U4 Expert Answer







Corruption self-assessment tools for the public sector

Query

Please provide a list of corruption self-assessment tools for the public sector, including examples of countries where such tools have been applied

Purpose

South Africa is looking to develop a selfassessment tool to assess levels of corruption, sector-specific risks and incidence, trust and progress. We are looking for a list of selfassessment tools and examples of countries where such tools are being applied.

Content

- 1. Overview
- 2. Generic assessment frameworks
- Selected institutional and sectoral assessment tools
- 4. Selected country-specific tools
- 5. Further reading

Caveats

This expert answer does not claim to be comprehensive in its coverage of corruption self-assessment tools, neither does inclusion of specific tools imply any form of endorsement by Transparency International or U4.

Self-assessment is understood to imply that the process is owned and led by government or public sector agencies. We therefore do not include tools designed for implementation by third parties such as civil society, nor do we include private sector assessment tools. The review also does not cover what have been termed "personal integrity tools" which aim to assess the levels of personal integrity and ethics among public officials. For a discussion of such tools please see the related 'Overview of integrity assessment tools' (Martini 2012).

Summary

This expert answer provides an overview of self-assessment tools which have been designed for governments and/or development partners to analyse the extent and/or risks of corruption in the public sector. It covers generic assessment frameworks as well as institutional and sectoral assessments tools and provides examples from Albania, Australia, Hungary, Macedonia, Moldova, Montenegro, Netherlands, Philippines, Slovenia, South Africa and Vietnam.

Author(s): Andy McDevitt, Transparency International, tihelpdesk@transparency.org **Reviewed by:** Finn Heinrich, Transparency International, tihelpdesk@transparency.org

Date: 7 November 2016 **Number:** 2016:17

U4 is a resource centre for development practitioners who wish to effectively address corruption challenges in their work. Expert Answers are produced by the U4 Helpdesk – operated by Transparency International – as quick responses to operational and policy questions from U4 Partner Agency staff.

1 Overview

The review has identified two broad categories of public sector integrity self-assessment tools:

Generic assessment frameworks

These aim to assess the legal and institutional architecture for promoting integrity and combatting corruption across the public sector. Such approaches are useful to obtain a rather general holistic picture of the entire governance system in a country, but they do not offer an in-depth diagnosis of any specific institution. They can, however, point to those institutions where such an assessment might be needed. These approaches can be resource and time intensive as they generally require analysis across the different strands of public service.

Generic approaches rely largely on legalinstitutional analysis to assess the strength of the legal and/or institutional framework for combatting corruption, combined with primary data (key informant interviews or surveys of public officials) to evaluate how the public sector operates in practice and/or to validate the findings of the assessment.

Institutional and sectoral assessment tools

These aim to diagnose corruption and/or corruption risks within specific government agencies and sectors. The main benefit of this approach is that it offers a relatively quick and cost-effective way of identifying areas where corruption risks are greatest and prioritising corrective action. Because there are a number of existing "out-of-the-box" indicators and checklists which can be adapted and applied at the institutional level, they require less investment. The drawback is that they tend to cover a range of "standard" risks which may or may not be applicable to the specific context under review and thus often require adaptation.

Institutional and sectoral assessments often combine secondary data with the use of checklists and questionnaires, focus groups, surveys and/or key informant interviews to gather information from public officials and/or external experts on corruption risks and conflicts of interests.

Pros and cons of self-assessment

The main advantage of self-assessment, especially at the institutional level, is that it fosters ownership and minimises organisational resistance. Institutions can tailor the assessment methodology to their exact needs and gaining access to data is rarely a problem. Moreover familiarity with the specificities of organisational operations can produce results which are more relevant and actionable.

On the other hand, self-assessment may suffer from subjectivity and many institutions find it challenging to objectively identify corruption risks associated with their own operational procedures and practices. They may also be resistant to publishing findings that do not present their organisation in a positive light. There is thus the danger that organisational risks are not properly identified, or if they are, they are not objectively assessed. Self-assessment practices therefore tend to be successful only in organisations which are genuinely open to critical self-reflection and learning. Another challenge is that the institution conducting the self-assessment rarely possesses the technical knowledge to conduct the research.

To overcome such challenges, one option may be to conduct a joint assessment, combining internal and external expertise, such as consultants. While this approach requires good planning and sufficient resources, it can serve to strengthen the impartiality and legitimacy of the assessment while also diminishing organisational resistance and ensuring ownership of the results. Another option is to use a standard self-assessment framework which is supplied by an independent organisation, but applied internally.

Another possible approach is to combine self-assessment with survey tools, which use standard questionnaires among citizens to gather their perceptions and experiences of corruption in the public sector as a whole or within specific agencies. Surveys can identify the specific types, forms, frequency and costs of public sector corruption and important regional and interagency differences. Furthermore, surveys of users of government services can identify gaps in implementation that may not emerge from self-assessment.

2 Generic assessment frameworks

OECD. 2005. Public Sector Integrity – A Framework for Assessment

http://www.oecd.org/gov/ethics/publicsectorintegrit yaframeworkforassessment.htm

The OECD's Assessment Framework provides policy makers and managers with a roadmap to design and organise assessments in specific public organisations and sectors. It includes practical checklists, decision-making tools and options for methodologies based on good practices.

Based on this framework, a number of countries have undertaken public sector integrity reviews, most recently Italy and Tunisia.

World Bank. Ongoing. Public Accountability Mechanisms (PAM) Initiative

http://web.worldbank.org/WBSITE/EXTERNAL/TO PICS/EXTPUBLICSECTORANDGOVERNANCE/ 0,,contentMDK:23352107~pagePK:148956~piPK: 216618~theSitePK:286305,00.html

PAM provides assessments of countries' in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials. Several transparency and accountability mechanisms are studied: (a) financial disclosure (income, assets and interests); (b) conflict of interest restrictions; (c) freedom of information (openness, access, rights); and (d) immunity provisions. The data generated by the PAM initiative is useful to governments interested in establishing or modifying their own public accountability systems.

PAM reviews have been conducted in close to 90 countries worldwide.

Regional Anti-Corruption Initiative (RAI). 2014. Anti-Corruption Assessment of Laws

http://rai-see.org/wp-

content/uploads/2015/06/Comparative_Study-Methodology_on_Anti-

corruption_Assessment_of_Laws.pdf

Anti-corruption assessment of legislation is a review of the form and substance of drafted or enacted legal rules. It detects and minimises the risk of future corruption that the rules could facilitate. Part 3 of this report contains a detailed description of the assessment process, including: (a) the actual corruption proofing; (b) the

framework for implementing corruption proofing; (c) a description of generic regulatory corruption risks; and (d) an addendum on corrupted legislation.

3 Selected institutional and sectoral assessment tools

General

Regional Anti-Corruption Initiative (RAI). 2015. Corruption Risk Assessment in Public Institutions in South East Europe:
Comparative Research and Methodology
http://rai-see.org/wpcontent/uploads/2015/10/CRA_in_public_ins_in_S
EE-WEB final.pdf

This paper presents different options, integrated frameworks and practical advice to conduct tailored corruption risk assessment(s) for public sector agencies. It includes examples of corruption risk assessments conducted in south eastern Europe and beyond.

International Organization for Standardization. 2009. ISO 31000:2009 - Risk Management: Principles and Guidelines

http://www.iso.org/iso/home/standards/iso31000.htm

ISO 31000:2009 can be used by any organisation, including public sector organisations, regardless of size, activity or sector. Using ISO 31000 may help organisations increase the likelihood of achieving objectives, improve the identification of opportunities and threats, and effectively allocate and use resources for risk treatment.

Customs administration

World Customs Organization, 2012. Revised Integrity Development Guide

http://www.wcoomd.org/en/topics/integrity/~/media

/B89997B68D6A4E34AE9571979EADA39F.ashx
The Integrity Development Guide provides a
practical framework to examine the management,
administrative and integrity strategies currently in
place in customs administration and to identify
opportunities for further improvement. The guide
contains a detailed description of each element to
be assessed, a checklist to conduct a selfassessment exercise and examples of good
practice.

Education

UNDP. 2011. Fighting Corruption in the Education Sector – Methods, Tools and Good Practices

http://www.undp.org/content/dam/undp/library/Democratic%20Governance/IP/Anticorruption%20Methods%20and%20Tools%20in%20Education%20Lo%20Res.pdf

This publication presents a series of methods, tools and good practices to map corruption risks, develop strategies and sustain partnerships to address challenges and tackle corruption in the education sector.

Asian Development Bank. 2010. Education Risk Assessment Guidance Note

https://www.adb.org/documents/guidance-note-education-sector-risk-assessment

This guidance note is part of a series of notes for priority sectors and sub-sectors of the Asian Development Bank (ADB). It offers a framework for mapping governance risks to inform the preparation of country partnership strategies. The framework covers: (a) institutional aspects (policy, legal framework and regulation); (b) organisational aspects (planning, financial management, procurement and human resources); and (c) sector operations.

Health

UNDP. 2010. Fighting Corruption in the Health Sector – Methods, Tools and Good Practices http://www.undp.org/content/dam/undp/library/De mocratic%20Governance/IP/Anticorruption%20Me thods%20and%20Tools%20in%20Health%20Lo% 20Res%20final.pdf

This publication presents a series of methods, tools and good practices to map corruption risks, develop strategies and sustain partnerships to address challenges and tackle corruption in the health sector.

Infrastructure

Global Infrastructure Anti-Corruption Centre. 2013. *Anti-Corruption Scorecard for Public Sector Construction Projects*

http://www.giaccentre.org/scorecard.php
The Anti-Corruption Scorecard is designed to
provide an assessment of anti-corruption
governance in relation to public sector

construction projects in a particular country or in relation to a particular project owner. The scorecard measures a number of factors including perceptions of the extent to which corruption takes place in public sector construction projects, and the extent to which effective systems are implemented by government, public sector project owners and the private sector to help prevent such corruption.

New South Wales Independent Commission Against Corruption (ICAC). 2010. Development Assessment Internal Audit Tool

https://www.icac.nsw.gov.au/documents/preventin g-corruption/cp-publications-guidelines/3494development-assessment-internal-audit-tool-april-2010/file

This tool is designed to assist local councils in managing their exposure to corruption risks in development assessment and approval processes. It is not intended to provide a comprehensive analysis of organisational risks involved in this operational area. The tool focuses on procedural controls and does not incorporate broader issues, including those related to organisational culture.

Law enforcement

U4. 2015. Corruption Risks in the Criminal Justice Chain and Tools for Assessment

http://www.u4.no/publications/corruption-risks-in-the-criminal-justice-chain-and-tools-for-assessment/

This U4 issue paper provides an overview of where corruption is most likely to arise in the investigation, prosecution, trial, and incarceration stages of the criminal justice process. For each stage, it includes the tools available to assess corruption risks, and, where sufficient experience exists, an evaluation of the usefulness of these assessment tools. Tools applicable to the investigation phase include tools to assess citizens' experiences with police corruption, tools to assess police officers' attitudes toward misconduct, and tools to evaluate operations and integrity of the entire police service. Tools for the prosecution phase include a small number of cross-country assessments, including evaluations by the Council of Europe and the Organization of American States. Assessment tools for measuring corruption risks during a criminal trial and appeal include the UNODC's Criminal Justice Assessment Toolkit and country-level assessments of judicial integrity and capacity, the

Implementation Guide and Evaluative Framework for the UNCAC Article 11, GIZ's Judicial Integrity Scan and Bangalore Principles implementation measures, and Transparency International's diagnostic checklist. Tools for assessing corruption risks in specific correctional systems include those implemented in the Philippines and South Africa.

Natural resources

OECD. 2016. Corruption in the Extractive Value Chain: Typology of Risks, Mitigation Measures and Incentives

http://www.oecd.org/dev/corruption-in-the-extractive-value-chain-9789264256569-en.htm
This typology of risks, mitigation measures and incentives in the extractive chain covers a broad spectrum of inter-connected policy areas, including licensing, procurement, tax issues and public financial management. It provides practical options to tackle corruption risks at both the public and private levels and calls for collective action that can be undertaken across OECD and non-OECD countries, extractive companies and civil society.

Parliaments

UNDP and Global Organisation of Parliamentarians Against Corruption. 2013. Anti-Corruption Self-Assessment Tool for Parliamentarians

http://www.undp.org/content/undp/en/home/library page/democratic-governance/anti-corruption/anticorruption-self-assessment-tool-forparliamentarians.html

This self-assessment tool focuses on the role of parliaments in the fight against corruption and more specifically on the implementation of the provisions of Chapter 2 of the UN Convention against Corruption. It comprises a series of questions and checklists, answers to which will serve to identify gaps in the effectiveness of a parliament's contribution to the implementation of the convention.

Procurement

OECD. 2014. MAPS Methodology for Assessing Procurement Systems

http://www.oecd.org/dac/effectiveness/commonbe nchmarkingandassessmentmethodologyforpublicp rocurementsystemsversion4.htm

This methodology has been designed to enable a country to conduct a self-assessment of the quality, effectiveness and transparency of its procurement system based on a set of predefined indicators, or to help development agencies carry out joint or external assessment of a country's procurement system.

Water

Asian Development Bank. 2009. Guidance Note – Urban Water Supply Sector Risk Assessment

https://www.adb.org/documents/guidance-note-urban-water-supply-sector-risk-assessment
This guidance note aims to explain key sector features of urban water supply and identify entry points for mapping governance risks. The framework covers: (a) institutional aspects (policy, legal framework, and regulation); (b) organisational aspects (planning, financial management, procurement, and human resources); and (c) sector operations.

World Bank. 2008. Deterring Corruption and Improving Governance in the Urban Water Supply and Sanitation Sector: A Sourcebook http://documents.worldbank.org/curated/en/54675 1468160176847/pdf/468290REPLACEM10WN18 1Sourcebook1rev.pdf

The sourcebook is meant as a resource to assist water and sanitation sector practitioners to assess the extent and risks of corruption in the sector and to improve governance in ways that reduce corruption. Corruption and governance are considered at three levels: (a) the sector – who does what, how are decisions made, and how can citizens hold government and providers accountable? (b) the provider – how is the service operated and maintained, and how are bills issued and collected? and (c) capital projects – these are the largest expenditure items in the sector, and a traditional focus for governance and corruption concerns.

UNDP. 2011. Fighting Corruption in the Water Sector – Methods, Tools and Good Practices http://www.undp.org/content/undp/en/home/library page/democratic-governance/anti-corruption/fighting_corruptioninthewatersector.htm

This publication presents a series of methods, tools and good practices to map corruption risks, develop strategies and sustain partnerships to address challenges and tackle corruption in the water sector.

4 Examples of country-specific tools

Albania

Council of Europe. 2010. Project against Corruption in Albania (PACA) - Corruption Risk Assessment Methodology Guide http://www.coe.int/t/dghl/cooperation/economiccri me/corruption/projects/Albania/Technical%20Pap ers/PACA_TP%202%202011-Risk%20Assessment%20Methodology.pdf This paper proposes a general guide to the methodological issues underlying risk assessments in public sector institutions (such as a ministry) and on how to design a risk assessment. The guide may also be used for conducting risk assessments on wider targets, such as a sector (for example, healthcare), as it can be used in the assessment of specific institutions within that sector. The methodology is designed to provide guidance on: (a) how to assess the incidence and seriousness of corruption in a given institution; and (b) how to identify the factors that cause or create risks of corruption occurring in the institution, in order to inform the design of policies to address those factors.

Australia

University of Adelaide and Local Government Association of South Australia. 2014. Survey on Attitudes to Corruption, Misconduct and Maladministration in the Local Government Context

http://www.lga.sa.gov.au/webdata/resources/files/2013.26%20-%20LGRDS%20-%20Survey%20on%20Corruption%20-%20FINAL%20Report.pdf This project provides an initial study into the attitudes of those within local government in South Australia and members of the public to corruption, misconduct and maladministration. Two surveys were developed: one for respondents in local government and the second for members of the public. Each survey consists of three parts, each including closed questions to provide quantitative, statistical data, supplemented by open questions to allow a richer qualitative analysis of responses.

New South Wales Independent Commission Against Corruption (ICAC). 2016. Community Attitudes to Corruption and to the ICAC http://www.icac.nsw.gov.au/docman/preventingcorruption/research-1/4839-community-attitudessurvey-report-on-the-2015-survey-june-2016/file The New South Wales Independent Commission Against Corruption (ICAC) regularly conducts the community attitudes survey (CAS) to assess the engagement of the public in supporting the state's resistance to corruption and the public's desire for promoting integrity in the public sector. The CAS is used to gauge the public's perception of corruption and of the ICAC and has been conducted by the ICAC every three years (approximately) for over 20 years. Information from the CAS may be used to identify the extent to which corruption is considered a problem in New South Wales and to evaluate whether the ICAC has been effective in developing public awareness of the ICAC and its work.

Office of Police Integrity, Victoria. N.d. Ethical Health Assessment Tool – A tool for assessing ethical health frameworks in police service http://www.ibac.vic.gov.au/docs/default-source/toolkit/ethical-health-assessment-tool---ebooklet.pdf?sfvrsn=8

The Ethical Health Assessment Tool has been developed for use by law enforcement agencies to assess the strength of their integrity systems and procedures. It is a framework intended for local adaptation. Informed by integrity and anticorruption research, the tool is designed to assist a police service to: (a) assess its integrity framework; (b) identify areas of weakness; and (c) develop strategies or processes for improvement.

Hungary

State Audit Office of Hungary. 2014.

Objectives, Methodology and Results of the Integrity Survey (2011–2013)

https://asz.hu/storage/files/files/public-finance-quarterly-

articles/2014/a_szatmari_kakatics_szabo_2014 _2.pdf

The Hungarian State Audit Office uses a national survey of public organisations to map corruption risk across the country on an annual basis. In 2013, 1500 organisations participated in the survey generating three indices: (a) the inherent vulnerability factors index measures the risks that depend on the legal status and responsibilities of organisations (such as regulation or provision of public services); (b) the factors enhancing corruption vulnerability index captures the risks that increase inherent vulnerability, which result from the daily operation of the various institutions: and (c) the risk-reducing controls factors index reflects whether the given organisation has institutional controls in place, and whether these controls actually work and fulfil their objectives.

Macedonia

Regional Anti-Corruption Initiative and Austrian Development Agency. 2016. Setting up the Institutional and Operational Framework of Corruption Risk Assessment in Macedonia: Practical Suggestions and Reflections

http://rai-see.org/wp-content/uploads/2015/05/RAI-Report-Setting-up-CRA-framework-in-Macedonia.pdf

This tool presents a brief overview of the main features of a proposed risk assessment process for public institutions in Macedonia. It deliberates on some key points to be considered in the process of establishment of a corruption risk assessment mechanism and presents a process support matrix, which can be used as a checklist, providing guidelines on the elements that should be clarified and comprehensively described when the risk assessment procedures are established.

Government of the Republic of Moldova. 2008. *Methodology of Corruption Risk Assessment in Public Institutions*

http://www.coe.int/t/dghl/cooperation/economiccrime/moneylaundering/projects/molico/AC/Output1. 6/912%20MOLICO%20Nat%20%20Legisl%20_methodology%20of%20corruption%20risk%20assessment.pdf

Moldova's self-assessment tool aims to identify the institutional factors that might favour corruption in a given public institution and draw up recommendations on how to eliminate or diminish their effects (integrity plans). First, an assessment of "preconditions" is carried out, focusing on the legal framework, the organisational structure and the codes of ethics of the organisation. Then comes the assessment of the corruption risks. Risks are investigated and identified via an assessment of employees' resistance to corruption, a questionnaire to the institution's staff, an assessment of the organisation's relationship with the public and an analysis of concrete corruption cases before being analysed for prioritisation.

Montenegro

Montenegro Directorate for Anticorruption Initiative, UNDP and Delegation of the European Union in Montenegro. 2011. Corruption Risk Assessment in Special Risk Areas

http://www.me.undp.org/content/montenegro/en/home/library/democratic_governance/Corruption.html

This risk assessment tool focuses on the areas of privatisation, public procurement, urban planning, local governance, and education and health in Montenegro. The methodology consists of the following phases: (a) stock-taking of existing relevant integrity/corruption assessments, with particular regard to the special risk areas; and (b) integration of the data into a single risk assessment document and formulation of recommendations for improvement of the country's strategic anti-corruption framework.

Netherlands

National Office for Promoting Ethics and Integrity in the Public Sector, Integrity Office of the Municipality of Amsterdam and Netherlands Court of Audit. N.d. Self-Assessment INTegriteit (SAINT) http://www.intosaijournal.org/technicalarticles/technicalapr2008b.html

This self-assessment tool aims to identify the working processes within an institution that are most vulnerable and prone to specific integrity risks. The risk assessment process consists of a one day workshop divided into two parts. First, the participants select the most vulnerable processes on the basis of an inventory of the primary and support processes of the assessed organisation.

Subsequently, the most significant integrity risks within the selected processes are described. In the second part, the existing integrity system of the organisation is assessed. The integrity system comprises measures aimed at protecting the organisation against specific integrity risks and measures intended to embed, consolidate and organise the integrity policy (system measures).

Netherlands Ministry of Interior. 2004-2012. *Integrity Monitor*

https://www.government.nl/documents/reports/201 6/01/18/integrity-management-in-the-public-sector-the-dutch-approach

The integrity monitor consists of: (a) a checklist of formal policies and inventory of the number of disciplinary cases or alleged integrity incidents to the secretary-directors and the clerks of the representative body; and (b) a perceptions study of integrity and integrity policy among civil servants and elected and appointed holders of political office (written survey, distributed by mail to enhance response rate).

Philippines

Philippines Office of the Ombudsman. 2005-. Integrity Development Review (IDR) http://www.pdf.ph/downloads/governance/Underst anding%20the%20IDR%20(PDF).pdf The IDR is a corruption prevention tool which assesses the integrity measures employed by a local government unit to address corruption vulnerability related to its functions and operations. It is undertaken with the use of two major tools: the Corruption Resistance Review (CRR) and the Corruption Vulnerability Assessment (CVA). The CRR provides a quick scan of integrity building and corruption prevention measures used by the local government in its operations. It is carried out through three major activities: the employees' survey, the stakeholders' survey and document review. The CVA entails mapping/identification of risks involved in carrying out the local government's functions. Published examples of the implementation of the IDR include those of the Department of Environment and Natural Resources, the Navy and Armed Forces of the Philippines, and the National Irrigation Administration.

Slovenia

Slovenian Commission for the Prevention of Corruption. N.d.: *Integrity Plan*

https://www.kpk-rs.si/en/prevention

Slovenia's integrity plan is a tool for establishing and verifying the integrity of an organisation. The tool has been developed on the basis of the integration of international conventions, standards and principles for corruption prevention into national law. Application of the integrity plan involves: (a) identifying relevant corruption risks in different working fields of an individual organisation; (b) assessment of the danger corruption risks may pose to individual organisations; and (c) determining measures to reduce or eliminate corruption risks

South Africa

South Africa Public Service Commission. 2011. Profiling and Analysis of the Most Common Manifestations of Corruption and Its Related Risks in the Public Service http://www.psc.gov.za/documents/2011/PSC%20 Report-

%20Profiling%20and%20Analysis%20of%20the% 20most%20Common%20Manifastations%20of%2 0Corruption%20and%20its%20Related%20Risks %20in%20the%20Public%20Service.pdf South Africa's methodology is mostly based on the analysis of reported cases of alleged fraud and corruption and their management by the institution. This assessment aims to: (a) analyse institutional responses to handling cases of alleged corruption in the South Africa Public Service; (b) assess the potential risks or threats related to corruption occurring in government departments and public bodies; (c) determine areas of high corruption risk; and (d) propose appropriate systems to address the most common manifestations of corruption and its related risks in the public service.

Vietnam

Centre for Community Support Development Studies (CECODES) and UNDP. 2009-2015. Provincial Governance and Public Administration Performance Index (PAPI) http://papi.org.vn/eng/

PAPI is the largest time-series national governance and public administration performance monitoring tool in Vietnam exclusively based on citizens experiences. Since 2009, PAPI has captured and reflected the

experiences of nearly 75,000 citizens. PAPI assesses three mutually reinforcing processes: policy making, policy implementation and the monitoring of public service delivery. The dimensions are specifically tailored to Vietnam's national and local level contexts. The philosophy behind PAPI's innovative policy monitoring. approach is that citizens are seen as "end-users of public administrative services" capable of assessing governance and public administration in their localities

5 Further reading

UNDP. 2015. Users Guide to Measuring Corruption and Anti-corruption, UNDP http://www.undp.org/content/undp/en/home/library page/democratic-governance/anti-corruption/users-guide---measuring-corruption-and-anticorruption.html

Martini, M. 2012. Overview of Integrity
Assessment Tools, U4 Expert Answer
http://www.transparency.org/files/content/corruptio
nqas/340_Overview_of_integrity_assessment_too
ls.pdf

McDevitt, A. 2011. *Public Integrity Topic Guide*, GATEway Corruption Assessment Toolbox, Transparency International http://gateway.transparency.org/files/uploads/Public_Integrity_Topic_Guide.pdf

McDevitt, A. 2011. Corruption Risk Assessment Topic Guide, GATEway Corruption Assessment Toolbox, Transparency International http://gateway.transparency.org/files/uploads/Corruption_Risk_Assessment_Topic_Guide.pdf