

APPENDIX 3. MACPI IN-DEPTH INTERVIEW GUIDE

Objective: To assess the corruption vulnerability of an organisation by evaluating the likelihood of corruption of all types in the activities of the organisation.

Method and process: The interviewed expert is presented with a draft list of activities of the organisation and a list of corruption types with their respective definitions. The interview is conducted in the following steps:

1. Review of the list of activities of the public organisation.
2. Introduction to the surveyed types of corruption (description and eventual clarifications by interviewer).
3. Evaluation of the likelihood of types of corruption for each activity.
4. Definition of anticorruption policy (introduction and explanations provided by interviewer).

In case the expert needs to consult colleagues and organisational documents the interview is interrupted and a second meeting is scheduled.

5. Identification of general anticorruption policies (address more than one activity).
6. Identification of specific anticorruption policies (address single activities).

Introduction

Interviewer: The objective of this research is to make a detailed assessment of the implementation of anticorruption policies in your organisation. Your input will help prepare the assessment by mapping the zones of corruption vulnerabilities (risks) of your organisation and identifying the currently applicable anticorruption policies. As this approach or some of its elements might be new or unfamiliar to you, I will provide you with some preliminary draft list of activities, definitions of different types of corruption and an empty corruption vulnerability map which we will jointly fill in.

Interviewer hands over background materials.

Note: in case previous assessments have been made it would be useful to provide also the already completed map of the corruption vulnerability zones, a list of activities and a list of anticorruption policies.

Interviewer: Corruption activities vary and include many different types of deliberate noncompliance with rules which are directly linked to benefits to officials. Different types of corruption are usually linked to specific activities. We would therefore need to:

- compile a list of activities the public organisation performs (by statute) in order to serve its public function;

- evaluate the potential corruption risk for each activity;
- identify existing anticorruption policies;
- link existing policies to the corruption risk they are targeting.

Review of the list of activities

Interviewer:

Please review the draft list of activities of your organisation we have prepared. It includes activities that are common to all public organisations and some other which are specific for your organisation.

Do you think that these activities properly reflect the structure of your organisation?

Would the activity titles we have used be understandable to all employees? Should some activities be split up or aggregated?

Are there specific departments in the organisation that control and supervise all other departments (e.g. internal affairs, inspectorate, etc.)?

Are hiring, career development and procurement conducted by separate departments or each department has a role in these processes?

Interviewer (at the end of the review): Would you agree that I send you the revised list of activities for final confirmation?

Introduction to types of corruption and corruption vulnerability zones

Interviewer:

We will now focus on the different types of corruption that might occur in your organisation. Let me first briefly introduce you to the definitions of the main types of corruption I gave you.

Interviewer reads and explains each type of corruption, and gives examples and answers questions by expert to ensure that all types of corruption are clearly understood.

Interviewer:

Now we will jointly review the likelihood of types of corruption to occur activity by activity. What I mean by “to occur” is that for a certain type of corruption we could say that:

- It has practical relevance/makes sense either for employees or clients of your organisation.
- Such a transaction contains a potential corruption interest – both sides would benefit by violating the law and the likelihood of being caught is low.
- Such cases have been identified in your organisation.

- Given the current situation in the country (city, organisation, etc.) one could not rule it out.

Interviewer:

Let us start with the first activity in the list (.....).

Do you believe that **abuse of power** is possible/could happen or happens for this activity?

Would you say it is very probable?

Do clients of your organisation hint or indicate to employees that they would have an interest in such a transaction?

What would you say is the most likely mechanism of such a transaction, if it happens?

Have such cases been identified?

Interviewer goes over the table cell by cell and asks the above questions as appropriate. Marks cells of corruption vulnerability and record corruptions transaction mechanisms described by expert.

Corruption vulnerability map (based on Border Police diagnostics)

	Abuse of power	Abuse of property	Nepotism	Clientelism
Human resources				
Procurement				
Preventive investigation				
Border security (green border)				
Investigation				
Provision of information				
Border crossing control				
Administrative and punitive activities				

Anticorruption policies

Interviewer:

Now we have completed the corruption vulnerability map of your organisation. There are some cells in the table that proved risky. We now need to draw a list of anticorruption policies that are currently implemented in your organisation. Most probably you will need to consult documents and/or colleagues before we

can complete this task. Before that I would like to introduce you to the topic and explain what we actually mean by anticorruption policies.

First, we divide these policies into two groups: general policies which apply to most activities in the organisation and specific policies which are designed to counter corruption in specific activities. Among the general ones – common to most public organisations in the country – we could list the following:

- Asset declarations of employees;
- Declarations for conflict of interest;
- Anticorruption training;
- Awareness campaigns, information days;
- Civic control mechanisms like corruption mailboxes, web sites that collect feedback from clients, complaint procedures, etc.

An additional comment is necessary before we discuss each of these policies.

We view anticorruption policies as additional control mechanisms which identify deliberate noncompliance for private gain. The measures employed by the policies verify, control and eventually sanction violation of rules. At the same time, rules in the organisation define and prescribe how procedures should be conducted, how things should be done. Sometimes rules themselves are good enough to prevent deliberate noncompliance and additional inspections seem unnecessary. In short, anticorruption policies provide a second layer of control which checks for noncompliance linked to private gain for employees.

In addition, in order for rules and organisational mechanisms to qualify as anticorruption policies, they need to meet some criteria:

- to be formally adopted by the organisation (written and endorsed by management);
- to specify responsibilities;
- to specify procedures of control;
- to specify sanctions in case violations are encountered.

Interviewer can interrupt the interview and a second meeting can be scheduled. Interviewer asks respondent to prepare and send the list of general and specific anticorruption policies.

Second stage interview

Interviewer:

Now we have a draft list of general and specific anticorruption policies implemented in your organisation. Let us review each one to ensure that they qualify as anticorruption policies.

Interviewer uses the list and starts with the first policy; asks all relevant questions; proceeds to the second policy and continues until the list is exhausted.

Interviewer:

What is the official name of each of these policies (how is it known in your organisation)?

Is this policy part of the ordinary organisational routine, or it is an additional mechanism of control adopted at a later stage?

Who is responsible for the implementation of this policy?

What happens if employees are caught violating this policy? Have there been such cases in the last 2-3 years?

Do you think most employees are aware of this policy?

Types of corruption (handout)

- *Nepotism*: the exploitation by a public official of his/her power and authority to procure jobs or other favours for relatives (family members and close friends), which can take place at all levels of government, from low-level bureaucratic offices to central government ministries.
- *Clientelism (patronage)*: the informal relationship between people of different social and economic status (and not relatives): a 'patron' (boss) and his 'clients' (dependents, followers, protégés). The relationship includes a mutual but unequal exchange of corrupt favours.
- *Abuse of power by a public official* (not included in the previous cases): intentional abuse of functions or position, by performing or failing to perform an act in violation of law by a public official for the purpose of obtaining an undue advantage for himself/herself or for another person or entity.
- *Abuse of property by a public official* (not included in the previous cases): intentional misappropriation or other diversion of any property, public or private funds or securities or any other items of value entrusted to the public official by virtue of his/her position, by said public official for his/her benefit or for the benefit of another person or entity.

Sample list of activities (handout)

- Human resources – recruitment, dismissal, promotion;
- Public procurement;
- Preventive investigation – prevention of illegal migration, smuggling and trafficking;
- Border security – prevention of unauthorised passage of persons, vehicles and immigrants;
- Investigations carried out by investigating officers;
- Information activities – risk analysis and information campaigns;
- Border checkpoints – processing of documents of legitimate persons and vehicles and preventing unauthorised passage of people and vehicles through checkpoints;
- Administrative and punitive – control and penalties for illegal immigrants; traffic control near the airport, railway stations; issuing passes to employees of companies operating in the area of border crossing.

Sample list of anticorruption policies (handout)

General policies (Border Police)

- General anticorruption measures for vetting of job applicants for the Ministry of Interior.
- Regulating the activities of employees through additional orders and instructions as a reaction to certain offenses which are not regulated by any existing law or regulation (for example, Border Police employees are not allowed to ask citizens to buy goods for them).
- Anticorruption training at the Police Academy.
- Information campaigns – promoting positive examples, familiarising employees with quarterly reviews (corruption problems and the measures that have been taken).
- Annual submission of declarations of assets and income.
- Direct supervisors are advised of the asset declarations of employees. In order to guarantee they have really done so, direct supervisors are required to sign every declaration.
- Immediate reactions to corruption complaint – carrying out checks/investigations, initiating disciplinary proceedings and informing the relevant departments and others.
- Information campaigns among the general public to advertise phone numbers and internet addresses where citizens can report cases of corruption.

Specific policies (Border Police)

- Change of shift schedules and rotation of shifts at border checkpoints.
- Constant video surveillance of workplaces at border checkpoints.
- Interviews with passengers crossing the border and detained illegal immigrants, refugees, etc.
- Unannounced visits (audits) by heads units.