

**NATIONAL STRATEGY FOR PREVENTION OF CORRUPTION  
IN THE REPUBLIC OF BULGARIA  
2015-2020**



**April 2015**

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## *1. Objectives and principles*

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This strategy reflects a strong will and a distinguished vision of the government to prevent and counter corruption. The strategy is based on the understanding that corruption is a major threat to democracy in Bulgaria. It destroys the functionality of law in the state and undermines citizens' confidence in democratic values and hinders economic development as well. Especially dangerous is corruption among senior government officials as it is a major factor responsible for the building of corruption environment and the hindrance of effective implementation of anti-corruption policies and measures.

The need to adopt a new anti-corruption strategy is driven primarily by expectations of Bulgarian society to achieve tangible results in the fight against corruption. It is explicitly highlighted in the European Commission report on Bulgaria's progress under the Mechanism for Cooperation and Verification of January 2015 and is intended as a measure in the government's program for sustainable development of the Republic of Bulgaria 2014 - 2018.

The strategy takes into consideration the findings and recommendations in the reports of the European Commission impact assessment of the Integrated Strategy for prevention and countering corruption and organized crime, anti-corruption report of the European Union, the updated strategy for continuing the reform of the judiciary and other analytical and strategic documents on countering corruption. It builds on the analysis of anti-corruption policies and the developed on its basis Strategic Guidelines for Prevention and Combating of Corruption 2015 - 2020 (adopted by a decision of the Council of Ministers on 27 February 2015) and is consistent with the Action Plan for implementation of recommendations of the European Commission report of January 2015 within the Mechanism for Cooperation and Verification (adopted by the Council of Ministers on 11 March 2015).

This strategy offers no comprehensive catalog of measures for combating corruption. The approach in the strategy here is a different one. It focuses on key measures which

implementation is supposed to have a decisive anti-corruption effect. A top priority is the fight against corruption in the high echelons of power (i.e. the social range of individuals defined in the terms of the current Law for Publicity of Property of Persons occupying top positions in the government administration). Emphasis in the strategy is the proposed reform of the institutional framework for preventing and combating corruption targeting a better efficiency and coordination between existing administrative bodies and units. At the same time is taken into consideration the need for the engagement of independent, competent and respectable personalities in the anti-corruption institutions, without which no institutional system could ensure a necessary efficiency.

The measures proposed are very ambitious, but realistic as well as feasible to be executed next. For this reason the strategy does not include measures which can be distinguished as good arguments for constitutional changes.

The strategy recognizes the crucial importance of policies in other areas that have an overall impact on the fight against corruption without duplicating priorities and measures set out therein, namely: judicial reform, administrative reform, e-government and public procurement. A successful implementation of these policies will create a favorable environment for declining corruption practices.

The strategy does not deduct it explicitly as a priority to counter corruption in local government authorities, because mayors, deputy mayors and chairmen of municipal councils are within the range of senior government officials.

The horizon of the 2020 strategy is in alignment with other national strategic and program documents which implementation is essential for achieving the objectives of this strategy, including the National Development Program „Bulgaria 2020“.

The actual strategy is focused on the objective 2020 that Bulgaria becomes a country where petty corruption is largely reduced below the EU average boundaries and corruption among senior state officials does not remain unpunished; anti-corruption institutions work efficiently and have a real deterrent effect on corruption events, and perception and experience of

individuals and companies about the levels of corruption in Bulgaria have been significantly reduced.

The main target actions defined by the strategy are:

- ✓ Displaying the priorities of the state policy for preventing and countering corruption,
- ✓ Identifying specific anti-corruption measures and related government policies,
- ✓ Shaping the institutional system for preventing and countering corruption,
- ✓ Assigning a set of general guidelines for preventing and combating corruption to be reflected in the anti-corruption policies in various sectors.
- ✓ Determining the mechanism and institutions responsible for implementation and monitoring strategy.

The main principles of state policy on prevention and countering corruption are:

- ✓ Supremacy of Law
- ✓ Establishing the principles of good governance, transparency and accountability in the work of the administration
- ✓ Ensuring the rights and legitimate interests of citizens
- ✓ Consistent, systematic and ongoing implementation of the state policy in the field of preventing and countering corruption
- ✓ Involvement of interested parties and stakeholders in the process of decision making.

Corruption has various manifestations and has been criminalized by various criminal groups. For the demands of a Strategy corruption is to be considered on the big screen as misuse of power for private benefit.

## ***2. Priorities of government policy for preventing and combating corruption***

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### **PRIORITY 1: DEVELOPMENT OF AN EFFECTIVE SYSTEM OF ANTI-CORRUPTION ORGANS AND UNITS**

Effective prevention and countering corruption requires strengthening of institutional capacity and improving of inter-institutional relations. Proactive and effective institutions showing the will to deal with corruption motivate citizens to contribute to its declining and increase their confidence and respect for law and order and the respective authorities. Institutions that demonstrate an incapability to deal with the problem discourage citizens to cooperate and to have a legal behavior. They disrupt the confidence in government authorities and evolve a common sense of injustice and impunity.

Overcoming deficits in the institutional framework through the establishment and strengthening of anti-corruption authorities and entities and their transformation into powerful effective authorities, guided by the principles of transparency and accountability is the only way to attain a substantial progress and qualitatively different results in countering corruption.

Analyses show that the existing overall system of bodies with often redundant or inefficiently distributed anti-corruption authorities do not provide the required tangible and concrete results in the combat against corruption. Every institution creates its own anti-corruption unit, but the results of its work are not visible. It does not sufficiently guarantee effective inter-institutional cooperation and response against infringements with an adequate intensity. Even if measures have been taken, they do not reach the attention of the general public. They evolve a common sense that the problem is transferred between institutions and it matches only bureaucratic functionality. Its actions are not executed with the necessary determination and the problem is not promptly recognized sometimes as well.

We need a qualitatively different approach in this respect: setting clear tasks and responsibilities of the institutions, especially equipped with features concerning prevention and countering corruption, conflict of interest and violation of ethical rules for working in government and municipal administration; aiming to establish a system for checking the integrity of employees involved in anti-corruption bodies with powers; establishing clear rules for interaction between the public and private sectors, and civil society; introducing efficient and effective mechanism for monitoring, analysis and evaluation of the measures taken.

## *Measures*

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1. **Determination of a national coordinator for anti-corruption policies.** It is to be explicitly referred to the Deputy Prime Minister as a leading responsibility in the coordination of anti-corruption. This will emphasize the importance of these policies and will ensure the necessary political commitment to them.

2. **Establishing a National Council on anti-corruption policies.** It will be built as an inter-institutional body with advisory, coordination and control functions in relation to anti-corruption policies and will be chaired by the national coordinator. Such advice is necessary given the institutionally independent nature of state anti-corruption policy and the need for concerted efforts to achieve meaningful results. Its composition must balance the need for a broad participation and representativeness, and the ability for operational activities and decision-making. The Council will meet regularly and will report about current results of anti-corruption policies to the public. Its main tasks will include designing national strategic documents, programs and plans for preventing and combating corruption; setting priorities and measures of anti-corruption policies and accounting and control of their implementation; discussing the results of anti-corruption policies and elaboration of proposals for improving their efficiency; collecting information data and discussing specific problems in the conduct of anti-corruption policies; assigning research analysis on issues related to corruption, including a single anti-corruption body; elaborating proposals concerning legislation changes. Together with the Council will operate a Civic Council which will ensure a permanently institutionalized dialogue with the civil society on the issues of combating corruption.

3. **Establishing a new single independent anti-corruption authority.** The authority will incorporate functions currently executed by various bodies without clear and effective communication and interaction between them. The goal is to implement effective prevention of corruption in the high echelons of power by an operating system to report and set thorough examination of the circumstances relating assets to a potential conflict of interest, as well as

procedures for establishing a conflict of interest. The creation of a single authority will impose a conversion of existing authorities and bodies (Commission for the prevention and detection of conflict of interest, Center for Prevention and Countering Corruption and Organized Crime, a structural unit at the Court of Auditors) and redirect their administrative and financial resources to the new authority. Essential is the way to constitute a body to secure independence, integrity and responsibility of its working staff as well as to ensure coherence and continuity in its activities. Aiming to achieve efficiency in the work of the new body it should be implemented a reliable system to select employees, guaranteeing their independence, integrity and professionalism. The main tasks of this body are: analysis and verification of the submitted declarations of property and potential conflict of interest of persons occupying high administrative positions; development of ethical standards and standards of integrity as well as assistance to institutions by developing systems to checking the integrity of employees; developing methodologies for risk assessment of corrupt behavior; analyses of current legislation and preparing recommendations on the prepared law drafts resp. legislative changes related to anti-corruption measures and providing them to the National Council on anti-corruption policies, which has to scrutinize details and comment on them. Aiming to ensure efficiency in the operation of the single authority he should have wide opportunities to access different records and to require information, including bank and tax secrecy. Besides the imposition of administrative sanctions, the single authority will be able to approach the Commission for forfeiture of illegally acquired gain to perform a thorough inspection of the property of the persons concerned and the competent authorities for further prosecution if there is a suspicion of crime. As a guarantee of efficiency and accountability the single anti-corruption body will introduce a system to periodically and independently evaluate its activities.

**4. Establishing a specialized inter-institutional agency as a Liaison Unit between the Prosecutor's Office of Bulgaria (POB), the State Agency of National Security (SANS) and the Ministry of Interior (MOI) to investigate crimes committed by individuals occupying senior positions of government administration.** This way it will be used and further developed the model of available specialized units as a team work between prosecutors, investigators and agents who have passed a mandatory preliminary monitoring and checks for loyalty, working

separately from other Public Prosecution structures and the State Agency of National Security, with complete guarantees against potential leaks. The unit will be strengthened with substantial human resources and will focus its work on cases of corruption committed by persons occupying high echelon positions. An integral part of the work responsibility in the unit should be investigation of the election commerce and abuses involving top positions of government administration.

**5. Strengthening independence, capacity and authority powers of inspectorates as important administrative tools for preventing corruption. Inspectorates will enhance features for checking property declarations of state officials.** It is necessary to adopt a normative regulation which settles uniformed rules and procedures for the operation of inspectorates, including the work on signals of corruption. Inspectorates should be obliged to publish reports on their activities for shorter periods, including particular accountability of its signals given by citizens. Inspection and control authorities to key ministries where corruption particularly affects a large number of employees and where the risks of corruption and political pressures are particularly high should be subject to special measures to ensure their effectiveness. New principles, which should be based on the development and work of inspectorates, shall include:

- ✚ Independence - settlement through legislative rules to ensure objectivity and transparency in the appointment and removal of state officials and non-interference in their work, including political pressure on the appropriate manager.
- ✚ Transparency and public accountability of the work done;
- ✚ Ensuring adequate human and financial resources that cover the number of agencies and personnel, observed by the inspectorate;
- ✚ Increasing efficiency in combating corruption through concrete assignments and annual action plans in this area.

It is essential to settle a special status and authority powers of the General Inspectorate at the Council of Ministers. Because of its structural position at the highest executive authority it should have coordinating functions interacting with other inspectorates to provide a methodological guidance to collect, summarize and analyze the results of their work based on



unified standard efficiency criteria and could execute inspections together with other inspectorates. This will ensure a greater independence and objectivity of the checks provided.

**6. Expanding the authorities of the Commission for forfeiture of illegally acquired gains to investigate unexplained sources of wealth.** The Commission should be capable to carry out checks and investigate other authorities with control functions, including the single anti-corruption authority. For greater efficiency it should follow a reduction of mismatch in the wealth of the inspected person if a reasonable assumption of illegal acquisition available as a condition to introduce forfeiture proceedings. Relevant legal changes will be taken as well to achieve the targets.

**7. Increasing the capacity of institutions for preliminary control of public procurement,** including development of internal control systems.

#### PRIORITY 2: COMBATING CORRUPTION IN THE HIGH ECHELONS OF POWER

Combating corruption in the high echelons of power is hampered by the deep politicization of state and municipal administration, judiciary, investigative and law enforcement authorities. All of them are vulnerable and often are hosted by political or corporate interests.

Combating corruption among senior government officials lacks a separate structure with a clear focus of the work on investigation of corruption offenses at senior government positions in the judiciary, executive, legislative and local authorities.

It is necessary to establish an anti-corruption system to ensure the efforts of prevention and countering corruption independently of the inspected and investigated persons.

#### *Measures*

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In addition to the above mentioned institutional measures are leading the following:

1. **Reform of the asset statements and conflict of interest by extending the scope of the declared circumstances**, inclusion of additional criteria of economic dependence and related parties (including those in de facto marital cohabitation) and explicit and detailed instructions for specific circumstances which should be declared.

2. **Establishing a system of penalties with real deterrent effect.**

3. **Adoption of a modern penal policy and corresponding amendments of criminal law focused on legislation processes.** It is necessary to develop a package of proposals for changes in the criminal law in order to increase effectiveness and efficiency of criminal prosecution of corruption with an emphasis on corruption in the high echelons of power (e.g. improved formulations of corruption offenses based on the analysis of practice in their application increasing the deadlines for investigation of corruption offenses).

4. **Further vocational training and specialization of investigating authorities and magistrates** working on corruption offenses facing the fact that investigation of corruption offenses of individuals occupying high state positions is characterized by significant factual and legal complexity.

5. Improvement of normative acts and regulations, and internal rules to guarantee **protection of whistleblowers on corruption.**

### PRIORITY 3: COUNTERING POLITICAL CORRUPTION WITH EMPHASIS ON ELECTORAL CORRUPTION

Political corruption is the main generator of destructive processes that determine a low quality of the functioning of Bulgarian political system as a whole and it is an obstacle to economic and social prosperity. The scale of bought and controlled votes in the last decade has acquired threatening proportions.

The political system in Bulgaria is in a crisis of legitimacy. One of the serious problems associated with the transparency of financing of political parties, election campaigns and the

electoral process. The achieved actual level of transparency and accountability is far from the high public expectations for integrity.

Measures are needed to prevent and detect fraud in the electoral process, which repel Bulgarian citizens from participating in it and undermine their confidence in the functioning of democracy. There should be introduced tools for current control in the election campaign, accompanied by the imposition of timely adequate sanctions. It is necessary to create a model of organization of the work of law enforcement, which limits the intervention of political and economic factors on their work, and the establishment of liaisons between representatives of law enforcement institutions and political figures as well as other individuals who impede impartial performance of their responsibilities.

### *Measures*

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1. The competence of the specialized unit countering corruption should include **investigation of crimes against political rights of citizens (vote buying, violation of vote secrecy)** committed by individuals occupying high government positions or in complicity with such persons.
2. **Changes of Election Code** in order to reduce controlled and bought votes, including measures against: handling and errors in counting the ballots; potential pressure on voters by local political and economic factors; failure to comply with the requirements of transparency and accountability in the financing of political activities and financing of electoral campaigns.
3. **Amendments of the Law on Political Parties** directed at: a strict fixation of eligible expenditure of political parties and the creation of additional safeguards for transparency in its financing; removing inconsistencies and contradictions within the rules in the Election Code.
4. **Establishing a system to monitor bought and controlled vote to increase the effectiveness of countering crimes against political rights of citizens.**

PRIORITY 4: PREVENTING AND COUNTERING CORRUPTION IN THE JUDICIARY SYSTEM OF POWER,  
THE MINISTRY OF INTERIOR AND SUPERVISORY BODIES

Corruption in the Interior Ministry and the judicial authorities may largely render organizational, functional and sanction measures for prevention and countering of corruption in various spheres of public life. These bodies are entitled to ensure supremacy of the law and respect for citizens' rights. They have the legal authority to detect, investigate and punish corruption crimes. Due to the high responsibility with which they are charged, susceptibility to corruption in these areas is higher and appropriate response to such behavior should be uncompromising. Acts of corruption in the Interior Ministry and judiciary power are disrupting the common sense of state among citizens and their confidence in the institutions, and create a sense of injustice, inequality and impunity and motivate disregardful behavior towards the established law and order.

Preventing and countering corruption in the Interior Ministry and the judicial system requires decisive measures directed at:

- Establishing effective monitoring mechanisms to identify and sanction corrupt behavior by employees of the Interior Ministry and magistrates;
- Raising awareness of public confidence in the police and judiciary system;
- Strengthening civil control, by creating conditions for active participation of citizens in the prevention and detection of corrupt practices in the Ministry of Interior and the judiciary authorities;
- Ensuring conditions for a real transparency in the judiciary bodies.

It is particularly important be adopted targeted measures to counter corruption in the control authorities as the Customs Agency, the National Revenue Agency, the State Automobile Inspectorate and others. In view of the specifics of their activities it is appropriate to develop individual action plans to prevent and counter corruption.

## *Measures*

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Achieving the objectives of this priority is largely a function of the implementation of the measures provided in the Strategy for judicial system reform, adopted by the National Assembly in 2014 and the Strategy for prevention and countering corruption in the judicial system adopted by the SJC in 2013. Except that, they include:

1. Investigation of corruption in the judiciary power by the specialized unit countering corruption.
2. Comprehensive control through analysis and verification of the declarations of conflict of interest and property status of magistrates.
3. Actual systems for integrity check of the employees in these structures, as well as effective tools for risk assessment of corrupt behavior which application is carried as responsibility by the respective administrative directors.
4. Rotation of employees working in areas which are at risk for corruption, as well as expansion of office positions.
5. Settlement of obligation to return the received upon termination of employment benefits by employees convicted in corruption.
6. Development and implementation of a plan to decline corruption in the bodies of the Ministry of Interior.
7. Elaboration and implementation of plans for preventing and countering corruption in relevant supervisory authorities.

### PRIORITY 5: RELEASE OF CITIZENS OF PETTY CORRUPTION

The level of petty corruption is high to the extent that this form of harmful behavior in many cases is accepted as a norm by the citizens. This replaces the social values and principles of democracy and the market economy as well as disrupts the confidence in the institutions.

Analysis of corruption and sociological studies shows that the highest risk of corruption in respect to the citizens is within the Ministry of Interior (MOI) and healthcare system. In terms of business the corruption affects the NRA, the Customs, DAI, municipal and district administrations, issuing permits and licenses, as well as bodies providing public subsidies in the agricultural sector. Currently, the institutions responsible for these government policies have strategic documents and action plans to combat corruption.

It is necessary to take measures targeted at:

- Encouraging citizens to report in cases of petty corruption;
- Effective protection of persons by signaling system of guarantees of protection from persecution, official and administrative repression;
- Strengthening the role and effectiveness of the control bodies;
- Increasing transparency in the work of anti-corruption units;
- Imposition of timely and adequate administrative and criminal penalties in cases of corruption;
- Combating corruption in the local government by extending the measures focused on strengthening prevention and prosecution.

### *Measures*

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1. Reducing intervention of the human factor in the provision of administrative services and implementing control functions - electronic services, electronic public records, video surveillance and more. In this respect it is important the implementation of the Strategy for development of e-government in Bulgaria 2014 - 2020

2. Increasing independence, authorities and capacity of inspectorates. The measure was developed as an integral part of the system of anti-corruption bodies and units.

3. Analysis and monitoring of electronic detailed declarations on conflict of interest and property status of civil servants in central and regional administrations. This measure should be implemented by building upon institutional capacity for inspectorates (in terms of employees in

central administration) and regional administration (in terms of employees in local administration).

4. Elaboration of uniform standards and mechanisms for submitting and processing reports of corruption by citizens and businesses.

5. Settlement of the statutory obligation to consider anonymous reports that contain sufficient information to identify the offender and the offenses he has committed. Under current legislation anonymous signals are not considered. The decision ignores the fact that notifying employees of the administration are afraid to reveal their identities because of fearing repression and at the same time they are the source of detailed specific information that the reviewers could not identify in the absence of cooperation from the administration concerned.

6. Development of guidelines, principles and normative regulations for integrity tests as a tool of intra-institutional practice and responsibility of the heads of relevant departments for its implementation.

7. Introduction of a "hotline" and a system for receiving signals and complaints of corruption in public administration.

8. Development of sectorial anti-corruption plans for high-risk sectors of the responsible institutions that provide necessary legal and organizational measures for preventing and countering corruption in the sector as well as a reporting mechanism on the results of their application.

#### PRIORITY 6: CREATE AN ENVIRONMENT OF PUBLIC INTOLERANCE TOWARDS CORRUPTION

Corruption has become a common phenomenon, to which a large part of society shows tolerance and insufficient sensitivity. Published cases of corruption do not encounter always a strong resistance from the critical mass of people. Creating an environment of intolerance to this kind of appearance is an important factor to achieve results in countering corruption.

What is needed is a systematic and target oriented policy to show the damages of corrupt behavior in terms of economic development and destructive impact within societal development.

### *Measures*

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1. Organization of communication anti-corruption campaigns.
2. Provision of cash prizes of investigative journalists, officials and citizens who have submitted signals and specific information about corruption, led to convictions or sanctions of punished criminals.
3. Introduction of anti-corruption education as integral part of civic education. Anti-corruption education is the way to achieve moral integrity of society. It includes the awareness of young people about the nature, fields, forms and patterns of corrupt behavior; enhancing detection capabilities on varieties of corruption, and the mechanisms for their implementation; understanding and analysis of reasons and factors for the dominance of ego-dominated interests among certain groups in different areas of public life.

### *3. Leading legislative initiatives, time frame and financial security*

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Most of the measures envisaged in the strategy suggest changes in the actual legislation; the most important changes are:

1. A new law governing the status and functions of the single anti-corruption authority. The goal is to be adopted by mid-2015, to be capable to start working latest in early 2016; meanwhile it should have selected and trained employees, and their work in the new authority is to be accompanied by good resources and a methodological tool.
2. Amendments to the Law on Forfeiture of the State of illegally acquired assets to expand opportunities for investigation of unexplained sources of wealth. The objective is the Law to be adopted by mid-2015.



3. Amendments of the Criminal Law and Code as well to increase the effectiveness of prosecution of corruption. The deadline for its development and adoption is June 2015.

4. Amendments of the Election Code focused at reducing opportunities for buying votes.

The changes will be discussed within overall policy advices on changes of electoral legislation. Adequate financial support is a key to successful implementation of any strategic document. In terms of budgetary restraints all the possibilities for providing the necessary funds should be used. A reform of the institutional system makes it possible to optimize available resources and to prepare a shift to the new authorities and units. It is possible to look for internal administrative mechanisms and transfer of employees to the anti-corruption units. Financing of the measures will be provided within annual laws on State budget. It will be actively used available European funding as well. Preliminary meetings with representatives of foreign partners of Bulgaria give a reason to expect support, especially on the increasing of capacity for investigation and prevention of anti-corruption.

#### ***4. Accountability, monitoring and evaluation of the strategy and implementation of anti-corruption policies***

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Coordination and monitoring on the implementation of the strategy is carried out within the National Council on anti-corruption policies as a body that defines policies and observes the overall performance. The Council elaborates annual and semi-annual reports on the implementation of the strategy to be considered by the Council of Ministers.

Together with the National Council on anti-corruption policies will also perform actions the Civic Council, which will monitor as well the implementation of the strategy and will make proposals to improve their efficiency. Members of the Civic Council are representatives of non-governmental organizations and businesses that have a pro-active attitude on countering corruption.

In order to ensure a stronger commitment and responsibility in the implementation of individual measures there will be developed action plans in the Strategy indicating responsible institutions and deadlines.

For effective monitoring of the implementation of the Strategy it is necessary to significantly increase transparency and accountability of institutions. The principles of transparency and accountability are nominally present in the work of institutions currently having functions in combating and preventing corruption. Practically, however, this level of transparency makes it impossible to assess the effectiveness of combat against corruption. It is necessary to establish a system to collect adequate statistics on the work of investigative and supervisory bodies. In terms of high echelons of state corruption MOI, SANS, the Prosecutor's Office and the Court already have collected simple statistics on a number of operational matters, pre-trial proceedings and convictions, which does not allow a comprehensive assessment of the effectiveness of actions. In relation to petty corruption there is no real mechanism to collect information about countering corruption and cases already registered by the institutions. The information is not summarized at the national level.

In terms of efficiency and resource availability there is also no transparency in the reports of the respective institutions. It is difficult to distinguish the annual budget and the actual number of experts and administration related to anti-corruption activities. This way the actions may be masked as ineffective counter-measures and stressed as a lack of adequate human resources to counteract.

Implementation of the Strategy will be the subject of a monitoring mechanism and evaluation by independent external evaluators. The assessment will be based on a detailed methodology developed which will include:

- Summary of the progress reports of the institutions implementing the strategy.
- Sociological research.
- Statistical and economic analyzes.

The assessment will be done by applying a wide range of quantitative and qualitative indicators that fall into two categories allowing taking into consideration the implementation of the strategy and the impact of anti-corruption measures:

- ❖ Indicators to assess the implementation of specific measures included in the strategy are related to: the presence of implementation of the measure adequacy of its application, terms of implementation, degree of realization, quality, quantitative indicators, efficiency (assessment of resources related to the achieved effect).
- ❖ Indicators to monitor the achievement of the vision and its priorities. These indicators will be based on concrete data of sociological surveys of victimization from corruption of individuals and companies; corruption pressure from citizens on public servants or vice versa; total score values and acceptability of corruption; the level of corruption; assessment of the actions of anti-corruption institutions and others.

The methods of monitoring and evaluation will be:

- ◆ Monitoring on the level of administrative corruption. It will evaluate the frequency of bribery given by citizens and the corruption exerting pressure on them. The monitoring will be carried out twice a year.
- ◆ Monitoring / evaluation of the implementation of specific policies. It will apply to the most important (key) policies of the Strategy and will include an assessment of their effectiveness. This monitoring will be held once a year.
- ◆ Monitoring on the implementation of anti-corruption policies in key public bodies (institutions) as the Ministry of Interior, the Customs Agency, judiciary and healthcare system. The evaluation method can be applied by an external evaluator as well as independently by institutions, and will be held once a year.

The results of institutional and external monitoring and evaluation should serve as a benchmark for updating the Strategy.