

**OPEN-ENDED INTERGOVERNMENTAL WORKING GROUP ON THE
PREVENTION OF CORRUPTION
THEMATIC COMPILATION OF RELEVANT INFORMATION SUBMITTED
BY Italy
Article 8, Paragraph 5
Asset and Interest Disclosure Systems
Italy (ninth session)**

Information on asset and interest disclosure

Article 14 of the Legislative Decree no. 33/2013 provides for holders of political offices some transparency measures on asset, interest and financial data. In 2016 the Legislative Decree no. 97, amending the article 14, extended the asset and income disclosure to Executive officials.

The obligation applies to:

- holders of political offices of State, Regions and Local entities ;
- holders of administrative, direction or Government offices, however named, except in the case of appointments without remuneration; holders of management positions, granted for whatever reason, including any appointment granted at the discretion of the political bodies without resorting to public selection processes.

This category includes, e.g., the President and the members of the board of Independent Authorities; the Presidents and the Steering Board of public bodies such as the National Social Welfare Institution (INPS); members of the bodies determining the policy of public controlled companies and controlled private entities (private entities include associations, foundations and any private entity with a budget over € 500.000, whose activities has been financed for the most part by public administrations in the last 2 years and with all the members of the administrative body appointed by public administrations);

- holders of management positions, granted for whatever reason, including any appointment granted at the discretion of the political bodies without resorting to public selection processes. This category includes managerial senior positions such as Secretary

General, Head of Department, General Manager and any other managerial position, also those conferred on subjects who do not possess the rank of employees of public administrations (external appointments).

However, it has to be pointed out that the disclosure for all the subjects of this category is suspended until the delivery of the judgment of the Italian Constitutional Court. The duty to disclose asset and income data has, in fact, been challenged in March 2017 by some Executive officers as violating the Italian Constitution and the European law, in particular the right to privacy, the protection of personal data and the principle of proportionality.

Public officials, as above identified, are subject to disclose and publish on the websites of the administrations where they hold offices the following information related to their income and asset:

- a) remuneration of whatever type related to the acceptance of the office included the public money spent on business travels and missions;
- b) data related to the acceptance of other offices, both in public and private bodies, and the relevant remuneration received on any ground;
- c) other appointments, if any, remunerated with public money with an indication of the relevant amount;
- d) copy of the latest tax return (annually)
- e) a statement on his/her real rights on immovable properties and movable properties recorded in a public register, ownership of company shares and equity participations, ownership of companies, any company directorships or posts as internal company auditors (within three months from the appointment and then annually to communicate any variation).

The obligation to publish the copy of the latest tax return and a statement on the real rights on immovable properties and movable properties recorded in a public register, ownership of company shares and equity participations, ownership of companies, any company directorships or posts as internal company auditors, also applies to public officials' not separated spouse and relatives within the second degree of kinship, if they have consented to such disclosure. Evidence shall in any case be given in case of lack of consent.

All asset and income declarations are published on the websites of the public administration where the public official holds his/her office. All information is public.

Public administrations publish the data within three months from the appointment and for the three years following the termination of the appointment, except for the information relating to the patrimonial situation and, where permitted, the declarations of the not separated spouse and the relatives within the second degree of kinship, that are published up to the termination of the office or of the mandate. At the expiry of the period of publication, the relevant data and information are accessible with a request under the Freedom of Information Act.

With the resolution no. 241/2017 the ANAC adopted Guidelines for the implementation of article 14 of Legislative Decree no. 33/2013 which requires, inter alia, the publication of asset and income declarations. The Guidelines also include formats for the asset declarations and indicate that the obligation to publish the income declarations is fulfilled with the publication of the same tax return presented to the Revenue Agency or with the tax summary contained in the same tax return.

Oversight of transparency and asset disclosure obligations

From a general point of view, according to the legislative framework, ANAC is in charge of the oversight on the compliance with the transparency obligations (Legislative Decree no. 33/2013). To this end it could: perform the monitoring ex officio or following a complaint/report; order to proceed, within 30 days, with the publication of data; apply sanctions for lack/delay of compliance of certain kind of data.

ANAC adopts guidelines to support public administration and all other entities to enforce the provisions on asset and declaration disclosure. It also defines criteria, models and standard schemes for the organization, codification and representation of the documents, information and data object to mandatory publication. Also the oversight activities as well as the sanctioning procedures are codified in specific regulations adopted by ANAC and published in the Italian Official Journal.

Concerning asset declaration obligations (related to holders of political offices of State, Regions and Local entities, public society, etc.; holders of administrative, direction or government offices, etc.),

ANAC controls the correct compliance with the obligation of publication on asset declaration, (Article 14 of the Legislative Decree no. 33/2013) exercising its powers of inspection through request of information, acts and documentation to the public entities and ordering to proceed with the publication of data, documentation, and information required, and applying sanctions in case of lack or delay of the publication.

The reviewing of declarations is requested to the subject obliged to present them by the same public administration which receives the declarations for the publication. It should be reminded that the declarations are made under the personal and penal liability of the signer.

Provisions confer to the ANAC only the power to verify that the information and data published fully respond to the data and information the law requires to be disclosed. It is a review limited to verify the declarations in terms of publication, updating, completeness of information, readiness for consultation. The review is done by the ANAC ex officio or following a complaint.

The same public administration which receives the declarations for the publication is in charge of demanding their correction. In particular the check is carried out by the Manager for corruption prevention and transparency.

Provisions confer to the ANAC only the power to verify that the information and data published fully respond to the data and information the law requires to be disclosed. It is a review limited to verify the declarations in terms of publication, updating, completeness of information, readiness for consultation. ANAC verifies that all data and information provided by the law are published in the internet website of the monitored administration in the specific section "Transparent Administration", specifically in the sub-section (holder of political and administrative office positions). In case of request of access, by subjects involved or by other subjects, to document and data related to the oversight process, the access is postponed to the end of the procedure.

Revealing a non-compliance with publication of data for which the legislative decree no. 33/2013 provides an administrative sanction - information related to patrimonial situation, included tax return, the stock detained in companies, shareholdings, compensation related to the appointment- the ANAC verifies the reason for the violation. Information is requested from the Manager for corruption prevention and transparency of the administration and from the Independent evaluation body. If it is found that the holder of the duty has refused to communicate the information required, a sanction from 500 to 10.000 euros is applied to

him/her by the ANAC. The related decision is published on the website of the administration or body involved.

A list with the name of all non-compliant subjects is published on the website of ANAC.

Non-compliance with the obligation of publication also constitutes element of evaluation for managerial responsibility related to the administration object of monitoring by ANAC, possible cause of responsibility for damage to the reputation of the administration and are in any case evaluated for the provision of the retribution of result and accessory retribution related to the individual performance of the individuals involved.



SNA REPLY TO UNODC NOTE: IX Intergovernmental Working Group on Corruption Prevention – Vienna 6/7 September 2018: collection of information from Member States

With MAE (Ministry of External Affairs) note prot. MAE00389662018-03-02, UNODC informs that the issues to be discussed in the Working Group meeting (Vienna, 6/7 September 2018) will be:

(a) *preventing and managing conflicts of interest*

(b) *asset and interest disclosure systems* SNA has so far developed the following specific training activities:

1. *(preventing and managing conflicts of interest)*

Training programs on: codes of conduct; workshops in risk area: “Appointments and assignments”; workshops on whistleblowers (focused on control instruments and on the reporting issue).

2. *(asset and interest disclosure systems)*

Training programs on transparency.

A concise supplementary worksheet follows.

1. The Italian Civil Service Training System for the Prevention of Corruption.

The SNA (Scuola Nazionale dell'Amministrazione – National School of Public Administration) is the main stakeholder entrusted with the task of training civil servants, as laid down in art. 21 D.L. N. 90/2014 converted into Law N.114/2014. This law suppressed training schools run by the Ministries of Interior, Defence, Foreign Affairs and Economy and Finance and devolved their functions to the SNA.

Law 190/2012 appoints SNA as the main provider of training services in the field of the prevention of corruption for civil servants in Public Administrations¹.

¹L. 06/11/2012, n. 190 on the Prevention and Suppression of Corruption in Public Administration, published in Official Gazette November 13 2012, n. 265. Art.1 par. 11: *The School of Public Administration, with no new or increased charges for using public finance and human resources, equipment and financial resources available to current legislation, prepares specific and sectoral training programs of employees of Public Administrations on the issues of ethics and legality. On a regular basis and in agreement with Administrations, the SNA provides for the training of civil servants working in sectors where there is the highest risk of corruption being committed.*



SNA organizes and delivers training programs on integrity and anti-corruption compliance in traditional classroom-based training sessions and through distance learning (e-learning and blended learning).

2.SNA anti-corruption courses

SNA anti-corruption courses are divided into two main categories: a catalogue of training programs which can potentially be accessed by the whole civil service, and tailor-made training programs outlined in the National Anti-Corruption Plan - Piano Nazionale Anticorruzione (PNA), and in the Three-year Plans for the Prevention of Corruption and Transparency – Piani Triennali per la Prevenzione della Corruzione e per la Trasparenza (PTPCT).

SNA training activities are designed for managers and staff working in public administrations (as indicated in the PNA), and in particular those responsible for drafting and implementing anti-corruption and risk management policies, whether on the level of government or central state authorities, local authorities or institutions.

There are two main types of training:

1. "general level" training
2. "specialist level" training

The first area of intervention for training activities aims in particular to share and promote values associated with ethics and legality. The recipients of these activities are therefore not only civil servants, but anyone working with public authorities in any form. The underlying logic is that the only way to create a hostile habitat for corruption, and illegal behavior in general, is if everybody working within each public authority fully shares these values (creating an unfavorable environment for corruption).

The second training area is more "technical", and is divided into different areas according to the recipients and the role they play in anti-corruption measures. In particular, we provide:

- a. training for anti-corruption managers (risk managers) regarding risk management techniques applied to preventing cases of corruption;



- b. training for managers and staff in the risk areas;
- c. training for members of supervision bodies;
- d. Teacher training for instructors.

In particular, training programs delivered by SNA in the field of corruption prevention and integrity of civil servants are divided into five subgroups:

- A. Anti-Corruption and Risk Management
- B. Ethics, Codes of Conduct and Whistleblowing
- C. Public Contracts
- D. Transparency and F.O.I.A.
- E. Courses on Ethics and Corruption Prevention inserted in mandatory initial or in-service training paths (e.g. access training paths for managerial, prefectural or diplomatic careers).

3. Preventing and managing conflicts of interest; asset and interest disclosure systems

Both relevant legislation and new codes of conducts consider conflict of interests and asset and interest disclosure system as transversal (general) measures of treatment, appropriate for every administration included in the objective scope of Law 190/2012.

For this reason, most of the SNA training offer specifically focuses on these two issues, in the learning catalogue training programs previously quoted (see Table 1).



Table 1

	Conflict of interest	Asset and interest disclosure systems
A. Preventing Corruption and Risk Management		
Drafting Three Year Plans for the Prevention of Corruption	X	X
The Role of the Anti-corruption Officer (basic and advance level)	X	
Planning and Implementing of Training as an Anti-corruption Measure	X	
The Prevention of Corruption in Public Administration	X	
Workshop for Personnel in Risk Areas: Permits and Authorizations, Public Contracts, Appointments, Legal Affairs and Litigation, Checks, Controls, Inspections and Sanctions	X	
The Role of the Independent Bodies for Assessment – OIV		
Programs on Ethics and corruption prevention in mandatory training courses	X	
B. Ethics, Codes of Conduct, Whistleblowing		
Ethics, Codes of Conduct	X	
Whistle-blowing	X	
E-learning: basic training course for civil servants, basic training course for public executives, advanced training course for public officials and anti-corruption officers	X	
C. Public Contracts		
Expert in Public Procurement SNA-ANAC	X	
The New Code of Public Contracts		
Management of Companies in Administration		
D. Transparency and F.O.I.A		
Rules for Access under FOIA: requirements for a correct compliance		X
The Italian F.O.I.A. and Administrative Transparency: requirements for a correct compliance		X
Managing FOIA and Access Registers: technical and operational issues		X
E. Courses on Ethics and Corruption Prevention inserted in mandatory initial or in-service training paths (e.g. access training paths for managerial, prefectural or diplomatic careers).	X	X



More in detail, as inferred by this table, the issue of conflict of interest is addressed:

- In programs entitled to “Ethics and codes of conduct”;
- In any program of the area “Anti-Corruption and Risk Management” (in modules concerning analysis of measures and resulting liabilities);
- In specific training programs devoted to the risk area “Appointments and Assignments”;
- In programs focused on “Whistleblowing” (as far as control instruments and reporting issues are concerned).

On the other hand, the issue of asset and interest disclosure systems is included in training programs on transparency and hence:

- Legal rules for general access (so-called F.O.I.A.).
- Italian F.O.I.A. and administrative transparency.
- Managing F.O.I.A. and Access Registers.



Table 2: SNA anti-corruption courses 2015/2018

Courses highlighted in red deal with conflicts of interest

Courses highlighted in yellow deal with disclosure

Courses highlighted in green deal with both of the above themes

2015

ANTI-CORRUPTION AND RISK MANAGEMENT

LEARNING CATALOGUE

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Advanced training program for Subjects Responsible for the Prevention of Corruption	11	264	316	175	141	164	152
Workshops for Independent Bodies for Assessment (OIV)	3	18	87	38	49	34	53
Workshops for training agents (training program for trainers)	4	72	75	34	41	21	54
Workshop for personnel working in the risk area: "Recruitment and promotion of employees"	9	59	244	87	157	87	157
Workshop for personnel working in the risk area: "Works, Services and Supplies Procurement"	9	59	438	204	234	108	330
Workshop for personnel working in the risk area: "Permits and Authorizations"	9	59	247	108	139	80	167
TOTAL	45	531	1407	646	761	494	913



TAILOR-MADE TRAINING PROGRAMS UNDER SPECIFIC AGREEMENTS

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
AGENAS (Agency for Regional Health Services) General training course on Anti-Corruption	4	24	151	54	97	6	145
AGENAS (Agency for Regional Health Services) Advanced training course - Guide to the Redaction of the Three Year Plan for the Prevention of Corruption	1	18	31	8	23	8	23
MINISTRY OF JUSTICE Advanced course for the Department of Juvenile Justice in the field of Corruption Prevention	1	14	24	9	15	9	15
MINISTRY OF INTERIOR Training Course for the Subjects Responsible for the Prevention of Corruption in Prefectures and in the Ministry of Interior's Departments (Follow-Up L. 190/2012)	3	54	102	43	59	59	43
ISTAT (Italian National Institute of Statistics) Advanced course for ISTAT executives on methods and systems of corruption prevention	1	12	45	22	23	45	0
EQUITALIA (state-owned tax collection agency) Advanced course for Subjects Responsible for the Prevention of Corruption	2	24	60	52	8	37	23
ISTAT (Italian National Institute of Statistics) Advanced Course for the ISTAT Subjects Responsible for the Prevention of Corruption	1	24	38	12	26	3	35
PCM (Presidency of the Council of Ministers) Planning Risk Treatment Measures	1	4	31	15	16	23	8



MPLS (Ministry of Labour and Social Policy) Risk Management - Internal Auditing and Process Governance	1	36	55	23	32	22	33
MISE (Ministry of Economic Development) Workshop on corruption prevention for MISE executives	1	10	43	19	24	43	0
ISTAT (Italian National Institute of Statistics) Workshop for ISTAT personnel working in the risk area: "Recruitment and Promotion of employees"	1	7	32	9	23	4	28
ISTAT (Italian National Institute of Statistics) Workshop for ISTAT personnel working in the risk area: "Works, Services and Supplies Procurement"	2	14	54	43	11	4	50
ISTAT (Italian National Institute of Statistics) Workshop for ISTAT personnel working in the risk area: "Permits and Acquisition"	1	7	44	12	32	3	41
MEF (Ministry of Economy and Finance) Workshop for MEF personnel working in the risk area: "Works, Services and Supplies Procurement"	1	5	15	10	5	0	15
MEF (Ministry of Economy and Finance) Workshop for MEF personnel working in the risk area: "Inspections"	1	9	30	19	11	18	12
TOTAL	22	262	755	93	82	29	146



ETHICS, CODES OF CONDUCT AND WHISTLEBLOWING

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Ethics, Codes of Conduct and Disciplinary Procedures for Civil Servants after Public Administration Reform	8	80	199	56	143	57	142
TOTAL	8	80	199	168	236	104	300

PUBLIC CONTRACTS

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Public Procurement Expert Degree	2	228	70	30	40	23	47
Selection Stages of Procurement Process: from Eligibility of Competitors to Tender Evaluation	2	36	53	25	28	3	50
Fighting Collusion in Public Procurement	1	6	12	8	4	0	12
Adoption of the Award Criterion and its Practical Application in Service and Supply Procurement	2	24	53	27	26	14	39
TOTAL	7	294	188	90	98	40	148

TOTAL AMOUNT CLASSROOM BASED COURSES

	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
TOTAL	82	1167	2549	997	1177	667	1507



2016

ANTI-CORRUPTION AND RISK MANAGEMENT

LEARNING CATALOGUE

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Tutoring and supporting the redaction of the Three Year Plan for the Prevention of Corruption	1	36	47	28	19	33	14
Advanced training program for Subjects Responsible for the Prevention of Corruption	9	216	207	116	91	97	110
Workshop for Independent Bodies for Assessment (OIV) and Internal Auditing	3	21	91	36	55	31	60
Workshops for training agents (training program for trainers)	4	72	75	20	55	22	53
Implementation of anti-corruption regulations in Public Administrations	10	120	293	109	184	81	212
Anti-corruption measures in government-owned, controlled and monitored subjects. ANAC guidelines application and sectorial regulations	3	15	44	18	26	8	36
Economics of corruption principles	1	6	27	13	14	11	16
Workshop for personnel working in the risk area: "Recruitment and promotion of employees"	9	45	145	49	96	29	116
Workshop for personnel working in the risk area: "Public Contracts"	11	55	411	184	227	115	296
Workshop for personnel working in the risk area: "Incompatibility, conflict of interests, pantouflage (art. 53 d. lgs. n. 165 del 2001)"	8	40	164	51	113	28	136
Workshop for personnel working in the risk area: "Legal affairs, litigation, and management of procurement procedures"	3	15	63	15	48	12	51
Workshop for personnel working in the risk area: "Preventing and combating corruption:"	6	30	133	50	83	20	113



focus on economical, ethical, managerial, organisational and liability issues (general frame)"							
Workshop for personnel working in the risk area: "Permits and Authorizations with or without direct and immediate economic effect for the beneficiary "	6	30	130	54	76	55	75
Workshop for personnel working in the risk area: "Recruitment and promotion of employees"	2	10	39	17	22	10	29
TOTAL	76	711	1869	760	1109	552	1317



TAILOR-MADE TRAINING PROGRAMS UNDER SPECIFIC AGREEMENTS							
TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIAL
AEEG (Regulatory Authority for Electricity Gas and Water) Implementation of anti-corruption regulations in Public Administrations	1	6	17		17		17
AGCM (Italian Antitrust Authority) Implementation of anti-corruption regulations in Public Administrations (basic course)	2	8	356		356		356
AGCM (Italian Antitrust Authority) Implementation of anti-corruption regulations in Public Administrations (advanced level)	1	3	50		50		50
AGENZIA DELLE DOGANE (Customs Agency) Risk Assessment	1	14	59	36	23	5	54
ANAC (Anti-Corruption National Authority) Training in prevention of corruption and transparency	6	294	273	119	154	20	253
ANAC-MINISTRY OF INTERIOR (PREFECTURES) Corruption prevention in procurements and management of companies into administration	4	84	108	39	69	47	61
Naples Municipality Recruitment and promotion of human resources	2	24	58	23	35		58
Naples Municipality "Financial Risk Area "	1	12	26	10	16	1	25
Naples Municipality "Risk area: relationship between citizen and companies"	2	24	56	33	23		56
Naples Municipality Ethics and behaviour	3	18	124	69	55		124



Naples Municipality Transparency after anti- corruption law 190/2012 and Madia Reform 124/2015	4	24	180	74	106	1	179
Naples Municipality Implementation of anti- corruption regulations (specific for executives)	1	12	27	14	13	27	0
Naples Municipality Implementation of anti- corruption regulations in Public Administrations (specific for Subjects Responsible for the Prevention of Corruption)	1	18	30	8	22	1	29
MEF (Ministry of Economy and Finances) General Training Course for Corruption Prevention	3	15	375	142	233	29	346
INPS (National Social Welfare Institution) Workshop for personnel working in the risk area: "Recruitment and promotion of employees"	1	4,5	157		157		157
INPS (National Social Welfare Institution) Workshop for personnel working in the risk area: "Works, Services and Supplies Procurement"	2	9	290	80	210	66	224
INPS (National Social Welfare Institution) Workshop for personnel working in the risk area: (Public Procurement)	1	4,5	166		166		166
TOTAL	36	574	2352	647	1705	197	2155



ETHICS, CODES OF CONDUCT AND WHISTLEBLOWING

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Ethics, Codes of Conduct and Disciplinary Procedures in contractualized public sector after anti-corruption law (L. 190/2012) and Madia law (L.124/2015)	8	80	169	77	92	43	126
TOTAL	8	80	169	77	92	43	126

PUBLIC CONTRACTS

LEARNING CATALOGUE

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Degree of expert in public procurement	3	276	148	69	79	36	112
Contracts in Public Administrations: administrative, economic and managerial issues	2	120	100	39	61	15	85
New legal discipline of procurement and grant contracts - Classroom programs	2		99	42	57	16	83
TOTAL	7	396	347	150	197	67	280

TAILOR-MADE TRAINING PROGRAMS UNDER SPECIFIC AGREEMENTS

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
MIT - (Ministry of Infrastructures and Transport) authority for Public Works for Lazio, Abruzzo and Sardinia - "Procurement and construction contracts" - L'Aquila edition.	1	8	51	32	19	2	49
TOTAL	1	8	51	32	19	2	49



PROGRAMS ON ETHICS AND CORRUPTION PREVENTION IN MANDATORY TRAINING COURSES

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
MIN INT - IV biennial training program of personnel in prefecture career	1	25	50	23	27		50
TOTAL	1	25	50	23	27	0	50

TOTAL COURSES DELIVERED IN CLASSROOMS

	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
TOTAL	129	1794	4838	1689	3149	861	3977



2017

ANTI -CORRUPTION AND RISK MANAGEMENT

LEARNING CATALOGUE

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Implementation of anti-corruption regulations in Public Administrations	6	72	213	101	112	49	164
Specialistic course for Subjects Responsible for the Prevention of Corruption (basic level)	4	96	116	64	52	45	71
Specialistic course for Subjects Responsible for the Prevention of Corruption (advanced level)	2	48	63	34	29	25	38
Workshop for Independent Bodies for Assessment (OIV) and Internal Auditing	5	35	137	64	73	41	96
Change Agents and training programs as preventing corruption tools	1	18	15	5	10	0	15
ANAC Inspective activity and its procedure. Inspector's Power and responsibility. Protection of inspected subjects	1	6	12	6	6	5	7
Tutoring and supporting the redaction of the Three Year Plan for the Prevention of Corruption	1	36	28	8	20	11	17
Transparency and new right to access (supplementary workshop SNA-ANAC to the training program: Tutoring and supporting the redaction of the Three Year Plan for the Prevention of Corruption)	1	3	20	9	11	5	15
TOTAL	21	314	604	291	313	181	423



TAILOR-MADE TRAINING PROGRAMS UNDER SPECIFIC AGREEMENTS

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
AGCM (Italian Antitrust Authority) Advanced program for AGCM staff in corruption preventing: risk management system	2	8	165	62	103	0	165
TOTAL	2	8	165	62	103	0	165

ETHICS, CODES OF CONDUCT AND WHISTLEBLOWING

TITLE	N° EDITIONS	TOTAL HOURS OF DIDACTICS	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIAL
Ethics, Codes of Conduct and Disciplinary Procedures in contractualized public sector	8	80	284	98	186	106	178
ANAC code of conduct and new Disciplinary Procedure after Madia Law n. 124/2015 and anti-corruption law n. 190/2012: power, responsibility and management of the procedure	3	18	256	111	145	0	256
Whistleblower	1	6	37	17	20	4	33
TOTAL	12	104	577	226	351	110	467



PUBLIC CONTRACTS

LEARNING CATALOGUE

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Management of Companies into Administration	1	18	19	10	9	18	1
New legal discipline for procurement and grant contracts	2	160	99	42	57	16	83
Degree of expert in public procurement	1	120	43	23	20	11	32
TOTAL	4	298	161	75	86	45	116
TAILOR-MADE TRAINING PROGRAMS UNDER SPECIFIC AGREEMENTS							
TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
MIT - (Ministry of Infrastructures and Transport) authority for Public Works for Lazio, Abruzzo and Sardinia - "Procurement and construction contracts" - Rome edition	1	8	80	47	33	4	76
AICS (Italian Agency for Cooperation and Development) Training Program on Public procurement and grant contracts	1	18	13	4	9		13
TOTAL	2	26	93	51	42	4	89



TRANSPARENCY AND F.O.I.A.

LEARNING CATALOGUE							
TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
General Access regulation (FOIA): required instruments for a correct implementation in Public Administrations	1	28	39	11	28	9	30
General Access regulation (FOIA): required basic instruments for a correct implementation from administrative departments	2	12	48	22	26	48	0
TOTAL	3	40	87	33	54	57	30



TAILOR-MADE TRAINING PROGRAMS UNDER SPECIFIC AGREEMENTS							
TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
MAECI (Ministry of Foreign Affairs and International Cooperation) Italian FOIA and administrative transparency: instruments for a correct application of general access	1	7	17	7	10	2	15
AICS (Italian Agency for Cooperation and Development) Transparency and anti-corruption	2	12	68	17	51	1	67
TOTAL	3	19	85	24	61	3	82



PROGRAMS ON ETHICS AND CORRUPTION PREVENTION IN MANDATORY TRAINING COURSES

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
MIN INT - V biennial training program of personnel in prefecture career	1	26,5	38	16	22		38
MIN INT - procurement of services and supplies	1	7	82	5	77	16	66
MIN INT - XXX training course for access to the title of Deputy Prefect	1	17	27	7	20	27	0
MIN INT - XXXI training course for access to the title of Deputy Prefect	1	33	33	13	20	33	0
MEF - Training program for 179 recruit officials	1	90	169	63	106	0	169
MEF - Training program for 40 recruit officials	1	24	37	10	27	0	37
Training program for 34 recruits official at Corte dei Conti (Court of Auditors)	1	12	32	8	24	0	32
26° cycle executive career	1	20	26	15	11	26	0
Training program for on trial Secretaries of Legation	1	8	36	24	12		
Professional Refresher Course for Secretaries of Legation	1	10	19	16	3		
"Corruption Prevention and transparency" - preposting for personnel leaving for abroad service	2	4	100				
TOTAL	12	251,5	599	177	322	102	342

TOTAL COURSES DELIVERED IN CLASSROOMS

	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
TOTAL	59	1061	2371	939	1332	502	1714



TOTAL COURSES IN E-LEARNING

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC	TOT PARTICIPANTS	MALE	FEMALE	EXECUTIVES	OFFICIALS
Generalist program for public employees (e-learning)	1	6	4488				
Generalist program for public executives (e-learning)	1	6	291				
Specialist program for officials and Subjects Responsible for the Prevention of Corruption (e-learning)	1	21	172				
TOTAL	3	33	4951	0	0	0	0



2018

ANTI-CORRUPTION AND RISK MANAGEMENT

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC
Redaction of the Three Year Plan for the Prevention of Corruption	3	126
Corruption Prevention in Public Administrations	8	96
Integrative workshops to the course: Corruption Prevention in Public Administrations	20	120
Functions of Subjects Responsible for the Prevention of Corruption - basic course	9	216
Functions of Subjects Responsible for the Prevention of Corruption - advanced course	7	168
Planning and implementation of training programs as prevention measure	6	72
Funcions and role of OIV (Independent Bodies for Assessment)	4	48
TOTAL	57	846

ETHICS, CODES OF CONDUCT AND WHISTLEBLOWING

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC
Whistleblowing	4	24
Ethics, Codes of Conduct and Disciplinary Procedures in public sector	8	80
TOTAL	12	104

PUBLIC CONTRACTS

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC
Degree of expert in public procurement	3	360
New Procurement Code	3	108
Service and Supply Procurement in First Aid and Acceptance Posts for foreigners (CPSA)	1	32
Economic Analysis of Public Contracts	2	24
Management of Companies into Administration	2	36
TOTAL	11	560



TRANSPARENCY AND F.O.I.A.

TITLE	N° EDITIONS	TOTAL HOURS DIDACTIC
General Access regulation (FOIA): required instruments for a correct implementation	3	75
Italian FOIA and administrative transparency: instruments for a correct application of general access	4	24
Management of FOIA issues and Access Register: technical and operational issues	3	18
TOTAL	10	117

TOTAL COURSES DELIVERED IN CLASSROOMS

	N° EDITIONS	TOTAL HOURS DIDACTIC
TOTAL	90	1627