



**UNODC**

United Nations Office on Drugs and Crime

## Annex I

### Guidance Note

#### **Experiences, good practices and challenges in measuring corruption and the effectiveness of anti-corruption frameworks**

Measuring corruption and the effectiveness of anti-corruption frameworks can enhance our understanding of its causes, risks, consequences, and trends. It allows for the identification of gaps and weaknesses in legal and institutional frameworks and the monitoring and evaluation of the effectiveness of anti-corruption policies and actions and can thereby inform domestic policy responses.

Due to the hidden and often complex nature of corruption, measuring it poses various challenges. In addition to requiring financial and technical capacity to gather and analyse data, any measurement approaches need to take into account the specificities of geographic, sectoral and legal contexts.

In resolution 10/4, the Conference of the States Parties requests the United Nations Office on Drugs and Crime to collect information on good practices, lessons learned and challenges in measuring corruption and to collect data on methodologies and indicators for measuring corruption risks, trends and prevalence, as well as for assessing the effectiveness of their policies and actual measures to combat corruption.

Part 1 of this Annex contains dedicated questions regarding measuring the effectiveness of anti-corruption frameworks. In this respect, reference is made to the document “Good practices, lessons learned and challenges in periodically evaluating the efficiency and the effectivity of anti-corruption measures and policies” (CAC/COSP/WG.4/2023/2), which contains an analysis of the information submitted by 38 parties to the Convention and was presented to the 14<sup>th</sup> session of the Working Group in 2023. Parties are invited to send additional information regarding measuring the effectiveness of anti-corruption frameworks and may wish to consider using the questionnaire contained below.

Part 2 of the below questionnaire contains questions on the measurement of corruption.

The answers to the questionnaire will flow into an analytical paper to inform the discussions of the 15<sup>th</sup> session of the Working Group on Prevention. In addition, unless otherwise requested, the responses will be published as part of the creation of a repository of methodologies and indicators for measuring corruption risks, trends and prevalence in line with paragraph 8 of resolution 10/4.

#### **Part 1 – National experiences with assessing the effectiveness of anti-corruption frameworks**

1. Does your country have any mechanisms in place to assess the effectiveness of its legislative and/or institutional anti-corruption framework? Please briefly summarize the methodology, scope and frequency of the process as well as any specific tools your country uses.

The Law on Prevention of Corruption ("Official Gazette of Montenegro", no. 53/14 and 42/17) regulates the competence of the Agency for Prevention of Corruption (hereinafter referred to as the Agency) to, in accordance with Article 78 paragraph 1 of the Law:

- " Take the initiative to amend the laws, other regulations and general acts, in order to eliminate the possible risk of corruption or to align them with international standards in the field of anti-corruption;
- Give opinions on draft laws and other regulations and general acts for the purpose of their alignment with international standards in the field of anti-corruption."

---

**Making the world safer from drugs, crime and terrorism**

Also, Article 79 of the same Law establishes that the Agency can, on its own initiative or at the request of an authority, company, legal person, entrepreneur or natural person, give an opinion for the purpose of improving the prevention of corruption, reducing the risk of corruption and strengthening of ethics and integrity in authorities and other legal persons, which includes an analysis of the risk of corruption, measures to eliminate the risk of corruption and corruption prevention.

On the other side, the Agency for Prevention of Corruption has Methodology for corruption proofing of legislation in Montenegro, which represents the basis for its work in the implementation of anti-corruption assessment of regulations. It was developed in 2017 in cooperation with RAI (Regional Anti-Corruption Initiative) experts. In cooperation with the United Nations Development Program (UNDP) in Montenegro, intensive work was done to improve this Methodology with the aim of determining risk areas from the emergence of corruption, especially the part of the Methodology that refers to the list of risks, all with the aim of easier and more objective identification of future regulations which would be the subject of the Agency's analysis. Thus, the Methodology was innovated in November 2022.

The aforementioned Methodology contains a Checklist for assessing the risk of corruption in regulations and an overview of all potential risks that may arise in the adoption of a certain normative act, with practical examples that should illustrate possible situations in which the adopters of these acts can find themselves, or fall into the trap of regulatory risks. Part of the Methodology also defines procedural guidelines, that is, what constitutes the essence of the Agency's work within this jurisdiction and what separates it from the jurisdiction of other state bodies.

The Methodology itself recognizes more corruption risks in norms such as:

- vague, imprecise and incomprehensible norms that open the possibility for different discretionary interpretations
- the use of different terms in the law,
- wide discretionary powers of decision makers,
- leaving the possibility for sub-legal acts to regulate issues that must be subject to legal regulation,
- ambiguity of words and phrases used in the regulation,
- undefined time frames for procedures,
- lack of transparency,
- undefined supervision over the body that implements the law...

Additionally, Government of Montenegro, in consultation with the Agency for Prevention of Corruption, adopted amendments to the Rules of Procedure of the Government of Montenegro at the session as of December 29, 2023 ("Official Gazette of Montenegro," No. 3/12, 31/15, 48/17, 62/18, and 121/23). These amendments propose introduction of a Preliminary Corruption Risk Assessment (CPL) as a mandatory procedure in the drafting of legislative proposals and other regulations established by the Government, in accordance with the act of the Ministry of Justice regulating the content of the CPL form.

1. The Agency for Prevention of Corruption established a **mechanism for assessing the effectiveness and efficiency of integrity plans**. The process of adopting and implementing integrity plans is regulated by the Law on Prevention of Corruption and monitored by the Agency. Integrity plan is a corruption risk assessment tool, developed on the basis of the susceptibility of jobs and work processes to the emergence and development of corruption and other forms of biased conduct of public officials and employees of an authority.

-----  
Public authorities assess the efficiency and effectiveness of integrity plans after every two years, by completing a questionnaire prepared by the Agency. Authorities then revise their integrity plans.

The Agency developed a general questionnaire and special versions for three sectors (healthcare, education and local self-government) and updates all versions regularly. Based on individual assessments, the Agency assesses the efficiency and effectiveness of all integrity plans and provides authorities with recommendations for further improvement.

The assessment was carried out in 2018, 2020 and 2022, upon each of the three first generations of integrity plans. The Agency developed a special methodology and indicators, determining the percentages of authorities who provided a positive answer to selected questions, and compared the available information from all three assessments to establish whether progress has been made. Indicators include: the number of irregularities, reports, complaints, penalties, proceedings initiated on various grounds, as well as good practices.

The methodology was applied to all ten sectors into which Montenegrin authorities are classified, as well as at the overall level. The outcomes helped the Agency pinpoint the areas in which challenges remain and where additional measures are needed.

In 2021-2022, the questionnaire was filled out by 654 authorities. The Agency analysed the questionnaires and prepared the Report on efficiency and effectiveness of the third generation of integrity plans, available at: <https://www.antikorupcija.me/me/integritet/izvještaji/> in Montenegrin.

The document provides a detailed overview of the degree of fulfilment of obligations from the relevant anti-corruption laws, irregularities reported to authorities, the existence of relevant procedures, trainings on ethics and integrity, transparency of the work of authorities and the quality of the integrity plans.

In addition, the Agency evaluates the quality and implementation of adopted integrity plans in its annual reports on adoption and implementation of integrity plans.

2. In order to further enhance the effectiveness of integrity plans, the Agency developed the **Methodology for assessing the implementation of anti-corruption measures**, in cooperation with the United Nations Development Program (UNDP) in Montenegro and its experts, based on Korea's Anti-Corruption Initiative Assessment. This evidence-focused methodology includes the development of criteria and indicators related to integrity plans, based on which the scoring and ranking of authorities in the selected systems/sectors is performed. The Agency implemented the Methodology in three sectors in 2021-2023: state administration, social and child protection and judiciary. Local self-government was selected to be the fourth sector, and its evaluation started in June 2024.

The indicators in the Methodology are related to the implementation of three important anti-corruption laws, but also to good practices, such as proactive transparency, adoption of certain internal procedures, educational activities on ethics, integrity and anti-corruption, and the quality and content of the integrity plans.

After verifying the documentation submitted by the authorities, proving that they met the indicators, the Agency prepares individual reports with recommendations to all participating authorities, as well as sectoral reports, which contain rankings of all institutions in the sector, based on their score and performance. The key findings in the first two sectors were presented and the best-ranked institutions publicly announced at the event "Integrity in Action". Two sectoral reports on the implementation of the Methodology are available at <https://www.antikorupcija.me/me/integritet/izvještaji/>, in Montenegrin and English.

In cooperation with the UNDP in Montenegro, the Agency evaluated the level at which the authorities incorporated the recommendations into their revised integrity plans. The findings are presented in the Report on the Adoption and Implementation of Integrity Plans in 2022, which is available in Montenegrin at the same web address.

The Agency intends to apply the Methodology to authorities from the remaining six sectors in the upcoming period: education, healthcare, state-owned enterprises, municipality-owned enterprises, independent and regulatory authorities and culture.

2. Please describe the institutional setup for assessing the effectiveness of the anti-corruption framework. Which institutions are involved in the assessment? Is there a mechanism for interagency cooperation in assessing the effectiveness of the anti-corruption framework? Does your country engage with academia, civil society and the private sector throughout these processes?

A special Section for corruption proofing of legislation in the Agency for Prevention of Corruption was established, which derives its competence from Article 78 paragraph 1 and 79 of the Law on Prevention of Corruption.

The task of this Section is to contribute, through the drafting of opinions, to the fact that the regulations contain clear, precise and unambiguous norms, and that its implementation will not lead to corruptive consequences, but to greater legal security for all citizens. What constitutes the second segment of the work of this Section is the membership in several working groups for the drafting of regulations, where it has the opportunity to directly contribute to the elimination of corruption risks from the norm in the very process of drafting regulations.

Opinions issued by the Agency are not binding, but their submission to the Parliament, the Government, the APC's Council and the proponent, as well as their publication on the APC's website and their use by the media makes them available to the professional and interested public, who can further exert pressure for the proposed legal solutions are improved in this direction.

In addition, the Agency participates in the work of several working groups for the drafting of laws, which is of particular importance bearing in mind that the analysis of the entire context of the drafting of a regulation is the best way to a clear, precise and unambiguous norm, the application of which will not lead to corrupt consequences, which ultimately means and greater legal security for all citizens.

The second mechanism regarding corruption proofing of legislation that is relatively new and that exists in the Rules of Procedure of the Government of Montenegro at the session as of December 29, 2023 ("Official Gazette of Montenegro," No. 3/12, 31/15, 48/17, 62/18, and 121/23) stipulated that the Ministry of Justice is required to provide an opinion on the CPL form, which pertains to the proposal for a law or another regulation. The proposer should

receive this opinion within a period not exceeding 14 days. The preliminary control of corruption risks aims to enable the proposer of legislation to assess potential corruption risks that the legislative act may contain and to allow the Agency to more quickly identify norms containing corruption risks and provide recommendations for their elimination. The opinion of the Agency on the Draft Decision on Amendments to the Rules of Procedure of the Government of Montenegro, adopted ex officio and at the request of the General Secretariat of the Government on December 20, 2023, was prepared on December 25, 2023, under number 03-04-2322/2. Since the implementation of the Amendments to the Rules of Procedure of the Government of Montenegro just started, we still don't have tangible results of its impact regarding corruption proofing skills of the central authorities.

-----

1. The entire process of assessing the effectiveness and efficiency of integrity plans is carried out by the Agency for Prevention of Corruption, based on the questionnaires filled out by up to 750 authorities in Montenegro.
2. The Methodology for assessing the implementation of anti-corruption measures is carried out by the Agency for Prevention of Corruption in cooperation with the United Nations Development Program (UNDP) in Montenegro, based on the documentation and information provided by the authorities in the sectors selected to be evaluated. The process in the first three sectors was facilitated by two experts, one from a Montenegrin NGO, and the other from a region country.

3. If your country uses indicators to assess the effectiveness of its anti-corruption framework, please describe the indicators as well as the data sources used.

Indicators to assess the effectiveness of anti-corruption proofing of legislation are not defined.

1. The questionnaire for assessing the effectiveness and efficiency of integrity plans is continuously being revised by the Agency for Prevention of Corruption. The 2024 version of the questionnaire contains 164 questions, with additional questions for certain sectors. The indicators of effectiveness and efficiency of integrity plans, derived from the most relevant questions, include: the number of irregularities, reports, complaints, penalties, proceedings initiated on various grounds, as well as good practices, related to the development and implementation of internal procedures, trainings on ethics, integrity and anti-corruption, transparency of the work of authorities and the adherence to the anti-corruption laws. The questions are also aimed at measuring the quality and content of the integrity plans.
2. The indicators in the Methodology for assessing the implementation of anti-corruption measures are related to the implementation of three important anti-corruption laws (Law on Prevention of Corruption, Law on Management and Internal Control in the Public Sector and Law on Free Access to Information), but also to good practices, such as proactive transparency, adoption of certain internal procedures, educational activities on ethics, integrity and anti-corruption, and the quality and content of the integrity plans.

All indicators have weight values depending on their importance. Authorities must submit specified documents to the Agency as evidence that they met the indicators. There is a special group of indicators for deducting points, in case of irregularities and violations of law.

The Methodology applied to the first two sectors included 4 main categories, 9 criteria and 33 indicators (total 72 points) which were to demonstrate whether the public authorities have established institutional mechanisms for corruption risk management, internal control, availability of information on work activities, professional behaviour of employees, raising employee awareness of ethics and integrity and preventing conflicts of interest.

4. Please summarize any findings of the effectiveness assessment. If several exercises have been conducted, have any trends been identified?

Indicators to assess the effectiveness of anti-corruption proofing of legislation are not defined.

1. The Report on Efficiency and Effectiveness of the Third Generation of Integrity Plans is mainly based on the questionnaires filled out by the authorities in 2022, but also on the analysis of integrity plans, reports on their implementation and other relevant documents. The third cycle of integrity plans covers the period 2020-2021.

The authorities are classified into ten sectors: state administration and other state authorities, social and child protection, judiciary, local self-government, education, healthcare, state-owned enterprises, municipality-owned enterprises, independent and regulatory authorities and culture.

The Agency noted a continuous reduction in the intensity of corruption risks during the implementation of the third generation of integrity plans, at the overall level and at the level of each of the ten sectors. Although the third generation of integrity plans had significant effects on overcoming the identified risks of corruption and other unethical behaviour, the effectiveness was still lower compared to the second generation. This was largely caused by the covid-19 pandemic and frequent organizational changes in the authorities during the third cycle. Bearing this in mind, and considering the frequency of changes of integrity managers in the authorities, the Agency recommended in the Report that the role of integrity managers be further affirmed, and that the topic of professionalization of this position be considered, which the Agency had also previously encouraged.

In its third generation, the most effective integrity plans were those adopted by independent and regulatory bodies, and the least effective the plans of local self-government units and healthcare institutions. It is particularly noticeable that the latter two sectors are characterized by a continuous and drastic decline in the efficiency and effectiveness of integrity plans during the three cycles completed so far, so the analysis recognizes the need to prioritise support to municipalities and healthcare institutions in creating conditions for establishment and implementation of anti-corruption measures in the following period.

According to the latest assessment, but also all previous reports on the adoption and implementation of integrity plans, the authorities were least successful in overcoming the risks identified in the area of "HR policy, ethical and professional behaviour of employees".

The area of HR management is also characterized by the largest number of high-intensity risks, as well as the lowest degree of implementation of measures.

2. Some of the assessment findings in the sectors of public administration, social and child protection and judiciary are presented below. Full reports on the Methodology for assessing the implementation of anti-corruption measures in the first two sectors are published on the web site of the Agency for Prevention of Corruption.

Out of a total of 40 authorities in the state administration system, 32 participated in this assessment and 27 of them have formally established internal audit. However, almost half (13 in total) have not been audited in the previous two years. Also, when it comes to the percentage of implemented internal audit recommendations in the last reporting period, the result is 29%.

In the system of social and child protection, 87.5% of authorities did not establish internal audit. Since the Ministry of Finance supervises the work of public institutions in the area of social and child protection, the authorities often reported that performing internal audit does not depend on them. However, it is necessary to conclude an agreement for the performance of internal audit by the internal audit unit of another entity in accordance with Article 49 of the Law on Management and Internal Control in the Public Sector. Out of 32 authorities for social and child protection in which the assessment was conducted, an internal audit was conducted only in one.

Based on the 24 individual reports on the implementation of recommendations, state administration authorities integrated 32.6% of the Agency's recommendations into their integrity plans. The improvements relate to strengthening the institutional framework for the prevention of corruption, and criteria improvement of human resources management as well as strengthening transparency of the work of authorities.

When it comes to the social and child protection sector, out of 27 institutions that adopted a new integrity plan, 18 of them (67%) incorporated the recommendations provided by the Agency in the assessment into that document. Most of the incorporated recommendations in revised integrity plans refer to the strengthening of transparency in work, improving human resource management and undertaking measures aimed at improving the internal mechanisms of ethical and professional behaviour.

5. How does your institution or country use the results of the assessments to inform policy-making? Has your country amended its anti-corruption framework in response to the outcomes of the effectiveness assessments?

Opinions regarding anti-corruption proofing of legislation that are issued by the Agency are not binding, but their submission to the Parliament, the Government, the APC's Council and the proponent, as well as their publication on the APC's website and their use by the media makes them available to the professional and interested public, who can further exert pressure for the proposed legal solutions are improved in this direction.

The Agency focuses its activities on strengthening inter-institutional cooperation with law proponents, non-governmental organizations and other domestic and international partners who can be a significant support to the Agency in the successful implementation of activities on this plan, so that the Agency's opinions become a powerful tool for the legislative and executive authorities in drafting and passing regulations that are relieved of corruption risks.

All these activities, as well as the participation of the Agency in the work of the working group for the drafting of the law, are of particular importance, bearing in mind that the analysis of the entire context of the drafting of a regulation is the best way to a clear, precise and unambiguous norm, the application of which will not lead to corruptive consequences, which in ultimately means greater legal security for all citizens.

The Government of Montenegro recognized the importance of the conducting corruption proofing of legislation as binding in the process of drafting laws by amending the Rules of Procedure of the Government of Montenegro at the session as of December 29, 2023 ("Official Gazette of Montenegro," No. 3/12, 31/15, 48/17, 62/18, and 121/23), but since it is new jurisdiction we still need to wait to see the tangible results of its impact regarding corruption proofing skills of the central authorities.

The goal of the Agency in this area in the coming period is to increase the level of activity in the direction of introducing corruption proofing of legislation as binding in the process of passing regulations, and believes that Parliament will recognize the importance of this tool so that the regulations enacted by Montenegro will be weighted from the risk of corruption in the legal norms themselves, which can cause great social damage, because depending on the case by case, they open a normative space for individual abuses but also the possibility for systemic corruption.

-----

1. When assessing the efficiency and effectiveness of integrity plans, the Agency provides authorities with recommendations for further improvement and monitors whether the authorities follow through on the recommendations.

The insights gained by the Agency in the assessment help it to enhance the work of the public sector, identify areas in which the implementation of anti-corruption tools needs to be improved and direct its support in that context and direction.

2. The Agency provides the authorities with concrete recommendations for improving the implementation of anti-corruption measures. The Agency also evaluated whether the authorities incorporated the recommendations into their revised integrity plans.

Media involvement and the competitive element inspired the authorities to be proactive. During one month of collecting evidence, authorities introduced new practices to improve their rankings. This approach resulted in 200 new procedures, documents and good practices, which was the initial and immediate impact of the Methodology and an added value of the assessment process. Namely, in that period:

- 11 public authorities from the social and child protection sector adopted 39 internal procedures, which are significant in the context of preventing corruption.
  - 16 state administration authorities adopted 53 documents and carried out 9 other activities (appointments, putting practices in place) related to integrity, anti-corruption and ethics.
  - 14 procedures for recruitment were developed and adopted in both systems, which will foster the prevention of corruption in recruitment procedures.
- 18 courts issued 109 documents, established necessary practices and issued 12 decisions on the designation of persons for the implementation of certain measures.



6. Which challenges has your country encountered in assessing the effectiveness of anti-corruption frameworks, and which steps have been taken to overcome them?

Assessing the risk of corruption in regulations is a very young competence. It was introduced by the Law on Prevention of Corruption in 2014, which entered into force in 2016. This Law, Articles 78 and 79 introduced the assessment of corruption in regulations, both for valid laws, as well as for drafts and proposals of laws and other regulations.

The aforementioned assessment represents an initiative to the legislator or the proposer, based on the opinion of the Agency, to adapt the legal norms in order to eliminate the possible risk of corruption in their application. The assessment does not always mean an analysis of the entire legal text, but can also represent an analysis of individual institutes that are particularly at risk of corruption.

One of the basic principles on which the Agency insists in its opinions is the transparency of the legislative process itself, especially bearing in mind that public discussions, that is, enabling the participation of the interested public in the preparation of laws, represents an important preventive mechanism in the fight against corruption.

The participation of the public in the law-making process, both through the organization of public debates and through consulting the expert public, ensures the necessary level of transparency and participation in the legislative process and creates conditions in which the interested public can contribute to the quality of regulations, and determine the proposed solutions based on the public interest at the same time reducing the space for favouring individual interests.

While the organization of public debates during the drafting of laws proposed by the Government is binding in most cases, the lack of them is recognized in the procedure of proposing laws to the Parliament of Montenegro by members of the Parliament independently or on behalf of six thousand voters, in accordance with Article 93 paragraph 1 and 2 of the Constitution of Montenegro. That is why the Agency send the Initiative to the Parliament asking them to consider need to introduce the Preliminary Control on the Risks of Corruption (with a list of 23 questions), as mandatory in the procedure for determining and adopting this kind of law.

-----

1. A great number of public authorities and integrity managers (around 750) and their capacities are some of the main challenges in adopting and implementing integrity plans, as well as in assessing the effectiveness and efficiency of integrity plans. Frequent replacements of appointed integrity managers, often caused by the changes in the top managerial structures, also pose a challenge. To overcome this, the Agency continuously organises trainings and carries out daily consultations with integrity managers and other actors in this process.

The Agency for Prevention of Corruption cooperates with various organisations in organising trainings for integrity managers, in order to increase their capacities to adequately carry out corruption risk assessments and implement integrity plans. Trainings were recently held jointly with the Regional Anti-Corruption Initiative, Centre for Civic Education (a Montenegrin NGO), Police Academy of Montenegro and others. In cooperation with the Agency, the Montenegrin Human Resources Management Authority organises the Training Programme for Developing Key Skills to Perform the Duties of an Integrity Manager. This is a comprehensive learning programme, consisting of 12 anti-corruption topics, lectured by the representatives of public

authorities (including the Agency), civil society and private sector. There is a final examination on all courses, and participants who pass the exam are awarded a certificate, proving that they acquired the key skills. Three rounds of the Programme have already been completed.

Another challenge in the process of assessing the effectiveness and efficiency of integrity plans is a big collection of data needed to be processed and analysed. In 2018, the Agency completed the development of the web application for integrity plans, which serves as an IT platform for entering, recording, reporting and monitoring the implementation of integrity plans, as well as for assessing the efficiency and effectiveness of integrity plans. The application was officially launched in August 2018.

The web application has two groups of users – users from state authorities (integrity managers) and administrators (officers of the Agency). The functional structure of the administrator and user modules is set forth in the relevant instructions.

Users of the application (integrity managers) can electronically enter, continuously update and monitor all data related to integrity plans through an intuitive interface.

When it comes to the questionnaires for assessing the effectiveness and efficiency of integrity plans, the application provides insight into statistical data regarding the answers provided by a specific authority or by a specific system/sector in which the authorities are classified, or into overall statistical data. Completing the questionnaire through the application allows the Agency to compare responses, indicators and other statistical data between different two-year periods, which can reliably show whether the desired effects and progress in the implementation of integrity plans by Montenegrin authorities have occurred.

2. A great number of public authorities, especially in certain sectors (such as education and state-owned enterprises) pose a challenge, having in mind that each public authority needs to be assessed individually and thoroughly. Detailed reports with findings and recommendations need to be drafted for each authority, as well as for the sector as a whole. This requires significant knowledge, time and resources from the Agency and the experts engaged in this process.

To overcome this challenge, the Agency carries out the assessment in phases, starting with smaller sectors. The first phase focused on two sectors, which encompassed around 40 authorities each (public administration and social and child protection). The third sector in the subsequent year included 45 authorities (judiciary), and the fourth sector 25 (local self-government), which are to be analysed in 2024, starting in June.

Another challenge may be unwillingness of the authorities to be the subject of the Methodology for assessing the implementation of anti-corruption measures.

To incentivise their participation, the Agency promoted the highest ranked authorities and best practices. The ranking and competition elements, as well as the media coverage, proved to be particularly motivating for the authorities, as all 45 judicial authorities joined the project in its second phase.

7. Which good practices could your country share regarding the measurement the effectiveness of anti-corruption frameworks that could benefit other States?

Through the process of improving the Methodology for corruption proofing of legislation in Montenegro and passing the Opinion on the Draft Law on the Government, the Agency

recognized the need and space for the normative anti-corruption assessment to become an integral part of the legislative process.

Thus, during 2022, the Government and the Parliament were sent the Initiative for the introduction of Preliminary Control on the Risks of Corruption (with a list of 23 questions), as mandatory in the procedure for proposing laws established by the Government of Montenegro, as well as in the procedure for proposing laws by deputies independently or on behalf of six thousand voters, in accordance with Article 93 paragraph 1 and 2 of the Constitution of Montenegro. In this way, preconditions would be created for the timely elimination of the risk of corruption in the legal norms themselves, which can cause great social damage, because depending on the case by case, they open the normative space for individual abuses but also the possibility for systemic corruption.

The above mentioned initiative is recognized as important, so the Government of Montenegro, in consultation with the Agency for Prevention of Corruption, adopted amendments to the Rules of Procedure of the Government of Montenegro at the session as of December 29, 2023 ("Official Gazette of Montenegro," No. 3/12, 31/15, 48/17, 62/18, and 121/23) which propose introduction of a Preliminary Corruption Risk Assessment (CPL) as a mandatory procedure in the drafting of legislative proposals and other regulations established by the Government, in accordance with the act of the Ministry of Justice regulating the content of the CPL form.

-----

1. The Agency for Prevention of Corruption of Montenegro is willing to share all aforementioned practices with other States.
2. The Agency for Prevention of Corruption of Montenegro is willing to share all aforementioned practices with other States.

The Montenegrin delegation, consisting of representatives of the Agency for the Prevention of Corruption and the United Nations Development Program in Montenegro, presented the Methodology for assessment of implementation of anti-corruption measures at the largest global anti-corruption conference in Atlanta, USA. The 10th session of the Conference of States Parties to the UN Convention Against Corruption (UNCAC) – COSP in the capital of the US state of Georgia gathers global leaders, who discuss the future directions of the international community in the prevention and fight against corruption.

Recognizing the importance of the Methodology for assessment of implementation of anti-corruption measures, COSP dedicated a special panel to the presentation of this document to representatives of member states, international organizations and civil society, who exchange experiences and challenges in measuring corruption, with the aim of promoting anti-corruption mechanisms and their effects.

At this largest global anti-corruption gathering, the methodology was presented by acting Deputy Director of the Agency, Boris Vukašinović. "Our primary goal has always been and continues to be, not just documenting integrity on paper but actively putting it into action. Our aim was to challenge lethargic institutions, motivating them to go beyond basic legal compliance and embrace proactive measures", he pointed out.

"Together with our partners from the United Nations Development Programme, and with the unselfish support of the Republic of Korea's Anti-Corruption and Civil Rights Commission, we

created an innovative, evidence-based Methodology for assessing the implementation of the anti-corruption measures“, Vukašinović added.

8. Has your country been guided by any international efforts aimed at improving or assessing the effectiveness of anti-corruption frameworks (e.g., peer review mechanisms, methodologies provided by international organizations)? If not, are there any tools or measures by international organizations that you would consider helpful in this regard (e.g., guidance on data collection, provision of tools, stronger focus on effectiveness in peer reviews)?

Methodology for corruption proofing of legislation in Montenegro, which represents the basis for anti-corruption assessment of regulations was developed in 2017 in cooperation with Regional Anti-Corruption Initiative (RAI) experts. In cooperation with the United Nations Development Program (UNDP) in Montenegro, intensive work was done to improve this Methodology with the aim of determining risk areas from the emergence of corruption, especially the part of the Methodology that refers to the list of risks, all with the aim of easier and more objective identification of future regulations which would be the subject of the Agency's analysis. Thus, the Methodology was innovated in November 2022.

Additionally, RAI and UNODC developed guidelines with checklists of questions for the higher education sector and public enterprises areas which will be useful tool in future activities to amend the legislation in these two areas. This activity was conducted through implementation of the "Southeast Europe - Together Against Corruption (SEE-TAC)" project.

- 
1. The Regional Anti-Corruption Initiative (RAI) provided support to the Agency for Prevention of Corruption in the early stages of developing the questionnaire for assessing the effectiveness and efficiency of integrity plans in 2017.

The Regional Cooperation Council (RCC) supported the Agency in developing the special version of the questionnaire intended for the institutions in the healthcare system.

2. The Agency for Prevention of Corruption developed the Methodology for assessing the implementation of anti-corruption measures in cooperation with the UNDP in Montenegro. The Methodology is based on Korea's Anti-Corruption Initiative Assessment. The UNDP office in Montenegro supported the Agency in carrying out the Methodology in all phases so far, with additional support from Korean colleagues.

9. Please insert any information you would like to add, such as descriptions of indicators or links to sources or reports.

## Part 2 - National experiences with corruption measurement

**A. Existing national or sub-national mechanisms to measure corruption and/or the effectiveness of anti-corruption frameworks**

1. Does your country have any mechanisms in place to quantify or measure corruption? Please briefly summarize the methodology and scope (e.g. national, regional, sectoral) and frequency of the measurement process.

The Agency for Prevention of Corruption monitors the process of adoption and implementation of integrity plans in Montenegro, as regulated by the Law on Prevention of Corruption. The integrity plan is a corruption risk assessment tool, developed on the basis of the susceptibility of jobs and work processes to the emergence and development of corruption and other forms of biased conduct of public officials and employees of an authority.

The obligation of adopting integrity plans applies to around 750 Montenegrin public authorities, organised into ten systems/sectors.

Since integrity plans are two-year documents, four cycles of integrity plans in Montenegro were completed as of 2024 (2016-2017, 2018-2019, 2020-2021 and 2022-2023), while the fifth cycle is ongoing (2024-2025).

In the framework of developing the integrity plan, the authorities identify corruption risks and select work posts and work processes susceptible to corruption. Special attention is given to the classification of risks based on their type and importance. Classification of risk involves the cross section between the consequence and probability of risk according to the “temperature map”, contained in the integrity plan. Classification of risk allows for assessment of significant and minor risks. Based on the results of identification, assessment and classification of risks, the authorities plan and implement measures for overcoming the risks.

The authorities have the obligation to submit the report on the implementation of integrity plan to the Agency by 15 April of the current year for the previous year.

Public authorities assess the efficiency and effectiveness of integrity plans after every two years, by completing a questionnaire prepared by the Agency. Authorities then revise their integrity plans.

The Agency prepares annual Reports on adoption and implementation of integrity plans, in which it analyses all integrity plans in Montenegro and submitted reports on their implementation. The Agency provides for analytical and statistical overview of identified risks (status and trends), and implementation of measures for mitigating risks. These comprehensive reports include recommendations for improving integrity plans, given within the ten systems in which authorities are organised.

The Agency provides support to authorities in developing and implementing integrity plans, by having an intensive communication and cooperation with authorities and giving them advice and suggestions in this area. The Agency also organises work meetings, workshops and trainings for integrity managers and other staff involved in drafting and implementing the integrity plan.

In 2018, the Agency launched the web application for integrity plans. It serves as an IT platform for entering, recording, reporting and monitoring the implementation of integrity plans.

The application for integrity plans represents a unique register of risks identified in all Montenegrin authorities. Users (integrity managers) can electronically enter, continuously update

and monitor all data related to integrity plans through an interface consistent with the integrity plan form. Administrators (officers of the Agency) can monitor the adopted plans, process statistical data and carry out a qualitative and quantitative assessment of the implementation of anti-corruption measures.

The Montenegrin authorities also enter into the application the yearly reports on the implementation of the integrity plan (implementation of planned measures and risk re-assessment), which allows the Agency to obtain a comprehensive statistical overview of the implementation of integrity plans on an annual basis, as well as risk intensity trends. The application also supports the analysis of the questionnaires for assessing the efficiency and effectiveness of integrity plan, which are filled out by public authorities through the application.

The Agency is constantly upgrading the application, adding new and improving existing features. It enables the Agency to search and filter data from integrity plans and reports by a large number of criteria, such as authority, system and subsystem into which authorities are classified, thus producing a better quality analysis of adopted integrity plans and giving more relevant recommendations for their improvement.

2. Please summarize any findings of the measurement exercises. If several exercises have been conducted, have any trends been identified?

As of 1 June 2024, a total of 740 public authorities designated their integrity manager, and 738 adopted an integrity plan (out of 755 authorities).

In 2023, the list of integrity managers was published for the first time on the Agency's website. Out of the total number of integrity managers, 62.3% are female and 37.7% are male. The representation of female integrity managers increased by 0.5% compared to 2022 and by 2.5% compared to 2021.

The Agency prepares annual Reports on adoption and implementation of integrity plans, in which it analyses all integrity plans in Montenegro and submitted reports on their implementation.

In 2023, a total of 712 reports on the implementation of integrity plans for the previous year were submitted to the Agency.

The Report on Adoption and Implementation of Integrity Plans in 2023 shows that in the first year of the fourth cycle of integrity plans (2022), a high level of implementation of measures to overcome identified risks has been achieved. Namely, in the reports submitted in 2023, it was assessed that 20,801 measures were implemented (78.5% of measures, which is 1% higher than the previous year), leading to a reduction in the intensity of identified risks in integrity plans.

Out of the ten systems in which the authorities are classified, the highest level of implementation of measures was achieved in the judiciary (87.7% of implemented measures), educational institutions (84.5%), state-owned enterprises (79.7%), state administration and other state bodies (77.3%) and health institutions (77.1%).

Of the four general areas of risk (obligatory for all authorities), the highest degree of implementation of measures was achieved in the areas of "Financial planning and management"

(83.9% of measures were implemented by the end of 2022) and "Leadership and management" (82% of measures). In the area of "Data keeping and security of data and documents" 76.9% of measures were implemented, as well as 73.4% measures in the area of risk "HR policy, ethical and professional behaviour of employees".

In 2023, the authorities reported on the status of a total of 12,220 risks through the application for integrity plans. Of that number, it was estimated that the intensity of 3,389 risks decreased, the intensity of 7,893 risks remained at the same level, while a total of 938 risks were reported to be increased compared to the previous risk assessment.

The average risk intensity in all integrity plans adopted until the end of 2022 (the fourth generation of integrity plans) was 22.3 on a scale of 1-100, and during the first year of implementation of those integrity plans, the risk intensity decreased to 20.6 (according to data from reports submitted in 2023). The intensity of the risk is usually reduced as a direct consequence of the successful implementation of the measures.

3. Which institutions are involved in the measurement efforts (*e.g. Ministry/ies, Anti-Corruption Agency, Civil Service Commission, Ethics Commission, National Statistical Office, Supreme Audit Institution, procurement authority, tax authority, law enforcement authority*)? Is there a mechanism for interagency cooperation in measuring corruption?

The public authorities' efforts in the process of adoption and implementation of integrity plans are measured by the Agency for Prevention of Corruption, based on the integrity plans and reports on their implementation, submitted to the Agency by around 750 public authorities.

4. Does your country engage with academia, civil society and the private sector in measuring corruption?

Within the cooperation with the Regional Anti-Corruption Initiative (RAI), the implementation of the project "Southeastern Europe – Together Against Corruption" included support to the Agency for Prevention of Corruption in the areas of integrity plans (Corruption risk assessment - CRA) and giving opinions on regulations (Corruption proofing of legislation - CPL). After finalizing the mapping of two sensitive sectors to corruption - the higher education sector and the sector of state-owned enterprises, CPL and CRA guidelines were developed with checklists for the mentioned two sectors, which were presented to the relevant Montenegrin institutions in 2022.

The Agency for Prevention of Corruption cooperates with various organisations in organising trainings for integrity managers, in order to increase their capacities to adequately carry out corruption risk assessments and implement integrity plans. Trainings were recently held jointly with the Regional Anti-Corruption Initiative, Centre for Civic Education (a Montenegrin NGO), Police Academy of Montenegro and others. In cooperation with the Agency, the Montenegrin Human Resources Management Authority organises the Training Programme for Developing Key Skills to Perform the Duties of an Integrity Manager. This is a comprehensive learning programme, consisting of 12 anti-corruption topics, lectured by the representatives of public authorities (including the Agency), civil society and private sector. There is a final examination on all courses, and participants who pass the exam are awarded a certificate, proving that they acquired the key skills. Three rounds of the Programme have already been completed.

In April 2021, the Agency submitted five best practices on the subject of corruption risk assessment and integrity plans, for the purposes of drafting the “Manual for Preventing Corruption and Promoting integrity”, organized by the EPAC/EACN network and the Federal Bureau of Anti-Corruption (Austria). Specifically, the General Assembly of EPAC/EACN established the working group – EU Integrity, which was implemented jointly by four institutions. Each of them led a working subgroup, with an emphasis on a certain aspect. Subgroup 4 dealt with the topic of Integrity and Anti-Corruption Standards. The manual was presented and published in December 2021 and contains the five APC contributions.

5. Which challenges has your country encountered in measuring corruption and which steps have been taken to overcome them? *E.g. Lack of resources, lack of methodological guidance, lack of technical capacity, lack of credibility of data, lack of legislation and procedures in place, multiplicity of data collection approaches, multiplicity of data sources and formats*

A great number of public authorities and integrity managers (around 750) and their capacities are some of the main challenges in adopting and implementing integrity plans in Montenegro. Frequent replacements of appointed integrity managers, often caused by changes in the top managerial structures, also pose a challenge. To overcome this, the Agency continuously organises trainings and carries out daily consultations with integrity managers and other actors in this process.

Another challenge in the process of analysing identified corruption risks and measuring the efforts in the implementation of integrity plans is a big collection of data needed to be processed and analysed. The Agency developed the web application for integrity plans, an IT platform for entering, recording, reporting and monitoring the implementation of integrity plans.

The application for integrity plans represents a unique register of risks identified in all Montenegrin authorities. The authorities also enter into the application the yearly reports on the implementation of the integrity plan (implementation of planned measures and risk re-assessment), which allows the Agency to obtain a comprehensive statistical overview of the implementation of integrity plans on an annual basis, as well as risk intensity trends.

The application provides insight into statistical data at the level of a specific authority, specific system/sector in which the authorities are classified, or at the overall level.

6. Which good practices could your country share regarding the measurement of corruption that could benefit other States?

The Agency for Prevention of Corruption of Montenegro is willing to share all aforementioned practices with other States.



## B. Specific areas of corruption, indicators and sources

1. Which types of corruption does your country measure and which specific indicators does your country use to assess the level of corruption?

Please tick or describe the indicators your country uses to measure corruption.

	Direct measures (e.g. prevalence of corruption collected through surveys)	Perception (among general population or selected groups collected through surveys)	Risk constraints (factors that deter corruption, e.g. use of e-governance)	Risks Opportunities (Factors that enable corruption; e.g. little oversight)	Legislative response ( <i>de jure</i> ; e.g. law in place)	(Criminal) Justice response ( <i>de facto</i> ; e.g. arrests, convictions for corruption offences)
Bribery	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Embezzlement/ misappropriation	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Money-laundering	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Illicit enrichment	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Abuse of functions	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Public hiring based on merit	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Independence and integrity of the judiciary	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.

	Direct measures (e.g. prevalence of corruption collected through surveys)	Perception (among general population or selected groups collected through surveys)	Risk constraints (factors that deter corruption, e.g. use of e-governance)	Risks Opportunities (Factors that enable corruption; e.g. little oversight)	Legislative response ( <i>de jure</i> ; e.g. law in place)	(Criminal) Justice response ( <i>de facto</i> ; e.g. arrests, convictions for corruption offences)
Conflict of interest	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Management of Public finances	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Public procurement	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Candidature for and election to public office	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Preventive measures for the private sector	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Preventive measures for state-owned enterprises	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Training programmes	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Resources allocated to fight corruption	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>
	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

	Direct measures (e.g. prevalence of corruption collected through surveys)	Perception (among general population or selected groups collected through surveys)	Risk constraints (factors that deter corruption, e.g. use of e-governance)	Risks Opportunities (Factors that enable corruption; e.g. little oversight)	Legislative response ( <i>de jure</i> ; e.g. law in place)	(Criminal) Justice response ( <i>de facto</i> ; e.g. arrests, convictions for corruption offences)
Public reporting and access to information	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Protection of reporting persons	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Other: Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Other: Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Other: Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Other: Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.
Other: Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.	Yes <input type="checkbox"/> No <input type="checkbox"/> Click or tap here to enter text.

Please insert any information you would like to add, such as descriptions of indicators or links to sources or reports.

2. Which methods and data sources does your country use to measure corruption?

- Population surveys
- Business surveys
- Public official surveys
- Administrative records
- Procurement data
- Banking data
- Criminal justice records
- Other:

**NOTE:** From the perspective of its mandate, the Agency for Prevention of Corruption has been conducting public opinion surveys since its establishment in 2016, at the end of each calendar year, to measure the awareness and attitudes of Montenegrin citizens towards corruption, their knowledge of the Agency’s mandate, and their views on its work. The Agency prepares the public opinion survey questionnaire, while the fieldwork and analysis of the results are carried out by specialized independent public opinion research agencies. These surveys help the Agency determine public perception of corruption and the work of our institution and, based on the recommendations obtained through them, establish and plan the direction of action through campaigns. Comparative analysis of survey results over the years is a valuable tool for determining the perception of corruption in Montenegro, not only for the Agency but also for other state bodies/institutions that have the fight against corruption in their portfolio. Such analysis has been included in the Anti-Corruption Strategy 2024-2028, which was adopted by the Government of Montenegro in June this year.

### C. Data collection and use

1. How does your country ensure the validity and integrity of the data collected on corruption?

2. Are policies or mechanisms in place to

- Discuss and agree on data objectives, priorities and scope between relevant stakeholders
- Collect data to measure corruption systematically
- Collect data disaggregated by
  - sex
  - age
- Validate the accuracy and impartiality of the data collected to measure corruption

- Facilitate data sharing across institutions
- Integrate data from different sources
- Ensure easy access to data
- Release information on the measurement of corruption on regular basis (monthly, yearly)

3. Which technological tools or systems are employed by your country in the collection and analysis of relevant data?

4. How does your country utilize the data on corruption to inform policy-making and anti-corruption strategies?

5. Has your country participated in any international efforts or collaborations aimed at improving the measurement of corruption? If not, which efforts would you find helpful to inform your national measurement work?

6. If your country does not currently measure corruption, can you indicate why? Would any international efforts, e.g., those by international organizations, be helpful to inform national efforts in this regard? Which tools, support or other measures would you consider helpful?