

EXECUTIVE SUMMARY

Anticorruption policy making has gained considerable experience over the last decade, both within member-states and in the institutions of the European Union. The methods of evaluating policy effectiveness, however, are insufficiently developed and applied mostly at the macro (country and/or society) level. Refocusing these on the individual public institution has the potential of a breakthrough in anticorruption policy assessment and design. It is for this purpose that the *Monitoring Anticorruption Policy Implementation* (MACPI) was developed as a tool allowing evaluators and policy makers to review the anticorruption setup of individual public sector organisations.

The blueprint

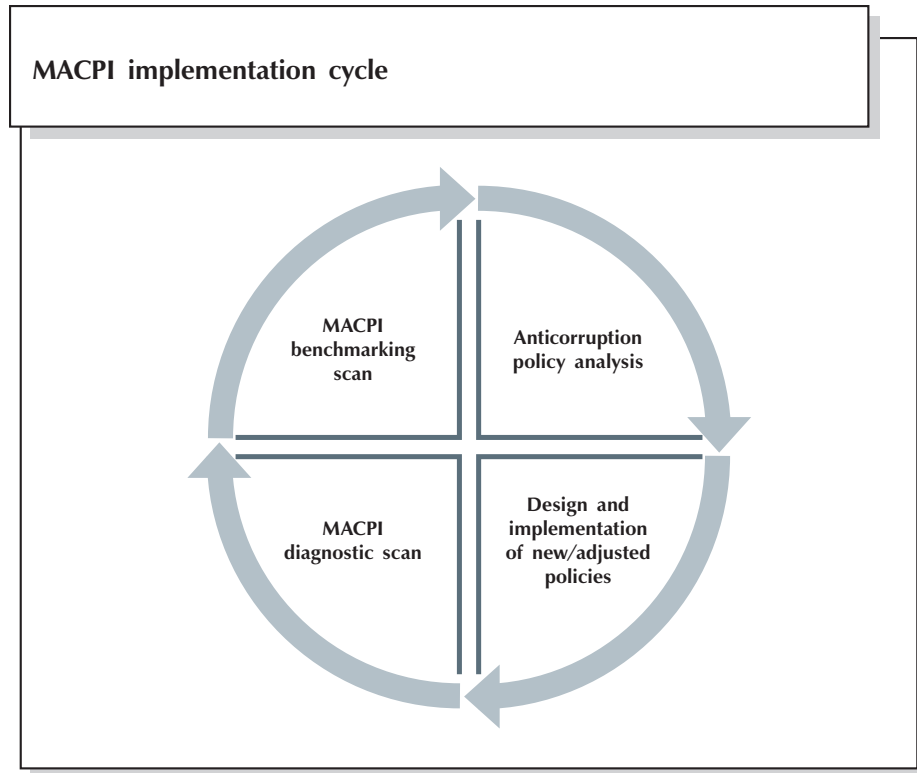
MACPI is premised on the notion that the content of corruption at the macro level (society) and micro level (public organisation) differ substantially. While micro level corruption transactions represent cases of deliberate noncompliance with rules and regulations for some kind of private gain, at the macro level corruption can be described as a governance regime, which allows policies deviating from the public good to be put forward. Although bringing about macro level political change has proven a demanding and often elusive longer-term objective, most national governments in the EU confine themselves to national level anticorruption policies. To reduce the prevalence of actual corrupt transactions these policies need to be translated into mechanisms and protocols that operate in individual public organisations. This, however, has rarely been the case.

MACPI is capable of mapping and **assessing the anticorruption policies implemented in public organisations**. This includes a set of qualitative and quantitative instruments (MACPI tool), which: (i) review all cross-sections of activities of the organisation and types of associated corruption risks; (ii) identify corruption vulnerability zones – in other words, mechanisms of noncompliance with rules that make it possible for public officials to enrich themselves at the expense of the public; and (iii) map and assess anticorruption policies. The diagnostic carried out with MACPI produces findings in the following fields of inquiry:

- the level of corruption vulnerability of a public organisation for each of its specific activities;
- the coverage of the activities of the organisation by anticorruption policies, and the effectiveness of these policies;
- the level of implementation of anticorruption policies.

MACPI ascertains **whether the corruption vulnerabilities of a public organisation are adequately addressed** by anticorruption policies and how effective these policies are. The tool also informs policy makers on the existence of two gaps:

- an implementation gap – there is only formal compliance with anticorruption policies;
- a policy design gap – corruption vulnerabilities are not addressed by any policy.



The identification of the two gaps is the first stage of the MACPI cycle. Based on the benchmarking results of MACPI diagnostics policy-makers can then make adjustments to policies and introduce a new round of diagnostics in the second stage.

MACPI was tested in two public organisations and two municipalities in Italy and Bulgaria. The piloting results demonstrate that it is predominantly general anticorruption policies that are applied, with few measures tailored to the specific vulnerabilities of the organisations. This emphasises the need for prioritising the public organisation level in the anticorruption policy process.

The policy implications

MACPI comes at a time of search of the reasons for the limited progress against corruption in many countries and has implications for policy making at the national and EU levels. The tool operationalises the need for monitoring the implementation of anticorruption policies and is suitable as an input to policy design.

At the **national level**, policies should be MACPI tested before implementation; only after successful results (confirmed by MACPI), the policy should be recommended

for adoption. Anticorruption policies at the national level that do not have any implementability at the organisational level should be discouraged.

At the **EU level**, MACPI is relevant to the work carried out in the wake of the *EU Anticorruption Report*. Anticorruption policy has been mainstreamed in the EU economic governance and in the programming of the European funds, which means that the need will arise to evaluate the anticorruption preparedness of national public institutions. Given that anticorruption would feature in the non-binding guidelines being developed for member states on how to strengthen the functioning of their public sector institutions and invest in administrative capacity, MACPI can be valuable in producing evaluation findings used to formulate targeted solutions. The improvement of administrative capacity in the member states following European Semester recommendations can also benefit from the capacity of MACPI to overhaul integrity measures and procedures in the institutions of economic governance.

MACPI provides the missing link between the measurable evaluation of specific public services and the design of anticorruption policies targeting their actual corruption vulnerabilities.