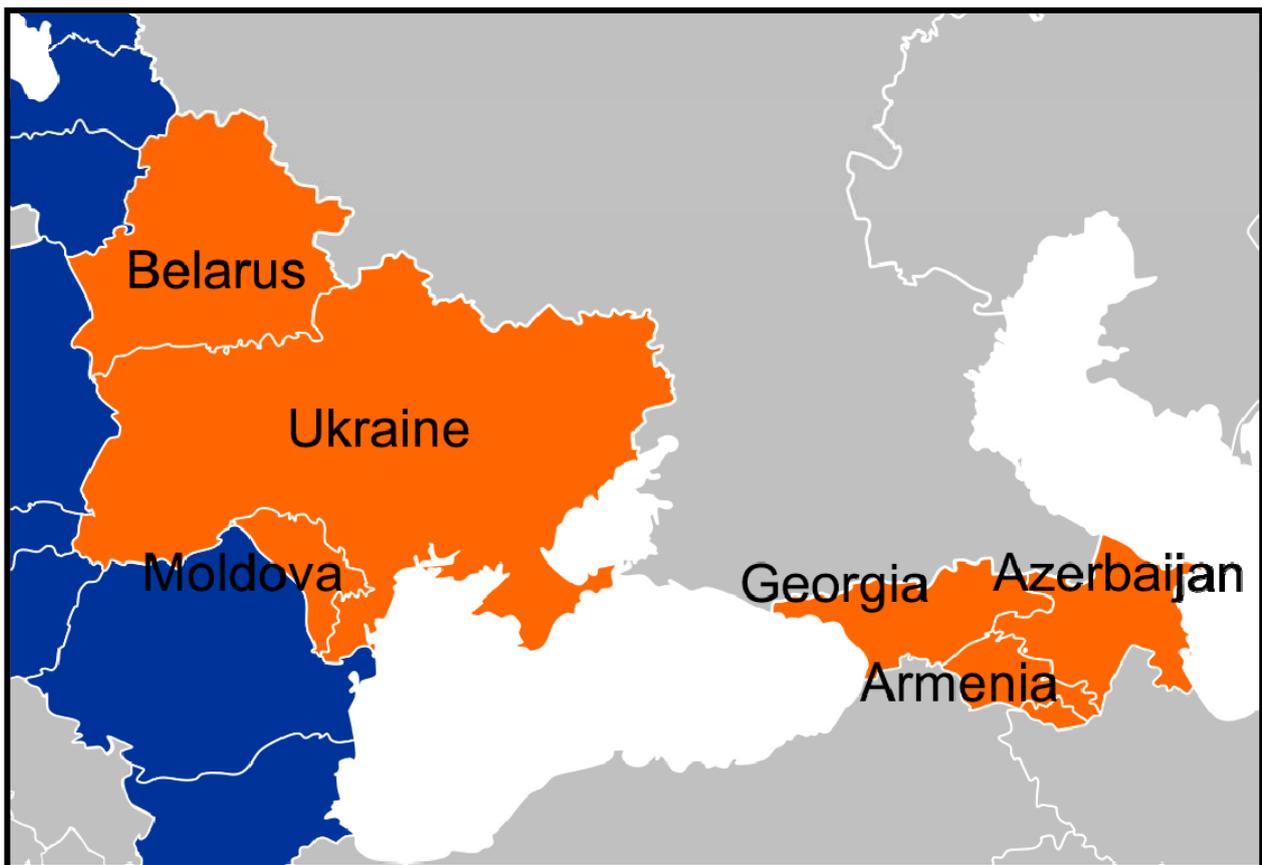




**European Committee
of the Regions**

Preventing Corruption and Promoting Public Ethics at the Local and Regional Level in Eastern Partnership Countries



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Executive Summary

This study identifies the main current vulnerabilities of local and regional authorities (LRAs) in Eastern Partnership (EaP) countries regarding public procurement and public services, and provides a systematic assessment of priority avenues of intervention.

Research methods employed here involved an original expert survey designed to systematically evaluate the main forms of corruption occurring at the subnational level in EaP countries. Targeting relevant experts from the public sector, academia and CSOs, we aimed to disentangle the prevalence of specific forms of corruption in each country, as well as the most suitable means to counter it. The original expert survey data was triangulated with existent studies and reports, as well as other primary data sources (e.g. institutional webpages).

Key findings suggest that the lack of transparency is the main vulnerability of LRAs in all case studies. Nepotism and untrained personnel is predominant concerns for public procurement across cases. Abuse of administrative resources in electoral campaigns along with nepotism are predominant concerns in terms of public service delivery. In depth country analysis shows that the lack of transparency is of primary concern in Azerbaijan and Belarus, ambiguous legislation is the most stringent problem in Armenia and Ukraine (recent progress has been reported here); personnel recruitment and qualification is the core issue in Georgia and, favoritism in public procurement procedures is the main concern in Moldova. Overall, there is an estimate of average capacity to counter corruption at the level of the LRAs in EaP countries. Georgia stands out as the most willing to engage in anti-corruption efforts, while Azerbaijan has the lowest institutional competence to engage in preventive anti-corruption measures.

Examples provided through the experts' qualitative assessment illustrate specific corruption manifestations: preferential mechanisms in allocating public contracts for road repairs and transportation (e.g. Kyiv, Kharkiv, Chişinău), construction works (e.g. Minsk) or waste management (e.g. Yerevan, Bila Tservka, Bălţi), as well as those referring to access to social services (e.g. Tblisi), public utilities – especially energy (e.g. Shuakhevi Hydropower plant), or construction permits (e.g. Chişinău).

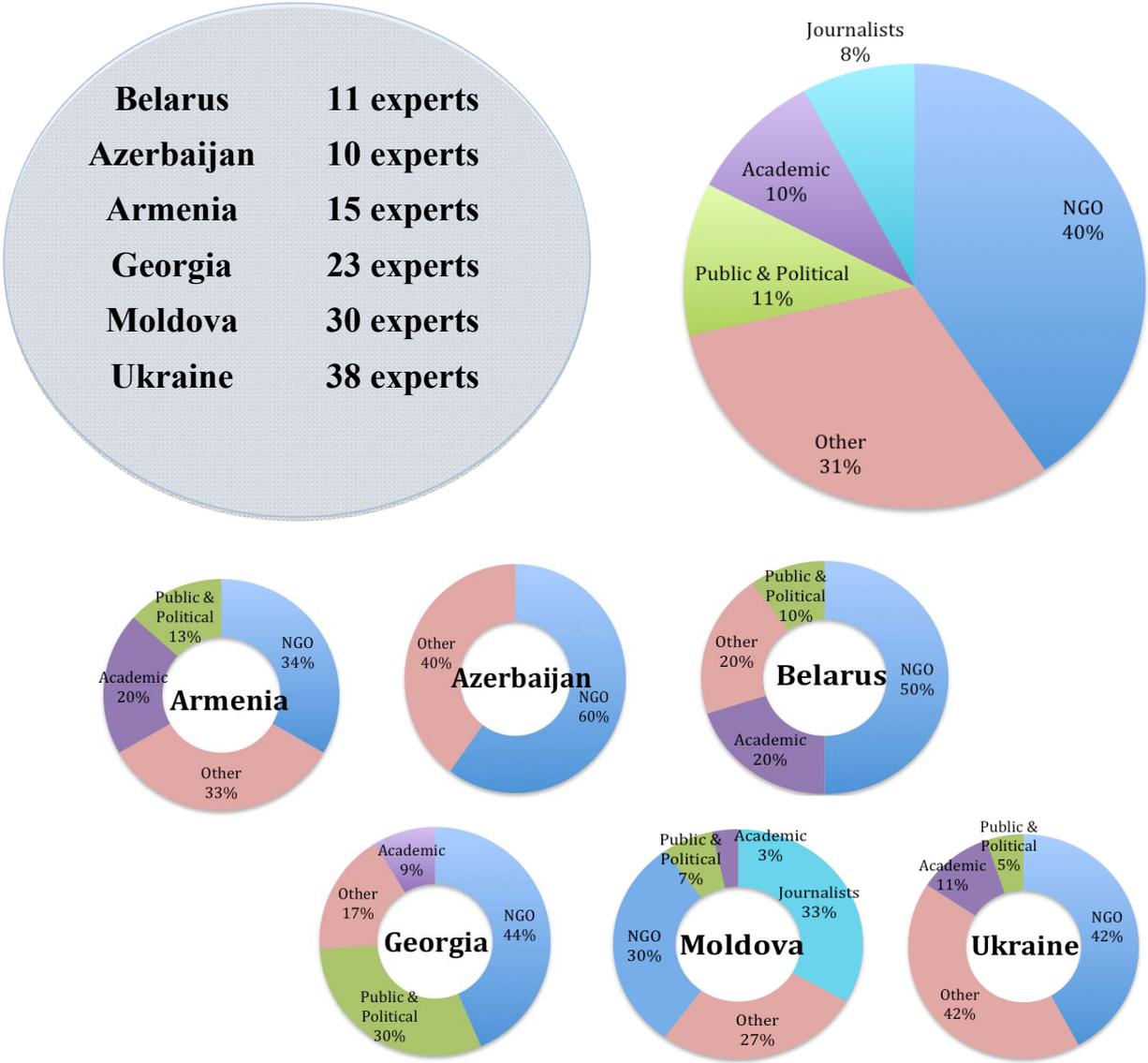
Recommendations formulated here are informed by the benchmark practices we have identified in each case, as well as the existent challenges. These include: digitalisation of bureaucratic public services (e.g. permits, certificates), centralised online system for announcing job openings in the public sector,

training public sector employees in the implementation of transparency measures and ethical conduct, allowing citizens' access to the deliberative process of local councils etc.

Introduction: Methodology and Scope of Investigation

Corruption is one of the most pervasive phenomena affecting public administrations across the globe. With increasing prerogatives being transferred from the central government to the local and regional authorities, it is of paramount importance to understand the mechanisms that favour corruption at the subnational level. In doing so, we can subsequently engage with the best measures to prevent it and promote public ethics.

Figure 1: Sample Distribution for Expert Survey (January 2017, n = 127)



The present study is anchored in an expert survey conducted in all Eastern Partnership (EaP) countries between 12 December 2016-20 January 2017. We used a systematic coverage of expert databases: public sector and politicians network of the European Committee of Regions (CoR), civil society organizations network of the European Bank for Reconstruction and Development (BERD), and the Romanian Academic Society (SAR) network of experts. We also employed snowballing techniques (i.e. at the end of the questionnaire the experts were asked to provide further references) as well as targeted invitations.

The survey was translated in all 6 national languages, and we have 126 respondents in total. The targeted category of respondents were: academics, public sector employees, politicians, journalists and representatives of local and international civil society organizations (CSO) (e.g. Freedom House, Open Society, Transparency International, German Marshall Fund), international organizations experts (e.g. NATO, OSCE, Council of Europe, GRECO, World Bank) and other senior local experts. The effort of collecting primary data was possible due to the translation work of several scholars and civil society persons who translated the expert survey questionnaire.¹

The survey (see Annex 2) consisted of 19 questions that allowed us to collect three kinds of information:

- (1) ranking of pre-established typologies of corruption and institutional practices in Local and Regional Authorities (LRAs),
- (2) illustrative examples and semi-structured assessment of corruption and institutional practices in Local and Regional Authorities (LRAs), and
- (3) personal details (e.g. professional experience, age, gender, nationality)

The questionnaire was distributed to targeted experts online via SurveyMonkey, using web links, mailing lists and social media. The number of respondents varies across questions because we report only the valid answers. Some skipped questions or did not complete the survey overall.²

¹ Special thanks go to Marina Galstyan (Armenia), Aytan Gahramanova (Azerbaijan), Ryhor Nihznikau and Hanna Asipovich (Belarus), Nanuli Silagadze (Georgia), and Olena Podolian and Valentyna Romanova (Ukraine). The compilation of the data base and dissemination towards relevant experts in the targeted case studies benefitted from the contribution of Simona Ernu (SAR), Valentina Dimulescu (SAR), Cristina Buzaşu (BERD), Bianca Toma (CRPE), and Oskar Whyte and Joris Wagemakers (CoR).

² Regarding the latter, this happened quite randomly, there was no particular question after which respondents stopped participating.

In addition to the Expert Survey, the present study benefited from a triangulation of data with Country Reports (for the past 3 years), such as Nations in Transit (Freedom House), and other in-depth assessments of corruption and institutional capacity realized by Transparency International, World Bank and the Council of Europe. We did not however benefit from the insight of polls to judge directly citizens' perceptions on corruption at the LRA level. While the latest Corruption Perception Index scores for EaP countries suggest a relatively stable situation³, there is little data on popular concerns regarding different types of corruption. For EU countries more specific indicators have been developed (e.g. electronic tenders)⁴, while for South Eastern Europe, several citizens' surveys have been deployed⁵. In the present study we piloted the assessment of citizen' concerns via representative categories of experts (i.e. Civil Society Organizations and Journalists), but we recommend a future deployment of a systematic survey of the population in EaP states which goes beyond measuring perceptions of corruption, and examines forms of corruption (e.g. nepotism, transparency) as we do here.

The structuring of the present analysis was informed, firstly, by the 31st Session Report of the Congress of Local and Regional Authorities, *Preventing corruption and promoting public ethics at local and regional levels*. Secondly, it was based on previously assessments by the authors with regards to the phenomenon of corruption in public administrations⁶

³ According to Freedom House's Corruption Perception Index in 2016, Armenia scored 35, Azerbaijan 30, Belarus 40, Georgia 57, Moldova 30 and Ukraine 29. http://www.transparency.org/news/feature/corruption_perceptions_index_2016 (last accessed on the 27th of January 2017).

⁴ <https://www.hertie-school.org/blog/time-dig-deeper-measure-corruption/>

⁵ <http://seldi.net/home/>

⁶ Gherghina, S. and Volintiru, C., 2015. A new model of clientelism: political parties, public resources, and private contributors. *European Political Science Review*, pp.1-23. Volintiru, C., 2015. The exploitative function of party patronage: does it serve the party's interest?. *East European Politics*, 31(1), pp.39-55. Volintiru, C., 2013. How Public Spending is Fuelling Electoral Strategies in Romania. *Südosteuropa. Zeitschrift für Politik und Gesellschaft*, (02), pp.268-289. Volintiru, C. 2013. Corruption in Romania: Manifestation Form and Prevention Efforts. *PRIAD Policy Journal* (1):2.

Prevalence of Corruption at the Local and Regional Level in Eastern Partnership (EaP) Countries: Country Assessments

Armenia

The most prevalent forms of corruption in Armenia, according to the experts are: favoritism in public procurement (71%), conflicts of interests (57%) and nepotism in appointing public officials (50%). Abuse of power (7%) is not considered by respondents to be of average or significant importance.

The *Nations in Transit* Report shows a slight improvement of corruption issues in Armenia over the past decade, falling from 5.75 to 5.50 in 2009, and later on, to 5.25 in 2012. The latter improvement of the score was based on the introduction of E-government services that ‘reduced opportunities for bribery’ as well as new regulations that led to ‘higher numbers of corruption lawsuits and fines against senior officials and large companies’.⁷

The main problems in Armenia regarding public procurement that were reported by experts are: lack of transparency (77%), nepotism (69%) and an ambiguous legislation (46%). The legislative reforms of 2012 regarding the conduct of civil servants have been an important step forward, but there is still a regulatory gap regarding public procurement procedures.

Experts provided us with illustrative examples of corruption in the process of public procurement at the local or regional level. In Armenia, within the capital city of Yerevan, one of the sectors in which public procurement issues have caught the public’s attention is garbage disposal, as in the recent example of a large contract awarded by the public zoo with no public announcement in advance.

While in press and annual CSOs’ reports, most instances of corruption in Armenia are reported at the national level, there is some collusion between political and private contractors at the local level too. Such is the case of the Kotayk Province which is under the influence of the prominent businessmen Gagik Tsarukyan.⁸

⁷ Freedom House (2012), *Nations in Transit - Armenia*, p 67-68.

⁸ Freedom House (2016) *Nations in Transit -Armenia*, p 8.

The main problems in Armenia regarding public services that were reported by experts are: abuse of administrative resources in election campaigns (92%) and lack of transparency (62%). Our study reveals that employees in the public services and subordinated or coordinated public sector institutions (e.g. school) are pressured to vote for the incumbent parties in power at the local level.

Institutional capacity is not very good at the level of Local authorities in Armenia given the stalled efforts to reform the administrative structures through consolidation so far. The territorial reforms left many of the smaller communities with an uncertainty about the way they will be financed from the central budget in the future. Experts believe that both for preventive as well as corrective measures to counteract corruption, there is a good level of competence in LRAs, but a limited willingness to engage.

Effective measures to reduce corruption in Armenia are seen to be: increasing transparency and public awareness on activities (92%), raising awareness among citizens and NGOs (42%) and informing the public employees about the causes and consequences of the phenomenon (33%).

Azerbaijan

The most prevalent forms of corruption in Azerbaijan, according to experts are abuse of power (100%) and to a much lower degree, conflict of interests (43%). Decisions contrary to public interest (14%) are not considered by respondents to be of average or significant importance. The prominence of abuse of power in Azerbaijan is linked to the centralization of the decision-making process in the public administration system. Along with Belarus, it is one of the EaP countries where self-governance in local and regional authorities is weakest, and the institutional structure of the central government allows for a high degree of discretionary control over public resources.

The *Nations in Transit* Report reflects a deterioration of corruption prevalence in Azerbaijan over the past decade, with an increase from 6.25 to 6.50 in 2009, and later on to 6.75 in 2013. Still, the source of the graft and corruption problems is generally found within the central administrative structures of the state. The low prevalence of corruption in local authorities is mostly linked to their weak institutional status with limited prerogatives and funding. This explains why some of the more pervasive practices of wasteful allocation of resources and favoritism in public procurement contracts are not judged by experts to be relevant to LRAs in Azerbaijan.

The main problems in Azerbaijan regarding public procurement that were reported by experts are: lack of transparency (100%), poor protection for whistleblowers (71%) and nepotism (46%). Similarly, for public service delivery, the main problems are (once again) lack of transparency (86%) and nepotism (71%). In Azerbaijan there is also a much smaller evaluation of competence and willingness to engage in preventive anti-corruption measures as opposed to corrective ones.

A legislative framework for whistleblowing protection would increase both the transparency of administrative procedures, as well as signal the abuses of power that take place at the local level in Azerbaijan. In the absence of such a state initiative, local civil society entities can be encouraged to develop their watchdog capabilities.

While not developed by LRAs but providing many of the local public service delivery, in Azerbaijan there is a newly established e-government application—ASAN SERvice (Azerbaijan Service and Assessment Network).⁹ Created by the State Agency for Public Administration and Social Innovations (ASAN) and acting under the authority of the President’s Office, for a number of bureaucratic public service provisions it allows citizens to see how many people have been serviced, how many are queued and average service delivery time. It is available for five public service centers in Baku and six other major cities (i.e. Sumaqayit, Gyandhza, Sabirabad, Barda, Gabala, Masally).

Furthermore, since 2015, the online portal for fees and taxes payment is live,¹⁰ giving citizens the possibility to pay fines (e.g. traffic fines), duties, administrative fees (e.g. identity card, driving license, ordinary passport), utility payments (e.g. energy fees), and other payments (e.g. mobile service). It is not only effective in diminishing petty corruption and interaction with clerks, but it is also creating a system of interoperability of citizens data, between the various Ministries (e.g. Department of Internal Affairs, Ministry of Public Finances) so that monitorization is more effective.

⁹For further details see the institutional portal here: http://www.asan.gov.az/en/content/index/329/state_agency_for_public_service_and_social_innovations_under_the_pr#.WIOQerZ97_Q, last accessed by the authors on 15.02.2017.

¹⁰For further details see the institutional portal here: www.asanpay.az, , last accessed by the authors on 15.02.2017.

Belarus

The most prevalent forms of corruption in Belarus, according to the experts are: abuse of power in public office (64%), conflicts of interests (46%) and clientelistic distribution of goods and services (46%). In contrast to what they regard as the most prevalent forms of corruption, experts believe that the citizens' concerns are much higher regarding nepotism in appointing public officials (46%) and decisions contrary to public interest (64%). This shows a limited awareness of the public on the extent and effects of various corruption practices in Belarus, which is in accordance with the lack of transparency being the main vulnerability of LRAs in Belarus.

The *Nations in Transit* Report reflects a stable evaluation of corruption and local democratic governance as being poor in Belarus over the past decade. With no clear legislative provisions for self-governance, the local authorities remain largely controlled by central state. There is however an active control against corruption (to constrain the power of local office holders, not necessarily to reduce wasteful allocations).

The main problem within the LRAs in Belarus both in terms of public procurement and public service delivery is the lack of transparency. Public procurement procedures are equally affected by an ambiguous legislation (44%) and untrained personnel (44%), while public services are affected by the clientelistic distribution of goods and services (78%).

While legally accountable to the citizens, LRAs in Belarus are captured by national political elites as regional councils are dominated by heads of state enterprises and organizations¹¹. Furthermore, since 2011 regional governors have been integrated into the military hierarchy as coordinators of local army units. This dilutes even further their democratic accountability as heads of administrative institutions.

In Minsk, Belarus's capital, the incumbent mayor's project of building swimming pools raised concern, especially as he excluded the offers of international bidders. According to our expert survey data, in the cities of Gomel and Bobruisk in Belarus there are issues with the contracting procedures for

¹¹ Freedom House (2016) *Nations in Transit - Belarus*, p 8, for further details see Andrey Kazakevich and Vadzim Smok, "Алігархія ці вертыкаль? Рэгіянальныя эліты ў Беларусі: эвалюцыя ў 1999–2014 гадах на прыкладзе абласных Саветаў" [Oligarchy or vertical? Regional elites in Belarus: Evolution in 1999-2014, the case of the local councils], Institute of Political Studies "Political Sphere," 2014, http://palityka.org/wp-content/uploads/2014/03/Reg_elites_Political_Sphere-2014.pdf.

apartment buildings. Nevertheless, local administrations in urban areas of Belarus are still much more likely to be reactive to citizens' concerns and needs than regional authorities will ever be.

Apart from increasing transparency and public awareness on the activities of LRAs, experts believe Belarus would benefit from raising awareness amongst citizens and NGOs about the causes and effects of corruption, as well as training public sector employees in preventive measures.

Georgia

The single most prevalent forms of corruption in Georgia, according to the experts is nepotism in appointing public officials (91%). Experts believed citizens to also be concerned about abuse in public office, but do not regard it themselves as a significant manifestation of corruption. The high prevalence of nepotism in Georgia is linked to a weak legislative framework on the selection and evaluation of employees in the public administration.

In the Corruption Perception Index (CPI), Georgia has the highest score (57) in the EaP region—averaged at 30, which shows both a popular and an institutional commitment to fighting corruption. Similarly, in the *Nations in Transit* Report, we find here across the past decade one of the lowest score in the region for both local democratic governance and corruption. Legislative reforms to local self-governance have influenced in 2015 the decrease of the score for local democratic governance from 5.50 to 5.25¹². Procedural reforms in bureaucratic interaction between citizens and the public administration (e.g. online payments) in 2012 have increased transparency and limited petty corruption and as such the corruption score for Georgia fell to its lowest, from 4.75 to 4.50.

The main problem of public procurement in Georgian LRAs is the untrained personnel (71%)—the highest manifested experts' concern across the EaP set of cases. This reflects the evaluations of high prevalence of nepotism (52%) as the main problem regarding public service delivery in Georgia. At the root of this problem is the lack of a formalized system of recruitment and promotion within the public sector, poor publicly advertised openings, and a heavy reliance on recommendations in the employment process (to the detriment of qualifications or experience)¹³. All of these issues are much greater at the level of LRAs than

¹² Freedom House, 2015 Nations in Transit - Georgia, p. 250.

¹³ Charkviani, T., 2013. Post-Soviet Georgia in the Process of Transformation-Modernization Challenges in Public Service. *Romanian Journal of Political Science*, 13(2), p.137.

at the central government level, as the lower attractiveness of the former positions further diminishes the employment competitions.

Based on the qualitative analysis of corruption occurrences, the poor allocation of financial and human resources in Georgian LRAs creates vulnerabilities for corruption in social service delivery, not necessarily in the overall public service system.

Georgian experts have specifically chosen to refer to inadequate budgetary allocations for LRAs and unqualified staff as main vulnerabilities of LRAs in the provision of public services . Nevertheless, within the institutional capacity assessment, Georgia scores slightly above all other EaP countries, as having a good institutional capacity especially in terms of willingness to engage and competence (surpassed here only by Armenia). Furthermore, Georgia seems to have a strong will to tackle corruption both in preventive and corrective measures. Beyond the increase of transparency and public awareness on LRAs activities (which is a constant recommendation across the region), experts believe that Georgia would also benefit from civil servants' instruction on corrective measures to counter corruption.

Third party monitoring (whether from public audit bodies or civil society organizations) is highlighted as a benchmark of anti-corruption efforts in Georgia, within the legislative framework of the recently amended Law no. 157/2016 on Conflict of Interest and Corruption in Public Institutions.

Moldova

The most prevalent form of corruption in Moldova, according to the experts is favoritism in public procurement (83%), followed by nepotism in appointing public officials (48%) and conflicts of interests (48%). Experts also believe that there is a high concern amongst citizens' about the prevalence of favoritism in public procurement, thus reflecting a much higher awareness of the public regarding institutional distortions in Moldova.

The Nations in Transit Report reflects a deterioration of the overall prevalence of corruption in Moldova, following the theft of 1 bil. \$ and other graft allegation¹⁴. Nevertheless, the same source reports a recent improvement of local democratic governance in Moldova, following the adoption of the Law on

¹⁴ Freedom House (2016) Nations in Transit - Moldova, p 3.

Local Public Finances in 2015 which effectively diminishes the significance of political leverage in ensuring budgetary allocations from the central government, as it provides a standard formula for such transfers.¹⁵

The main problems in Moldova regarding public procurement that were reported by experts are: lack of transparency (77%), nepotism (65%) and untrained personnel (54%). In the Moldovan municipality of Bălți, waste disposal and cleaning contracts are flagged as opaque and preferential. Often, improprieties in the administrative process are publicly linked to the personal interests of the incumbent mayor, as in such cases as Renato Usatii (Bălți, Moldova). Other public services affected by corruption in the procurement process are the medical and educational centers that fall under the authority of local administrations (given the process of decentralization).

The main problems in Moldova regarding the provision of public services reported by experts are: lack of transparency (77%), clientelistic distribution of public goods (69%) and nepotism (65%).

As a direct reflection of the main problem that affects both public procurement and the provision of public services, experts account for the most effective measures to counter corruption in Moldavian LRAs to be: increase transparency and public awareness on activities (91%), as well as raising awareness among citizens and NGO (61%).

Our survey suggests as a main method of countering corruption the implementation of internal or external programmes of strengthening the administrative capacity of LRAs (Moldova is the only country where this was suggested as one of the main measures to counter corruption).

Over half of country experts said that external consultants were employed by Local Authorities in Moldova with the purpose of providing transparency to administrative activities and preventing the wasteful allocation of public resources. Experts positively assessed the impact of public acquisition plans and strategies, and public consultations on the topic of public procurement, in addition to live streaming of deliberative sessions of some of the LRAs' councils.

¹⁵ Freedom House (2016) Nations in Transit - Moldova, p 8-9.

Ukraine

The most prevalent form of corruption in Ukraine, according to the experts is favoritism in public procurement (79%), followed by abuse of power in public office (55%) and clientelistic distribution of public goods (48%). Experts believe Ukrainians are very much concerned by decisions contrary to public interest (66%) and nepotism in appointing public officials (40%) (even if their own expert assessment places a lower emphasis on these instances of corruption).

The Nations in Transit Report reflects a recent improvement in the local democratic governance of Ukraine, falling from 5.50 to 5.25 this year as the constitutional changes regarding decentralization passed through the national deliberative forums.¹⁶ These reforms aim at increasing the budgetary autonomy of local governments, as well as their decision-making functions (e.g. local strategies of development). Additionally, much like in Armenia, the process of decentralization also involves a consolidation of smaller communities effectively reducing the number of LRAs in Ukraine¹⁷.

The main problems in Ukraine regarding public procurement that were reported by experts are: nepotism (70%), ambiguous legislation (60%) and untrained personnel (47%). Contracts for road repairs and public transportation are highlighted by experts. One of the signaled incidents in public procurement is the hastily contracting for major repair works in Kiev Oblast at the end of the budgetary year, with the payments, and reception of the contracts being done only a few days after¹⁸. Also, most of the road repairs in Kharkiv seem to be carried by companies close to decision-makers involved in the tender process.

Public service delivery in Ukraine is hindered by the clientelistic distribution of goods and services (73%) and the lack of transparency (60%). Private interests are flagged in the case of the introduction of new public service facilities (e.g. electronic ticketing, permits or insurance provisions) as providers are political clientele companies that are certificated and funded by local authorities.

One of the most important positive benchmarks in public procurement in EaP countries is the recent introduction in Ukraine of the electronic procurement

¹⁶ Freedom House (2016) Nations in Transit - Ukraine, p 9-10.

¹⁷Decentralization Reform, National Reforms Council, <http://reforms.in.ua/en/reforms/decentralization-reform>

¹⁸Suggested source by the expert respondent: <https://www.kyivpost.com/ukraine-politics/activists-report-raft-state-procurement-violations-december.html>

system, ProZorro, with the new Law no. 922/2015 on Public Procurement coming into force in 2016.

A second example is the development of “one-stop-shop” administrative centers in Ukraine. While not as digitally advanced, these territorial centers do provide additional facilities of accessibility to the beneficiaries of public services. The “Transparent Offices” (TSNAP) providing administrative services operate in the city councils of regional centers: in Western Ukraine (e.g. Ivano-Frankivsk, Lutsk, Vinnitsa, Khmelnytsky), Central Ukraine (e.g. Dnepropetrovsk, Krivoy Rog, Pavlograd, Dnipropetrovsk), Eastern and Northern Ukraine (e.g. Kharkiv, Luhansk, Sumy, Chernigov, Zhitomir) and in Kyiv. Several TSNAP (in Kharkiv, Kyiv, Dnipropetrovsk) have a web platform where you can order individual services, appointment, monitor the movement of the case, and other informative consultations through a web portal. Administrators TSNAP inform applicants by email or by phone about the status of processing of their solicited document. In some centers you can even order the finished document by mail and do not have to collect it in person from the TSNAP.

Nevertheless, unlike in Azerbaijan where the local and regional prerogatives meet central government prerogatives on the same platform, in Ukraine these remain separate. Consequently, most of the popular administrative services (e.g. passports, cadaster) remain under the executive power: the State Registration Service of Ukraine, State Migration Service, State Land Agency and others.

Finally, the Ukrainian municipality of Bila Tserkva recently launched a blockchain based platform for public property lease – Auction 3.0. The new system aims to use public monitorization of the auction process to reduce fraud to the minimum. After being piloted in certain LRAs the Ukrainian authorities hope to scale it nation wide.

Prevalence of Corruption at the Local and Regional Level in Eastern Partnership (EaP) Countries: Cross-Country Comparisons

In every EaP country there is one form of corruption on which the large majority (approximately two thirds) of the experts agreed to be prevalent, and significantly more prevalent than other forms. This suggests that there are country specific conditions and mechanisms through which corruption manifests itself at the level of Local and Regional Authorities (LRAs).

Based on the triangulation of both quantitative and qualitative survey data, we were able to discern the main traits for each country. For Azerbaijan and Belarus the lack of transparency is the most stringent issue; for Armenia and Ukraine most of the issues stream from ambiguous legislation; in Georgia the most poignant issue is personnel recruitment and qualification, and in Moldova it is favoritism in public procurement.

Table 1: The perception about the most prevalent forms of corruption in LRAs (%)

EXPERT ASSESSMENT	Favoritism in public procurement	Nepotism in appointing public officials	Abuse of power in public office	Decisions contrary to public interest	Conflicts of interest	Clientelistic distribution of public goods
Armenia	71	50	7	43	57	36
Azerbaijan	29	29	100	14	43	29
Belarus	27	36	64	36	46	46
Georgia	36	91	41	41	41	32
Moldova	83	48	21	45	48	38
Ukraine	79	34	55	37	37	42

Note: The sum of percentages is greater than 100% because it was a multiple-choice question. The “other” category is not reported here because only 2% of the experts in all countries used it.

Table 1 includes the answers of experts for each of the most prevalent form of corruption in their countries (in percentage).¹⁹ One important similarity across the six countries is the high number of experts indicating conflicts of interest and nepotism as prevalent forms of corruption. In spite the country-level variation, these two forms appear to be common concerns in the EaP countries.

Table 2 includes the percentage of experts in every country indicating a particular form as being of major concern to citizens.²⁰ The present study could not build a representative sample for a citizen survey²¹, and there are no available large sample survey data for the EaP countries of the type available in EU countries (e.g. Eurobarometer, SELDI). Our methodology attempted to fill this gap with a dedicated question on the popular concerns in their countries (as opposed to their own expert assessment). Because our sample included such categories of respondents as civil society leaders or journalists, we expect the data from this question provides us with a partial assessment of citizens’ main corruption-related grievances.

Table 2: The perception about the forms of corruption in LRAs of major concern to citizens (%)

CITIZENS’ PERCEPTIONS	Favoritism in public procurement	Nepotism in appointing public officials	Abuse of power in public office	Decisions contrary to public interest	Conflicts of interest	Clientelistic distribution of public goods
Armenia	21	64	21	50	29	64
Azerbaijan	29	57	100	43	29	43
Belarus	9	46	64	64	9	36
Georgia	27	86	55	27	36	5
Moldova	59	55	35	69	45	31
Ukraine	24	40	66	66	32	34

Note: The sum of percentages is greater than 100% because it was a multiple-choice question. The “other” category is not reported here because only 2% of the experts in all countries used it.

¹⁹ Experts were asked to identify the most prevalent forms of corruption at the level of LRAs in their country. They were provided with a list of potential forms, having the possibility of a multiple answer with a maximum of three choices. On top of the predetermined answer options, they had the possibility to add a form of corruption through an open answer made available via the “other” option. For the forms of corruption there were only isolated instances in which respondents chose the “other” option; for reasons of simplicity we did not report those answers in this report.

²⁰ Experts were also asked to estimate what forms of corruption present at the level of LRAs in their countries are of major concern for citizens. Respondents had again the possibility to provide a multiple answer, with a maximum of three choices being permitted.

²¹ We recommend a future deployment of a systematic survey of the population in EaP states which goes beyond measuring perceptions of corruption, and examines forms of corruption (e.g. nepotism, transparency) as in similar population survey studies conducted in the EU member states.

One relevant conclusion of these distributions is the salience of all forms of corruption for citizens and their relatively high importance; there are only isolated instances in which particular forms are less significant (e.g. favoritism in Azerbaijan, clientelism in Georgia). Another relevant conclusion is that experts differentiate between what they consider to be the prevalent form of corruption in their country and what is of concern to the public.

Table 1 and 2 demonstrate little direct association and sometimes demonstrate more of an inverse association (e.g. Armenia’s expert assessments on the prevalence of favoritism and clientelism as opposed to how concerned they believe citizens to be of these phenomena). This suggests that experts believe the true magnitude of corruption instances sometimes escapes the attention of citizens, especially in administrative and procedural areas with which they have lesser contact (e.g. public procurement, conflict of interests).

As specific functions of the Local and Regional Authorities (LRAs), we compare and contrast the incidence of corruption in public procurement with that occurring in the delivery of public services.

Public procurement is considered as the administrative process by which public administrations (i.e. LRAs) purchase works, goods, or services from private companies²². Adjacent to public procurement issues are usually problems regarding transparency, conflict of interests, and nepotism (contracting component). Public procurement can be applied for investment purposes (e.g. building swimming pools in Minsk), as well as everyday public service delivery (e.g. transportation, cleaning).

Table 3: The perception about the main vulnerabilities of LRAs in public procurement (%)

PUBLIC PROCUREMENT	Armenia	Azerbaijan	Belarus	Georgia	Moldova	Ukraine
Ambiguous legislation	46	0	44	29	35	60
Lack of transparency	77	100	89	38	77	40
Untrained personnel	8	29	44	71	54	47
Poor protection for whistle blowers	31	71	0	19	31	30
Nepotism	69	71	22	57	65	70

Note: The sum of percentages is greater than 100% because it was a multiple-choice question. The “other” category is not reported here because only 3% of the experts in all countries used it.

²² <http://cor.europa.eu/en/events/Documents/Preventing%20Corruption%20and%20promoting%20public%20ethics%20at%20local%20and%20regional%20levels%2023%20August%202016.pdf> (last accessed on the 27th of January 2017)

Corruption can be reflected in a restricted or conditional access to public services, the decrease of their quality and quantity, or their use for electoral gains. As such, adjacent to issues of public service we find the following corruption categories: lack of transparency, clientelism, nepotism (recruitment of staff component), no whistleblower protection or abuse of administrative resources in election campaigns.

In general, poor protection for whistle blowers is not seen as a major vulnerability in EaP countries. While whistleblowers protection does not seem to be amongst the main suggestions for anti-corruption measures in our survey, the experts did point out that civil servants are often pressured into covering for illegal or distortive practices for fear of being fired (e.g. Ukraine). One exception is Azerbaijan where whistleblower protection is placed second. There is also great difference between countries regarding the role of ambiguous legislation, ranging from no perceived vulnerability in Azerbaijan to 60% of experts mentioning it in Ukraine.

Furthermore, the issuance of permits (e.g. building permits) or certification is one of the most frequently signaled cases of distorted institutional procedures, either due to bribes or preferential treatment. Information is withheld to increase the dependency of beneficiaries on the public employees. Social services and benefit allocation, as well as preferential access to medical services are especially vulnerable to this patrimonial approach (e.g. Azerbaijan, Georgia, Belarus).

The interpenetration between the businessmen and political elites are frequently mentioned as an issue of public procurement process in EaP countries. In various forms of state capture, the public procurement process is filled with loopholes to ensure the access of party loyal clients to public contracts. Examples include: confidential agreements for prices (in Georgia), procurements bellow the more transparent electronic acquisition threshold (in Ukraine), no publication of tenders (in Armenia, Azerbaijan and Ukraine), as well as a generalized inflation of acquisition prices.

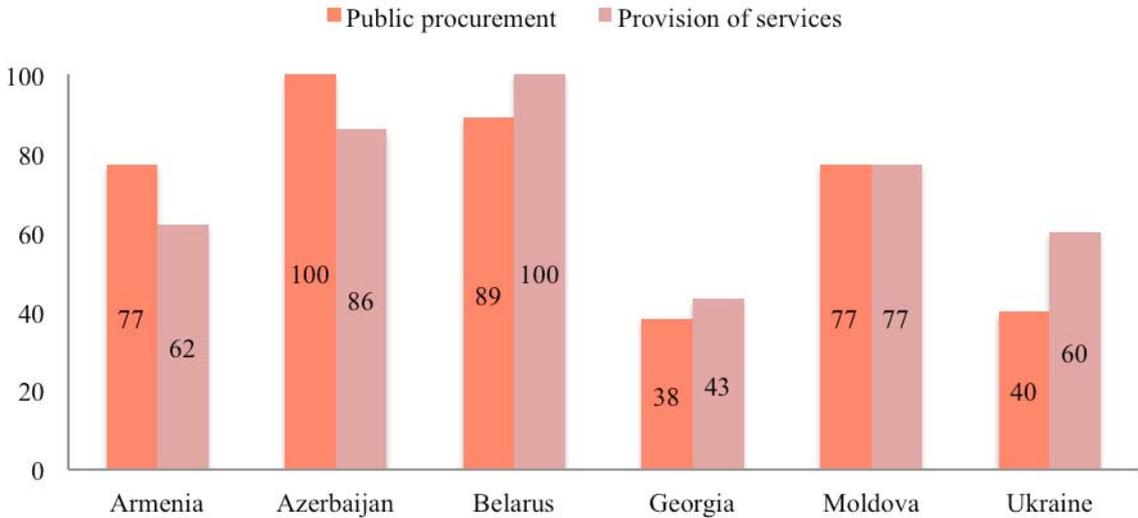
Overall, the lack of transparency or criteria for budgetary allocations, as well as the preferential treatment given to certain contractors are the main traits of public procurement problems in the analyzed set of cases. Public and private interests collide in all cases when awarding public contracts (e.g. fictitious tenders, companies controlled by mayors). Furthermore, in cases such as Belarus, there is a widespread practice of granting presidential pardons to businessmen prosecuted for corruption, as long as they make some compensatory payments, leading to weak incentives for anti-corruption efforts.

Table 4: The perception about the main vulnerabilities of LRAs in the provision of public services (%)

PUBLIC SERVICES	Armenia	Azerbaijan	Belarus	Georgia	Moldova	Ukraine
Abuse of administrative resources in electoral campaigns	92	43	56	38	54	57
Clientelistic distribution of public goods	46	43	78	29	69	73
Lack of transparency	62	86	100	43	77	60
Nepotism	46	71	22	52	65	57
Other	8	14	0	38	0	7

Note: The sum of percentages is greater than 100% because it was a multiple-choice question.

Figure 2: The lack of transparency as vulnerability for LRAs (%)



The empirical evidence presented in Tables 3 and 4 indicate the lack of transparency as the major vulnerability for the activity of LRAs in the EaP region. Figure 2 compares these levels for the public procurement and provision of services across the six countries. Across countries, the two that are labeled as

“consolidated authoritarian regimes”²³—Azerbaijan and Belarus have the most severe lack of transparency in LRAs for both public procurement and public service delivery. Consistent with other reports on corruption and institutional capacity, as well as with its sustained reform efforts, Georgia seems to have the lowest problem with transparency standards.

In the case of Armenia and Azerbaijan, the lack of transparency is seen as a bigger problem in the public procurement process, than in the public services. In contrast, Belarus, Georgia and Ukraine show a higher vulnerability of lack of transparency in public services, while for Moldova administrative procedures seem to be equally marked by poor transparency.

Most of the problems raised with regards to corruption in public services are related to simultaneous problems with public procurement procedures. For example, the quality of such public services as waste management and collection (e.g. Ukraine), sewage (e.g. Armenia), or transportation (e.g. Moldova), the desire of the local authorities to favor certain contractors lowers the quality of services provided to the population.

In the case of most of the EaP subnational authorities, the inventory and/or administration of private and public property falls under their prerogatives. Nevertheless, cadaster records have been historically poorly kept²⁴, and the lack of transparency and improper filing of records continues to be an issue today. In Moldova, Ukraine Armenia, municipal LRAs are accused of selling lands, factories or forests from the public patrimony to the profit of elected political elites. State capture also influences the way urban planning is developed and permits are granted.

We have also developed an institutional capacity assessment built on four levels of assessment: affordability, availability, competence, and willingness to engage (see Figure 3 and 4).

The affordability layer is designed to reflect the extent to which LRAs in each country have the possibility to allocate material and human resources to designing and deploying anticorruption tools and tactics. The layer of availability refers to both access to international cooperation and training

²³ Based on Nations in Transit taxonomy Georgia, Moldova and Ukraine are considered to be “Transitional Government or Hybrid Regime”, Armenia is regarded as “Semi-Consolidated Authoritarian Regime”, and Azerbaijan and Belarys are seen as “Consolidated Authoritarian Regime”, <https://freedomhouse.org/report/nations-transit/nations-transit-2016>, last accessed by the author on 15.02.2017.

²⁴ D'Arcy, M. and Nistotskaya, M., 2016. State First, Then Democracy: Using Cadastral Records to Explain Governmental Performance in Public Goods Provision. *Governance*.

sessions on anticorruption, as well as local or grassroots initiatives to monitor the LRAs (e.g. Go Local²⁵, Ukraine). Competence and willingness to engage are both dimensions of assessment of the human resource employed in LRAs.

We do not restrict the category of anticorruption agents to public sector employees, as important measures can be taken from outside the institutions (e.g. third party monitorization), but a long-term perspective on anticorruption efforts is fundamentally reliant on the integration of public ethics within the institutional process of the LRAs.

We applied this assessment framework for both preventive and corrective measures in the fight against corruption at the level of Local and Regional Authorities (LRAs). Preventive measures are here considered to be those that try to stop the occurrence of corruption beforehand (e.g. transparency of administrative procedures, rotation of personnel in positions at risk, codes of ethics/of conduct, mandatory declarations of personal interests).

Corrective measures are here considered to be those that are deployed in an attempt to stop or punish corruption after it has occurred (e.g. whistleblowing, referral to appropriate regulatory agencies). The latter can also have confounding effects with preventive efforts as anticorruption campaigns can sometimes create deterrence effects. Nevertheless, for the purpose of the present study, we distinguish between the two as different institutional approaches to anticorruption efforts.

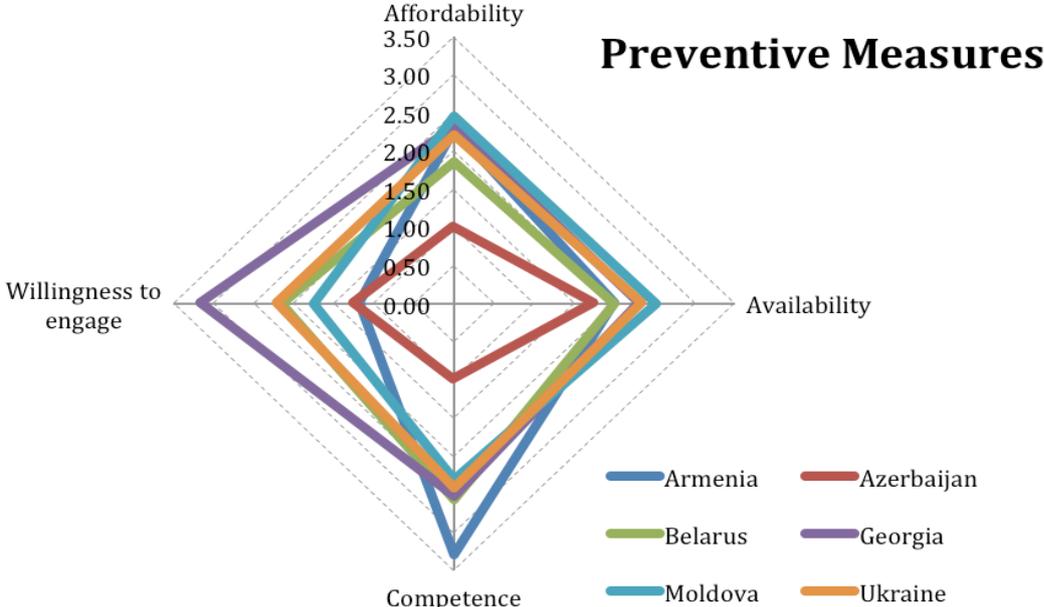
The key to understanding the inclination of decision-makers in LRAs to implement anti-corruption measures is to link them to any electoral capital these might bring them. Public ethics can be in general a positive attribute for any incumbent, but it is reliant on the public's awareness. In this sense, we can see the case of Belarus where preventive anticorruption measures are judged to have a limited capacity, while corrective ones have a good one—one of the highest in the region alongside Armenia. This can be explained by the fact that anticorruption campaigns have the dual goal of generating deterrence (or hierarchical obedience), while reassuring the public of the vigilance of relevant oversight bodies. In contrast, little is done to improve the quality or transparency of the public procurement system and public service delivery.

When ranking together the institutional capacity assessment for all types of anticorruption measures based on the EaP regional averages we find almost all

²⁵ <http://golocal-ukraine.com>

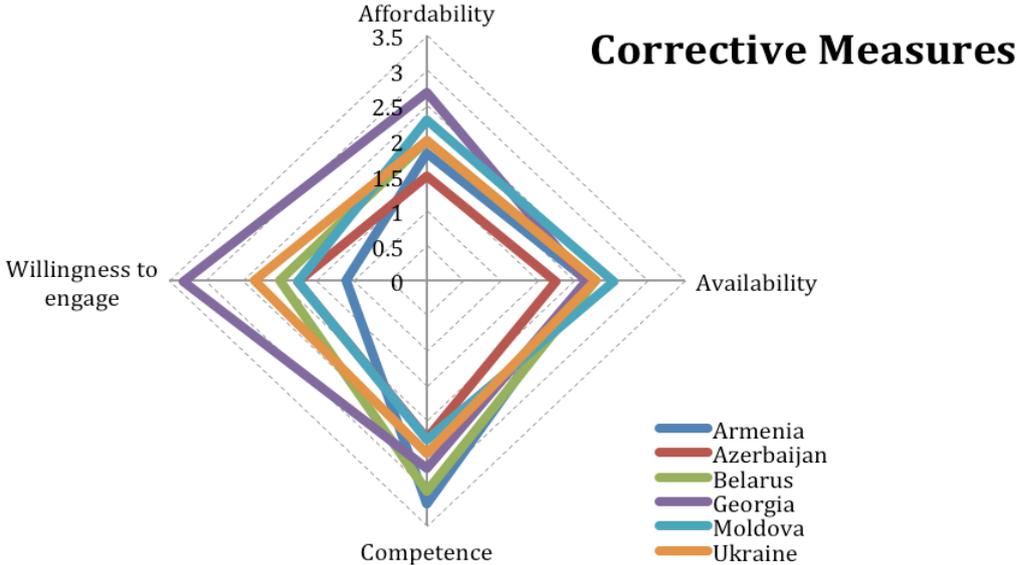
of them to have a moderate capacity. Only the willingness to engage in preventive measures is below average, judged by experts to be limited.

Figure 3: Institutional Capacity in Developing Preventive Anti-corruption Measures



Note: 1=very limited, 5=very high

Figure 4: Institutional Capacity in Developing Corrective Anti-corruption Measures



Note: 1=very limited, 5=very high

This is counterproductive, as preventive measures are some of the least costly (e.g. sharing best practices, increasing transparency and accountability). In the electoral gains light, they are however less noticeable as correcting already manifested problems. In this sense, as we will detail in the final section of this

report, many of the efforts to counter corruption at the LRAs level in EaP countries have to increase the conceptualization of personal benefits to decision-makers in engaging in preventive anticorruption measures.

Regardless of country differences, the main method indicated by the experts is to increase transparency and public awareness about the activities of the LRAs. This is intuitive when scrutinizing the answers about the forms of corruption. Favoritism, nepotism and abuse of power in public office emerged as relevant forms of corruption in almost all the investigated countries. The positive experiences of countries dealing with corruption in the past illustrate that the increase of transparency can effectively help in the fight against corruption.

There is no single preferred method to counteract corruption, with the exception of increasing transparency, which is favored by the majority of experts within a country. In other words, there is little agreement among experts about the impact of other methods. Some methods are generally considered to have less impact, such as information about the causes and consequences of corruption, employees' training on preventive measures or employees' instruction on corrective measures.

Policy Recommendations for Strengthening the Institutional Capacity of Local and Regional Authorities (LRAs) in Eastern Partnership (EaP) Countries

The first set of recommendations streams from benchmark observations within EaP LRAs streaming from the present study (i.e. based on the original data collection of the expert survey). Benchmarking good practices is an easy and effective exercise that should surpass the present study, and develop a continuous form of collecting examples from the territories—as for example within a permanent dedicated online platform, or a quarterly newsletter. While such measures involve LRAs and increases the quality of the services they provide, they can however be achieved only with the regulatory and budgetary support of the national or international institutions.

Good practice examples:

- ✓ **introduction of an integrated, universal and easily accessible electronic system for public procurement procedures, such as Prozorro²⁶ in Ukraine.** Our examples show that corrupt intentions can still manipulate the public procurement system to avoid submitting tenders via Prozorro platform (e.g. dividing contracts into smaller bits to fall under the mandatory e-procurement threshold). Nevertheless, it is still an effective tool for: (1) private contractors who want to engage in fair and open competition, (2) LRA decision-makers who might violate transparency and ethical procedures due to incompetence, and not corrupt intentions, and finally (3) citizens and civil society organizations who can exert a watchdog function if they wish.

- ✓ **publicly available list of targeted social assistance beneficiaries in Azerbaijan.** Many European countries do not make the list of taxpayers or social assistance beneficiaries publicly available in order to protect the citizens' right to the intimacy of private life. However where such measures have been introduced, they proved to be an effective self-regulating tool of society. The public listing of targeted social beneficiaries in Azerbaijan can have a deterrence effect for both the

²⁶For further details please see: <https://prozorro.gov.ua/en/>, last accessed by the authors on 15.02.2017.

corruption demand (i.e. prevent fraudulent intentions of beneficiaries that would not be entitled to these services) as well as the corruption supply (i.e. prevent clientelistic distribution of favours or abuse of administrative resources in election campaigns).

- ✓ **digitalization of bureaucratic procedures in order to increase the accessibility to public services (e.g. ASAN e-governance platform²⁷, ASAN online payments platform²⁸)**. The implementation of “one-stop-shop” online platforms for the provision of bureaucratic public services is one of the most desired reforms of the administrative system by the citizens. This is a field of activity where petty corruption is often present and restricts the accessibility of public services as well as decreases their quality by imposing additional direct (e.g. no. of taxes, bribes) and indirect costs (e.g. time spent). The slow progress achieved in EaP countries in this respect (along with other EU countries as well) is mainly driven by: (1) high costs of developing such online, integrated systems (usually requiring a big data consolidation and interoperability of institutional databases beforehand), and (2) difficulties in linking together different institutions from both the national (e.g. Ministry of Internal Affairs) and local administrative layers (e.g. cadaster records).

The second set of recommendations responds to country-specific vulnerabilities that we have identified in the present study. Such examples should once again be collected in a continuous process of evaluation of good and bad examples from the region. Often the vulnerabilities can be annulled through simple measures reliant primarily on procedural know-how, and only to a marginal extent on resource allocation.

Suggestions based on identified country-specific problems:

- ✓ Developing a systematically deployed training programme aimed at raising the awareness on the affordability and availability of preventive anti-corruption measures in Azerbaijan.
- ✓ Strengthening the whistle protection legislation and watchdog capabilities in Azerbaijan and Belarus.

²⁷For further details please see: <http://www.asan.gov.az/en/content/tree/150/>, last accessed by the authors on 15.02.2017.

²⁸ For further details please see: <https://www.asanpay.az>, last accessed by the authors on 15.02.2017.

- ✓ Creating a centralized online portal for LRAs job openings in Georgia, to counter the discretionary appointments and the poor qualification of the staff.
- ✓ Increase funding available to LRAs in Ukraine for the contracting of external expertise – technical assistance programmes for both preventive and corrective measures.
- ✓ Declarations of interests by elected officials and a mandatory verification of ownership structure of private contractors, to prevent collusion between business interests and administrative functions in the public procurement process.
- ✓ Public database of acquisition prices for any public procurement of LRAs for comparative purposes – deters price inflation.

Finally, a last set of recommendations on measures that can be taken by LRAs in EaP is informed by international, overview assessment of anticorruption efforts, which the authors believe can and should be transferred to EaP countries. This set of recommendations is linked to the ability of EU and national authorities to empower LRAs to absorb and develop good practices.

Further recommendations:

- ⇒ Develop local initiatives for electronic procurement systems, as well as more progressive digital systems of citizen-driven monitorization of administrative procedures and decisions (e.g. Auction 3.0 in Ukraine, live streaming Local Council Meetings in Moldova).
- ⇒ Extended declarations of interests for elected officials, councilmen, and civil servants to include family members, so as to deter the preferential allocation of public contracts to ones' own company.
- ⇒ Reports of activity at the end of every year, with a detailed account of public investments and public services delivered, constructed on the system of set goals and self-monitorization of progress.
- ⇒ Consolidated registries of legislative provisions accessible to the public.
- ⇒ Comparative public procurement price database (ideally realized by LRAs, but it can also be done by CSO).

- ⇒ Participative budgetary construction (i.e. public consultations on the main investment priorities of the LRA, at least for medium and long term investments).

- ⇒ Online modules that could benefit local and regional authorities and administrations across the EaP on various procedural aspects that impact significantly on public procurement procedures, transparency standards, or conflict of interests and clientelism. Based on the present evaluation we make several recommendations on the potential topics of such online modules: regional benchmark practices – good examples of the region/own country; designing accessible institutional webpages; content upload on institutional webpages; constructing interoperable databases; using e-governance portals' specific tools; standardized forms of decision-makers' reporting (e.g. personal wealth, interests, annual performance reports); national and international regulations concerning public procurement process; whistleblower rights etc.

Annex 1. Prioritization Matrix for Corruption Problems in EaP Countries

Prioritization Matrix scale (1-5)	Eastern Partnership (EaP)
Transparency;	1
Conflicts of interest and clientelism;	3
Protecting whistleblowers;	6
Nepotism (recruitment of staff);	2
Public procurement;	5
Abuse of administrative resources in election campaigns;	4

	Main Problems in Public Procurement	Main Problems in Public Service Delivery
Armenia	Lack of transparency Nepotism Ambiguous legislation	Abuse of administrative resources in election campaigns Lack of transparency Clientelistic distribution of public goods Nepotism
Azerbaijan	Lack of transparency Poor protection for whistleblowers Nepotism	Lack of transparency Nepotism Abuse of administrative resources in election campaigns Clientelistic distribution of public goods
Belarus	Lack of transparency Ambiguous legislation Untrained personnel	Lack of transparency Clientelistic distribution of public goods Abuse of administrative resources in election campaigns
Georgia	Untrained personnel Nepotism Lack of transparency	Nepotism Lack of transparency Abuse of administrative resources in election campaigns
Moldova	Lack of transparency Nepotism Untrained personnel	Lack of transparency Nepotism Clientelistic distribution of public goods
Ukraine	Nepotism Ambiguous legislation Untrained personnel	Clientelistic distribution of public goods Lack of transparency Abuse of administrative resources in election campaigns Nepotism

Source: Based on original expert survey conducted for this study.

Annex 2. Expert Survey Questionnaire

(Page 1 – General Overview)

1. In your opinion, who has been primarily responsible for public service delivery in the last five years?

Central government only	Central government executes majority of tasks; local governmental units executes minority of tasks	Both central government and sub-national unit execute amount of services equally	Local governmental units executes majority of tasks; central government executes minority of tasks	Sub-national units only
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2. In your opinion, what has been the capacity of local civil service to perform in a satisfactory manner their administrative tasks, over the last five years?

Very low capacity Low capacity Moderate capacity High capacity Very high capacity

3. In your opinion, what are the most prevalent forms of corruption at the level of Local and Regional Authorities (LRAs) in COUNTRY? (multiple choice, maximum 3 answers)

- a. Favoritism in public procurement
- b. Nepotism in the appointment of public officials
- c. Abuse of power while in public office
- d. Decisions being taken contrary to public interest
- e. Conflicts of interest
- f. Clientelistic distribution of public goods and/or services
- g. Other (please specify)

4. In your opinion, what forms of corruption present at the level of LRAs in COUNTRY are of major concern for citizens? (multiple choice, maximum 3 answers)

- a. Favoritism in public procurement
- b. Nepotism in the appointment of public officials
- c. Misuse of prerogatives and administrative powers
- d. Decisions being taken contrary to public interest
- e. Conflicts of interest
- f. Clientelistic distribution of public goods and/or services
- g. Other (please specify)

(Page 2 – Public Procurement and Public Service)

5. In your opinion, what are the main vulnerabilities of Local and Regional Authorities (LRAs) regarding public procurement contracts? (multiple choice, maximum 3 answers)

- a. Ambiguous legislation
- b. Lack of transparency
- c. Untrained personnel
- d. Poor or non-existent protection for whistle blowers
- e. Nepotism
- f. Other (please specify)

6. Could you please briefly provide some illustrative examples of corruption in public procurement at the level of Local and Regional Authorities (LRAs) in your country?

(open question)

7. In your opinion, what are the main vulnerabilities of Local and Regional Authorities (LRAs) regarding the provision of public services in COUNTRY? (multiple choice, maximum 3 answers)

- a. Abuse of administrative resources in electoral campaigns
- b. Clientelistic distribution of goods and services
- c. Lack of transparency
- d. Nepotism
- e. Other (please specify)

8. Could you please briefly provide some illustrative examples of corruption in the provision of public services at the level of Local and Regional Authorities (LRAs) in COUNTRY?
(open question)

(Page 3 – Fighting Corruption)

9. In your opinion, what would be the best method through which corruption at the level of LRAs in COUNTRY can be counteracted? (multiple choice, maximum 3 answers)
- Inform public employees about the causes, forms and effects of corruption
 - Dedicated training on preventive measures against corruption (e.g. ethical conduct) for public employees
 - Instruct public employees on corrective measures against corruption (e.g. whistleblowing)
 - Raise awareness amongst citizens and local NGOs about the causes, forms and effects of corruption through dedicated campaigns
 - Increase central transfer to strengthen the administrative capacity of LRAs
 - Use external expertise to increase the institutional capacity in the fight against corruption
 - Increase transparency and public awareness on the activities conducted by LRAs (e.g. public procurement, criteria for the allocation of public resources)
 - Other (please specify)

10. Can you think of any examples of good practice on preventive measures against corruption in Local and Regional Authorities (LRAs) in your country?
(open question)

11. Can you think of any examples of good practice on corrective measures against corruption in Local and Regional Authorities (LRAs) in your country?
(open question)

12. How would you rate the administrative capacity of the LRAs in COUNTRY to prevent and correct corruption from the point of view of: (*scaling matrix*)

Row: Preventive—stop the occurrence of corruption beforehand (e.g. transparency of administrative procedures, rotation of personnel in positions at risk, codes of ethics/of conduct, mandatory declarations of personal interests), Corrective—stop corruption after it has occurred (e.g. whistleblowing, referral to appropriate regulatory agencies)

Column: Affordability, Availability, Competence, Willingness to engage

13. Do LRAs in your country employ external consultants—either from the private sector or civil society – to strengthen their capacity to fight corruption?

Yes (go to question 14)

No (jump to question 15)

14. What does their technical assistance cover?
- Transparency of LRAs activities
 - Preventing the misuse of public resources
 - Training the LRAs' personnel with regards to ethical conduct and fighting corruption
 - Training the LRAs' personnel with regards to international standards and legislative provisions regarding corruption
 - Strengthening the administrative capacity of LRAs
 - Other (please specify)

15. How long is the experience of <COUNTRY> with the fight against corruption at the LRA level?
<5 years 5-8 years 9-12 years 13-16 years >16 years

(Page 5 – Final Aspects)

16. How would you rate your general knowledge about COUNTRY?

Very basic Basic Average Good Very good

17. Field of activity:

- Academic
- NGO
- Journalist
- Politician
- Other (please specify):

18. Gender

- Male
- Female

19. Age: completed years

Final page:

We would like to thank you for filling in this questionnaire, and to reassure you that all answers will remain confidential and anonymous!

The results will be used exclusively for research purposes. Our goal is to have an assessment of corruption in your country from as many experts (e.g. academics, journalists, civil society representatives or politicians) as possible. Accordingly, we would be grateful if you could specify in the field below the e-mail addresses of **at least two other people** who could also inform us about the topic.