

Assessing the Preventive Anti-Corruption Efforts in Slovenia

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Purpose:

Corruption is one of the greatest and most serious social problems our country faces today. Slovenia was found to be burdened with systemic or structural corruption; therefore, one of its priority efforts should be establishing a more effective national structure and taking the most appropriate systemic anti-corruption measures. According to the fact that the previous repressive reactions against corruption have proven ineffective, it is necessary to pursue the objective of its anti-corruption measures aimed at its prevention. One of the major measures is the integrity plan, representing a successful breakthrough in the area of prevention of corruption, as Slovenia is the first in the European Union to have implemented it. Consequently, a research on integrity plans was conducted.

The purpose of the article is to highlight or emphasize the meaning of the topical preventive measure in curbing corruption in Slovenia from the perspective of public sector institutions which are obliged to elaborate the integrity plan.

Design/Methods/Approach:

This contribution is based on methods specific to qualitative research, particularly comparative and descriptive ones. Further, the methods of analysis and examination of relevant domestic and foreign primary and secondary resources and legal acts are used. As a data collection technique, the authors take interviews with integrity plan planners and producers.

Findings:

With regard to the issue at hand, aversion or unwillingness of integrity plan producers to participate in our research was found, generally. However, the detailed results of the research not only show that the current concept of integrity plan should be partially upgraded, but they also reveal that only few leading employees participate in elaborating their integrity plan.

Originality/Value:

An issue arising from the paper reflects the exceptional endeavor to establish a stable prevention national policy.

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Keywords: integrity, integrity plan, integrity plan producers, corruption, prevention of corruption, Commission for the Prevention of Corruption, Slovenia

Ocenjevanje preventivnih protikorupcijskih prizadevanj v Sloveniji

Namen prispevka:

Korupcija je eden izmed največjih in najresnejših družbenih problemov, s katerim se sooča tudi naša država. Za Slovenijo je bilo ugotovljeno, da je obremenjena s sistemsko oziroma strukturno korupcijo, zato mora biti eno od njenih prednostnih prizadevanj vzpostavitev učinkovitejše nacionalne strukture in sprejem čim ustrežnejših sistemskih protikorupcijskih ukrepov. Glede na dejstvo, da so se dosedanje represivne reakcije v boju zoper korupcijo izkazale za neučinkovite, je treba sprejeti ukrepe, ki so preventivno usmerjeni. Eden izmed večjih takšnih ukrepov je načrt integritete, ki predstavlja uspešen preboj na področju preprečevanja korupcije, kajti Slovenija je prva v Evropski uniji, ki ga je implementirala, zato je bila opravljena raziskava o načrtih integritete.

Namen članka je izpostaviti oziroma poudariti pomen aktualnega preventivnega ukrepa pri obvladovanju korupcije v Sloveniji, in sicer z vidika institucij javnega sektorja, ki morajo izdelati načrt integritete.

Metode:

Prispevek temelji na metodah, značilnih za kvalitativno raziskovanje, zlasti komparativnih in deskriptivnih. Opravljena sta bila tudi pregled in analiza ustreznih domačih in tujih primarnih in sekundarnih virov ter pravnih aktov. Kot tehniko zbiranja podatkov so avtorji uporabili intervjuje s snovalci in zavezanci za načrt integritete.

Ugotovitve:

V zvezi z obravnavano problematiko je bilo na splošno ugotovljeno, da obstaja pri zavezancih za pripravo načrta integritete odpor oziroma nepripravljenost sodelovati v raziskavi. Ne glede na navedeno pa podrobnejši rezultati raziskave niso samo pokazali, da je treba sedanji koncept načrta integritete delno nadgraditi, temveč so tudi razkrili, da le malo vodilnih delavcev sodeluje pri izdelavi načrta integritete.

Izvirnost/pomembnost prispevka:

Problematika tega prispevka odraža prizadevanje po vzpostavitvi stabilne preventivne nacionalne politike.

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Ključne besede: integriteta, načrt integritete, zavezanci za načrt integritete, korupcija, preprečevanje korupcije, Komisija za preprečevanje korupcije, Slovenija

1 PROLOGUE

Corruption can be prosecuted after such an offense has been committed, but first and foremost it requires prevention (United Nations Office on Drugs and Crime [UNODC], 2005).

According to Dobovšek (2006, 2012), the goal of each effective strategy against corruption is to establish the environment for the prevention of corruption or the national system of organizational integrity; therefore, each organization should have elaborated its anti-corruption program based on recognition of their own vulnerable and exposed activities – i.e., its integrity plan (hereinafter: IP), developing adequate and appropriate combination of preventive measures that would support effective and quality activities and promote professional behavior in the areas particularly exposed to corruption.

In accordance with the United Nations Convention against Corruption [UNCAC] (Transparency International, 2003), corruption is no longer a local issue, but an international phenomenon that affects all societies and economies and, in particular, damages democratic institutions, national economies, and the rule of law; consequently, international cooperation for its prevention and control is needed, as well as a comprehensive and multidisciplinary approach and consistent implementation of the provisions of such areas, and also technical assistance, capacity building and institutional development for its effective prevention, detection and suppression – while not neglecting the support and involvement of individuals and groups outside the public sector; such as civil society, non-governmental organizations and community if we want the efforts to be successful (Zakon o ratifikaciji Konvencije Združenih narodov proti korupciji, 2008).

As many authors (Martinez-Vazquez, Arze del Granado, & Boex, 2007, etc.) have found, realization that corruption is a global phenomenon makes it clear that the fight against corruption is not an issue of international aid, but rather a matter of global subsistence.

Cockcroft (2012) considers that all forms of activities and efforts in fighting corruption, despite the progress made so far, are still underdeveloped and believes anti-corruption reform can succeed only with the support by active politics. *“Without this, all national efforts are meaningless – corruption will become a hostage to the growing problems of the 21st century.”* (Cockcroft, 2012: 9)

Huther and Shah (2000) argue that in a largely corruption-free environment, anti-corruption agencies, ethics offices, and ombudsmen strengthen the standards of accountability. In countries with endemic corruption, however, the same institutions function in form but not in substance; under a best-case scenario such institutions might be helpful, but the more likely outcome is that they help to preserve social injustice.

Rose-Ackerman and Truex (2012) assert that real reform in fighting corruption requires systemic policy initiatives, but “a clean hands policy” in which wealthy countries hold themselves aloof from tainted countries and individuals; without doing anything, actually, addressing the underlying problems will simply further divide the world into rich and poor blocks.

Martinez-Vazquez et al. (2007) have outlined that leadership and political commitment is the key for the success of anti-corruption efforts. According to the persuasion of the latter, a comprehensive anti-corruption effort needs a double pronged approach aiming at controlling the opportunities of corruption by curative approaches based on enforcement and prosecution, while simultaneously

using a preventive approach that attacks the roots of corruption by addressing the system of incentives embedded in the public sector. Furthermore, they emphasize that anti-corruption strategies need to be sustainable, comprehensive, adequately implemented, and appropriately designed. *“But, we need to worry about other issues as how to adopt the implementation of a strategy to the particular characteristic of developing countries or, indeed, how to generate a genuine desire to fight corruption at the highest level of government.”* (Martinez-Vazquez et al., 2007: 221) They (Martinez-Vazquez et al., 2007) have also found out, that the most common cause of unsustainability and failure is the lack of political will to maintain the fight against corruption. *“Political will against corruption can be supported by (or forced from) civil society’s demand from the ‘bottom up’.”* (Martinez-Vazquez et al., 2007: 222) Nevertheless, comprehensiveness and sustainability of effort are generally not sufficient for success. Anti-corruption strategies need to be championed by the highest political officers in the country, which means the commitment of the office of the president and the entire government cabinet. Political will to fight corruption can be generated or reinforced by different stakeholders’ advocacy and pressure imposed on the others. To be successful, anti-corruption efforts also need to be sustained over time. The international experience shows that one of the most common causes of failure in anti-corruption efforts is the lack of continuity in effort once the strategy has been put into motion (Martinez-Vazquez et al., 2007). *“When the most sophisticated and sound anti-corruption strategies and institutional strategies are technically in place, their success depends critically on the details of their implementation and the facto mechanisms that may bend or weaken the strategy to corrupt practices. Where these mechanisms have not been clearly identified, anti-corruption efforts may prove futile. Thus, we need to ask not only whether a country does undertake a given anti-corruption strategy or measure, but also whether they do it correctly.”* (Martinez-Vazquez et al., 2007: 219)

One of such modern concrete measures of anti-corruption strategies is the integrity project, or more precisely, the IP. Dobovšek (2009: 269) points out that *“the IP is one of the most modern methods to establish legal, ethical, and professional quality of work in various governmental and non-governmental organizations. Operating with IP is one of the basic precepts of the Slovenian national strategy against corruption”*. The IP is an important institutional project and instrument an organization applies to raise awareness about strong and weak points of its operations, particularly focusing on the development and maintenance of its integrity and uncorrupted condition. As such, it is a relatively new phenomenon in the public sector (Meško, Dobovšek, & Ažman, 2014). But – if the IP is to be one of sustainable anti-corruption measures, it must not become just one of cosmetic corrections on paper only. Indeed, it is, for this reason, worthwhile to note that the IP requires operational integrity or activity, i. e., continuous project teamwork, applying to leadership as well – actually, it is inevitable. *“In Slovenia, integrity plans have their custodians within each and every entity. They are individuals who are accountable for preparing, implementing, and constantly evaluating and updating their plans. Having such people on their staff enables the Corruption Prevention Commission (CPC) to work more effectively”* (Organization for Economic Co-operation and Development, 2013). Dobovšek (2008: 20) argues that *“the basis for any IP is a focus*

on decent and honest behaviours” [...] and that “stimulation of integrity relies on the dignity of all officials, but the leadership of the institution carries the greatest burden; and it is vital that the leading employees set an example within their own organizations”. But not only Slovenia, also Serbia is engaged in IP (Transparency International, 2011).

2 THE ESSENTIAL FACTS ABOUT THE RELEVANT (PREVENTIVE) ANTI-CORRUPTION EFFORTS

The UNCAC (Transparency International, 2003; UNODC, 2004), in comparison with the other anti-corruption conventions against corruption, contains the most extensive provisions regarding the methods, means and standards for preventive measures in the public and private sector. Second chapter of the UNCAC (Transparency International, 2003) is completely dedicated to prevention, including measures in the public and private sector, and contains a model of the preventive policies, such as the establishment of anti-corruption bodies, and ensures transparency of political party funding, etc. (Transparency International, 2003; UNODC, 2005, 2009).

Meško (2009), similarly, gives a careful consideration to preventive measures. She concludes that preventive measures are a necessary and a very important factor, and the pro-active development of anti-corruption is needed. Dobovšek and Kordež (2005) also find out that a key objective to eliminate corruption is prevention, which has recently become a guiding idea of the modern criminal policy, and strong endeavours to prevent harmful consequences of corrupt practices.

The Stockholm Agreement (European Commission, 2011a; European Council, 2010) states that the best way to reduce the level of crime is to effectively prevent its emergence, and the same applies to corruption. In terms of successful crime prevention, crime prevention is particularly important, which is defined as a professional paradigm for understanding how to most effectively reduce crime. Meško (2002) defines it as a planned activity aimed at reducing and removing a wide range of opportunities for creating hazards, risks, jeopardy, interference in people's rights, especially setting obstacles to perpetrators to prevent them from committing offences while acting against the consequences of “ante delictum” and eliminating those situations that could possibly generate crime.

Previously mentioned authors (Martinez-Vazquez et al., 2007: 12) have argued that *“although corruption may be perpetrated by individuals, it takes place primarily within an institutional context – but people, not institutions, engage in corruption”*.

The European Commission [EC], in terms of strengthening the political will to tackle the problem of corruption in all Member States, announced publication of an anti-corruption report and urged the countries of the European Union [EU] to effectively reinstate or implement the existing instruments to combat corruption. EC welcomes the establishment of the measures focused on corruption in the internal and external policies of the EU. Therefore, every two years, an anti-corruption report is going to be prepared and published, including trends and weaknesses that need to be addressed, to promote the exchange of best

practices. The Report will be based on the data from numerous and various sources including monitoring mechanisms, such as the Council of Europe, the Organization for Economic Cooperation and Development, and United Nations, independent research experts, the European Anti-Fraud and Eurojust, Europol, the European Anti-Corruption Network, Member States Eurobarometer surveys, and civil society (European Commission, 2011b, 2014). In accordance with foregoing, the EC, a few months ago, released its first report and estimated that corruption costs us at least 120 billion EUR per year, which amounts to almost its annual budget, and acknowledged the current financial crisis to be result from a failure to control corruption risks, thus restricting corruption, which is one of the EU's 2012 priorities (Global Advice Network [GAN], 2013; European Commission, 2014). According to the estimates by the Commission for the Prevention of Corruption (hereinafter: the CPC), the value of corruption in Slovenia is even higher and varies between 1.5 and 2.5 percent of GDP, reaching, on a large scale, almost five percent of the global GDP (Fajon, 2012).

If we take a look at the previous research results by one of the foremost leading international preventive institutions or non-governmental organizations in fighting corruption, i.e., Transparency International, we get to the index of perception of corruption or Corruption Perception Index [CPI], which measures the perceived levels of public sector corruption in numerous countries and territories. The analysis of data shows that, between 2009 and 2013, Slovenia slid down the scale by 16 places (i.e. from the 27th to the 43rd place) (Transparency International, 2013), as mentioned in one recent research on corruption in Slovenia. Namely, Dobovšek and Škrbec (2012) found that corruption in our country not only impacts the rule of law and the manner of people's thinking or establishing certain values but also concluded that the most corrupt practices are actually promoted by those who are supposed to set an example of proper and honest attitude towards matters of public importance in all fields of social relations and processes. The foundations of moral and ethical values are indeed already violated by the individuals who should safeguard and expand or strengthen integrity.

According to Voliotis (2011: 555), *"the authority is the main driver of corruption, but organizations need it for coordination"*, and an independent media can be an important check on the arbitrary exercise of power by government if the government provides adequate information and the press is not controlled (Rose-Ackerman, 2008).

"Reporters without Borders 2013"¹ (GAN, 2013) ranked Slovenia at the 35th place (out of 179 countries), while the "Freedom House 2013" (GAN, 2013) ranked our country at the 40th place (out of 179 countries) and indicated the media environment as free, or "free". "National Integrity Assessment in 2011" (GAN, 2013) states the independence of the media in Slovenia is at risk due to political, advertising, economic, and equity pressures, and the same report states that the Slovenian media, however, play an important role in the prevention and reporting of corruption. Nevertheless, the "Bertelsmann Foundation 2012" states

¹ See more at: GAN. Business Anti-Corruption Portal. Private Anti-Corruption Initiatives. Retrieved from <http://www.business-anti-corruption.com/country-profiles/Europe-central-asia/slovenia/initiatives/private-anti-corruption-initiatives.aspx>

that the role of civil society organizations in Slovenia, despite their prolonged poor organization, already strengthens (GAN, 2013).

In 2004, Slovenia adopted two important strategic anti-corruption acts, i.e., the Resolution on the prevention of corruption in the Republic of Slovenia (Resolucija o preprečevanju korupcije v Republiki Sloveniji, 2004) and the Prevention of Corruption Act (Zakon o preprečevanju korupcije, 2004), but in the past ten years our country has not been as successful as it should have been. This area needs to enhance consensus on a common effort in fighting corruption, i.e., its prevention through implementation of preventive measures, which also refers to the IP.

Resolution on the prevention of corruption in the Republic of Slovenia (Resolucija o preprečevanju korupcije v Republiki Sloveniji, 2004) is actually not a legally binding regulation, but it strives for realistic, gradual, and prudent measures to tackle corruption. Its primary goals are preventively oriented, aiming at long-term and permanent elimination of the conditions generating and developing corruption, as well as at establishing an appropriate legal and institutional environment for preventing corruption and consistent enforcement of liability for illegal acts while establishing and reinstating a generally acceptable system of zero tolerance with regard to all corruption practices through various forms of education and with regard to the efficient use of internationally established standards in this area. For preventing, detecting and prosecuting corruption and successful implementing of anti-corruption measures, the assumptions arising from the the aforementioned resolution are significant, and they must be provided in respect of human rights and fundamental freedoms and be fully consistent with the Slovenian Constitution (Ustava Republike Slovenije, 1991), legislation, regulations, and international legal acts. It is necessary to highlight "the assumption" of "prevention before repression", because previous reactions to the manifestations of corruption were highly repressive and, consequently, eliminated only the consequences instead of the causes of this social pathological phenomenon (Resolucija o preprečevanju korupcije v Republiki Sloveniji, 2004).

The study conducted in the Netherlands and Slovenia in 2011 which examined the values of the organization outlines that values of organizations in both countries show considerable similarities, in spite of the fact the corporate executives also rank accountability relatively lower in Slovenia than in the Netherlands. These findings lend support to the thesis that post-socialist transition in Slovenia has not yet led to a comprehensive change in the mindset of managers or organizational culture. Formal administrative reforms, new legislation, and EU membership are apparently not (yet) sufficient conditions for completing the europeanization of public and business sectors' organizational culture (Jelovac, van der Wal, & Jelovac, 2011).

In April 2012, the CPC (Komisija za preprečevanje korupcije, 2012d) commissioned a study on quality of economic and business environment in the Republic of Slovenia conducted among Slovenian companies engaged in business activities. It was found out that the reasons a setback in competitiveness in the Republic of Slovenia derive from systemic corruption. Moreover, the CPC stated that systemic corruption in the Republic of Slovenia today is so ingrained that it may be regarded as structural. The "Global Competitiveness Report 2013-2014"

(GAN, 2013) of the World Economic Forum ranks corruption among the top five most problematic factors for doing business in Slovenia; after gaining access to financing, inefficient government bureaucracy, restrictive labor market regulation and tax rates. However, the surveyed executives report that financial resources are rarely diverted due to corruption, and companies' attitudes are considered to be relatively highly ethical. In addition to the above, investors are advised to carefully develop, implement, and enhance system integrity in investment management when operating in Slovenia.

In dealing with organizational culture, ethics needs continually to be stressed and reinforced, and clear messages need to be communicated about which behaviors are acceptable and which are not. Excuses are often given for corrupt behaviors because there is no clear message about unacceptable or dubious behaviors (Graycar & Villa, 2011). They (Graycar & Villa, 2011: 17) also assert that *"often, colleagues who transgress give the impression that their activities are what everybody does or have always done"*. If there is no action against transgressors, particularly if the behavior is widely known, then the organization has a culture problem. Workplace practices of good behavior need to be rewarded and celebrated and poor behavior penalized. Within an organization, anti-corruption culture needs to be reinforced with good personnel management and job design, reporting mechanisms for questionable behaviors, and no retribution against whistle-blowers. Robert Klitgaard's famous formula $C = M + D - A$ (corruption equals monopoly plus discretion minus accountability) provides a basis for shaping culture and work activities (Graycar & Villa, 2011). Van Wart (2013) considers that ethic leadership requires not only clear principles and integrity but also, in the public sector and its high standards, a sense of duty, spirit, sustainability, and even sacrifice. Occasionally, such leadership tends to be built on superior self-knowledge and a sense of optimism infused with energy and perseverance. Many executives in recent scandals graduated from the most prestigious business schools. At this point it can be summarized that these scandals are not caused by executives' lack of intelligence, but rather by their self-interests and a lack of wisdom, virtue or integrity, honesty, and character (Li, Ping, & His, 2012).

After it has been found that Slovenia is burdened by systemic or structural corruption, one of the national anti-corruption strategies undoubtedly becomes an effort to establish a most effective system of anti-corruption measures. As the current repressive reactions against corruption have not proven to be effective, it is necessary to adopt anti-corruption measures that are prevention-oriented. One of such measures is the IP, which represents a new ambitious national breakthrough in the field of prevention of corruption and requires a new mental approach within the implementation of working processes whose actual efficiency was verified by a conducted analysis and research.

3 METHODS

According to an overview of the relevant literature, we conclude that no research or empirical survey has been done, at least according to the publicly available information. Therefore, we conducted a research to find out the Slovenian public

sector's opinion, i.e., the IP producers and public sector expert's standpoint, IP planners, or the CPC about the IP in the public sector with a focus on its efficiency. We chose qualitative research methods. Prior to the research, an analysis of the IP or examination of relevant domestic and foreign primary and secondary resources and legal, a review of the status of the IP as well as in-depth interviews with the IP producers and the CPC were done. The interviews took place in Slovenia in 2013. Each interview lasted for a maximum of one hour and half. The interviews were conducted on the basis of a previous written request and permission of the organization (i.e. the leadership).

A population unit consists of approximately 2,000 IP producers and planners in Slovenia ($N = 2,000$), and we contacted 100 organizations. Our sample consists of 20 respondents ($n = 20$), as the rest did not agree on cooperation. We conducted convenience or an opportunity sample. The sample was generated by sending an e-mail request and full anonymity was guaranteed. The respondents were also assured that the information will be used in the aggregate form and for scientific purposes only. Prior to conducting the interview, a questionnaire or a list of questions was sent to the respondents, so that they could prepare for the interview.

Our efforts went in the direction of a respondent's full expression; therefore, all questions were fully open, and this applies to both, IP planners (employees of CPC) and IP producers. The questions were asked only by employees working in the scope of integrity or prevention of corruption. The answers were handwritten and the interviews were not recorded and transcribed or coded, as we assumed that the respondents prefer to participate in the research in such a way, especially when taking into account the nature of the topic.

Throughout the research period, special attention was paid to objectivity, and we tried to be nonpartisan. As regards validity of the gathered data, we can say that several indicators on the same variable were used, which means that more substantive domains of theoretical concepts were covered, as we tried to avoid systematic inaccuracy. In terms of reliability or repeatability of measurements, it can be said that we are going to conduct the research again, and an alternative form of a method and internal consistency method will be used.

4 OVERVIEW AND ANALYSIS

Originally, a deadline for the submission of the IP for the IP producers was June 5, 2011, but due to the novel of the Integrity and prevention of corruption Act the latter was extended for one more year, i.e., until June 5, 2012 (Komisija za preprečevanje korupcije, 2012c). By that time, the IP producers in Slovenia were obliged to elaborate their IPs, or in short, they were supposed to do an assessment of institution's corruption exposure and a plan of the measures for timely detection, prevention, and elimination of the risks of corruption and submit it to the CPC.

During the extended time, the CPC carried out lots of workshops, lectures, and open days (i.e., by March 2012, more than a hundred such events were organized), and extensive experience was shared between the CPC and the IP

producers. Within the time of examination and counting the submitted IPs, the CPC encountered problems due to a failure to update the information on the IP producer's changes concerning the legal status forms of organizations due to reorganization or transformation of the structure of organizations. For instance, some IP producers ceased to exist or got united, renamed or they changed their legal status form or structure of the organization, so the final number of the relevant IP producers was changing over the time.²

Notwithstanding the foregoing, the focus here was on April 2012 (i.e., two months before the deadline). As we can see below, the table 1 shows that little more than half or 1,032 IP producers out of 1,965 submitted the IP. However, the situation changed by the deadline (i.e., by June 5, 2012), which means that the number of submitted IPs most likely increased. Nonetheless, we were not interested in that date, but in that in April, i.e., an interim period.

No. & Pct. or %	The IP producers by groups	Submitted IP (No.)	Non-submitted IP (No.)	Submitted IP (Pct. or %)	Non-submitted IP (Pct. or %)
1	Courts (24)	23	1	95.83	4.17
2	Admin. units (58)	53	5	91.38	8.62
3	Protection work. centres (20)	18	2	90.00	10.00
4	Centres for social work (62)	54	8	87.09	12.91
5	Homes for the elderly (57)	38	19	66.67	33.33
6	Government services (17)	12	5	70.59	29.41
7	Nurseries (108)	76	32	70.37	29.63
8	People's universities (27)	19	8	70.37	29.63
9	Inspectorates (14)	9	5	64.28	35.72
10	Independent and sovereign state bodies (11)	7	4	63.64	36.36
11	Pharmacies (24)	15	9	62.50	37.50
12	Hospitals (24)	15	9	62.50	37.50
13	Health centres (57)	35	22	61.40	38.60
14	Primary schools (474)	284	190	59.91	40.09

Table 1:
Review of the IP, April 2012,
Source: the CPC
(Komisija za preprečevanje korupcije, 2012a)

² An assertion acquired by the competent employees for the IP at the CPC in Republic of Slovenia on 15th March 2013.

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Table 1: continuation	No. & Pct. or %	The IP producers by groups	Submitted IP (No.)	Non- submitted IP (No.)	Submitted IP (Pct. or %)	Non- submitted IP (Pct. or %)
15		Ministries and constituent bodies (41)	24	17	58.54	41.46
16		Prosecutions (12)	7	5	58.33	41.67
17		Health institutions (14)	8	6	57.14	42.86
18		Music schools (52)	29	23	55.77	44.23
19		Public funds (18)	10	8	55.55	44.45
20		Secondary schools (123)	58	65	47.15	52.85
21		Homes for pupils and students (18)	8	10	44.44	55.56
22		Municipalities (211)	86	125	40.76	59.24
23		Agencies (37)	15	22	40.54	59.46
24		Museums, galleries, archives and parks (79)	32	47	40.51	59.49
25		Institutes (22)	7	15	31.82	68.18
26		Other public institutions (221)	70	151	31.67	68.33
27		Public institutions for sport (44)	10	34	22.73	77.27
28		Universities, faculties and colleges (35)	5	30	14.28	85.72
29		Libraries (63)	5	58	7.94	92.06
Tog.		1,965	1,032	935		

As the table reveals, the approximate number of the IP producers obliged to elaborate the IP in Slovenia is 1,965 (data refer to April 2012), and they are divided into the following groups: courts, administrative units, protection working centres, centres for social work, homes for the elderly, government service, nurseries, people's universities, inspectorates, independent and sovereign state bodies, pharmacies, hospitals, health centres, primary schools, ministries and constituent bodies, prosecutions, health institutions, music schools, public funds, secondary schools, homes for pupils and students, municipalities, agencies, museums, galleries, archives and parks, institutes, other public institutions, public institutions for sport, universities, faculties and colleges and libraries.

5 FINDINGS

With regard to the issue at hand, aversion or unwillingness of IP producers to participate in our research was found, generally. However, the detailed results of the research not only show that the current concept of IP should be partially upgraded, but they also reveal that only few leading employees participate in elaborating their IP. In the following, some more detailed findings can be observed as well.

First, the great majority of them (87%) stated that they are already preoccupied and understaffed; therefore, the IP mostly burdened them considerably. In this respect, the respondents also answered that the Integrity and Prevention of Corruption Act (Zakon o integriteti in preprečevanju korupcije, 2011) – which is actually a legal framework for producing the IP – did not implement only the IP, but also established other new scopes, such as conflict of interests, restrictions on operations and gifts, functions incompatibility, anti-corruption clause, property registration, lobbying, etc., which consequently dictated lots of previously not known legal concepts and demanded an additional liabilities and responsibilities. To sum up, the IP initially burdened the public servants heavily whereat we are aware that our sample is small, therefore, the conclusions, in particular, generalization is not appropriate – which actually applies to all following findings.

Second, in most cases (84%) the respondents find the IP beneficial as well as viable and necessary preventive anti-corruption measure for strengthening usefulness of integrity in Slovenia, and they undoubtedly welcome and support it; however, in the form and the manner set at this phase (i.e., in the time of conducting research, not now), it is perceived more as a static document rather than a dynamic process. They also stated that “there is too much unnecessary administrative tasking within its elaborating”. Thus, the IP was found slightly inelastic or exhaustive, particularly in terms of its usability. Furthermore, upgrading and refining of the IP were proposed, particularly in terms of its IT support or automation. The respondents suggested reminder’s implementation and the establishment of a centralized and uniform environment for all of the IP producers. Hence, “we could be daily interactive when dealing with the IP”. Moreover, they also recommended establishing “internal integrity or anti-corruption communication network”, so that the employees could be daily acquainted with the content arising from strengthening of the utility of integrity, “we could identify, and cope as well as deter corruption more effectively”. In a nutshell, the current IP is a beneficial as well as a viable and necessary preventive anti-corruption measure, but it is not applicable and effective enough and should be upgraded.

Third, as already mentioned, elaborating the IP merely concerned already burdened employees but not “the leading ones”. In this context, the respondents argued that the “non leading employees” have no direct influence on decision-making, such as their superiors or executives; therefore, “it is necessary the latter participate in increasing or enhancing the organization’s utility of integrity”. The respondents answered that their executives should be primarily engaged in strengthening the integrity processes (i.e., in elaborating the IP), and

“it is not even necessary they directly produce it, they may be, for instance, just sent to a training in a similar content also referring to the IP”. “It is essential the executives hear and listen to such content as many times as possible, because only that way they will consider the IP elaborating process more seriously and understand how much time it actually takes.” The respondents conclude the executives do not show any particular interest in their IP or its contents at all. In short, the leadership, in principle, did not participate in producing the IP, which has been found inappropriate.

Fourth, employees from a wide range of a job descriptions were considered for IP custodians (i.e., within the range “Adviser III” – “Secretary” levels), which presents a huge difference and inequality in terms a particular public servant’s salary. In facts, it means that there can even be a 16 salary-grade difference (i.e., from 28th to 44th), and it was observed that in some organizations the IP custodians are, as a result of their job description, already mainly engaged in working processes related to quality evaluation, which, indeed, coincides with the content of the IP; however, on the other hand, there were employees to whom the IP was simply added to the existing/quite a different/or regular job description and tasks. A finding resulting thereof is improper or unbalanced delegation of tasks according to various salary grades of the IP producers.

Fifth, the biggest issue at hand was to define corruption procedures of risks, and the smallest was to determine the measures for their reduction. Some respondents stated that defining the corruption procedures of risks was a big issue for them, because they had never faced or assessed, theoretically, a corruption risk before, and determining the right measures seemed, for example, a logical consequence.

Sixth, the IP was significantly well accepted by the “centralized” IP producers or state authorities but much less by the “decentralized” IP producers, i.e., municipalities, (public) agencies, institutions, funds, public economic institutions, centers, schools, etc., but we did not find the reasons why.

Seventh, the IP were not internalized, especially by those IP producers who have a small number of employees and elementary schools. Here, once more, we did not manage to obtain any direct answers to determine why, as the latter most strongly refused to participate in our research.

Eight, when elaborating their IP, IP producers said that they had already assessed risks three times i.e., according to the Integrity and Prevention of Corruption Act (Zakon o integriteti in preprečevanju korupcije, 2011), the Public Finance Act (Zakon o javnih financah, 2011), and the Occupational Health and Safety Act (Zakon o varnosti in zdravju pri delu, 2011); therefore, nearly two thirds of respondents called for consideration to merge the issue of risks. The participants pointed out that they have to assess risks, although different, three times per year. Therefore, they suggested combining all legally binding risk assessments under one regulation/law.

Further, more than half of the respondents emphasized that it would be necessary to establish the IP in the private sector as well, especially in banks.

Moreover, it was found that the task requires considerable recognition of the diligence, commitment, effort, contribution, support and assistance by the CPC’s employees responsible for the scope of integrity, especially where there are few

such employees with regard to an extremely large number of the IP producers: only three CPC employees and almost 2,000 IP producers. In fact, the respondents appraised engagement and support of the CPC as appropriate and satisfactory, some even assessed the functioning of the CPC as more than satisfactory, but most of them assessed it as professional and accurate.

Finally, in the next phase (i.e., after examining all of the IPs), communication or a contact between the CPC and IP producers is expected (e.g., organization and accomplishment of seminars, trainings, exposure to examples of good practices where the IP producers could discuss the issues resulting from the IP, discussions about the modification and upgrading of the existing integrity utility, etc.).

As regards the IP planners' findings, we can summarize that it is the CPC's standpoint that it is crucial that every employee in the public sector is engaged in elaborating the IP, and what's more, this right and duty has arisen from the law. The CPC also considers that the IP could be partially upgraded.

6 DISCUSSION

When dealing with corruption, we should pay attention to choose appropriate measures, as the literature review (Komisija za preprečevanje korupcije, 2014; Resolucija o preprečevanju korupcije v Republiki Sloveniji, 2004; UNODC, 2004) on corruption showed that the most effective and comprehensive ones are those aimed at its prevention. For instance, the 3rd chapter of the the aforementioned resolution states that just repressive response to corruption leads only to the removal of harmful consequences in individual cases, while the causes, motives and circumstances determining the occurrence of corruption remain intact. Not only because of explicit global trends, but also due to greater efficiency and effectiveness of preventive action, the basic premise for the content and implementation of Slovenian anti-corruption measures are prevention, detection causes and conditions for corruption and [...], while repressive function continues to be a corrective, useful for sanctioning illegal practices.

This paper has covered a considerable scope of anti-corruption measures concerned with the Slovenian case, or more precisely, with the IP project. As a matter of fact, the IP is one of the modern preventive anti-corruption measures or tool which aims at strenghtening integrity, and our country recently adopted it. In other words, it is actually called a successful national breakthrough in the area of prevention of corruption, for Slovenia is the first in the European Union to have implemented it.

As Dobovšek (2006) claims, the essence of every strengthening of integrity should not stem in bureaucratisation, but in awareness, intellectual awakening or genuine understanding of positive impacts and effects of integrity on the organization, as well as in strong opposition to corrupt, unethical, and unlawful behaviour or risks, and this especially applies to leadership.

Due to the fact that our research involved a relatively low number of participants, it can be observed that findings cannot be generalized to the whole population or to all the IP producers obliged to elaborete the IP. According to the foregoing, the results of the research have shown that Slovenia did accept the

IP, but, on the other hand, the respondents already suggested its upgrading, or more precisely, they proposed its automation and simplification of thereto related procedures for its elaboration, and the CPC partly agrees with the proposal. The research has also revealed that leadership did not participate in elaborating the IP, which is particularly worrying, as the CPC experts (Komisija za preprečevanje korupcije, 2012b) stressed that integrity of organization should be built from “top to bottom”. Therefore, organizing and executing seminars, trainings, discussions, workshops, round tables, public forums, etc., where the leadership of Slovenian public sector and the CPC (as well as the IP producers or the custodians, if necessary) could discuss the content with regard to the IP and where examples of good practices would be exchanged, are highly recommended. The IP producers also suggested unifying the job title/description for the IP custodians (e.g., “The custodian of the IP and quality management”), which would actually imply the same payment for the task for all IP custodians, as well. This is definitely a proposal worthy of consideration at the national level, referring to the entire Slovenian public sector.

In conclusion, we could say the Slovenian IP project is, in principle, an important step in the direction of strengthening the integrity of our public sector, but the solution for its efficiency lies in upgrading the current phase or/and the concept that actually relates to simplification, automation, and changing mentality of leadership.

Notwithstanding the foregoing, Slovenia should continue with the IP project, for our national integrity in recent years is not exactly where we would want it; therefore, one of the objectives of the current government is to advocate for preventive measures in fighting corruption, even if it fails to bring immediate financial yields.

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