# CORRUPTION RISK ASSESSMENT LESSONS LEARNT: MONTENEGRO

Becici, 10 September 2014

# What is it

- Process of identification of factors that favour or may favour corrupt behaviour in public institutions, and formulation of specific recommendations to eliminate such behaviour or mitigate it as much as possible.
- It is not determining whether there is corruption, but rather focusing on specific practices within certain institution that might compromise the capacity of that institution to perform its function in an impartial and responsible manner.

# Why we did it

- In 2011, **corruption risk assessment** in the special risk areas, as identified in the *Strategy for the Fight against Corruption and Organised Crime* (*2010-2014*): **privatisation process, public procurement, urban planning, local governance, education, and health.**
- **Objective:** CRA methodology, findings and recommendations to become the basis for further formulation and improvement of strategic documents; and, if successful, to apply it to other areas.

# How we did it

- The cycle of CRA for preparation of strategic documents:
- **1. Assessment of preconditions for risk occurrence** (External factors: legal, institutional, strategic frameworks, human resource policy, etc.)
- **2. Assessments of risk phenomena** (Internal factors: institutional culture, transparency, good governance, accountability, etc.)
- **3. Recommendations for elimination or mitigation of risks** (Refer to both preconditions for risk occurrence and risk phenomena)

# How we did it

- **4. Formulation of strategic goals and measures**

(National and sector strategies, APs, indicators)

- **5. Performance evaluation of strategic goals and measures and re-assessment of risks** (At the end of a strategic cycle; carry out evaluation and repeat risk assessment to serve as a basis for new strategic cycle)*

# How we did it

- The CRA phases were done through: (1) Analysis of available reports and structured consultations with relevant stakeholders, and (2) Integration of the data into a single risk assessment document with recommendations.
- www.antikorupcija.me → DACI activities → Reports

# Integrity plans

- Legal introduction of integrity plans in public administration; July 2011, amendments to the Law on Civil Servants and State Employees, Article 68
- *A state authority shall adopt integrity plan on the basis of assessment of vulnerability of certain job positions to occurrence and development of corruption and other forms of partial action of civil servants and state employees, which shall include measures for prevention and elimination of risks for corruption occurrence and development, in accordance with the* ***guidelines issued by the administration authority in charge of anti-corruption activities****. The state authority shall determine a civil servant who is responsible for preparing and implementing the integrity plan.*

# Integrity plans

- Guidelines for development of integrity plans;
- Integrity trainings part of mandatory trainings of the HRMA
- Twinning project (Oct 2012 – May 2014):
- Trainings of 90 integrity managers; IPs in 4 pilot institutions (PD, CA, BC, SSPO); a collection of documents prepared to assist civil servants in tasks relating to integrity plans (Manual for integrity, Instructions for risk management...)
- www.antikorupcija.me → Integrity

# Status

- Adoption and initial implementation of integrity plans
- DACI's data by July 2014: integrity plans adopted in 35 institutions; drafting underway in other 16 institutions; integrity managers appointed in 74 (total number of public administration bodies to which the integrity provision applies 102).
- Next steps: adoption and implementation in all PA bodies; continued trainings and awareness raising; further legal regulation (supervision, sanctions for non-compliance, etc)*; reporting and assessment of impact...