

1. **Awareness-raising policies and practices, with special reference to articles 5, 7, 12 and 13 of the Convention**
  2. **The public sector and prevention of corruption: codes of conduct (article 8 of the Convention) and public reporting (article 10 of the Convention)**
- 

## UNCAC Article 5 – Preventive anti-corruption policies and practices

### Good practice reported by Slovenia:

- New website of the Commission for the Prevention of Corruption of the Republic of Slovenia (hereinafter the Commission, abbrev. KPK)
- the Commission's newsletter KPK vestnik (KPK Journal)
- Publishing texts on corruption and integrity on Slovenian Wikipedia site
- Code of conduct for employees and co-workers of the Commission for the Prevention of corruption of the Republic of Slovenia

Websites of competent authorities, including anti-corruption agencies and relevant ministries, have become an important component of awareness-raising activities, designed to reach the widest possible audience. That is the reason why the Commission decided to put much effort into its new user-friendly website ([www.kpk-rs.si](http://www.kpk-rs.si)), which was launched in June 2011. The important characteristics of the new website are informative texts which help the reader to familiarize himself with the anti-corruption topics and the fact that the website has been regularly updated and improved in order to reflect the ongoing activities of the Commission in the fight against corruption.

Moreover, in April 2011 the Commission started publishing monthly newsletter KPK vestnik (KPK Journal) on the relevant anti-corruption topics, activities and forthcoming events. The most important section of the KPK vestnik is a chapter each month dedicated to present different tool, mechanism etc. important in the field of corruption prevention (like integrity plans, incompatibility of office, conflict of interest etc.) promoted either by the Slovenian Integrity and Prevention of Corruption Act or other sources. The newsletter is distributed to all general secretariats of the public sector, NGOs and the media as well as individuals who requested it (available at <http://www.kpk-rs.si/sl/komisija/medijsko-sredisce/ahiv-newsletter>).

To reach the widest possible audience, the Commission prepared and uploaded general information on corruption (definitions, consequences) and integrity on the Slovenian site of Wikipedia (<http://sl.wikipedia.org/wiki/Korupcija>) (<http://sl.wikipedia.org/wiki/Integriteta>) as well as a text on the Commission's responsibilities, competences, field of work in English on the English site of Wikipedia.

The Commission's Code of conduct represents a different approach to promotion of ethics and integrity as well as accountability of the officials and the public servants employed by the Commission – it is written in an educative way presenting the Commission staff's commitment to

follow three main goals while performing their duties: personal integrity and integrity of the Commission, accountability for their work that should not be affected by conflict of interest or pressures imposed by the superiors or others while on the other hand the integrity of the individual and of the Commission should not be endangered by unlawful instruction to perform duties. The third goal is to achieve the highest possible level of staff's initiative. An important characteristic of the document are control questions which allow everybody to self-asses their level of acting accordingly with the code. The Code of conduct shall be adopted and signed by every member of the staff to show his or hers obligation to act accordingly and promote it and shall be posted in a form of a poster in the Commission's lobby available to everyone who enters the Commission's premises – media, people reporting corruption, other public officials. Code will also be available on Commission's website.

### **UNCAC Article 7 – Prevention of corruption in the public sector**

The focus of Article 7 (Public sector) is on the human resources management system of the civil service and the underlying principles of efficiency, transparency and integrity. This includes ensuring the prevalence of objective criteria for the recruitment of public officials, as well as continuous learning opportunities and adequate and equitable remuneration and conditions of employment for staff in the civil service.

#### **Good practice reported by Slovenia:**

- Integrity plans
- The Commission's open days and hotline for employees, responsible for drawing up integrity plans within their organizations
- Publishing brochures
- Online submission of report about violation of the Integrity and Prevention of Corruption Act (such are reports about acts of corruption, unethical or other unlawful behaviour, incompatibility of office, conflict of interest etc.)
- Handbook "Guidelines for officials (and high-ranking civil servants)"

According to the Slovenian Integrity and Prevention of Corruption Act (Article 47 to 50) government bodies, local authorities, public agencies, public institutes, commercial public institutions and public funds are obliged to develop and adopt integrity plans.

Integrity plan is a tool for establishing and verifying the integrity of the organization. It is a documented process for assessing the level of vulnerability of an organisation, its exposure to unethical and corruption practices. Moreover, is devoted to:

- identifying relevant corruption risks in different working fields of an individual organization;
- assessment, what kind of danger the corruption risks may pose to an individual organization;
- determining measures to reduce or eliminate corruption risks.

The integrity plan consists, in particular, of: assessment of corruption exposure of the institution; personal names and work posts of the persons responsible for the integrity plan; a description of

organisational conditions, staff and typical work processes including a corruption risk exposure; assessment and proposed improvements regarding:

- the quality of regulations, management, administration, etc.;
- the integrity of staff and institution;
- transparency and efficiency of processes and
- measures for timely detection, prevention and elimination of corruption risks.

All institutions are obliged by the law to send their integrity plans to the Commission - after analysing and processing all the integrity plans, the Commission will try to determine (on a national level) an exposure of different institutions, their organizational conditions, processes and employees to corruption and other illegal and unethical behaviour. The main goal is to strengthen integrity and anti-corruption culture in a public sector by identifying risks, planning and implementation of adequate measures. With putting in place an overall integrity plan system, causes of corruption will be eliminated, which will result in strengthening the rule of law and people's confidence in the institutions.

The Act sets an obligation to all the above mentioned to draw up integrity plans by June 5<sup>th</sup>, 2012 on the basis of guidelines produced by the Commission and submit them to the Commission. Through the integrity plan it will be possible to identify the level of exposure of an entity to corruption risks and risks of unethical and other unlawful behaviour. By identifying risks and risk factors it will be possible to assess the existing control mechanisms, evaluate their likelihood to occur and the level of damage they may cause and finally propose measures to minimize or suppress risks.

The Commission shall check whether entities have drawn up integrity plans and how they plan to implement them. A fine may be imposed on the responsible person of the body or the organisation obliged to draw up and adopt the integrity plan it fails to do so.

The Commission provides trainings for persons responsible for drawing up integrity plans within their institutions. This year's *"Open door day"* for public sector employees has proved to be very good and effective tool - not only to train but also to exchange information and problems among participants.

Publishing brochures on instruments enacted by the Integrity and Prevention of Corruption Act is also one of raising awareness activities of the Commission. Brochures on general information about lobbying and provisions of the Integrity and Prevention of Corruption Act regulating this activity. The brochures were provided to those who would most likely be approached by the lobbyists in order to familiarize themselves with the activity itself and their obligation under the Act (members of the National Assembly, the National Council and to the Office of the Prime Minister). Brochures on conflict of interest, integrity plans, incompatibility of office, prohibition of acceptance of gifts are being drawn up at the moment.

In order to encourage whistle-blowers to come forward an online application to submit a report about violation of the Integrity and Prevention of Corruption Act (such are reports about acts of corruption, unethical or other unlawful behaviour, incompatibility of office, conflict of interest etc.) has been installed on the Commission's website. At the same time, as the Commission's experience based on previous reports received show that often people are not familiar with instruments to fight corruption as set by the Act and with competences of the Commission like supervision of assets of officials, restrictions on business activities due to conflict of interest etc. which may be, if failed to

meet these obligations, reported to the Commission, the online application has been designed in a way to give a general information to the person submitting the report on the possible violations for handling of which the Commission is competent for.

Currently the Commission is preparing a handbook »Guidelines for officials« which will provide guidelines to newly appointed officials as which obligations under the Integrity and Prevention of Corruption Act should be met and which values should be promoted by an official in order to strengthen integrity and transparency, to prevent corruption and to avoid and eliminate conflicts of interest.

### **UNCAC Article 12 - Prevention of corruption in the private sector**

(important steps to recognize the role that the private sector can play in keeping corruption at bay and contributing to its elimination)

#### **Good practice reported by Slovenia:**

- Declaration of Fair Business

The declaration was prepared by the Anti-Corruption Task Force set up by the Slovenian association UN Global Compact Slovenia. The Task Force is comprised of representatives of interested companies, independent experts as well as representatives of the Commission and the Court of Audit of the Republic of Slovenia. The group was part of the Project Ethos and this declaration was its output. The declaration which was open to signatories in March 2011 will bind the signatories to transparent and fair business, to enclose the anti-corruption clause into all contracts exceeding EUR 10,000 and to mutually inform the signatories on potential violations of the declaration. Until now The representatives of the Commission provided the expert input into the content of the declaration.

### **UNCAC Article 13 - Participation of society in the prevention of corruption**

*Awareness-raising campaigns often involve the broadcasting of advertising material on television or radio, or the placement of campaign materials in print media or on wallboards and websites.*

#### **Good practice reported by Slovenia:**

- Contact email for NGOs [nvo@kpk-rs.si](mailto:nvo@kpk-rs.si) set up by the Commission
- Conference “Transparent and accountable practice of NGOs”
- Project “International Anti-Corruption Day” (Conference, Collection of scientific papers, Creative competition for primary schools)

The contact email has been set up to encourage NGOs to cooperate with the Commission by submitting their proposals, ideas and reports on corruption. It provides for another communication channel for the civil society which is often put aside by the state bodies.

A conference “Transparent and accountable practice of NGOs” was organized by Commission and the Centre for Information Service, Co-operation and Development of NGOs (CNVOS), a Slovenian NGO platform. Representatives of the Commission held presentations in three sections organised, Lobbying of NGOs, Transparent financing of NGOs and Integrity plans for NGOs. To further strengthen cooperation between the nongovernmental sector and the public sector representatives of state bodies were invited to participate in the audience in order to provide their input in the debates of each section.

A project »International Anti-Corruption Day” comprises different activities and events – conference with workshops, publishing a collection of scientific papers on integrity, ethics etc., creative competition for primary schools involving children expressing their views about equality, honesty, fairness, integrity in connection to a corruption phenomenon and creation of different materials – drawings, illustrations, statements etc. Selected materials (13 of them) will be exhibited at various locations in Slovenia, published in calendars and other publications of the Commission. All activities will be covered by the media.

### **UNCAC Article 8 – Codes of conduct for public officials**

(establishing measures and systems to facilitate the reporting by public officials of acts of corruption to appropriate authorities, establishing measures and systems requiring public officials to make declarations to appropriate authorities on their outside activities, investments, assets and substantial gifts or benefits...).

#### **Good practice reported by Slovenia:**

- online service “REPORT CORRUPTION” (protection of “whistleblowers” provided by the Integrity and Prevention of Corruption Act)
- online asset declaration system
- online system for reporting received gifts (for officials)

Anyone who believes that a particular practice within a state body, local community, public powers holder or other legal person of public and private law involves signs of corruption, may report it to the Commission or to other competent authority (the competent authority to accept reports of suspicion of the crime is the Office of the State Prosecutor, while the Commission is responsible for assessing the report suspicion of corruption (which does not constitute a criminal offense) and other violations of the Integrity and Prevention of Corruption Act.

To improve the quality of received reports – and also to make the procedure easier for users/reporting persons – the Commission prepared an online system for reporting corruption and other violations of Integrity and Prevention of Corruption Act. According to the Commission’s Action plan for Prevention of Corruption, an implementing document of the Resolution for the Prevention of Corruption of the Republic of Slovenia adopted by the National Assembly, the Commission’s aim is to put a direct link for reporting corruption on websites and internal sites of all public service bodies. The Commission is committed to protect identity of the whistleblower/reporting person, but only if the report given was in good faith.

### **UNCAC Article 10 – Transparency and public reporting**

*(Measures to enhance transparency in public administration)*

### **Good practice reported by Slovenia:**

- Project Transparency - Supervizor (an online application)

The Commission has designed a project called Transparency that is open to the public, the media, the profession and different supervisory bodies. At its initial phase the project provides three different services that will be later upgraded with new topics – Supervizor (an online application for monitoring expenses of public bodies), Contacts with lobbyists (a list of reported contacts with lobbyists) and Financial status of the Commission officials.

Supervizor - is an online service launched in August 2011 which enables the general public, the media, experts and government authorities an insight into expenditures (relating to goods and services) of all Slovenian public institutions. A public exposure of financial flows between the public and the private sector increases the responsibility of public office holders for the effective and efficient use of the public money, enables a reasoned discussion on the implemented measures and investments and, more importantly, also on the currently planned ones. Furthermore, it reduces the risks for mismanagement, abuse of authority and, in particular, it limits the systemic corruption, unfair competition and clientelism.

With the project Supervizor the Commission has opened a new paradigm of transparency of the state functioning and limiting of corruption risks ( <http://www.kpk-rs.si/sl/projekt-transparentnost>).