



# Introduction to Assessment of Anti- Corruption Initiatives



**Anti-Corruption &  
Civil Rights Commission**

**Introduction to Assessment of Anti-Corruption Initiatives**

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## *Chapter 1: What is AAI?*

The purpose of this technical guide is to give an overview of the *Assessment of Anti-corruption Initiatives (AAI)*—one of the major anti-corruption measures undertaken by the Anti-Corruption and Civil Rights Commission (ACRC) of Korea.

Since 2002, ACRC (formerly KICAC) has conducted the AAI pursuant to the Act on Anti-Corruption and the Establishment and Operation of the Anti-Corruption & Civil Rights Commission and the Enforcement Decree of this Act.

This guide is intended as a general reference for policy-makers and practitioners who are interested in incorporating the AAI in their public governance system. Therefore, the evaluation metrics and procedures for evaluation need to be tailored to specific situations of each country by considering a range of factors such as the current level of corruption and anti-corruption system. Even after the establishment of the system, the assessment framework should be revised in time to reflect the change of environment. The second part of this guide contains the assessment metrics of the AAI that is currently conducted by the ACRC.

### **1. Objectives**

The AAI represents a comprehensive yearly review of anti-corruption measures pursued by public-sector organizations. It is designed to determine if they have put in place effective systems and mechanisms to prevent and deter corruption and examine how they implement anti-corruption measures in accordance with the objectives of the government's anti-corruption policy. The fundamental goal of the AAI is to prompt each organization to make greater efforts to counter corruption and disseminate best practices.

## **2. Scope**

In principle, the AAI targets all public organizations including central government agencies, local government agencies and public service organizations. However, the agency in charge of the AAI should consider its capacity and budget to determine the scope of target organizations. In addition, target organizations should be selected based on a comprehensive review of their size and significance and relevant laws.

## **3. Procedures**

The assessment of anti-corruption initiatives can be carried out in the following order:

- (1) At the beginning of the year, the anti-corruption body (ACRC) establishes basic guidelines on anti-corruption initiatives of the year and communicates the guidelines to public organizations at each level.
- (2) Based on these guidelines, public organizations set up their own anti-corruption master plans and submit them to the anti-corruption body (ACRC). They pursue various anti-corruption initiatives in accordance with these master plans.
- (3) The anti-corruption body (ACRC) devises an action plan for assessing anti-corruption initiatives of public organizations based on the anti-corruption guidelines set up at the beginning of the year. Before finalizing the action plan, it is necessary to reflect the opinions of public organizations to be assessed as well as of experts in the planning process to enhance the reliability and validity. The action plan must contain target organizations, assessment period, assessment areas and detailed assessment indicators.

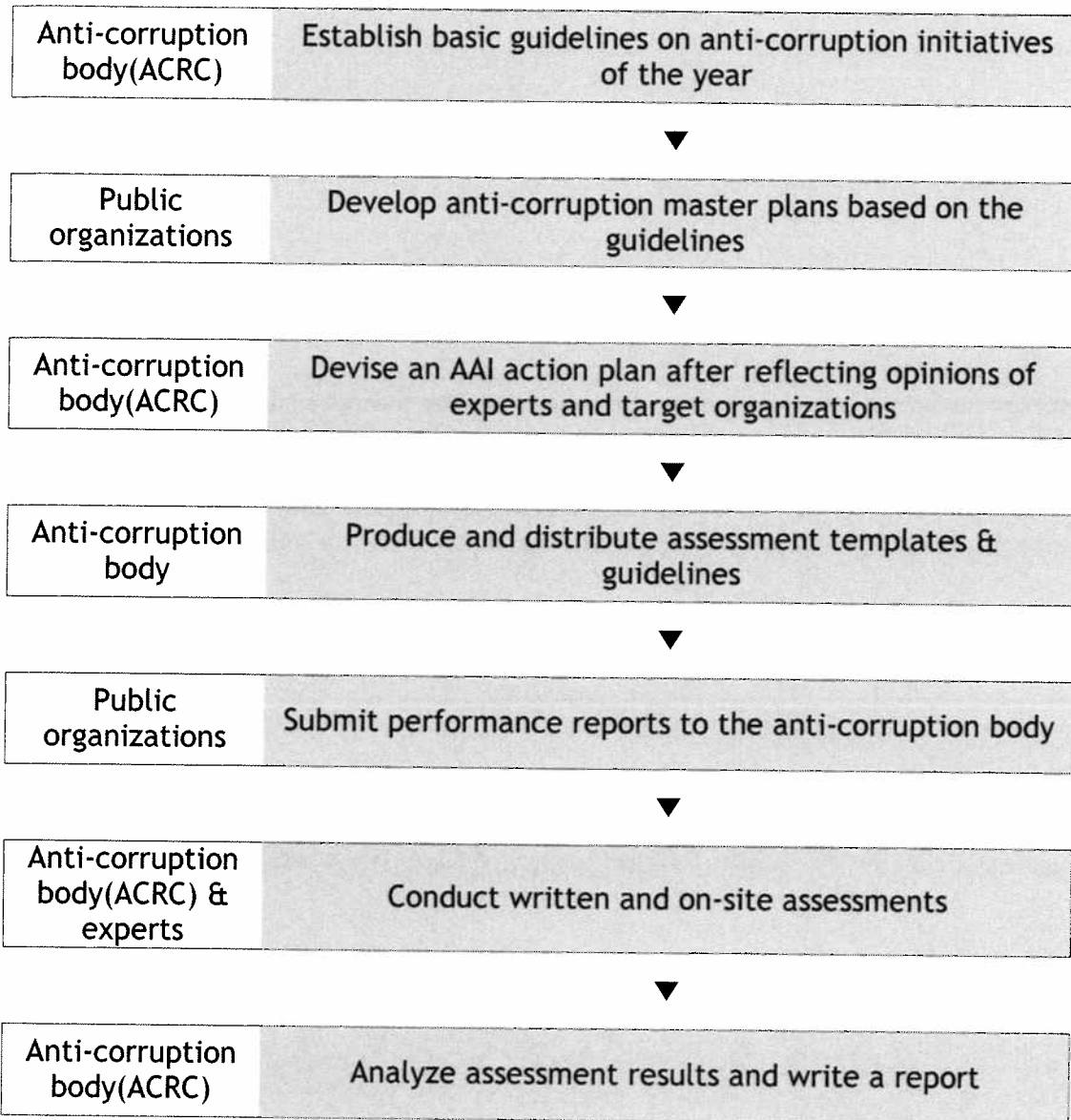
(4) Based on the action plan, the anti-corruption body (ACRC) produces an assessment toolkit to be distributed to each organization. This toolkit includes templates for performance reports and guidelines on preparing the reports. The anti-corruption body is required to send the toolkit to target organizations and induce them to implement anti-corruption initiatives by referring to this toolkit.

(5) Using the templates included in the toolkit, target organizations submit their anti-corruption performance reports to the anti-corruption body at the end of the year.

(6) The anti-corruption body organizes a task force dedicated to performing the assessment. This task force should not only consist of members of the anti-corruption body but also outside experts. This assessment task force carries out written assessments based on the performance data submitted by the target organizations. Additional on-site assessments can be conducted to complement written assessments.

(7) After the assessment of each target organization is completed, the anti-corruption body analyzes assessment results and prepares a report. This report is sent to each of the target organizations so that they can be used as a reference. The anti-corruption body may give incentives to organizations which obtain high scores in the assessment.

## Procedures for AAI



## *Chapter 2: What are the Contents of AAI?*

### **1. Initiatives to be assessed**

The initiatives subject to evaluation can be divided into two categories: “common initiatives” and “voluntary initiatives.”

“Common initiatives” are basic measures to prevent and control corruption which must be carried out by all public organizations.

“Voluntary initiatives” refer to those which are devised and pursued by each organization in order to promote integrity within their own organizations.

In the case of “common initiatives,” quantitative assessments can be performed on whether the target organization is equipped with anti-corruption systems and how these systems are operated. For “voluntary initiatives,” qualitative assessments can be conducted on their relevance to integrity enhancement, creativeness, and possibility of dissemination.

The tables below show the factors, criteria, and weights for each of the eight initiatives.

<b>Classification</b>	<b>Target Tasks for 2010 (Details)</b>	<b>Weight (%)</b>
Assessment of Common Initiatives	Establishment and administration of anti-corruption infrastructure (Building implementation system, private-public cooperation, etc.)	8
	Leader’s commitment (Awareness of staff, leader’s initiative, etc.)	5



	Comprehensive measures for institutional improvement (Implementation of recommended tasks, searching for new tasks, etc.)	12
	Management of corruption impact assessment (Improvement recommendation acceptance rate, establishment of voluntary assessment system, etc.)	8
	Implementation of code of conduct and report of violations (Environment for implementing codes of conduct and will to implement, etc.)	10
	Anti-corruption education and PR (Implementation level of integrity education, PR effort, etc.)	7
Assessment of Voluntary Initiatives (Best Practices of anti-corruption initiatives)		20
Achievement of Anti-corruption Activities (comprehensive integrity by organization), Effectiveness of Initiatives		30

## 2. Common initiatives

Common initiatives may include the following which form an integral part of any anti-corruption frameworks.

<b><u>Examples of “common initiatives”</u></b>
<ul style="list-style-type: none"> <li>▪ Establishment and operation of anti-corruption infrastructure</li> <li>▪ Leader’s commitment</li> <li>▪ Comprehensive measures for institutional improvement</li> <li>▪ Management of corruption impact assessment</li> <li>▪ Implementation of codes of conduct and report of violations</li> <li>▪ Anti-corruption education and PR</li> </ul>

The tables below show the factors, criteria, and weights for the samples of common initiatives.

**(1) Establishment and operation of anti-corruption infrastructure**

Category	Factor	Criteria	Sub-weight	Weight
Construction of implementation system	Substantiality of organizations' own plan	<ul style="list-style-type: none"> <li>▪ Completeness of plan</li> <li>▪ Validity of plan</li> </ul>	25	45
	Substantiality of organizations' own plan	<ul style="list-style-type: none"> <li>▪ Operation of organizations' own implementation system</li> <li>▪ Effectiveness of organizations' own implementation system</li> </ul>	20	
Vitalization of private-public cooperation	Establishment and operation of private-public cooperation system	<ul style="list-style-type: none"> <li>▪ Formation and operation of joint cooperation system</li> <li>▪ Joint cooperation activities</li> <li>▪ Achievement of anti-corruption private-public cooperation</li> </ul>	15	35
	Introduction and operation of integrity ombudsman system	<ul style="list-style-type: none"> <li>▪ Introduction of integrity ombudsman system</li> <li>▪ Achievement in integrity ombudsman operation</li> </ul>	20	
Spread of best practices	Achievement in the spread and dissemination of best practices	<ul style="list-style-type: none"> <li>▪ Achievement in the spread and dissemination of best practices</li> </ul>	10	10
Level of anti-corruption cooperation	Deadline met	<ul style="list-style-type: none"> <li>▪ Deadline for data submission met or not met</li> </ul>	5	10
	Introduction and participation in anti-corruption programs	<ul style="list-style-type: none"> <li>▪ Level of participation in anti-corruption policies pursued by the ACRC</li> </ul>	5	
Total				100

## (2) Leader's commitment

Category	Factor	Criteria	Sub-weight	Weight
Survey results on leader's commitment	Perception of members	<ul style="list-style-type: none"> <li>▪ Overall efforts</li> <li>▪ Integrity base built and motivation</li> <li>▪ Improvement of institution and system</li> <li>▪ Leader's example</li> </ul>	20	20
Achievement evaluation	Leader's interest	<ul style="list-style-type: none"> <li>▪ Leader's anti-corruption will shown internally</li> <li>▪ Leader's anti-corruption will shown externally</li> </ul>	20	80
		<ul style="list-style-type: none"> <li>▪ Establishment of incentives for anti-corruption achievements</li> </ul>	20	
	Leader's participation	<ul style="list-style-type: none"> <li>▪ More disclosure of business promotion expenses</li> <li>▪ Cases of leader's example</li> </ul>	20	
	Adequacy in punishment	<ul style="list-style-type: none"> <li>▪ Operation of a system to restrict employment of those who were dismissed for corruption</li> <li>▪ Compilation of data related to corruption in public service</li> </ul>	20	
Total				100

### (3) Comprehensive measures for institutional improvement

Category	Factor	Criteria	Sub-weight	Weight
Implementation of tasks recommended	Implementation rate of plans	<ul style="list-style-type: none"> <li>▪ Plans implemented</li> </ul>	35	50
	Establishment efforts and effect of institutional improvement	<ul style="list-style-type: none"> <li>▪ Follow-up measures after improvement recommendations</li> <li>▪ Effect of improvement tasks</li> </ul>	15	
Operation of voluntary institutional improvement system	Improvement of corruption-causing factors	<ul style="list-style-type: none"> <li>▪ Finding new tasks</li> </ul>	15	50
		<ul style="list-style-type: none"> <li>▪ Implementation rate of voluntary plans</li> </ul>	12	
		<ul style="list-style-type: none"> <li>▪ Result of effectiveness evaluation of institutional improvement tasks</li> </ul>	3	
	Institutional improvement in case of corruption	<ul style="list-style-type: none"> <li>▪ Measures against corruption occurring</li> <li>▪ Establishment of mandatory institutional improvement measures</li> <li>▪ Improvement plan complied or not</li> <li>▪ Adequacy of improvement plan</li> </ul>	15	
		<ul style="list-style-type: none"> <li>▪ Implementation result of improvement plans submitted</li> </ul>	5	
Total				100

#### (4) Management of corruption impact assessment

Category	Factor	Criteria	Sub-weight	Weight
Corruption impact assessment	Period for assessment request complied	<ul style="list-style-type: none"> <li>▪ Submission period for assessment request complied or not</li> </ul>	30	30
	Acceptance rate of improvement recommendations	<ul style="list-style-type: none"> <li>▪ Acceptance rate of improvement recommendations</li> </ul>	50	50
	Result of administrative rule implementation and management	<ul style="list-style-type: none"> <li>▪ Implementation rate of administrative rule improvement tasks</li> </ul>	20	20
	Level of cooperation by organizations	<ul style="list-style-type: none"> <li>▪ Submission, etc of self-evaluation</li> </ul>		Addition/subtraction of points
Total				100

#### (5) Implementation of code of conduct and report of violations

Category	Factor	Criteria	Sub-weight	Weight
Implementation environment	Vitalization of reporting	<ul style="list-style-type: none"> <li>▪ Operation of window for reporting in the website of organizations</li> <li>▪ Easy access to cyber centers</li> <li>▪ Offer of incentives to informants</li> </ul>	10	40
	System operation	<ul style="list-style-type: none"> <li>▪ Operation of example system</li> </ul>	20	

		<ul style="list-style-type: none"> <li>▪ Deliberation on codes of conduct establishment and amendment</li> </ul>	10	
Achievement	Consultation achievement	<ul style="list-style-type: none"> <li>▪ No. of consulting sessions for codes of conduct</li> </ul>	5	50
	Gratuities returned	<ul style="list-style-type: none"> <li>▪ No. of cases where gratuities returned</li> </ul>	20	
	Self-detection rate of offenses	<ul style="list-style-type: none"> <li>▪ Self-detection rate of offenses</li> </ul>	25	
Will to implement	Implementation of clauses of codes of conduct recommended	<ul style="list-style-type: none"> <li>▪ No. of education sessions for codes of conduct</li> <li>▪ No. of guidance and checkup for codes of conduct implementation</li> </ul>	10	10
Total				100

### (6) Anti-corruption education and PR

Category	Factor	Criteria	Sub-weight	Weight
Anti-corruption education	Hours of education completed	<ul style="list-style-type: none"> <li>▪ Hours of education completed per employee</li> </ul>	25	80
		<ul style="list-style-type: none"> <li>▪ Hours of education completed for every senior officials from directors and above</li> </ul>	40	
	Integrity education best practices	<ul style="list-style-type: none"> <li>▪ Identification and spread of best practices in integrity education</li> </ul>	2	
		<ul style="list-style-type: none"> <li>▪ Excellence in integrity education best practices</li> </ul>	13	

Anti-corruption PR	Development and utilization of education PR contents	<ul style="list-style-type: none"> <li>▪ Achievement in development and utilization of press releases</li> <li>▪ Achievement in development and utilization of education material</li> </ul>	20	20
Total				100

### 3. Voluntary initiatives

In addition to common initiatives, one can evaluate self-driven efforts made by each public organization to reduce corruption and increase transparency. Voluntary initiatives are evaluated by an assessment task force consisting of experts. Each member of the task force gives grades to individual initiatives in accordance with the assessment index, and the final grades are calculated by averaging the total grades given by each member. The following assessment index can serve as a reference.

#### Examples of assessment index for “voluntary initiatives”

	Highly positive (5)	Moderately positive (4)	Average (3)	Moderately negative (2)	Highly negative (1)	Weight
Submit or not?						30
This task is closely related to corruption of public officials.						20
The plan for this task is specific and clear.						10
This task is original and it is hard to find a similar one in other public organizations.						10

The implementation of this task will decrease corruption.						20
It is worthwhile to spread the idea of this task to other public agencies.						10

### *Chapter 3: Conclusion*

#### **1. Follow-up measures**

The results of the assessment and recommendations for improvement should be notified to each assessed public organization so that they can identify the problems and weaknesses in their current anti-corruption measures and devise solutions, thereby reinforcing their anti-corruption systems and capacities. The anti-corruption agency will be able to incorporate the assessment results in the development of future policies.

It is advisable to publicize the results of the assessment using diverse media such as press releases, publications, websites, and presentations, and distribute information on best practices identified as a result of the assessment so that they can be used as benchmarks across the public sector. Anti-corruption agencies can consider awarding best performers incentives such as prizes.

#### **2. Recommendations**

(1) The involvement of anti-corruption experts is essential to secure objectivity and reliability of the assessment. Particularly, in assessing qualitative items that entail



assessor's subjective opinion, it is required that a number of private experts participate in the assessment process.

(2) The anti-corruption body needs to finalize the assessment plan after gathering opinions of target organizations and experts on the draft plan.

(3) It is necessary to thoroughly check anti-corruption performances submitted by the target organization. It is because they might make a false and inaccurate report on their performance. Therefore, the anti-corruption body may have to make an on-site visit to closely examine whether anti-corruption performance reports of target organizations are fairly and accurately written.

## *Annex, Anti-corruption Initiatives Assessment for 2009*

### **1. Overview**

In its 2009 Assessment of Anti-Corruption Initiatives, the ACRC enhanced the utility of the Assessment to implement anti-corruption policies in the right direction, and focused on voluntary anti-corruption capacity building and effective improvement efforts by linking anti-corruption efforts and performance evaluation. First, the ACRC made basic municipalities (local governments) and organizations related to public service that had low integrity scores the target of Integrity Assessment, directly managing their anti-corruption initiatives. The ACRC linked policy transparency diagnosis efforts and BPR (business process re-engineering) with Integrity Assessment so that organizations themselves take the lead in developing and improving anti-corruption initiatives.

To make the Assessment more complete and feedback of the results more specific, the ACRC subdivided assessment results as follows. The ACRC induced anti-corruption initiative competition among organizations by further dividing assessment results from 3 categories (impressive, average and unsatisfactory) into 5 categories (highly impressive, impressive, average, unsatisfactory and highly

unsatisfactory). In addition, the ACRC identified strengths & weaknesses of each organization, pointed out corruption-prone areas and presented improvement directions. The ACRC identified best practices in anti-corruption policies and provided analysis reports of the best practices to both high performers and under performers so that they could utilize the reports in their assessment of initiatives next year.

## **2. Assessment process**

An evaluation team was formed to evaluate major anti-corruption initiatives carried out by the ACRC. For evaluation areas needing qualitative analysis such as implementation plan, anti-corruption best practices, voluntary initiative tasks, the ACRC had external professional companies carry out the job. The ACRC evaluation team collected the opinion of target organizations to set up basic assessment plan, and carried out assessment on major anti-corruption policies by receiving performance data of target organizations. The ACRC tried to boost objectivity of the evaluation by, if necessary, carrying out on-site inspections.

## **3. Assessment contents**

To encourage practical and voluntary anti-corruption efforts by organizations at all levels, the ACRC subdivided the evaluation system into common initiatives, voluntary initiatives and anti-corruption results in 2009.

In Common Initiative Assessment, anti-corruption infrastructure construction, efforts by organization head (leader), comprehensive measures for institutional improvement, anti-corruption education and promotion, corruption impact assessment operation, and codes of conduct implementation were comprehensively evaluated based on the analysis of corruption-prone factors such as work and corruption characteristics of organizations.

Assessment contents in detail are as follows:

① in anti-corruption infrastructure construction and operation, process mechanism building, private-public cooperation vitalization, and efforts to introduce and spread anti-corruption best practices are evaluated;

② in efforts by organization head, survey and anti-corruption achievement by organization head are added, together with the weight at the ratio of 2 to 8 assigned respectively and then evaluated;

③ in comprehensive measures for institutional improvement, implementation performance and effectiveness of recommended tasks, operation of voluntary institutional improvement system, and anti-corruption best practices are evaluated;

④ in anti-corruption education and promotion, the degree of anti-corruption education completion, completion results by rank, opening of education courses, and PR efforts are evaluated;

⑤ in corruption impact assessment, organizations' level of cooperation with corruption impact assessment and acceptance rate of recommendations issued by competent organizations are evaluated;

⑥ in codes of conduct implementation and vitalization of reporting, effectiveness of system introduction and implementation system, implementation achievement and will to carry codes of conduct are evaluated.

#### **4. Assessment result**

In line with the spread of pan-government anti-corruption measures and government's intent to carry out various projects early, the ACRC focused its capacity

on voluntary anti-corruption capacity building by organizations themselves in 2009 Assessment of Anti-Corruption Initiatives. As a result, it turned out that organizations made more efforts for developing and implementing voluntary and sustainable anti-corruption initiatives that can be improved. One hundred four target organizations developed and implemented their own anti-corruption policy plans. Twenty organizations that became target organizations for the first time made a lot of efforts for anti-corruption initiatives.

However, a large number of organizations carried out anti-corruption activities in the form of unilateral education without voluntary participation by employees, one-off campaign, rather than making efforts to improve bad structure, system and culture in public service. The biggest problem was that organizations conducted anti-corruption activities passively and repeatedly without specific analysis and introspection of anti-corruption results. This is a problem for organization heads to solve so that their organization can participate in anti-corruption activities in a sustainable and active manner in the future.

It was difficult to accurately measure results because efforts of organizations were indicated by input rather than output. Materials and data to verify results were not sufficient. Therefore, there is a need to come up with indices to point out the degree to which strategic tasks are implemented for 2010 Assessment of Anti-Corruption Initiatives.

Lastly, what is needed in the future is an effective validity analysis taking into account characteristics of organizations' work and changes in policy environment and an efficient review mechanism to set up and implement rigorous anti-corruption initiatives.

In terms of organization type, 9 organizations related to public service were rated as "highly impressive," garnering the largest points in comprehensive evaluation. However, no central government organizations such as ministries, agencies and commissions were given "highly impressive" mark.

The number of metropolitan city governments that were given “highly unsatisfactory” increased from 2 in 2008 to 8 in 2009, showing a deteriorating trend compared with 2008. This is due in large part to a drop in integrity score caused by differences in participation by organizations in voluntary initiative task such as Anti-Corruption Benchmarking and Policy Transparency and increased reflection of Integrity Achievement from 20% to 30%.

While central government organizations did well on Corruption Impact Assessment in relative terms, they were rated as “unsatisfactory” in most evaluation items such as anti-corruption infrastructure and efforts by organization heads, which means they need to make improvement efforts in overall evaluation items.

“Administration” level organizations did well on efforts by organization head, and anti-corruption education and promotion but did not do well on institutional improvement and voluntary initiatives. Metropolitan city governments did very poorly in most areas except for efforts by organization head and anti-corruption infrastructure construction and operation, meaning they have a lot to improve.

City and provincial education offices did well on overall areas and particularly well on anti-corruption infrastructure construction and operation, and comprehensive measures for institutional improvement. Organizations related to public service did very well on all areas, and 11 out of 13 received excellent scores in comprehensive measures for institutional improvement.

Result analysis of Assessment of Anti-Corruption Initiatives for the last 4 years shows that organizations with excellent results keep doing well and ones with bad results keep producing unsatisfactory results. Therefore, organization should stop passive anti-corruption activities that they kept repeating if they do not look back on and analyze assessment results in detail.

## **5. Utilization of assessment results and way forward**

Based on assessment results, the ACRC gives awards to individuals for their efforts in each area including anti-corruption infrastructure construction and operation, comprehensive measures for institutional improvement, corruption impact

assessment operation, codes of conduct implementation and vitalization of reporting and voluntary initiative tasks. The ACRC also offers awards and rewards for organizations with excellent results and their employees.

The ACRC notifies target organizations of comprehensive results and evaluation results by target tasks and analysis report of organizations with excellent performance. By doing so, the ACRC encourages organization to make voluntary improvement efforts in areas with low scores, and benchmarks best practices to make future initiative assessments understood better.

Since assessment results are determined mainly by voluntary initiatives and integrity achievements, the ACRC plans to boost the accuracy of the assessment on common initiatives by fine-tuning indices. As for voluntary initiatives, the ACRC will reinforce the assessment manual and consulting to encourage participation by more organizations.

In 2010, the ACRC plans to increase its efforts for anti-corruption initiatives, (incorporating local governments with low integrity scores) and to strengthen achievement evaluation by reflecting the degree of integrity improvement by organization in the evaluation.