

# Korea's Anti-Corruption Initiative Assessment

Frequently Asked Questions & Reference Materials



Anti-Corruption &  
Civil Rights Commission





# **Korea's Anti-Corruption Initiative Assessment**

**Frequently Asked Questions & Reference Materials**

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## Foreword

The Anti-Corruption Initiative Assessment (AIA) is a corruption prevention tool developed by the Anti-Corruption & Civil Rights Commission (ACRC) of the Republic of Korea. ACRC has implemented this assessment on an annual basis since 2002.

Based on its legal mandate to “survey and evaluate the anti-corruption policy measures of public organizations in Korea,” ACRC uses a self-reporting mechanism to evaluate how public institutions are implementing specific measures to prevent corruption, combining quantitative and qualitative indicators with a systematic, weighted scoring system. Target institutions are then ranked in tiers based on the total scores given by ACRC, and their rankings are released to the public at the end of the year. As such, AIA helps generate the incentives and institutional will within public institutions needed to undertake anti-corruption work, utilizing the power of performance information disclosure. As of 2019, AIA is administered on more than 250 public institutions in Korea.

No matter how many great policies an anti-corruption agency develops, no concrete results would be achieved without the active engagement of and implementation by public agencies. In this regard, AIA is an effective instrument that can ensure policy implementation by inducing institutional efforts for concrete anti-corruption measures.

Since 2015, United Nations Development Programme Seoul Policy Center (USPC) has partnered with ACRC to share AIA with developing countries. Through USPC's Development Solutions Partnership (DSP) programme, USPC and ACRC together have supported Vietnam, Malaysia, Uzbekistan, Iraq, and Moldova in benchmarking the AIA approach to develop innovative means of effectively monitoring the anti-corruption efforts of the public sector. Here, USPC and ACRC are in no way seeking to “cut and paste” AIA in other contexts. Rather, we offer the tested-and-proven AIA methodology as a reference point, and support the country-level application of AIA through a series of knowledge-sharing activities with our partner countries. UNDP Country Offices then work with their national anti-corruption partners to re-engineer, refine, and apply our AIA approach as appropriate to their circumstances.

This publication has been produced to provide our answers to some of the frequently asked questions from our partner countries when we share AIA, and also to give technical guidance to the agency administering AIA by sharing reference materials—such as our evaluation guide, the self-reporting template for target institutions, as well as ACRC's sample evaluation report. We hope that this reference book can benefit the countries that we cannot directly support within the scope of our DSP programme.



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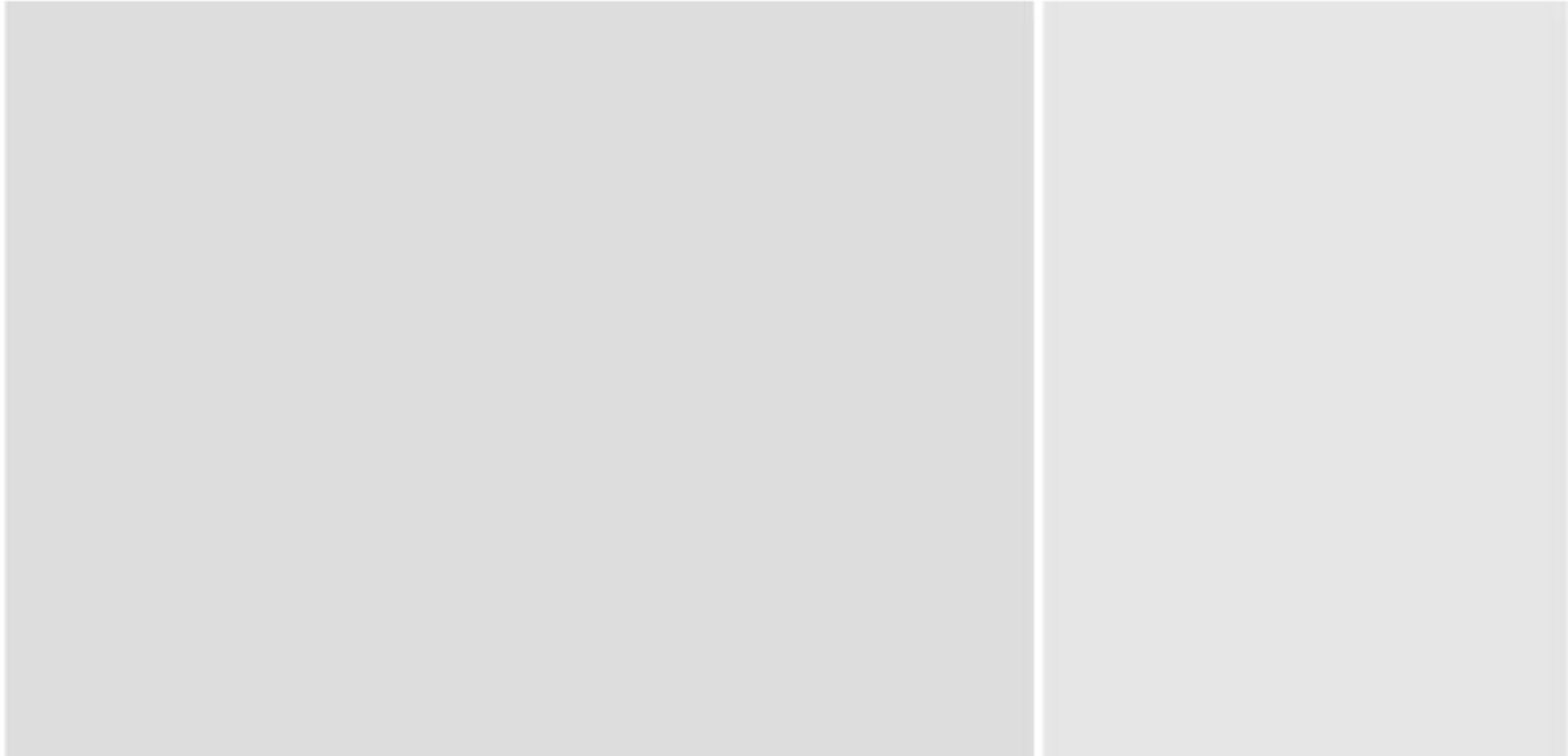






I.

## FAQ on Anti-Corruption Initiative Assessment (AIA)



## I. FAQ on Anti-Corruption Initiative Assessment (AIA)

### 1. Categorization and Selection of Target Organizations

#### Q How are target organizations categorized?

- When adapting the Anti-Corruption Initiative Assessment (AIA), one of the first steps to go through is deciding on how to categorize the organizations in a manner that takes into account national circumstances.
- Considering that institutions of different sizes and functions are not comparable for assessment, target organizations can be categorized by size and characteristics in order to relieve the burden felt by smaller organizations.
- In Korea, AIA target organizations are first categorized according to the administration type (i.e. central administrative agencies, local governments, public enterprises, etc.) and then subdivided into groups according to their institutional size.
- While categorizing is important, partner countries must also be aware of the fact that comparable validity might be lost if there are not enough organizations within one category.

#### Categorization of target organizations

- Central government agencies: 2 groups (ministries & commissions / administrations)
- Public service-related agencies: Classified into 5 groups according to the number of staff
- Local governments, education offices, national/public universities & hospitals: Single group

Number of staff	3,000 or more	1,000 ~ 2,999	500 ~ 999	300 ~ 499	150 ~ 299
Central gov.	Central I (Ministries / Commission)				Central II (Administrations)
Metropolitan / Provincial gov.	Single group				
Local gov.	Single group				
Education offices	Single group				
National / Public universities	Single group				
National / Public hospitals	Single group				
Public service-related organizations	Public service I	Public service II	Public service III	Public service IV	Public service V

## Q How are target organizations chosen when piloting AIA?

- While there are no rules set in stone, there are two possible ways:
  1. For technical trials, one can try to make a small sample of institutions that represent each category of target organizations—e.g. central ministries; provincial-municipal governments; public service organizations over X number of employees, etc. One can identify institutions that are likely to have a high institutional capacity and the willingness to cooperate with the AIA-administrating agency in order to ensure a successful pilot.
  2. If there is a strong political support from the top for AIA implementation, one can try to do the pilot on one category of target institutions and include all organizations within that category. For instance, if the central-level ministries are chosen, try to include all of them so that no one protests for having been selected for AIA.

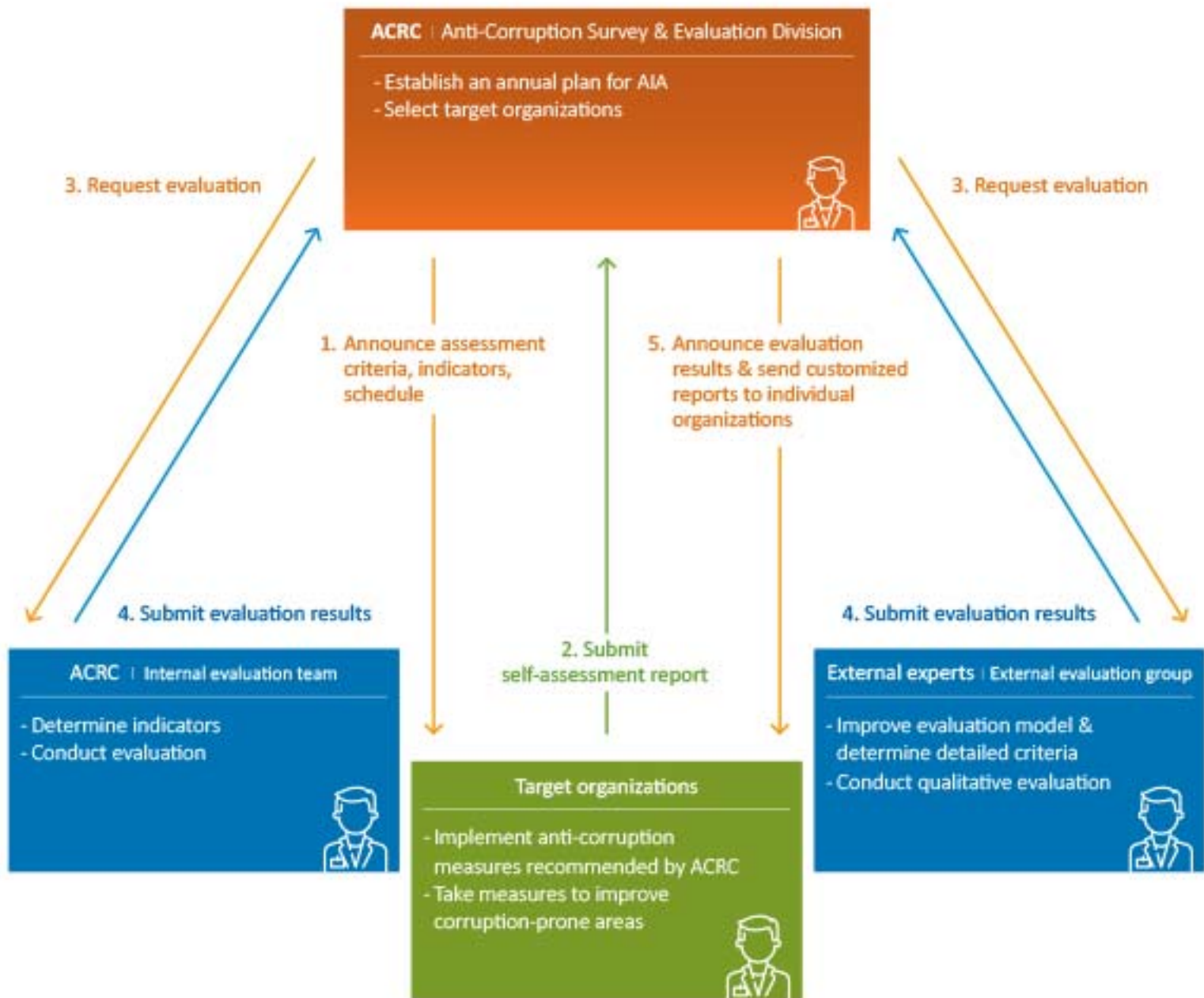
### Target organizations

Type		2017	2018
Central gov.	Ministries / commissions	24	24
	Administration	12	14
Local gov.	Metropolitan / provincial	17	16
	Municipal	35	37
Education offices		16	14
National / public universities		11	12
National / public hospitals		12	12
Public service-related organizations		129	141
Total		256	270

#### Criteria for selecting target organizations

- For a consistent assessment, the criteria for selecting target organizations remain the same as the previous year
- Based on the previous year's assessment, high-scoring organizations are excluded, while low-scoring organizations and organizations with occurrences of corruption are included
- Central / metropolitan / provincial gov. agencies: all agencies in principle
- Public service-related organizations: selected based on the number of staff, budget, functions, the result of Integrity Assessment, occurrences of corruption, etc.
- Municipal governments: at least 500,000 residents
- National / public universities: at least 3,000 students (from 2012)
- National / public hospitals: 12 hospitals (from 2015)

## 2. Administration and Procedure



**Q** Since the Anti-Corruption & Civil Rights Commission (ACRC) announces the plan for AIA around March and target organizations are asked to submit their self-assessment report around November, does this mean that organizations are only given 7 months to implement their anti-corruption measures?

- Although the ACRC announces its plan for AIA in March, there is consistency in the assessment criteria with only small changes being made, which gives target organizations enough time to prepare and implement their anti-corruption action plans. Therefore, the actual period for implementation of anti-corruption measures is one year (early November – late October).

## AIA Implementation Procedure: Annual Schedule

STEP <b>01</b>	Establish assessment plan (Feb.)	<ul style="list-style-type: none"> <li>▫ ACRC sets up a plan for AIA</li> <li>▫ Target organizations establish an anti-corruption action plan</li> </ul>
STEP <b>02</b>	Announce assessment plan (Mar. - Apr.)	<ul style="list-style-type: none"> <li>▫ ACRC announces the plan for AIA including target organizations, criteria, indicators, etc.</li> <li>▫ Organizations submit the anti-corruption action plan to ACRC</li> </ul>
STEP <b>03</b>	Implement anti-corruption measures (year-round)	<ul style="list-style-type: none"> <li>▫ Organizations implement anti-corruption measures</li> </ul>
STEP <b>04</b>	Conduct evaluation (Nov. - Dec.)	<ul style="list-style-type: none"> <li>▫ Organizations submit self-assessment reports to ACRC</li> <li>▫ ACRC conducts evaluation</li> <li>▫ ACRC receives appeals about the draft report of evaluation results</li> </ul>
STEP <b>05</b>	Announce evaluation results (Jan.)	<ul style="list-style-type: none"> <li>▫ ACRC analyses evaluation results</li> <li>▫ ACRC announces the comprehensive evaluation report &amp; best practices</li> <li>▫ ACRC sends customized evaluation reports to individual organizations</li> </ul>

**Q** When target organizations establish anti-corruption action plans, are they required to conduct a corruption risk assessment?

- Conducting a corruption risk assessment is up to the target organization as it is not mandatory.
- In terms of guidance for establishing action plans, the ACRC provides individual feedback every year in the customized report, allowing target institutions to grasp a general picture of what needs to be done.

**Q** Who is in charge of writing the self-assessment report?

- While the assessment indicators and components of AIA are developed by ACRC, the methodology of AIA is based on self-assessment reports. The target organizations fill out their self-assessment reports in accordance with the reporting template and are also required to submit evidential materials as proof.

\* Refer to the attached sample AIA reporting template

**Q** Does the ACRC visit offices to check whether the reports are true?

- The ACRC cannot visit all the organizations, but there are random onsite investigations.
- If it is found that an organization has falsely reported information, depending on the severity, punishment may follow. This includes the deduction of points or even the dismissal of all grades, and the disclosure of such facts to the public.

**Q** How is the external evaluation group (for qualitative indicator assessment) selected?

- Each year ACRC releases a procurement notice and selects, through competitive open bidding, one research institution which the ACRC signs a contracts with.

**Q** How does the ACRC ensure that there is no risk of target institutions bribing the external evaluators for more generous scores?

- Firstly, all external evaluators must sign a pledge saying that they will not contact or receive anything from the target institutions and that they acknowledge the consequences of such actions. External evaluators are punished by criminal law for receiving bribes. While there are several routes of reporting, such as whistle blowing and internal reporting, external evaluators who are usually professors can easily lose their jobs once they are caught. This makes it unlikely for them to take that risk.
- Secondly, the ACRC signs an institutional contract with the research institution instead of signing individual contracts with the evaluators themselves. This means that the research institution has legal liability for any accidents that might happen, which creates another way of ensuring integrity.
- Thirdly, the ACRC goes through technical evaluation and consideration of prior working experience with anti-corruption when selecting external evaluators.
- Lastly, the list of external evaluators is not disclosed to make sure that the target institutions cannot know who will be evaluating them.

**Q** Are the evaluation results from the external evaluation group regarded as final? Or does the ACRC adjust the results after the review?

- The ACRC does not adjust the evaluation results from the external evaluation group. The results from external evaluators are on qualitative indicators, therefore adjusting the results leads to objectivity issues.
- In addition, before the evaluation, the ACRC comprehensively discusses the criteria and scoring methodology with the external evaluation group in detail to make sure there is a common understanding of what they need to assess.
- Moreover, the evaluation result is not simply based on one evaluator's opinion, but is an average of opinions from a group of evaluators.

### 3. Assessment Criteria and Methodology

**Q** Does the same indicators and criteria apply to all target organizations?

- Yes, all target organizations are assessed by the same set of indicators to ensure comparability.

**Q** What do quantitative and qualitative indicators mean?

- Quantitative indicators are related to hard data. For instance, it measures how many times the institution held anti-corruption related meetings.
- Qualitative indicators assess, for example, how feasible the target organization's anti-corruption action plans are.

**Q** How are qualitative indicators assessed?

- In order to ensure the objectivity of the assessment on qualitative indicators, ACRC signs a contract with an external evaluation group consisting of professional researchers (e.g. members of academia). These external evaluators evaluate the quality of the target organizations' activities based on the descriptions made on the self-assessment reports.

**Q** How often does the ACRC update the AIA indicators?

- Although there is no set rule to update the indicators every year, the ACRC aims to adjust the indicators based on their progression by excluding those which have been successfully established and adding those that need improvement and institutional establishment.
- In addition, the ACRC tries to reflect any major corruption issues that occurred throughout the year. For instance, during the past few years, illicit hiring was a serious issue, which is why the ACRC included an AIA indicator providing additional points for the "Implementation of institutional improvement to end hiring irregularities" in 2019.

**Q** How are weight values decided?

- There are two ways: the first method is to determine the weight values based on the internal priorities. Another way is to interview people within the integrity units of target institutions. Based on this consultation, organizations can list their priorities and correspondingly assign weight values.

**Q** Does the ACRC put greater weight value towards indicators on the establishment, rather than the implementation, of anti-corruption action plans?

- This would depend on the situation. However, generally, the ACRC puts more weight towards indicators on the establishment of anti-corruption plans because indicators on establishment are usually qualitative while indicators on implementation tend to be quantitative.

**Q** Are all the target institutions ranked from best to worst?




- No, in order to prevent unnecessary fierce competition, we do not rank all of the institutions in order. Instead, we give them grades/tiers from 1 to 5 (1 being the best performing category).

**Q** Are the target institutions graded on a curve?

- Yes, before the ACRC reports the grades, the mean average is calculated to spread out the grades evenly. It is not based on absolute evaluation, but rather relative evaluation.

## 4. Specific Technical Questions on the 2018 AIA Assessment Methodology

## Structure and Components of the 2018 AIA

Sections	Criteria (weight value)	Factors (weight value)	No. of Indicators
<b>A. Planning</b> 	A-1. Establishment & implementation of an anti-corruption action plan (0.15)	1-1. Establishment of an anti-corruption action plan (0.70) 1-2. Implementation of an anti-corruption action plan (0.30)	3
<b>B. Implementation</b> 	B-1. Promotion of public participation & public-private partnership (0.20)	1-1. Involvement of members in anti-corruption activities (0.50) 1-2. Promotion of public-private partnership (0.50)	7
	B-2. Reduction of corruption risks (0.20)	2-1. Improvement of corruption-prone areas (0.45) 2-2. Management of the code of conduct (0.30) 2-3. Punishment for & control of corrupt acts (0.25)	10
	B-3. Promotion of a culture of integrity (0.25)	3-1. Anti-corruption training for employees (0.60) 3-2. Promotion of anti-solicitation systems & whistleblowing (0.40)	13
<b>C. Result &amp; Dissemination</b> 	C-1. Improvement of integrity (0.05)	1-1. Improvement in Integrity Assessment (0.70) 1-2. Disclosure of the result of Integrity Assessment (0.30)	2
	C-2. Dissemination of best practices (0.15)	2-1. Cooperation with related organizations (0.40) 2-2. Creation & operation of anti-corruption initiatives (0.60)	5
<b>D. Deduction of points</b>		1. Occurrences of corruption 2. Non-fulfillment of anti-corruption measures	40



## A-1. Establishment &amp; implementation of an anti-corruption action plan → 3 indicators

Factors	Weight Value	Description of Indicators
1-1. Establishment of an anti-corruption action plan	0.70	① Establishment of an anti-corruption action plan <ul style="list-style-type: none"> <li>- Relevance of the anti-corruption action plan set up by each organization</li> <li>- Whether the anti-corruption action plan is comprehensive, concrete, feasible and tailored</li> </ul>
1-2. Implementation of an anti-corruption action plan	0.30	① Implementation of an anti-corruption action plan <ul style="list-style-type: none"> <li>- Implementation of the anti-corruption action plan set up by each organization</li> <li>- Whether the anti-corruption action plan has been implemented as scheduled</li> </ul>
Addition of points		① Implementation of the National Anti-Corruption Plan (1 to 5 points)

## B-1. Promotion of public participation &amp; public-private partnership → 7 indicators

Factors	Weight Value	Description of Indicators
1-1. Involvement of members in anti-corruption activities	0.50	① Leaders' commitment to the fight against corruption (30) <ul style="list-style-type: none"> <li>- Commitment &amp; efforts of the head of agency to fight corruption</li> <li>- The head of agency taking the lead in enhancing integrity</li> </ul> ② Participation of members in anti-corruption activities (50) <ul style="list-style-type: none"> <li>- Participation of staff members in anti-corruption activities</li> <li>- Anti-corruption efforts of affiliated agencies</li> </ul> ③ Incentives for the unit/staff members in charge of anti-corruption work
1-2. Promotion of public-private partnership	0.50	① Organization of meetings with "citizen anti-corruption auditors" ② Activities of "citizen anti-corruption auditors" ③ Establishment & operation of a public-private consultative body
Addition of points		① Public-private partnership activities (10 points)

## B-2. Reduction of corruption risks → 10 indicators

Factors	Weight Value	Description of Indicators
2-1. Improvement of corruption-prone areas	0.45	① Implementation of ACRC's recommendation for institutional improvements ② Voluntary efforts to improve laws and systems to prevent corruption (qualitative assessment)
2-2. Management of the code of conduct	0.30	① Improvement of the code of conduct ② Monitoring of outside lectures conducted by employees ③ Self-inspection of code of conduct violations
2-3. Punishment for & control of corrupt acts	0.25	① Implementation of the National Anti-Corruption Plan (1 to 5 points)

## B-3. Promotion of a culture of integrity → 13 indicators

Factors	Weight Value	Description of Indicators
3-1. Anti-corruption training for employees	0.60	① Staff members who completed the basic training course for anti-corruption trainers ② Staff members who completed anti-corruption training ③ High-level officials who completed anti-corruption training
3-2. Promotion of anti-solicitation systems & whistleblowing	0.40	① Organization of meetings with "citizen anti-corruption auditors" ② Activities of "citizen anti-corruption auditors" ③ Establishment & operation of a public-private consultative body

## C-1. Improvement of integrity → 2 indicators

Factors	Weight Value	Description of Indicators
1-1. Improvement of the Integrity Score	0.70	① Improvement of the Integrity Score ◦ Change in the organization's score for Integrity Assessment from the previous year
1-2. Disclosure of the results of Integrity Assessment & AIA	0.30	① Disclosure of the results of Integrity Assessment & AIA ◦ Disclosure of the results of Integrity Assessment and AIA through the organization's website pursuant to Article 27-3 of the ACRC Act

## C-2. Dissemination of best practices → 5 indicators

Factors	Weight Value	Description of Indicators
2-1. Cooperation with related organizations	0.40	① Improvement of the Integrity Score = Anti-corruption activities in cooperation with other organizations (consultations, sharing information about anti-corruption measures, etc.)
2-2. Creation & operation of anti-corruption initiatives	0.60	① Disclosure of the results of Integrity Assessment & AIA = Development of effective anti-corruption initiatives which can be shared with or introduced to other organizations
Addition of points		① Organization of meetings with "citizen anti-corruption auditors" ② Activities of "citizen anti-corruption auditors" ③ Establishment & operation of a public-private consultative body

**Q** In 2018 AIA criteria B-1, the first indicator of 1-2 is 'organization of meetings with "citizen anti-corruption auditors"'. Here, how are the citizen anti-corruption auditors selected?

- The citizen auditors are designated by each target organizations.
- Citizen anti-corruption auditors refer to external experts who may be professors, judges, prosecutors, high-level officials, auditors, or members of civil societies in related areas.

**Q** In 2018 AIA criteria B-2, the first indicator of 2-1 is 'implementation of ACRC's recommendation for institutional improvements'. Here, how does the ACRC take into account the difference in the number of recommendations that each organization receives?

- In order to resolve unfairness in receiving points due to different number of recommendations, the ACRC utilizes the second indicator, 'voluntary efforts to improve laws and systems to prevent corruption', which is complementary to the first one. If an organization receives few recommendations, making it more difficult to earn points from the first indicator, the ACRC assigns greater points to the second one.

**Q** In 2018 AIA criteria B-3, factor 3-1 is 'anti-corruption training for employees'. Here, how can target organizations prove their training activities, and is this assessed based on percentage?

- Along with their anti-corruption training plan and report, target organizations are also required to provide hand-written signatures from all participants. The ACRC also randomly investigates such evidence to make sure the reports are not falsely written.
- Yes, the scores are given based on the ratio of the number of employees who have completed anti-corruption training. In order to take into account the difficulties that large-scale companies face in training their large number of employees, online training is also accepted.

**Q** The 2018 AIA deducts points for occurrences of corruption in section D. Here, how is 'occurrence of corruption' determined?

- Point deductions for the occurrence of corruption are determined based on the conviction of crimes as well as closed cases with disciplinary actions. Therefore, a simple report on corruption is not considered enough data to regard it as occurrence of corruption.
- For high-profile cases that may take up to several years to convict, the ACRC consults with experts on how long they should wait for conviction before deducting points.

**Comment**

It needs to be stressed that the most important aspect of AIA is not the technical details of the evaluation, as the main objective of AIA lies in the institutionalizing behavioural change through an annual cycle of evaluation within the public sector.

## 5. Publication and Utilization of Assessment Results

**Q** Can an organization view the reports and results from other organizations?

- The comprehensive AIA report which applies to all target organizations is disclosed to the public. However, customized reports that include individual feedback for each organization are only disclosed to the corresponding organizations. Therefore, except for the comprehensive report and their own customized report, organizations do not have the system authority to view any other data.

**Q** What are the examples of incentives for well-performing institutions?

- Incentives include: the promotion of members in charge of anti-corruption work, performance-based bonuses, the ACRC Chairperson's Award & Prime Minister's Award, and an opportunity to receive overseas anti-corruption training at the International Anti-Corruption Academy (IACA).



## 6. How to Deal with Feedback and Resistance

### Q How does the ACRC deal with suggestions and appeals from target institutions about AIA?

- Every year, the ACRC holds a 2-day workshop with target organizations to listen to their opinions on different aspects of AIA. By doing so, the ACRC receives their feedback for updating the AIA indicators.
- Regarding the evaluation results, organizations may make an appeal through the ACRC web page, which the ACRC would consider whether to accept.

#### Considering appeals about assessment results

- ACRC distributes the draft report of assessment results to target organizations
- Organizations can make an appeal about the assessment results
- ACRC considers whether to accept appeals

The image displays three screenshots from the ACRC web portal. The first screenshot, titled 'Web page to receive appeals about assessment results', shows a list of target organizations with columns for organization name, address, and a 'File an appeal' button. The second screenshot, titled 'File an appeal', shows a form for submitting an appeal, including a text area for the appeal content and a 'File an appeal' button. The third screenshot, titled 'Decision about appeals', shows a table with the following data:

No.	Organization Name	Appeal Status	Appeal Content	Decision
1	국립중앙도서관	접수됨	국립중앙도서관	접수됨
2	국립중앙도서관	접수됨	국립중앙도서관	접수됨
3	국립중앙도서관	접수됨	국립중앙도서관	접수됨
4	국립중앙도서관	접수됨	국립중앙도서관	접수됨
5	국립중앙도서관	접수됨	국립중앙도서관	접수됨

**Q** Since the implementation of AIA is not legally mandatory, how did the ACRC resolve difficulties with target institutions not willing to participate?

- As for Korea's case, when conducting the first AIA in 2002, participation rate was not a big issue given the political push from the president at that time. Yet, at later stages, the ACRC experienced a tendency from powerful institutions and low-performing institutions to ignore our requests and not cooperate.
- As a response, the ACRC marked such organizations as zero and published them as 'non-cooperative' in their press release, which put a lot of pressure on them from the public.
- When initially implementing AIA, it may be useful to not release the results from all of the institutions, but only disclose results from the best-performed institutions to put more emphasis on the positive aspects rather than the negative.
- To make institutions participate, it is important to let the institutions know that the purpose of AIA is not to punish or investigate them, but to help them through facilitating a platform for knowledge sharing and benchmarking. Generally, it's about changing the overall perception of AIA.
- It is also advised to start with simple indicators, otherwise institutions may find it difficult or be reluctant to submit their reports.

## 7. Expected Results of AIA

**Q** How did the ACRC change the perception of corruption among the public sector and ultimately the general public?

- The most crucial part is to change the mindset of the top leaders, either voluntarily or by force. Changing the perception of top leaders really trickles down and changes the culture of that organization.
- It is also important to mention that the public's perception shifts faster than the perception of public officials, which is probably due to the solidarity between public officials which makes them resilient to change.

**Q** What would be the systematic impact of AIA?

- The essential purpose behind AIA is to recognize and praise good behavior so as to create an annual mechanism of commending such practices.
- While the tool is technical in nature, AIA is a potent institutional mechanism that generates a virtuous cycle of anti-corruption efforts.

**Q** Can AIA also measure the actual level of corruption and integrity in the public sector?

- No, AIA is not designed to measure the level of integrity. Rather, it evaluates the voluntary efforts made by public institutions to raise its integrity level.
- Therefore, in Korea, ACRC has employed another policy tool called the Integrity Assessment (IA, please see the box below), which specifically aims to measure the actual level of corruption, to complement AIA.

## Korea's Annual Integrity Assessment (IA)

ACRC's annual Integrity Assessment (IA) evaluates the level of corruption in each public service institutions using results from the users' survey on how frequently corrupt acts take place during the delivery of public services. Compared with AIA, IA is a more extensive policy survey tool, administered not only to employees of public institutions, but also to outside users (i.e. citizens) who have had first-hand experience with public services, to measure how much corruption takes place and is perceived to occur from year-to-year within target organizations.

	AIA	IA
<b>Objective</b>	- Improve the adequacy and effectiveness of the anti-corruption efforts made by public agencies	- Raise public awareness of the need to fight corruption and enhance integrity
<b>Structure</b>	- Evaluate organizational performances in the Planning-Implementation-Result & Dissemination stages	- External Integrity: Public service users - Internal Integrity: Internal employees - Policy Customer Evaluation: Experts and stakeholders
<b>Target organizations</b>	- 270 organizations (2018)	- 270 organizations (2018)
<b>Methodology</b>	- Evaluation by ACRC and external experts (desk review, survey & statistics)	- External Integrity: Telephone survey - Internal Integrity: Online survey - Policy Customer Evaluation: Telephone survey
<b>Criteria</b>	- Planning: Set up anti-corruption action plan - Implementation: Promote public-private partnership, reduce corruption risks, promote integrity culture - Result & Dissemination: Improve integrity, disseminate best practices - Occurrences of corruption, non-fulfillment of anti-corruption measures (point deduction)	- External Integrity: Corruption Index, Corruption Risk Index, etc. - Internal Integrity: Integrity Culture Index, Work Integrity Index, etc. - Policy Customer Evaluation: Perception, control and experience of corruption - Occurrences of corruption, non-fulfillment of anti-corruption measures (point deduction)

## Comment

It is important for partner countries to recognize and understand both policy tools in order to successfully implement an AIA-like mechanism. While implementing IA along with AIA would be most ideal, IA can be financially burdensome in terms of human resources as it requires the hiring of survey institutions. AIA on the other hand, relies on the internal work of existing ACRC staff and the self-reporting system of the target institutions, thus not requiring vast financial resources like IA. Therefore, it is suggested that partner countries start with a more practical and implementable policy tool, AIA, and then further expand by implementing IA.

## 8. Final Words of Advice

### Q What is some advice for pilot countries first trying to develop indicators?

- Firstly, try to point out the key priorities within national initiatives. Then, consult with the relevant ministries since the ministries themselves are the ones who would be using the indicators.
- It is recommended to develop indicators that can capture the efforts of as many institutions as possible. For instance, some institutions may require legal adjustments to achieve anti-corruption initiatives. While progress from these institutions may not be immediately visible, it is important to make sure that the AIA indicators are able to acknowledge their efforts.

### Q What general advice would the ACRC give to countries trying to implement AIA?

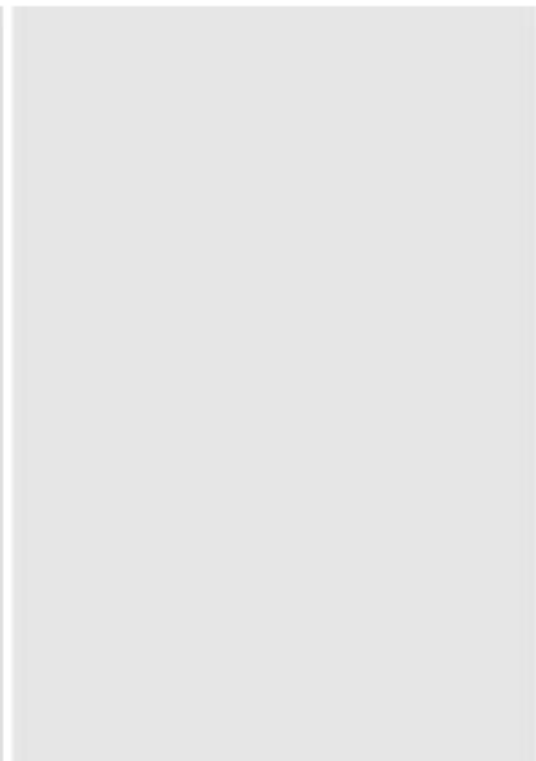
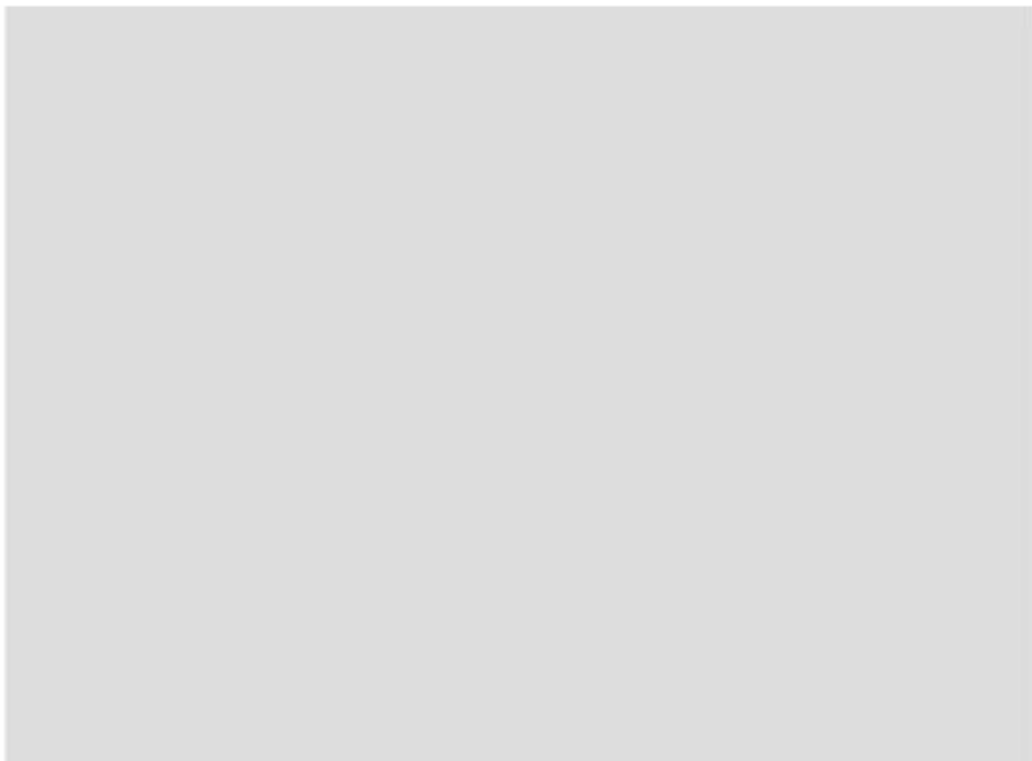
1. Make the assessment period regular.
2. Start with a few simple quantitative indicators in order to ensure political buy-in and minimize resistance from target institutions.
3. Consult with relevant stakeholders.
4. Seek out political support from the top.
5. Introduce AIA across an entire category of target institutions and then expand to other categories.
6. Utilize internal staff resources and whatever mechanisms that are already in place for public sector monitoring.
7. Communicate with the press and provide incentives.
8. Adjust the indicators from time to time, so that they can accurately capture key aspects of the country's challenges.





II.

## Sample AIA Reporting Template



## II. Sample AIA Reporting Template

### (Self-assessment report to be submitted by target institutions)

After implementing anti-corruption initiatives, target institutions draft a self-assessment report on their performances during the assessment period (November of the previous year – October of the current year) and submit it to ACRC by the annual deadline. Self-assessment reports are to be drafted, following the reporting template provided by ACRC.

#### Example 1. Establishment of an anti-corruption action plan

##### 1) Evaluation criteria & instructions for preparing a self-assessment report

Phase	A. Planning		
Criteria	1. Establishment & implementation of an anti-corruption action plan		
Factor	1-1. Establishment of an anti-corruption action plan	Highest Score	100

##### Evaluation Method & Instructions

##### Anti-corruption action plan reflecting the characteristics of the organization (max. 100 points)

- This indicator is intended to assess whether the annual anti-corruption plan has been established by fully considering the characteristics of the organization such as its functions, organizational environment, work process, etc.
- Given the total number of assessment criteria of this year, it is recommended that the annual action plan should consist of at least 20 activities.

##### Consider the following activities when making an action plan

**Setting up anti-corruption mechanisms:** organization of high-level & working-level anti-corruption meetings, appointment of external anti-corruption auditors, etc.

**Customizing the action plan:** identification of key reform areas and development of counter-measures based on the previous year's Integrity Assessment and Anti-Corruption Initiative Assessment results as well as administrative conditions

**Incorporating the assessment criteria:** align the action plan with major assessment criteria such as operation of anti-solicitation system, improvement of the code of conduct, promotion of whistleblowing, etc.

##### Anti-corruption action plan reflecting the characteristics of the organization (max. 100 points)

Detailed criteria	Highest score	Very good	Good	Average	Poor
a. Adequate reflection of organizational characteristics	20	20	16	12	8
b. Measures to ensure the integrity and accountability of high-level officials	20	20	16	12	8
c. Participation of the head of agency, high-level officials, and other employees in planned activities	20	20	16	12	8
d. Substance & concreteness of planned activities	20	20	16	12	8
e. Reasonable schedules & feasibility of the plan	20	20	16	12	8

Note	Each target organization is requested to submit an annual anti-corruption action plan (max. 10 pages) as an official document to the ACRC by April XX, 20XX. Supplementary documents can be attached to the action plan.
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\* The assessment criteria examples used in this sample reporting template are those drawn from ACRC's 2017 AIA indicators.

## 2) Template for a self-assessment report

Phase	A. Planning
Criteria	1. Establishment & implementation of an anti-corruption action plan
Factor	1-1. Establishment of an anti-corruption action plan

### Anti-corruption action plan

*\*Target organizations are requested to submit an annual anti-corruption action plan to the ACRC by the end of May every year. The organizations that have already submitted the plan do not need to fill out this form.*

**Example 2.** Involvement of members in anti-corruption activities

## 1) Evaluation criteria &amp; instructions for preparing a self-assessment report

Phase	B. Implementation		
Criteria	1. Promotion of public participation & public-private partnership		
Factor	1-1. Involvement of members in anti-corruption activities	Highest Score	100

## Evaluation Method &amp; Instructions

## ① Leaders' commitment to the fight against corruption (max. 30 points)

## - Commitments &amp; efforts of the head of agency to fight corruption

This indicator reflects the anti-corruption commitments and efforts of the head of agency, as evaluated by the employees. (The relevant survey data of the 20XX Integrity Assessment is used to get the score for this indicator.)

## - The head of agency taking the lead in enhancing integrity

This indicator reflects the degree to which the head of agency has taken the lead in enhancing integrity, as evaluated by the employees. (The relevant survey data of the 20XX Integrity Assessment is used to get the score for this indicator.)

## ② Participation of members in anti-corruption activities (max. 50 points)

## [ For the organizations which have affiliated agencies ]

## - Participation of staff members in anti-corruption activities (max. 20 points)

This indicator assesses whether the anti-corruption unit has put in place and operated a system to promote the participation of employees and the collection of their opinions in conducting anti-corruption activities, and has provided incentives for the employees who had participated in anti-corruption activities.

## - Anti-corruption efforts of affiliated agencies (max. 30 points)

Detailed criteria	Highest score
a. Criteria for selecting the agencies subject to assessment <ul style="list-style-type: none"> <li>- Number of target agencies, major affiliated agencies, agencies with occurrences of corruption, agencies with problems raised by ACRC, etc.</li> <li>- Whether provincial/metropolitan government agencies assessed municipal and affiliated agencies; whether municipal government agencies assessed affiliated agencies including government-funded agencies</li> </ul>	5
b. Composition of assessment criteria <ul style="list-style-type: none"> <li>- Whether the assessment criteria reflects the characteristics of the organization</li> </ul>	10
c. Utilization of assessment results (e.g. used for providing incentives)	15

*\*Target organizations may conduct a separate anti-corruption initiative assessment for their affiliated agencies, or incorporate such an assessment in their existing assessment program.*

## [ For the organizations which do not have affiliated agencies ]

## - Participation of staff members in anti-corruption activities (max. 50 points)

This indicator assesses whether the anti-corruption unit has put in place and operated a system to promote the participation of employees and the collection of their opinions in conducting anti-corruption activities, and has provided incentives for the employees who had participated in anti-corruption activities.

## ③ Incentives for the unit/staff members in charge of anti-corruption work (max. 20 points)

## - Internal regulations providing for an anti-corruption incentive scheme (10 points)

## - Operation of an anti-corruption incentive scheme (max. 10 points)

Good	Average	Poor
10	7	4

**Examples of an anti-corruption incentive scheme**

- Establishment of an "anti-corruption" or "integrity" unit
- Advantageous position of the anti-corruption or integrity unit within the organization
- Advantages in personnel evaluation
- Opportunity to participate in an overseas training program

\* "0" points will be given to the organizations which do not have an internal regulation providing for an anti-corruption incentive scheme, or have not operated such a scheme.

**Note**

"② Participation of members in anti-corruption activities" is a common indicator applied to all the organizations subject to assessment.

## 2) Template for a self-assessment report

Phase	B. Implementation
Criteria	1. Promotion of public participation & public-private partnership
Factor	1-1. Involvement of members in anti-corruption activities

## ① Participation of staff members in anti-corruption activities

Please describe the best practices related to the participation of staff members in anti-corruption activities. Description of each case should not exceed 2 pages.

<p>[Title: _____ ]</p> <p>Institutionalization of activities: <i>(permanent or temporary)</i></p> <p><b>Description:</b> Please give a brief description of major activities. Include any incentives provided for the employees who participated in these activities.</p> <p><b>Outcome:</b> For example, the opinions of the anti-corruption unit have been adopted by other units.</p> <p>Evidentiary documents: <i>(title, document no. &amp; date)</i></p> <p><i>* Please do not attach evidentiary documents and make them available for on-site inspection.</i></p>
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## ② Administration of the Anti-Corruption Initiative Assessment for affiliated agencies

Please describe the best practices related to the participation of staff members in anti-corruption activities. Description of each case should not exceed 2 pages.

Name of agency		Major criteria	Utilization of assessment results	Evidentiary documents
Total number of affiliated agencies	Major affiliated agencies			
				<i>Title, number, date</i>

*\* Please attach the plan and results of the Anti-Corruption Initiative Assessment conducted for affiliated agencies.*

## List of affiliated agencies

No.	Name of agency	Number of staff (as of 1 Jan. 20XX)	Budget (in million won, 20XX)	Administration of the Anti-Corruption Initiative Assessment
1				<i>Yes or no</i>
2				
3				

## ③ Incentives for the unit/staff members in charge of anti-corruption work

## Institutionalization of the incentives for the unit/staff members in charge of anti-corruption work

No.	Name of incentives	Relevant regulations	Relevant provisions
1			

## Provision of the incentives for the unit/staff members in charge of anti-corruption work

No.	Name of incentives	Relevant regulations	Relevant provisions
1			<i>Title, number, date</i>

\* Please do not attach evidentiary documents and make them available for on-site inspection.

**Example 3.** Punishment & control of corrupt acts

## 1) Evaluation criteria &amp; instructions for preparing a self-assessment report

Phase	B. Implementation		
Criteria	2. Reduction of corruption risks		
Factor	2-3. Punishment & control of corrupt acts	Highest Score	100

## Evaluation Method &amp; Instructions

## ① Self-detection of corrupt employees (max. 60 points)

- Points are given according to the rate of self-detection of corrupt employees among total employees.

$$\frac{\text{Points for self-detection of corrupt employees}}{\sqrt{\text{Number of total employees}}} \times 100$$

Level	Points
30% or higher	60
16 % or higher	56
10% or higher	52
7% or higher	48
Less than 7%	44
0%	40

*\*This indicator is used since it is important for target organizations to increase efforts to detect corrupt employees in their organizations.*

*\*An "act of corruption" is defined in article 2 of the Act on the Prevention of Corruption and the Establishment and Operation of the Anti-Corruption & Civil Rights Commission.*

**Calculation of self-detection of corrupt employees**

Sum of the weighted number of self-detected cases (number of corrupt employees)

*\*Weight values for disciplinary actions against corrupt acts:*

*disciplinary action (X 3), disposition (X 1)*

*e.g. (censure for 2 employees X 3) + (admonition for 3 employees X 1) = 9*

*\*Excluding wrongdoing such as drunk driving, sexual harassment, violation of service regulations, and professional negligence*

- For the organizations with no self-detected corruption cases, points will be given according to the amount of guidance and inspection provided relating to the violation of the code of conduct.



Level	Points
7 or more times	16
6 or more times	13
5 or more times	10
4 or more times	7
3 or less times	4

② Strict punishment for corrupt employees (max. 40 points)

- Points will be given by assessing whether the strengthened disciplinary standards have been applied to the corruption cases which occurred in each organization.

Category	Disciplinary standards applied
Public servants	<ul style="list-style-type: none"> <li>- Attached Table 1-2 in the "Enforcement Regulation of the Decree on Disciplinary Action Against Public Officials" (Disciplinary guidelines for the violation of the obligation of integrity)</li> <li>- Attached Table 2 in the "Regulation on Disciplinary Action Against Local Public Officials" (Disciplinary guidelines for the violation of the obligation of integrity)</li> </ul>
Employees of public service-related organizations	<ul style="list-style-type: none"> <li>- Attached Table 4 in the "Operational Guidelines for the Code of Conduct for Public Officials" (Disciplinary guidelines for the violation of "Restriction of Receiving Money or Other Valuables")</li> </ul>

- 4 points will be deducted for each case of mitigated punishment

\* Applicable to only corruption cases involving acceptance of money, entertainment or other valuables

\* Full points will be given to the organizations where no corruption cases occurred.

Note

1. Period for ① and ②: Detection or punishment which occurred between November 1, 20XX and October 31, 20XX
2. Type of disciplinary action or disposition: personnel action including mandatory retirement, disciplinary action, caution, warning, and admonition, while excluding simple corrective measures (based on the date when the disciplinary action has been finalized)

## 2) Template for a self-assessment report

Phase	B. Implementation
Criteria	2. Reduction of corruption risks
Factor	2-3. Punishment & control of corrupt acts

## ① Self-detection of corrupt employees

## Rate of self-detection of corrupt employees among total employees

[ For the organizations with self-detection records ]

Self-detected corrupt employees	Points for self-detection (A)	Number of total employees (B)	Rate of self-detection (A/B)
- Censure: 2 persons - Warning: 2 persons	8	$\sqrt{\frac{\text{Total employees: 400}}{\text{Total employees: 20}}}$	40.0%

\* The information given in the table above must be identical to the record of corrupt employees submitted to ACRC.

## Self-detection of corrupt employees

No.	Corrupt employee	Summary of corrupt acts	Date of occurrence of corruption	Date of confirmation of disciplinary action	Type of disciplinary action	Evidentiary documents
1	A XX (to be anonymous)					Title, number, date

\* The information given in the table above must be identical to the record of corrupt employees submitted to ACRC.

[ For the organizations with no self-detection records ]

Number of self-inspections conducted: \_\_\_ times

\* Fill in the number of inspections conducted by referring to B-2-2.

## ② Strict punishment for corrupt employees

## Application of disciplinary standards

Number of disciplinary actions (A)	Number of mitigated punishment (B)	Points
10	2	32

## Details about disciplinary actions

No.	Summary of corrupt acts	Disciplinary standard	Disciplinary action	Date of occurrence of corruption	Date of confirmation of disciplinary action	Note
1	<i>* Specify the amount of money involved in corruption, and activeness or passiveness of corrupt acts</i>	<i>Dismissal</i>	<i>Dismissal</i>			<i>*Specify any reasons for not applying disciplinary standards</i>

*\*Specify all corruption cases to which disciplinary standards have been applied (including caution, warning and admonition). Points will be deducted upon discovery of omitted information. If there are no occurrences of corruption, please write "not applicable".*





III.  
Sample AIA Evaluation Report



### III. Sample AIA Evaluation Report (Evaluation results received from ACRC)

For each target organization, ACRC provides a customized evaluation report which includes scores for each indicator, specific reasons for final scores, strengths and weaknesses of the organization's anti-corruption efforts, and key directions for the future. After the final score and evaluation grade (i.e. performance tiers) are assigned for each organization, the ACRC provides a consolidated evaluation report which includes information on the overall outcome of anti-corruption initiatives per type of organization and criteria, best practices, areas for further improvement and filed objections. The consolidated evaluation report is announced not only to target institutions, but also to the public.

#### Example 1. Establishment of an anti-corruption action plan

Result of the 20XX Anti-Corruption Initiative Assessment  
Name of the target organization

Category	Result		Score for each criterion						
	Grade	Average Score	a	b	c	d	e	f	g
Public Service I	1	96.71	90.00	95.72	97.70	98.50	94.00	100.00	0.00

#### [ Assessment Criteria ]

- a. Establishment & implementation of an anti-corruption action plan
- b. Promotion of public participation & public-private partnership
- c. Reduction of corruption risks
- d. Promotion of a culture of integrity
- e. Improvement of integrity
- f. Dissemination of best practices
- g. Deduction of points

Phase	A. Planning
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## 1. Establishment & implementation of an anti-corruption action plan

### 1-1. Establishment of an anti-corruption action plan (Total score: 90)

[ Score for each factor ]

Anti-corruption action plan reflecting the characteristics of the organization (max. 100 points)	
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Score	90
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\* The assessment criteria examples used in this sample evaluation report are those drawn from ACRC's 2017 AIA indicators.

[ Observations ]

- The anti-corruption action plan appropriately reflects the context of the organization through an analysis of the current level of integrity and its unique characteristics.
- Concerning the "activities to be reinforced", a specific comparison of the activities against the previous year would have made it easier to understand the change in the planned activities.

[ Conclusion ]

- The anti-corruption action plan is considered to be systematic and feasible.

## 2) Sample consolidated evaluation report for all target organizations

Phase	A. Planning
Criteria	1. Establishment & implementation of an anti-corruption action plan
Factor	1-1. Establishment of an anti-corruption action plan

**(Summary)****Good practices:**

The target organizations subject to assessment established concrete anti-corruption action plans based on the active participation of internal members and analysis of corruption-prone areas in their organizations.

**Weaknesses:**

Some organizations simply listed anti-corruption activities suggested by the ACRC without a serious consideration of their internal problems.

**[ Evaluation criteria ]**

Anti-corruption action plan reflecting the characteristics of the organization:

This indicator is intended to assess whether the annual anti-corruption plan has been established by fully considering the characteristics of the organization such as its functions, organizational environment, work process, etc.

## &lt; Detailed criteria &gt;

- a. Adequate reflection of organizational characteristics
- b. Measures to ensure the integrity and accountability of high-level officials
- c. Participation of the head of agency, high-level officials, and other employees in planned activities
- d. Substance & concreteness of planned activities
- e. Reasonable schedules & feasibility of the plan

**[ Good practices ]**

- The organizations with robust anti-corruption mechanisms set up anti-corruption action plans based on a detailed analysis of the organizational level of integrity and according to the conditions of the organization.
  - For example, the Ministry of Health & Welfare analyzed corruption-prone areas based on consultations with the Integrity Task Force and Integrity Ombudsman, and designated relevant units to be jointly responsible for anti-corruption work.
  - The National Police Agency made a thorough analysis of the results of the Integrity Assessment and the Anti-Corruption Initiative Assessment of the previous two years, and developed an anti-corruption strategy reflecting organizational characteristics.
- The target organizations subject to assessment built anti-corruption mechanisms involving the head of agency, executives and other employees, and increased the feasibility of anti-corruption action plans by reflecting various opinions.
  - For example, the Ministry of Justice organized an anti-corruption meeting chaired by the Minister to ensure the implementation of the anti-corruption action plan. The Ministry of Interior & Safety formed the anti-corruption task force, which consisted of the directors of major divisions.

**[ Weaknesses ]**

- 20 organizations, including the Jeju National University Hospital, Pusan National University Hospital, and the Ministry of Culture, Sports & Tourism, submitted an anti-corruption action plan consisting of less than 20 activities. Those organizations are advised to plan a sufficient number of activities by promoting the active participation of internal members in setting up the action plan.



**Example 2.** Involvement of members in anti-corruption activities

## 1) Sample customized evaluation report for each target organization

Phase	B. Implementation
-------	-------------------

## 1. Promotion of public participation &amp; public-private partnership

## 1-1. Involvement of members in anti-corruption activities (Total score: 92.21)

## [ Score for each factor ]

Leaders' commitment to the fight against corruption (max. 30 points)	
Commitments & efforts of the head of agency to fight corruption (max. 20 points)	The head of agency taking the lead in enhancing integrity (max 10 points)
16.52	7.69

## [ Observations ]

- Commitments & efforts of the head of agency to fight corruption: score from survey results
- The head of agency taking the lead in enhancing integrity: score from survey results

## [ Score for each factor ]

Participation of members in anti-corruption activities (max. 50 points)
50

## [ Observations ]

- This organization has put in place a system to promote the participation of employees in anti-corruption activities, and to provide incentives for the employees who had participated in such activities.
- The employees actively participated in anti-corruption activities based on institutionalized anti-corruption mechanisms.

## [ Score for each factor ]

Incentives for the unit / staff members in charge of anti-corruption work (max. 20 points)	
Internal regulations providing for an anti-corruption incentive scheme (10 points)	Operation of an anti-corruption incentive scheme (max. 10 points)
10	8

## [ Observations ]

- The internal regulation of this organization provides incentives for the staff members in charge of anti-corruption work.
- This organization has a unit dedicated to anti-corruption work and an incentive scheme for the employees who actively participate in anti-corruption activities, including advantages in personnel evaluation and an opportunity to attend an overseas training program.

## 2) Sample consolidated evaluation report for all target organizations

Phase	B. Implementation
Criteria	1. Promotion of public participation & public-private partnership
Factor	1-1. Involvement of members in anti-corruption activities

**[ Evaluation criteria ]**

This indicator is intended to assess whether target organizations have put in place and operated a system to promote the participation of employees and the collection of their opinions in the process of conducting anti-corruption activities.

**[ Good practices ]**

- Most of the target organizations conducted their own anti-corruption initiative assessment for their affiliated agencies, covering major affiliated agencies, agencies with occurrences of corruption, and those with problems raised by ACRC.
  - 93.3% of the organizations completed the activities related to "② Participation of members in anti-corruption activities".
- Most of the target organizations have put in place an anti-corruption incentive scheme such as the establishment of a unit dedicated to anti-corruption work, and internal regulations providing advantages in personnel evaluation.
  - A total of 246 organizations (96.1%) have introduced an anti-corruption incentive scheme providing benefits such as advantages in promotion, citations awarded by the head of agency, bonuses, and an opportunity to attend an overseas training program.

**[ Weaknesses ]**

- Some of the organizations are advised to have an anti-corruption incentive scheme incorporated in their internal regulations or increase efforts to operate such a scheme.
  - 16 organizations do not have an internal regulation providing for an anti-corruption incentive scheme or have failed to submit information about such a scheme, including Gwanak-gu District Office, Seongnam City Government, Gyeongsangnam-do Provincial Education Office, and Pukyong National University.

**Example 3.** Punishment & control of corrupt acts

1) Sample customized evaluation report for each target organization

Phase	B. Implementation
-------	-------------------

2. Reduction of corruption risks

2-3. Punishment & control of corrupt acts (Total score: 98)

[ Score for each factor ]

Punishment & control of corrupt acts (max. 100 points)	
Self-detection of corrupt employees (max. 60 points)	Strict punishment for corrupt employees (max. 40 points)
58	40

[ Observations ]

- The rate of self-detection of corruption employees is higher than 10% of the total number of employees.
- This organization strictly applied the disciplinary standards to the employees who violated the restriction of receiving money or other valuables during the assessment period.

## 2) Sample consolidated evaluation report for all target organizations

Phase	B. Implementation
Criteria	2. Reduction of corruption risks
Factor	2-3. Punishment & control of corrupt acts

## [ Evaluation criteria ]

Self-detection of corrupt employees:

This indicator is intended to lead target organizations to detect corruption committed by their employees by assessing the rate of self-detection of corrupt employees among total employees.

Strict punishment for corrupt employees:

This indicator assesses whether target organizations have applied strengthened disciplinary standards to corrupt employees without arbitrarily mitigating disciplinary action against them.

## [ Good practices ]

- 88 target organizations self-detected a total of 679 cases of corruption (7.7 cases per organization) committed by their employees through active inspection activities.
  - The 17 organizations with the highest number of such cases include: Yong-in City (66 cases), Hwaseong City (57 cases), Korea Electrical Safety Corporation (41 cases), Korea Land & Housing Corporation (40 cases), National Police Agency (36 cases), Ansan City (23 cases), and Suwon City (17 cases).
- In 312 cases (90.7%) out of 344 disciplinary actions taken against public officials who committed corruption, target organizations strictly applied the strengthened disciplinary standards.



## [ Weaknesses ]

- The target organizations subject to assessment differed widely in the rate of detecting corrupt employees.
  - 168 organizations (65.6%) did not detect any internal corruption cases during the assessment period. These organizations need to put in place an institutional mechanism to improve internal control.
- 32 cases involving mitigated punishment for internal corruption were found in 17 organizations including:
  - Ministry of Land, Infrastructure & Transport (5 cases), Gyeonggi-do Education Office (5 cases), Ministry of Science and ICT (3 cases), Grand Korea Leisure (3 cases), Ministry of National Defense (2 cases), National Police Agency (2 cases), and Seoul Metropolitan City (2 cases).
  - These organizations will be given a penalty in the next assessment.

**Example 3.** Punishment & control of corrupt acts

1) Sample customized evaluation report for each target organization

Phase	B. Implementation
-------	-------------------

2. Reduction of corruption risks

2-3. Punishment & control of corrupt acts (Total score: 98)

[ Score for each factor ]

Punishment & control of corrupt acts (max. 100 points)	
Self-detection of corrupt employees (max. 60 points)	Strict punishment for corrupt employees (max. 40 points)
58	40

[ Observations ]

- The rate of self-detection of corruption employees is higher than 10% of the total number of employees.
- This organization strictly applied the disciplinary standards to the employees who violated the restriction of receiving money or other valuables during the assessment period.







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