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## **Corruption Risk Assessment Methodology**

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## Introduction

Corruption Risk Assessment Methodology is designed for the **public sector institutions in Georgia**. The aim of the methodology is to foster a formation of honest civil service, free from corruption based on principles of good governance, rule of law, transparency, accountability, equality and integrity. **Corruption Risk-Assessment Methodology is a document of a recommendatory nature, which can be used by an institution in the process of internal corruption risk assessments** and can adapt the document to the specificities of the particular institution. **Eventual risk-factors and risks** for the public sector institutions are evaluated and determined based on this methodology. Corruption Risk-Assessment represents a **preventive instrument** for violations of integrity and corruption and does not intent to reveal and evaluate individual responsibilities. Assessment of integrity vulnerability risks is successfully applied in determining both individual and organizational level the risks and risk factors as well as the probability that such a risk will occur and the impact it causes. It also helps identify the areas where resource management will become more effective in the scope of risk management.

This methodology is based upon internationally acclaimed best practice: Corruption Risk Assessment Standards,<sup>1</sup> such as experience accumulated of the Transparency International, Organization for Economic Cooperation and Development (OECD), U S Agency for International Development (USAID) and European Council (CoE) and best practices applied in various countries (Romania, Albania, Moldova, Montenegro, the Netherlands and Slovenia).

The Secretariat of the Anti-Corruption Council designed the first-ever Corruption Risk Assessment Methodology through a thorough analysis of a number of methodologies existing in this area. Assessment results achieved with the help of this methodology will be used as a baseline for the elaboration process of the Anti-Corruption Strategy and its Action Plan.<sup>2</sup>

Elaboration of the Anti-Corruption Risk Assessment Methodology stems from the Activity N. 1.1.1. of the 2019-2020 Anti-Corruption Action Plan.<sup>3</sup> Besides, the Ministry of Justice of Georgia has already taken on such an obligation within the scope of the 2018-2019 Open Government Action Plan (obligation 6: strengthening of the existing anti-corruption institutions).<sup>4</sup>

The methodology should be updated annually by the end of the year based on the accumulated experience and faults detected in the practice. Assessments made in accordance with the methodology should also be reviewed annually.

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<sup>1</sup> EU Risk Assessment Handbook; Corruption Risk Assessment Handbook – Transparency International. A document prepared by the regional anti-corruption initiative on corruption risk assessment at the public sector institutions in the South-East Europe, A document prepared by the OECD on the Assessment of the Integrity Level in the Public Sector, etc.

<sup>2</sup> In accordance with the EU Risk Assessment Handbook the Anti-Corruption Strategy should be based upon raised awareness of the integrity risks and taking into consideration the existing and potential characteristics of corruption in order to be able to act upon them with the most relevant measures. European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017, p. 17.

<sup>3</sup> Decree №484 of 4 October 2019 of the Government of Georgia on approval of the implementation of the 2019-2020 National Anti-Corruption Strategy and the 2019-2020 Action Plan

<sup>4</sup> Decree №537 of 12 November 2018 of the Government of Georgia on the approval of the 2018-2019 Action Plan on the Open Government

Corruption Risk-Assessment Methodology is approved by the Anti-Corruption Council. The assessments conducted by the state institutions are recommended to be presented to the Council as well.

Anti-Corruption Risk Assessment process encompasses the following stages: (I) Planning of the Assessment Process, (II) Risk Detection, Analysis and Management (III) Monitoring and Control of Risks. Each stage is explained in detail in the methodology.

### Clarification of the terms

**Corruption: Offences stipulated in Articles** 163 (3), 164<sup>1</sup>, 180 (3, „a“), 182, 186 (3, „a“), 194, 194<sup>1</sup> (3, „b“), 195 (1), 203, 220, 221, 332, 333, 335, 337, 338, 339, 339<sup>1</sup>, 340, 341, 342 and 355 and other articles of the Criminal Code of Georgia committed against industry or economic activities and crimes committed financial sector. Also, violation of the Law on Integrity and Corruption in Public Institutions.

**Violation of Integrity:** Violation of the rules determined by the Ordinance N200 of 20 April 2017 of the Government of Georgia on the Violation of Ethics and General Rules of Behavior; as well as the violation of the ethics and general rules of behavior provided by the specialized legislation.

**Corruption Risk:** Any kind of internal or external vulnerability which could lead to corruption in the Public Sector. Corruption risk could be linked to the conflict of interests, incompatibility of functions, prohibited gifts and gaining illegal benefits of any kind, low level of transparency and etc.<sup>5</sup>

**Corruption Risk-Factor:** Reason, circumstance causing the corruption risk which could facilitate, or lead to corruption or violation integrity.

**Corruption Scheme/disclose of corruption** – any type of possible manifestation that is caused by specific corruption risk. Corruption scheme can be more than one.

**Corruption Risk Management:** is related to the process which encompasses identification, assessment, control and monitoring of the risks and risk factors.

### I. Planning of the Corruption Risk Assessment

Planning of the corruption risk assessment incorporates in itself process planning for the coordination body and the authority carrying out the corruption risk assessment. In some cases (depended on the decision of state agency's management) the coordination body and the authority carrying out the assessment can be the same.

The management of the institution takes a decision whether the risk assessment is outsourced (with the active involvement of the institution) or the assessment is conducted by the institution itself.

With the acknowledgment that having honest and free from corruption civil service should be an intention and the will of every institution, **as a rule the initiative to conduct risk-**

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<sup>5</sup> Corruption Risk Assessment Guide – Transparency International

**assessment are initiated by the management of the institution.** However, the institution can already have a body/unit responsible coordination of integrity within institution that will annually initiate conducting corruption risk-assessment. As a rule, Risks Department is tasked with the coordination, however if such a unit does not exist, the process can be initiated by the internal audit unit, general inspection, human resources management unit, administration, by the unit responsible for policy coordination or other. **A detailed work plan and preliminary mobilization of resources** are absolutely necessary in order to effectively plan the risk assessment process.

Process Planning Instruction	
Procedure-wise the following factors should be taken into consideration in advance	Information or annex
Organization of meetings with the top managers and expressing of their goodwill to conduct the corruption risk assessment	
Conducting a working meeting or, if need be, a seminar on corruption risk assessment for the representatives of the sector or the authority. This stage of awareness raising is significantly important in cases when corruption risk assessment has never before been conducted in the particular sector or organization is to be conducted for the first time.	
Informing all employees about the corruption risk assessment (managers should inform the employees about the importance, purpose and methods of the corruption risk assessment. This step is crucial because the employees should by no means perceive the corruption risk assessment as something negative. They should see this process as a means which will help the organization become more effective, maintain high level of integrity, its good name and reputation in the eyes of the citizens. Also, it is important that the employees should be explained about necessity of keeping the confidentiality in case of giving an information about potential risks).	
Selection of the project coordinator and members of the working group (representatives of all the units that will be assessed). Composition of the working group might be established by the order of the management.	
Results achieved during the working group meetings should be reflected in the meeting minutes.	
Distribution of work (a list of responsible persons by their names) – work plan with the time-schedule	
Identification of a single or a number of responsible persons that will be delivering information about the ongoing corruption risk assessment, its progress and challenges to the top management on regular bases.	

Identification of the <b>purpose</b> of the assessment: why are we assessing?	
Establishment of the <b>subject</b> for assessment: What are we assessing? Identification of the area which will be assessed.	
Elaboration of the assessment <b>methodology</b> : how are we assessing?	
Planning of the assessment process and identification of the person(s) to carry out the assessment: who is assessing?	
Establishing the <b>timeline</b> for the assessment.	
Establishing the means for data collection. In case there is no data in the relevant institution or in the area subject to assessment, means of use of data available in other institutions or countries (analogical statistical data)	
Identification of the method for the presentation of the results achieved in the process of the corruption risk assessment. One of the methods of presenting corruption risk assessment is using so called "Heat Map" (See Annex N6).	
Needs assessment for future changes: what will the achieved results be used for? <sup>6</sup>	

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<sup>6</sup> [Corruption risk assessment in public institutions in south east Europe](#), page 29. Besides, see [Corruption risk assessment in public institutions in south east Europe](#), pages 73-77.

## II. Corruption Risk Identification, Analysis and Management

Corruption risk identification and analysis encompasses statistics as well as dynamic data collection, identification of all sorts of risk-factors, risk assessment, establishing the factors that caused them, identification of control mechanisms, prioritization and designing a **risk matrix** based of the obtained information.

Corruption risk assessment is important because it helps focus not only on the perception of corruption, but also on the existing corruption as well as its quality and the **potential likelihood of existing corruption**.<sup>7</sup>

### i. Collection of Information

In order to establish the factors facilitating to and hindering the process of achieving integrity goals, it is absolutely necessary that both the internal and external contexts of the subject/sector/organization are assessed. Besides, it is absolutely mandatory to take into consideration the elements of the corporate culture such as: values, behavior of certain individuals.<sup>8</sup>

The external context might as well encompass geographic location, legislative and political frames, identification of stakeholders and complexity of relation with them.

In order to determine the internal context, the data should be collected in the following directions:

- Systemic institutional and legislative frame;
- Ongoing processes;
- Human Resources.

**While the legislative frame is being determined**, all documents that create legislative base, among them laws, regulations, decrees, decisions, internal acts, strategies, action plans and etc., should be reviewed and analyzed.

**While institutional frame is being determined** management structure, short-term and long-term development strategies, annual action plans and financial documentations as well as operational data and corruption prevention instruments applied in the area or organization in question should be described.

**Within the scope of the ongoing processes** all basic processes specific to the organization, initial and final phases of the process and each of the different stages it undergoes along the way, should be described.

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<sup>7</sup> Corruption Risk Assessment Handbook – Transparency International

<sup>8</sup> [OECD Framework for Assessment of Public Sector Integrity](#), p.11. Examples of risk-factors in the corporate culture – there is no habit of imposing responsibility on each other, Experience from the Netherlands [Corruption risk assessment in public institutions in south east Europe](#), pages. 33-37.

**Human Resources** encompass the roles, skills, competence assessment, behavior in stressful situations, relationships with colleagues and the ability to analyze the resources of the people involved in the process.<sup>9</sup>

**An example of institutional, legislative and human resource assessment** is to determine whether a public authority has its own Code of Ethics or a body responsible for ethics, whether it has mechanisms for whistle-blower protection, property declaration and monitoring as well as an obligation to publish information and etc. The abovementioned description should be strengthened with statistical data in order to be able to analyze the capacity level of the existing mechanisms to implement the processes in practice on a later stage.<sup>10</sup>

During corruption risk assessment two sources of information are used: **secondary sources** (existing processed documents), such as: analysis of desk research, court resolutions, citizen complaints, annual reports, internal and external audit reports and etc. **Primary sources** (primary documents) such as: sociological research and questionnaires for institution (see Annex N1) and for employees (see Annex N5) and/or stakeholders, working meetings, statistical information and interviews with the people having special competence in the field.

Secondary sources are used at the first stage in order to create a general impression about the country, the sector, the institution, as well as to be able to identify the risk-prone sectors, while primary sources are used to identify corruption risks and risk-factors leading to them.<sup>11</sup>

For a deeper analysis of the corruption risks a list of issues could be made based on the questionnaire, for example: if the questionnaire detects problems in the planning parts, this part will be thoroughly analyzed after the assessment is completed.<sup>12</sup>

At the initial stage the questionnaire provided in the Annex N1 could be used. In any case the questionnaire should be tailored to the requirements and characteristics of the institution carrying out the assessment.

## **ii. Identification and assessment of the Risks and risk-factors**

### **a) Identification of Risks and Risk-Factors**

**During the risk-factor identification** following questions should be answered: what could happen? When? Where? How? And why?<sup>13</sup> What factors will influence and encourage identification of a certain risk? (See Annex N2 and Annex N3).

A detailed description of where the process starts and finishes, who are the involved actors, what stages are covered and etc. should be made. Positions and functions of the people involved should be taken into consideration.

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<sup>9</sup> For the assessment of risks in this direction assessment paper of the staff member can be used

<sup>10</sup> [USAID Anti-Corruption Assessment Report](#), pp. 19-20, 24-25

<sup>11</sup> Corruption Risk Assessment Handbook – Transparency International

<sup>12</sup> [Corruptions Risk Assessment Methodology Guide](#), p. 13.

<sup>13</sup> [Corruption risk assessment in public institutions in south east Europe](#), p. 25.

During the risk identification it is absolutely mandatory to create a comprehensive list of risks, determine the circumstances and cases that could influence or interrupt completion of the task.<sup>14</sup>

Risk identification process requires that all stakeholders are involved, among them: financial officers, managers, employees, contractors, sub-contractors and third persons. At this stage it is as well very important to start a **Risk Register** that will store all the information regarding the detected risks which will be used for future plans.<sup>15</sup>

External or internal risk-factors should be determined in the following way (see examples of risk-factors in Annex N2):

- **Strategic Risks** - refers to long-term strategic goals (for example, having no policy paper or having vaguely stated/dubious aims in it);
- **Operational Risks** - refers to everyday activities and issues which the organization in question is facing (this could be malfunctioning IT system, complexity of the rules, belated issue of information and documentations, delays between processes, ambiguous responsibilities of persons involved in the process, ineffectiveness of organizational structure, legal side of the process, weak sides of the process and etc.);
- **Institutional (organizational) risk-factors** (for example, inadequate and ineffective organizational structure; lack of rotation system; insufficient and ineffective internal control; lack of budget or other kinds of financial problems that are being reflected on the integrity level of the employees);
- **Normative Risk-Factors** (For example, insufficient or incompatible legislation which creates obstacles for the organization to carry out its functions; lack of rules for working processes (refers to the lack of rules, instructions and managerial principles), ineffective administrative supervision of the legislation implementation process; taking other measures and drawing conclusions; vague provisions concerning discretionary authority and control mechanisms; regulations do not imply sufficient sanctions and they are not being implemented; cooperation level among the institutions is very low);
- **Corruption risk-factors related to persons involved in the process** (among others, the level of accountability and transparency. For example: defective human resource management strategy which causes high turnovers in the authority; defective or incomplete trainings on integrity and ethics; lack of experience or knowledge; nonexistent revenue and property monitoring; lack of monitoring of the conflict of interests);
- **Enforcement Risks** – lack of monitoring system over the achievements of the institution objectives;
- **Financial Risks** - refers to ineffectiveness of the financial control mechanisms of the authority in question;
- **Reputational Risks** – for example, negative external assessment (negative publicity);

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<sup>14</sup> ISO 31000 Standard, European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017, p. 17.

<sup>15</sup> [Analytics for Integrity: Data-driven Approaches for Enhancing Corruption and Fraud Risk Assessments](#), p. 18. See also Experience of Slovenia, [Corruption risk assessment in public institutions in south east Europe](#), p. 37-40.

- **Other Risks** – any kind of internal or external weakness or process which could cause corruption in the public sector and includes the following issues: conflict of interests, incompatibility of the functions, receipt of gifts and other kinds of illegal benefit, lobbying, whistle-blower protection, fraud, misuse of the authority, financing the political parties or election campaigns, discretionary authority, nepotism, limiting actions, revolving door, publishing property declarations, trading with the information, transparency of the procedures and documents and etc.

As a rule institutional approach is used in the process of corruption risk assessment. Thus, the aim of this approach is **to identify weaknesses in the rules and regulations** of the institution, sector and/or the process.

Objective risk (weak institutions and regulations) should be differentiated from the subjective risks (tolerance towards corruption, personal motivation, value/benefit equity, experience of the past).

At the stage of corruption risk identification and assessment, assessment stages, problematic issues and reasons causing them are also identified (see. Cause Identification Sample, Annex N3).

Significant attention should be paid to: sensitive processes, sensitive functions and other areas which are vulnerable towards corruption, as well as unethical behavior.

Based on the gathered information corruption-prone areas, in other words the “red-flags”, are being identified. See sample in Annex N4.

Significant attention should be paid to the following risks (see, also Annex N4):

- Position related risks;
- Business related risks (for example: corruption-prone areas (procurement, infrastructural projects, issuing of licenses/permits), control and supervision functions (for example, general inspections));
- Bribe taking risks;
- (Mis)use of authority for private benefits;
- (Mis)use of public resources for private interests;
- Risks that are linked to eventual possibility for a civil servant to use their influence, illegal or unethical actions, psychological or physical harassment of the civil servant in question.
- Risks related to nepotism and favoritism;
- Risks that could cause conflict of interests;
- Other risks that are linked to specific/concrete tasks or goals, projects, working processes or specific characteristics of the sector.

## **b) Identification of corruption risk control mechanisms**

After the risks have been identified the existing control mechanisms are to be linked. Internal control mechanisms might be: internal audit, general inspection, human resource management unit, etc. External control mechanism, among others, might include: Civil Service Bureau, State

Audit Service, Public Defender, State Inspector Service, State Procurement Agency, Law-enforcement organs, etc. **Proportionality and effectiveness of the existing control mechanisms are assessed.** In some cases adequate control mechanisms that are compatible with the identified risks could be unavailable, but control mechanisms aimed at the high-risk areas could as well be effectively applied to other risk- factors as well.<sup>16</sup> If control mechanisms are compatible and effective, the likelihood of the identified risks to occur is very little.

### c) Assessment of corruption risks

During the risk-factor analysis effectiveness of the existing control mechanisms is as well assessed. The analysis should show whether the risk factor could be:

- **Controlled** (effective control mechanisms);
- **Partially controlled** (control mechanisms should be improved/updated);
- **Impossible to control** (control mechanisms are not in place or are inadequate).

In case of controlled risks various mechanisms could be used. Such as: training of personnel, implementation of internal control mechanisms or development of managerial skills.<sup>17</sup>

Risks that are beyond control will become a task for future risk management.<sup>18</sup>

Partially controlled risks and Impossible to Control Risk-Factor could also be assessed with two more indicators:

- **Likelihood** - Likelihood of the identified risks to occur;
- **Impact** - Eventual impact made and consequences derived.

The nature of the risks could be studied by means of establishing **the quality of the likelihood of the corruption to occur** (in the conditions of existing mechanisms and control) **and the size of the impact** made (probable results), in case of its occurrence.<sup>19</sup>

**Likelihood of corruption risks to occur** is determined through the correlation between the risk-factors and existing integrity measures. The following criteria are applied in the process of assessment of the likelihood of the corruption risks occurrence: vulnerability of the regulatory legislative frame towards corruption, vulnerability towards corruption of legal framework, inclination of processes and institution towards corruption, ineffective management, low remuneration, cases of corruption at public institutions, low level of legislative awareness of the civil servants. In order to establish what is the **likelihood and impact of a particular risk**, the best is to base the assumptions on the experience. Including, statistical data of previous years will show what was the likelihood of risks and their impact in previous years – **low, middle or high**. Based on such data what will be the likelihood of occurring the risks and their impact in the future can be analyzed. In case of no statistical data, conducting internal surveys or interviewing staff on managerial positions could be an asset.

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<sup>16</sup> [Analytics for Integrity: Data-driven Approaches for Enhancing Corruption and Fraud Risk Assessments](#),

<sup>17</sup> Romanian Experience, [OECD Framework for Assessment of Public Sector Integrity](#), p.52.

<sup>18</sup> [Corruption risk assessment in public institutions in south east Europe](#), p. 73-77.

<sup>19</sup> European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017, p. 17.

Risks	Description of likelihood of the risks
<b>High</b>	Likelihood of a corruption risk to occur is high. This can be established based on the previous experience. Integrity mechanism existent in the institution cannot minimize the risk-factors.
<b>medium</b>	Likelihood of a corruption risk to occur is not high, because of the specificity of a work or due to existing integrity mechanism institution which can partially ensure/minimize the occurrence of risks.
<b>low</b>	Likelihood of a risk to occur is very low but it could still occur. The risk could only occur in certain conditions.

Impact	Assessment of the impact
<b>High</b>	<p>A corruption risk, in case of its occurrence, significantly influences the fundamental rights of <b>an individual</b>, rights of freedom and the right to receive public services. For example, hinders the right to fair trial, infringes the right to private life, family and education or right to property.</p> <p>High level of impact on a <b>Public institution</b> implies damage made to its image and trustworthiness. Results in financial damage, undermines the stability of the organization and the possibility to achieve main goals and encourages other organizations to engage in corruptive deals.</p> <p>High impact level on the <b>general public</b> implies the loss of local and foreign investments, negative influence on social development and damages the overall state of the rule of law in the country.</p>
<b>Medium</b>	<p><b>On individuals</b> - high level of impact implies unjustifiable expenditures for the realization of their rights and other obstacles. Such an influence could be, for example, made through requesting a fee for public services which, according to the law, are to be provided free of charge.</p> <p><b>On public institutions</b> - implies negative influence, significant financial losses and undermining the opportunities to achieve secondary aims of the organization.</p> <p><b>On the general public</b> - impact is not obvious.</p>
<b>Low</b>	Low level of risk impact causes unfavorable consequences, added financial expenditures.

Low level of impact on the organization is reflected in the damages of its public image, minor obstacles hindering the organization to reach its goals, minimal financial losses.

Corruption likelihood and impact levels are presented by the help of special charts, a special matrix is to be completed. This matrix helps categorize corruption risks in accordance to their levels.

**Likelihood and impact matrix** implies assigning low, medium or high scores to the likelihood and its eventual consequences. A chart could be drawn to understand which risks need to be acted upon and which ones are urgent to deal with. The map below shows the high priority risks in red color. Medium priority risks are indicated in yellow color, while low priority risks are shown in green. In general, green color is an indication of the fact that such risks are the least problematic ones.<sup>20</sup>

Likelihood	High	Medium Risk	High Risk	High Risk
	Medium	Low Risk	Medium Risk	High Risk
	Low	Low Risk	Low Risk	Medium Risk
		Low	Medium	High
		Impact		

It is also advisable to determine the **corruption risk dispersion area**.<sup>21</sup>

Dispersion Area	Definition of Risk	Person(s) that mitigate the risk
<b>Organizational</b>	Organizational risk is related to the elements of public administration, its culture and characteristics as well as the integrity level of its personnel and etc.	Managers, employees with a high level of integrity, internal audit, external controls, experts, ombudsman
<b>Sectorial</b>	Many of corruption related risks are characteristic of certain sectors, functions or processes. Systemic	The government, anti-corruption agencies, ministries, state audit, sectorial associations, civil sector,

<sup>20</sup> Ibid, p.19-20.

<sup>21</sup> European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017, p. 21.

	approach to such constant risks is the only effective solution. <sup>22</sup>	media and etc.
<b>Countrywide</b>	Organizational and sectorial risks that are best solved on a state level, e.g.: implementing uniform standards for civil servants, publishing property declarations of the highly ranked officials and etc.	The government, anti-corruption agency, the parliament, state audit, ombudsman, civil society, independent and investigation media

**In order to eliminate the risks on an organizational level**, it is absolutely important to determine all vulnerable activities and positions that contain risks due to gaps in the legislation, high level of discretion, weak security measures or other reasons. There are two types of risks: **General**, that are characteristic of almost any organization (e.g.: inexperienced or incompetent employees) and **Specific**, which are detected in the process of operations (e.g.: procurement).

Two types of assessments are used for organizational risk assessment: **internal** and **involving external experts**. Both types have positive and negative sides. A combined variation is also possible. In such a case the organization has the right to compare the self-assessment to the assessment conducted by the experts. Self-assessment, as the only means of assessment, could be used in cases where the organizational risks, taking into consideration the sectorial contexts, are minimal. But, in cases where both sectorial and organizational high probability risks are in place, a combined model should be granted priority.<sup>23</sup>

A list of functions, along the list of vulnerable functions, is designed in order to carry out **integrity control**. A list of ongoing processes could also incorporate the results of the risk assessments carried out in the past.

Based on the analysis of the results of the risk assessments carried out in the past, two approaches could be used in order to determine the above mentioned functions and processes: **a function-oriented and a process-oriented approach**.

A function oriented approach grants possibility to develop certain instruments aimed at a specific group of functions and is less oriented at the process within which these functions are carried out. A process-oriented approach determines the risks associated with a certain process from its beginning to its very end.<sup>24</sup>

During **Sectorial Risk Assessment** it is advisable to determine common characteristics and the scale of likelihood and limitations which are uniform for a group of organizations working in one and the same sector. For example, the law enforcement bodies are advised to have a special kind of Code of Ethics and respective trainings; authorities carrying out the state procurement procedures are advised to have uniform standards for procurement which meet the required transparency level and requirements for the external-control opportunities and etc. Based on

<sup>22</sup> [Corruption Assessment Handbook Draft Report Final Report, 2006 pp.7-9](#)

<sup>23</sup> European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017, 03 . 22-24.

<sup>24</sup> European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017, 03 . 27.

the abovementioned characteristics, circumstances indicating corruption should be determined. EU Handbook on the Quality of Public Administration provides a table of characteristic signs per sector which are reflected in the correlation between the likelihood and control.<sup>25</sup>

### iii. Prioritization of Risks

We can analyze characteristic features of the risks based on the results shown in the abovementioned matrix and **classify them in respect to priority/levels** which in its way determines the necessary quality of the response activities:

- How much needed it is to eliminate the risk (medium and high probability risks);
- Do we need to carry out certain activities; and
- Elimination of which risk is a priority.

High Risk	Response to the risk	
Involvement priority 1	Mitigation/elimination, if possible	These risks consequences are not acceptable. High priority of allocating resources to implement adequate measures of prevention and control should be taken immediately.
Medium Risk  Involvement Priority 2	Elimination or mitigation and control	The likelihood of the Risk occurrence can be managed by using or simplifying the existing measures, or taking additional measures for prevention and control.
Low priority Risk  Involvement Priority 3	Elimination, and control if possible	Introducing preventive actions is low on the priority list The impact of these risks can be more acceptable. Prevention and control measures can be used. New measures could only be used in case they do not require additional resources and trials.

### III. Risk Management and Control

Risk management and control implies determining the opportunities for the management of identified and analyzed risks by the use of the relevant resource to minimize or manage the risks and control the unintended results. A risk management plan and risk register is designed for this purpose. Both documents should reflect all risks that exceed the acceptable level and could hinder the organization from completing its tasks and reaching its goals.

Risk management incorporates the following stages:

<sup>25</sup> European Commission, Toolbox 2017 edition - Quality of Public administration, Theme 2, [Ethics, openness & anti-corruption](#), 2017,

- Elaboration of risk control measures by means of available resources;
- Preparing recommendations aiming at the improvement of processes and procedures;
- Designing a list of response measures aiming at the elimination of high priority risks;
- Designing a risk register.

A risk register should incorporate:

- A list of identified risks together with factors supporting them;
- Indication of the scale of the risks;
- A list of recommendations and measures to be taken into consideration together with a list of responsible persons and deadlines;

As a rule, risks are eliminated by means of applying one or a number of strategies that imply:

- **Avoiding risks** – termination or modification of activities in order to stop its progression. The risk could be avoided by means of changing activity area or respective regulations;
- **Mitigating Risks** – mitigating the likelihood of the risk to occur and/or mitigating the consequences caused by it;
- **Transferring of Risks** – In order to mitigate the likelihood and/or impact caused by them, risks could be transferred or shared with third parties that are better equipped to control them;
- **Allowing the Risks to Happen** – Nothing is done to mitigate the risk because according to the risk manager’s consideration, the organization is forced to let the risk of a certain level happen as the eventual damage that could be caused in the process of preventing it will prevail the damage that could be caused in case it occurs.

In the process of risk management it is advisable to integrate the newly adopted measures into the existing systems – such as: internal control, audit and other systemic means in order to avoid additional budget expenditures.<sup>26</sup>

<b>Corruption Risk Analysis Sample N1</b>
<ol style="list-style-type: none"> <li>1. <b>Identified Corruption Risk:</b> Conflict of interests is not regulated</li> <li>2. <b>Control mechanism</b> is not in place</li> <li>3. <b>Likelihood of such a risk to occur:</b> High because the civil servant and the client are relatives.</li> <li>4. <b>Risk Impact:</b> High because the authority loses its trust. Media reacts negatively. All positive agreements are deemed annulled in case if the conflict of interests is detected.</li> <li>5. <b>Results/ Risk Priority:</b> High – should be eliminated as soon as possible.</li> </ol>

<sup>26</sup> Experience of Montenegro, [Corruption risk assessment in public institutions in south east Europe](#), p. 48-51.

6. **Measures needed for risk elimination:** Regulations for the conflict of interests, processes needed to avoid the risks, sanctions and identified problematic areas should be made known, awareness should be raised and etc.

<b>Corruption Risk Analysis Sample N2</b> (Matrix)			
<b>Institution: X</b>			
<b>Unit: XYZ</b>			
<b>Corruption Risk Factor</b>	Local business climate		
<b>Corruption Risk</b>	Bribing government representative in order to make, maintain or influence on unfair business decision		
<b>Corruption Risk Scheme:</b>	a) Possible customs bribery in exchange for simplifying the import-related processes or ensuring the importation of illegal goods	b) Possible bribery of tax authorities to reduce or eliminate tax liabilities	c) Possible bribery of public officials for the purpose of obtaining favorable property or lease agreement
<b>Corruption Risks, control mechanisms</b>	<ul style="list-style-type: none"> <li>• anti-corruption policies and procedures, including customs duties;</li> <li>• anticorruption trainings for staff</li> <li>• Hot line for whistleblowers</li> <li>• Annual anti-corruption audit on bribes to tax system employees in selected regions / countries</li> </ul>	<ul style="list-style-type: none"> <li>• anti-corruption policies and procedures, including customs duties;</li> <li>• Annual anti-corruption audit on bribes to tax system employees in selected regions / countries</li> </ul>	<ul style="list-style-type: none"> <li>• anti-corruption policies and procedures, including customs duties;</li> <li>• anticorruption trainings for staff</li> <li>• Annual anti-corruption audit on bribes to tax system employees in selected regions / countries</li> </ul>
<b>Assessment of the corruption Risk control mechanisms:</b>	Controlled	Not controlled	Partially controlled

<b>Probability</b>	x	middle	middle
<b>Impact</b>	x	high	high
<b>Risks (revealed by probability and impact evaluation matrix)</b>	x	high	high
<b>Relevant mechanisms to eradicate risks</b>		<ul style="list-style-type: none"> <li>• anticorruption trainings for staff</li> <li>• Hot line for whistleblowers</li> </ul>	Hot line for whistleblowers

### Corruption Risk Analysis Sample N3

Investigator and/or Prosecutors encounter or are informed regarding a possible violation of the law.

As a consequence, it will be needed to decide on yes or no to investigate/prosecute.

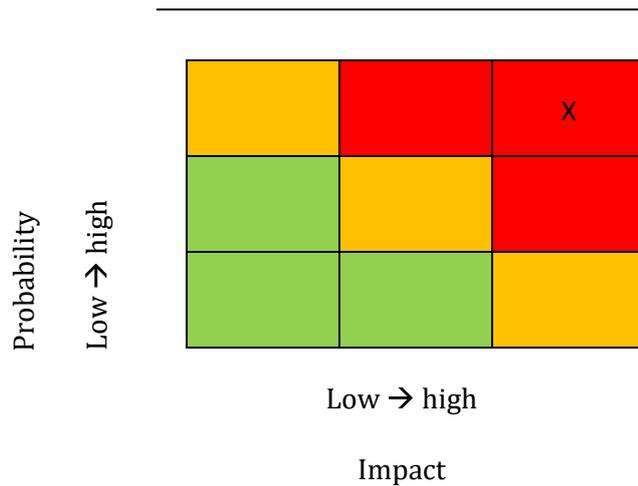
This is a risk area because of the possibility of so-called 'selective prosecution'. There is a probability the decision will be based on the grounds of Race, Gender, Sexual orientation, Religion, Nationality, etc.

On the basis of available statistics, it is known that the probability that this occurs is quite high.

The impact is also high (non-exhaustive list):

- Feeds distrust in the judiciary system and more specific regarding Police and Prosecutor's Office
- Can arouse lots of media attention
- Could trigger internal antagonisms
- Could raise the need for financial compensation for damages, etc.

Thus, because of the combination of high probability and high impact this is a priority area that needs attention. Therefore, in the Matrix it will be placed on the highest right corner.



Next step is to determine preventive instruments:

- Is there an objective decision control mechanism in place?
- The problem is openly discussed with investigators and prosecutors and clear instructions are provided on how to handle?
- There is a fair, and swift complaint procedure in place? Both internal and external?
- There is a sanction mechanism in place?
- Are data systematically collected on violations?

Finally, decision making:

- Is there a need to increase and improve the defence mechanisms? If so, how to implement those?
- Is data collection mechanism in place to measure the results/effectiveness of the measures?

## Literature

### Reports/Recomendations:

1. Corruption Risk Assessment Handbook – Transparency International;
2. [Anti-Corruption Assessment Guidebook – USAID](#) 2006 and 2019;
3. [A document prepared by the regional anti-corruption initiative on corruption risk assessment at the public sector institutions in the South-East Europe](#);
4. [A document prepared by the OECD on the Assessment of the Integrity Level in the Public Sector](#);
5. [Council of Europe, Technical Paper “Corruption Risk Assessment Methodology Guide”](#);
6. European Commission, Toolbox 2017 edition - Quality of Public administration.

### Legislation:

1. Ordinance №484 of 4 October 2019 of the Government of Georgia on approval of the implementation of the 2019-2020 National Anti-Corruption Strategy and the 2019-2020 Action Plan;
2. Ordinance №537 of 12 November 2018 of the Government of Georgia on the approval of the 2018-2019 Action Plan on the Open Government

### Official Web-pages

1. [Official web page of the European commission](#), publications

## Annex N1. Orientation Questionnaire

The purpose of the orientation questionnaire is to gather information about the institution. Based on the responses to the questionnaire the evaluator can have an idea of the existing situation and challenges in the agency and direct the resources to the relevant purpose.

Question		Answer
<b>Organizational Role</b>		
1.	What are main functions of the organization?	
2.	Does the organization have a declared aim or a description of its functions?	
3.	Do the personnel know about them?	
4.	Do the personnel agree with them?	
5.	Do the main units of the organization have a declared aim or the description of its functions?	
6.	Do the personnel know about them?	
7.	Do the personnel agree with them?	
8.	Does every employee have a job description for their positions and are they informed about them?	
<b>Budget</b>		
9.	How big is the budget of the organization?	
10.	What is the rough estimate of budget expenditure on salaries, investment, procurement of supplies, services and etc.?	
11.	What is the average annual amount of procurements/investments made by the organization?	
12.	What is the share of procurements made through tender competitions?	
13.	What is the share of direct procurement compare to the whole amount?	
14.	Does the ethics code for procuring agencies exist?	
15.	Does the regular training for the staff responsible for procurement exist?	
16.	What is the number of procurement during last three years where only one economic partner was involved?	
17.	How technically complex are the decisions taken about the budget expenditure?	
18.	Who is responsible for such decisions and what information do they base the decisions upon?	
19.	Are expenditure decisions centralized or decentralized (e.g.: do they need managers, supervisor's signature?)	
20.	Does the organization receive revenues from public or certain clients?	
21.	How does accounting for transfers, banking and auditing processes look?	
22.	How are such transactions received?	
23.	Does the agency have internal audit unit?	
<b>Human Resource Management</b>		
24.	How many people are employed at the organization?	
25.	How many of them are employed in the central apparatus and how many of them are employed at the LEPL?	

26.	From the percentage below, how many of them are civil servants, how many of them are employed for 1 year of probation time and how many of them are employed through short-term service contracts?	
27.	Does the organization have a follow-up mechanism or statistics, which shows how big is the turnover in the organization?	
28.	If yes, what is the frequency? High, medium, low or normal?	
29.	Besides the Civil Service Law what internal guidelines are used during the recruitment process?	
30.	For positions with high corruption risk - does the organization have specific recruitment criteria, which guarantee that high level of integrity will be maintained?	
31.	During recruitment – are candidates checked against activities that could hinder them from executing their work tasks?	
32.	Do your personnel know what conflict of interest is?	
33.	Are your employees trained in integrity issues?	
34.	Are integrity trainings repeated?	
35.	Are those trainings adequate to their needs and with everyday work situations?	
36.	Is there a contact person your employees could address for a piece of advice if need be?	
37.	Can employees address each other for a piece of advice until they inform the manager?	
38.	Do your employees consider their salaries to be adequate to their needs?	
<b>Procedures and Decision Making Process</b>		
39.	Which one of the following does the organization do? a. Issue of permits, certificates, ID cards, passports or other types of documents. b. Distribution of monetary allowances to citizens (social benefits). c. Monetary assistance to legal persons. d. Collection of public fees (taxes, fees and etc.)	
40.	If yes, are the procedures and respective criteria clearly formulated?	
41.	Where to find these procedures and criteria?	
42.	If civil servants have the right to use discretionary authority, do they have any kind of guidelines or a handbook which gives instructions on how to use this right?	
<b>Archive Making</b>		
43.	Does the organization have a clear rule on how to put together an archive?	
44.	Are individual decisions stored with respect to these rules?	
45.	Who has access to these files? Who can review and make changes?	
46.	What is the scale of information freedom regarding the organization documentation? Which decisions/files/documents are automatically public and what kind of information is provided upon request?	
47.	How does this work in practice?	
<b>Transparency</b>		

48.	Does the organization have any kind of formal policy or rules for automatic publishing of information?	
49.	Does this also encompass automatic publishing on the webpage? a. Organizational structure and contact persons b. Policy of the ministry and policy documents c. Laws and by-laws d. Draft laws and regulations	
<b>Availability of Information</b>		
50.	Does the organization have a civil servant responsible for publishing the information?	
51.	How many requests [to provide information] have the organization received in the previous year?	
52.	How many responses have been given?	
53.	How many requests are being processed?	
<b>Ethics and Integrity Frame</b>		
54.	Does the organization have a Code of Ethics or a Code of Conduct?	
55.	Do the personnel know that such a Code exists?	
56.	How often are employees trained in ethics?	
57.	Do the personnel have knowledge about the code? What measures are taken to ensure the knowledge?	
58.	Does the Code, any other regulatory document or internal regulation provide provisions that will help personnel decide how to act during the conflict of interests?	
<b>Reporting Mechanisms</b>		
59.	Do personnel have knowledge about the working processes and rules for reporting to their managers?	
60.	Does the organizations have an internal inspection or control unit?	
61.	Approximately how many control procedures were carried out during the last year?	
62.	Does the organization have an Internal Audit Department?	
63.	What important findings did this department come up with during the last year?	
64.	How often is the organization evaluated by external monitors or controllers?	
65.	How often is the organization evaluated by external audit?	
66.	Has any significant finding been detected during the last year or during the last external evaluation?	
<b>Internal Notification about Ethics Violations</b>		
67.	Is there a formal procedure according to which the civil servants could notify a contact person or a division specifically assigned for this duty about the violations of the code of ethics?	
68.	When a public servant himself/herself is a contact person for receiving such complaints, is there any alternative mechanism at the level of hierarchy or whether there exists the possibility of monitoring externally?	
69.	Are the personnel trained and informed about the procedure?	
70.	Is there a whistleblower mechanism in place?	
71.	How many cases of whistleblowing have been registered last	

	year and what did they result in?	
<b>Mechanisms for Appeals</b>		
72.	Are there clear procedures the citizens could use to appeal against the organization or the civil servants?	
73.	Where to get information about these procedures?	
74.	Are decisions on appeals taken by the same person as they are addressed to?	
75.	How many appeals did the organization receive during the last year?	
76.	How many appeals ended with documented positive outcomes?	
<b>Disciplinary Procedures and Sanctions</b>		
77.	How many disciplinary proceedings have been initiated against the personnel during the last year due to the violation of the rules of ethical behavior?	
78.	How many of these proceedings have been completed with disciplinary sanctions?	
79.	Which violations resulted in the use of sanctions?	
<b>Vulnerable Areas</b>		
80.	Could you identify the areas in your organization which are the most insecure towards disciplinary misconduct?	
81.	Has the risk analysis been conducted in order to identify such areas?	
82.	Does your organization's anti-corruption action plan take into consideration special measures intended for risk elimination?	
<b>Anti-corruption Policy</b>		
83.	Who is responsible for the elaboration, implementation, monitoring and coordination of the anti-corruption policy in your organization?	
84.	Is this responsibility reflected in the job descriptions?	
85.	Does the organization have a specially assigned working group to elaborate, implement, monitor and coordinate the anti-corruption policy?	

## Annex N2. Risk-Factor Identification Sample

Identification of risk-factors based on the facts of the violations of ethics principles

1.	<b>What did the violation imply?</b>
2.	Who (position and sector) let the violation occur?
3.	Personal motivation
4.	What caused this violation to take place?
5.	Analysis of the existing preventive measures
6.	Sanctions applied
7.	What impact did it have on the process and what consequences derived from it?
8.	Impact of the behavior made on the organization.
9.	Frequency of such violations

### Annex N3. Identification of reasons leading to corruption risks

Corruption Risks	Possible Grounds for Corruption
<b>Corruption risks in relation to individual behavior</b>	
Expenditures are significantly higher than revenues.	Revenues obtained through corruption
Activities carried out beyond public authority, e.g.: regular use of working /office hours for non-work related tasks.	Use of public resources for non-work related tasks
Activities carried out by civil servants or other persons in close relations to them that are beyond public authority  High risk of influencing the activities carried out by the public authority	Involvement into corruptive activities through secret agreements for their own or the benefit of their business partners
Strong resistance about the change of duties or transfer that would not be explained.	Illegal personal gain obtained in the scope of current authority which could be lost in the case of the duty change.
A purposeful try to avoid control, for example: to avoid the electronic system control	A desire to avoid control could mean a desire to avoid eventual corruptive activity
<b>Corruption Risks in Relation to an Unsanctioned Activity</b>	
An increase in minor procedural violations with a remarkable frequency.	Increased corruptions risks which indicates careless attitude towards the rule of law and order.
Loss of evidence, files and others and their occurrence in the possession of criminal offenders, business-partners of the public authority and others.	Rough negligence or intention, eventual corruptive deal with external actors
Influencing the procedures beyond the authority of a civil servant.	Obtaining benefits from persons interested to lead such procedures
Numerous failure to notify about the conflict of interests.	Intended abuse of a civil servant's position.
<b>Corruption Risks in relation to the Consequences</b>	
Unusually high numbers during control as a result of which no violations were detected.	Secret agreements that are a subject for control

Unusual negligence, superficial attitude towards control in the areas it is absolutely necessary and etc.	Behavior which is motivated by benefits received through corruption; tolerance towards corruption or hiding it.
Repeated cases of granting contracts to one and the same contractor with prices that are higher than the market price	Manipulating with the procurement procedures in favor of the contractor
Obvious differences seen in decisions taken in favor of different persons; unusual positive or negative attitude towards the applications filed by certain persons	Favoritism towards the people who seem to have overly exaggerated attitude towards the civil servants
Unusually frequent and unexpected breakdown pf the equipment for technical monitoring	Intended attempt to avoid monitoring and detection of corruption

**Annex N4. A sample of identification of circumstances indicating corruption (red flags)**

Question	Definition
<b>Is there a lack of availability of public services?</b>	High demands on public services could create favorable conditions for bribes and blackmailing (e.g.: health services could be vulnerable)
<b>Information imbalance between the provider and the customer</b>	When a provider has wider access to information than the customer, the transparency level could become insufficient or be naturally prone to monopoly. High barrier risk, “quarterly risks” among the service providers.
<b>Does the sector have close connection to business?</b>	The risk of “Revolving doors” and corruption agreements is high when a state authority establishes business relationships with the representatives of the business sector without addressing adequate transparency measures. The risk is higher when regulatory and executive competencies overlap each other.
<b>Is the reimbursement lower than the one available on the market</b>	Corruption risk might increase if salaries are: a) significantly lower (having in mind the unfavorable economic situation, b) lower than the salaries in the private sector. This create a risk for civil servants to get involved into corruptive agreements.
<b>Weak internal management and control mechanisms in the sector</b>	The sector might be characterized with ineffective supervision, for example: by a significant regulatory or an inspection body because this body is prone to corruption too. Such weak sides should be detected during the institutional analysis.
<b>Lack of external control in the sector</b>	The sector could become more vulnerable to corruption without an external control mechanism. Such external controllers might be: NGOs, citizens, etc.
<b>Do the civil servants perceive sanctions as</b>	Even in cases where the sector is

**weak?**

characterized with strong control mechanisms, financial or disciplinary sanctions could seem inadequate. Especially the sanctions that are aiming against unethical behavior.

## Annex N5. Integrity Management Questionnaire

The questionnaire is intended for the employees of the state institution. Results of the questionnaire are recommended to be part of the assessment. Based on the questionnaire it can be assessed whether or not institution has relevant standards and how are they implemented in practice.

Practical guide: For the easiness of filling up the questionnaire it is suggested to be filled electronically or in any other format that will allow automatic counting of the score (e.g. Google Docs).

	<b>Questions</b>	<b>Answers</b>	<b>Points</b>	
<b>1. Leadership and strategy</b>	1. Top management engages in activities and shows interest towards integrity issues (e.g.: talks regularly about ethics/integrity and shows exemplary behavior)	o yes (2) o partially (1) o no (0) o don't know		
	2. Top management has clear vision regarding integrity management (e.g.: integrity policy plan/strategy is elaborated and has concrete aims and tasks)	o yes (2) o partially (1) o no (0) o don't know		
	3. The management underwent trainings on ethics and integrity issues (integrity issues, problems, violations, impacts and etc.)	o yes (2) o partially (1) o no (0) o don't know		
	4. Management evaluations shows clear signs of ethics and integrity (e.g.: integrity issues are a part of evaluation frame and etc.)	o yes (2) o partially (1) o no (0) o don't know		
	5. Resolution of integrity issues are a part of strategic decisions (e.g.: which partner one could work with, where to invest)	o yes (2) o partially (1) o no (0) o don't know		
		<b>Total from 10 points</b>		
	<b>2. Values and Principles</b>	<b>Questions</b>	<b>Answers</b>	<b>Points</b>
		6. The authority has a declared moral/ethics values (e.g.: frankness, openness, trustworthiness, tasks)	o yes (2) o partially (1) o no (0) o don't know	

	7. The employees are involved in the process of determining the values of the organizations (e.g.: the process is supported by discussions, group projects and etc.)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	8. Values of the organization are documented (e.g., Code of conduct, List of values etc.)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	9. Values of the organizations are of high quality (e.g: are renewed and touch upon relevant issues)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	10. Values of the organization are implemented in practice (actively usable and distributed down to the employees. The organization has respective instructions)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
		<b>Total from 10 points</b>	
<b>3. Structure and procedures</b>	<b>Questions</b>	<b>Answers</b>	<b>Points</b>
	11. The authority implemented integrity standards (e.g.: National Sectorial Legislation on Integrity, standards and principles and others)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	12. The authority carries regular internal risk evaluations (in order to identify vulnerable processes/functions/risks)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	13. Administrative structure is in place and internal controls are carried out (e.g.: formal rules, procedures, policy, regulations, working processes.)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	14. Integrity procedures are productive (are composed of renewed and relevant issues)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	15. Integrity procedures are implemented	<input type="radio"/> yes (2) <input type="radio"/> partially (1)	

		o no (0) o don't know	
		<b>Total from 10 points</b>	
<b>4. Human Resource Management and Culture</b>	<b>Questions</b>	<b>Answers</b>	<b>Points</b>
	16. Employee evaluation (so called screening) is a part of a new employee recruitment process (e.g.: checking their compatibility with the organizational values)	o yes (2) o partially (1) o no (0) o don't know	
	17. Soon after recruitment, new employees receive information regarding the integrity policy and expectations toward them in this regards (e.g.: special courses, signing the Code of Conduct and etc.)	o yes (2) o partially (1) o no (0) o don't know	
	18. The authority is interested and carefully observes the awareness level of all employees on integrity issues (e.g.: by means organizing working meetings, discussions, trainings on integrity issues)	o yes (2) o partially (1) o no (0) o don't know	
	19. The authority is interested in developing ethical culture in the organization (e.g.: by conducting a satisfaction survey)	o yes (2) o partially (1) o no (0) o don't know	
	20. The authority has ethical culture (openness, readiness towards discussions and critics and etc.)	o yes (2) o partially (1) o no (0) o don't know	
		<b>Total from 10 points</b>	
	<b>5. Questions</b>	<b>Answers</b>	<b>Points</b>

	21. The authority has an anonymous procedure for whistleblowing (e.g.: whistleblower protection mechanisms, the organization has officers for confidential integrity and etc.)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	22. The employees know how to "blow whistles" and want to use this instrument in the time of need (e.g.: whistleblower procedure is clear and trustworthy)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	23. The authority has a procedure that allows to conduct an investigation into integrity violation (e.g.: investigation procedure, experienced investigators, etc.)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	24. The authority investigates integrity violations and enforces the results received through the investigation (e.g.: violations are always reacted upon even in the cases when violators are representatives of the top-management and etc.)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	25. Integrity violations are perceived adequately and conclusions are made based on them (e.g.: registering, assessment, regulations are used to solidify or change an integrity policy)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
		<b>Total from 10 points</b>	
<b>6. Communication and reporting</b>	<b>Questions</b>	<b>Answers</b>	<b>Points</b>
	26. The authority reports on integrity policy and incidents (e.g.: for the management, the working group, the beneficiaries)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	27. The authority carries out the integrity policy and incidents connected to it (e.g.: for the parliament, city municipality, the audit and inspection offices)	<input type="radio"/> yes (2) <input type="radio"/> partially (1) <input type="radio"/> no (0) <input type="radio"/> don't know	
	28. The authority informs the media outlets about	<input type="radio"/> yes (2) <input type="radio"/> partially	

	integrity violations	(1) o no (0) o don't know	
	29. Importance of integrity is highlighted through numerous means (e.g: publicity in internal magazines/blogs/internet webpages/talks/meetings with the personnel and etc.)	o yes (2) o partially (1) o no (0) o don't know	
	30. Integrity is used to create internal and external brands (e.g.: ethics/integrity is a part of job descriptions)	o yes (2) o partially (1) o no (0) o don't know	
		<b>Total from 10 points</b>	
<b>7. Planning and collaboration</b>	<b>Questions</b>	<b>Answers</b>	<b>Points</b>
	31. The authority has put together an integrity policy plan (e.g.: one clear document with concrete visions, aims and objectives)	o yes (2) o partially (1) o no (0) o don't know	
	32. The authority does periodic monitoring of its integrity policy	o yes (2) o partially (1) o no (0) o don't know	
	33. The authority uses systemic approach of integrity management (e.g.: based on methodology)	o yes (2) o partially (1) o no (0) o don't know	
	34. The authority allocated adequate resources for integrity management (e.g.: budget, time and personnel)	o yes (2) o partially (1) o no (0) o don't know	
	35. The authority does regular assessment of the internal integrity policy, analyses it and makes is compatible (e.g.: renewing of the policy, changing it and making it better)	o yes (2) o partially (1) o no (0) o don't know	

		<b>Total from 10 points</b>	
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**Additional question for employees of public agencies:** In case you decide to be involved in the corruptive activity via your position what will be the direction, the method and how would you do it?

**Annex N6. One of the Methods of presenting results of the corruption risk assessment**

If base on the corruption risk assessment it is established that the following circumstances represent corruption risks:

- Misuse of power;
- Illegal participation in commercial activities;
- Bribe taking;
- Failure to present asset declarations.

And based on the previous experience (e.g., analyses of statistics), there risks have different probability to occur on the matrix, for presenting corruption risks so called “Heat Map” can be used. The Heat Map can show the probability and level of impact in a one scheme.

