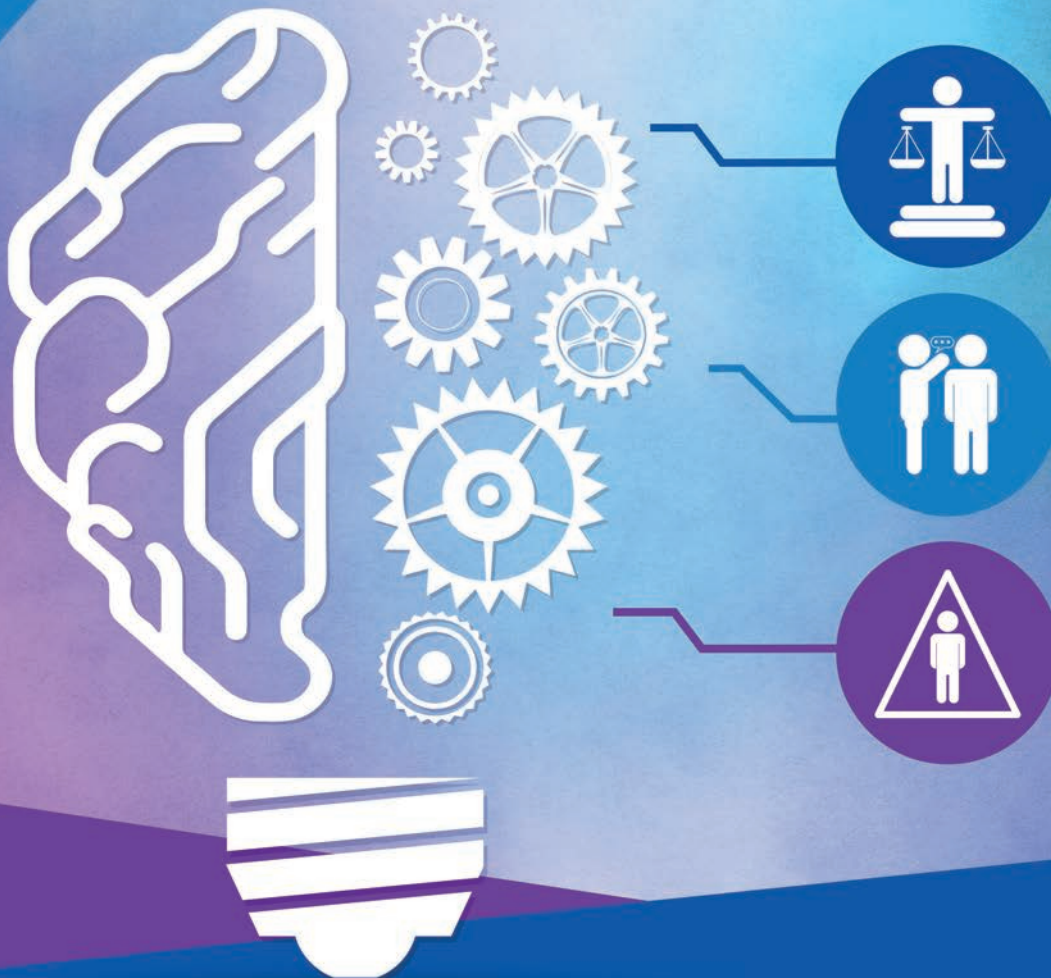


OECD Public Governance Reviews

# Promoting Corruption Risk Management Methodology in Romania

APPLYING BEHAVIOURAL INSIGHTS TO PUBLIC INTEGRITY





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# Foreword

Identifying and managing integrity risks is crucial for responding effectively and efficiently to threats from corruption and other integrity violations at organisational level. The methodologies for integrity risk management are straightforward and comply with international standards. However, the implementation of these methodologies in day-to-day practice is often challenging. A behavioural perspective can help explain why those who are supposed to identify, assess and manage risks may not take the right decisions or act as expected.

Romania has made significant progress in several areas of integrity policies. For example, the Romanian government has developed a corruption risk management methodology that must be implemented by all central public institutions. Concerned with ensuring the methodology truly reduced corruption risk, and not just focusing on formal compliance with the normative framework, the Ministry of Justice and the OECD carefully looked at the process through a behavioural lens. What behaviours are required for a successful implementation of the corruption risk management methodology? What barriers and biases could lead to suboptimal results? What capacities, opportunities and motivations are required so that public officials can -- and want to -- manage integrity risks beyond a mere “tick-the-box” exercise?

This report contributes to OECD work to help countries effectively implement the OECD *Recommendation on Public Integrity*. In addition, this report builds on the OECD report on *Behavioural Insights for Public Integrity: Harnessing the Human Factor to Counter Corruption* and applies OECD’s BASIC methodology to identify and better understand the behaviours underlying the implementation of Romania’s current corruption risk management methodology. The project is part of a broader support by the OECD focusing on three at-risk sectors: health, education and state-owned enterprises (SOEs). Based on this analysis, the report presents tailored behavioural approaches and recommendations to improve the uptake and impact of corruption risk management in Romania.

The report was reviewed by the OECD Working Party of Senior Public Integrity Officials (SPIO) on 13 November 2023. It was approved by the Public Governance Committee on 18 December 2023 and prepared for publication by the Secretariat.

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The OECD expresses its gratitude to the Romanian Government, in particular to representatives of the Directorate for Crime Prevention (*Direcția de Prevenire a Criminalității*) of the Ministry of Justice (*Ministerul Justiției*) for their leadership, guidance and support. The OECD thanks public officials from the Ministry of Health (*Ministerul Sănătății*), the Ministry of Education (*Ministerul Educației*), the Ministry of Energy (*Ministerul Energiei*), the Ministry of Internal Affairs (*Ministerul Afacerilor Interne*) and the Ministry of Transport and Infrastructure (*Ministerul Transporturilor și Infrastructurii*). Other stakeholders that contributed to the report were the National Anti-Corruption Directorate (*Direcția Națională Anticorupție*, DNA), National Integrity Agency (*Autoritatea Națională de Integritate*, ANI) and the General Anti-Corruption Directorate (*Direcția Generală Anticorupție*, GAD).

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# Executive summary

Decision 599 of August 2018 outlines the corruption risk management methodology for the Romanian central government. Despite the Romanian government's efforts to adopt a standardised methodology for corruption risk management, its implementation has been uneven, with varying levels of adoption.

This report focuses on the challenges faced in implementing the corruption risk methodology from a behavioural perspective and proposes concrete avenues to increase its adoption. It follows the BASIC methodology developed by the OECD (BASIC stands for **B**ehaviour, **A**nalysis, **S**trategy, **I**ntervention, **C**hange), a five-step methodology that provides guidance to policymakers on the steps to apply behavioural insights systematically when designing policy interventions. Across several ministries, the OECD conducted interviews and reviewed corruption risk registries through a behavioural lens.

## Key findings

As a result of Romania's National Anti-Corruption Strategy (NAS), Decision 599/2018 outlines a methodology for assessing and managing corruption risks, along with a standard approach for evaluating integrity incidents. The framework aligns with established good practices recommended by the OECD and other international organisations.

Based on the interviews and focus groups, the OECD developed a behavioural flowchart to illustrate the explicit and implicit steps required to manage corruption risk. Despite following international standards and being apparently clear, the flowchart evidences that the methodology is de facto cognitively demanding and time-consuming. In addition, public managers typically lack the required expert knowledge; attempting to transform all public managers into anti-corruption experts would not be efficient.

This complexity of the methodology, along with its cognitive and time demands, leads to the following challenges that in the end undermine the effectiveness of corruption risk management in practice:

- The first step to manage corruption risks is to identify the context where the risks may materialise. The Romanian methodology does not provide a clear definition of how to identify this context, however, leading authorities to identify corruption risk contexts using different criteria. This leads to not homogenous assessments which is making it difficult for authorities to compare their practices and for the Technical Secretariat of the NAS to provide meaningful feedback. Moreover, poorly identified risks create problems when designing meaningful intervention measures.
- The complexity of assessing the likelihood and impact of risks may lead the internal working group members, who are in charge of leading the risk assessment at entity level, to use mental shortcuts (“heuristics”) and overlook important information needed to correctly assess the identified risks.
- Intervention measures recur to “easy solutions”, such as recommending more trainings, and are designed without following a clear theory of change and an action plan. Indeed, many of the reviewed corruption risk registries suggest unspecified intervention measures. In addition, most interventions lack specified implementation timeframes and a clear verification method.

## Key recommendations

To address the challenges identified, this report provides the following recommendations aimed at empowering and supporting public managers in view of increasing the de facto adoption of the corruption risk management methodology:

- Redesign the risk registers to include intermediate indicators for intervention measures to guide public officials in the process of thinking why a specific intervention measure is supposed to generate the desired impact. This would increase working group members' opportunities to learn from the progress made in implementing the measures to control the identified risks and reduce the risk of falling back to easy solution that do not respond to the identified risks.
- Design a user guide for the adoption of corruption risk methodology in Decision 599/2018 that helps working group members learn from best practices and examples. Interviewed public managers were stating that more guidance to them is needed. The guide should include a step-by-step manual on how to design intervention measures using a theory of change.
- Develop a web-based application to guide the management of corruption risk that offers easy access to historical information on corruption incidents and intervention measures. Such an application can at the same time provide automated guidance and reduce the cognitive burden for public managers. A web-based application developed by the Romanian Ministry of Internal Affairs serves as an example of how this tool could be adapted to fit all central authorities in Romania.
- Establish a dedicated unit or person within each ministry to steer and assist the working group in managing corruption risks. All public managers cannot become experts in corruption which is why they require support. Cases from the Ministries of Energy and the Ministry of Internal Affairs could provide an example of how to implement this unit or dedicated person.

Finally, the report provides guidance on how such an intervention could be tested in an experimental setting, on how to implement the flowchart tool to map behaviours and the complexity of processes such as the corruption risk management methodology, and on basic elements of a communication strategy to raise awareness of the relevance of corruption risk management.

# **1** Corruption risk management in the Romanian central government

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This chapter stresses the relevance of managing integrity risks and lays out the essential steps. It further summarises the framework for corruption risk management in the Romanian central government as well as the challenges in its implementation since it was issued in 2018. The chapter takes a behavioural perspective and discusses how such challenges may be caused by heuristics (mental shortcuts or intuitive judgments) and biased decision-making by the individuals involved in the process.

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## 1.1. The relevance of integrity risk management

In public sector organisations, integrity risk management is crucial to prevent corruption and ensure delivery of public services to citizens. Effective internal control and risk management policies reduce the vulnerability of public organisations by guiding officials to adequately assess risks in their duties and develop strategies to manage them. For an integrated control system to work, countries must put in place response procedures for corruption cases and breaches of integrity standards. The OECD Public Integrity Handbook suggests using proactive corruption risk management tools that follow 6 steps (Figure 1.1): identifying risks, assessing their likelihood, evaluating their impacts, developing control measures, monitoring intervention outcomes and the evolution of risks as well as updating the process if new vulnerabilities arise (OECD, 2020<sup>[1]</sup>).

**Figure 1.1. Steps to manage corruption risks**



Source: Adapted from (OECD, 2020<sup>[1]</sup>).

Risk assessments are iterative processes that allow an organisation to understand the enablers and barriers to its objectives (OECD, 2020<sup>[1]</sup>). Each step is relevant and comes along with its own challenges. To properly identify integrity risks, information and knowledge about the context and past incidents is key. At the same time, an organisation must be able to be sensitive to emerging risks. The assessment of likelihood and potential damage also requires information guidance. For example, a methodology can rely on numeric scores (e.g. 1 to 5) to assess likelihood and impact, or they can use classifications (e.g. low, medium and high). Both likelihood and impact scores can be linked to specific criteria to facilitate the assessment (OECD, 2020<sup>[1]</sup>).

After both the likelihood and impact of risk materialisation have been identified, the next step is to define how to respond. The completed risk classification enables institutions to focus preventative efforts on the most relevant risk, consequently saving resources where incidents are expected to be less likely and/or the damage less problematic. Strategies for risk mitigation should be designed considering the best practices available as well as the availability of resources to develop new procedures or strengthen monitoring and training. Finally, organisations should clarify who monitors and evaluates the implementation to draw lessons and inform ongoing risk assessments.

In Romania, through Decision 599 of August 2018, the government requires all central public institutions to implement a corruption risk management methodology. Moreover, the Ministry of Development, Public Works and Administration has drafted a guide regarding risk management for the local administration (<https://www.mdlpa.ro/pages/metodologieidentificareriscuri>). The methodology approved by Decision 599/2018 provides guidance on how to identify risks, assess their consequences, develop control measures and monitor their effectiveness. It calls for the creation of a working group, where internal stakeholders can participate and bring their own expertise. However, despite Romania's efforts to promote the methodology's adoption, its use has been uneven, and it is unclear if it has been effective in reducing integrity incidents.

This OECD report builds on and complements other work carried out by the OECD in Romania (OECD, 2023<sup>[2]</sup>; OECD, 2021<sup>[3]</sup>). Taking a behavioural approach, it focuses on the implementation challenges of the corruption risk methodology and proposes concrete strategies to increase its adoption. Chapter 1

presents the existing Romanian framework for corruption risk management while discussing challenges to its adoption. The OECD focused mainly on the education and health sectors as well as State Owned Enterprises, however, the analysis and recommendations provided apply across the whole public administration. Building from this, Chapter 2 suggests four strategies to improve public officials' capabilities, opportunities and motivation to identify corruption risks, assess their likelihood of materialisation and subsequently design effective intervention measures.

## 1.2. The current corruption risk management methodology in Romania

### 1.2.1. Decision 599/2018 provides a framework for corruption risk management that is aligned with international standards

The Romanian National Anticorruption Strategy (*Strategia Națională Anticorupție*, SNA) is the core policy document guiding the government's integrity and anti-corruption efforts. The NAS has been regularly updated since the first NAS, which was first published in 2001-2004, with revisions based on external peer reviews and internal consultation processes by the Ministry of Justice. From 2016 to 2020, the NAS focused on creating a standardised methodology for corruption risk management, which was previously implemented as an internal initiative by some ministries.

As a result of the NAS, the Romanian government issued Decision 599 in August 2018. As mentioned previously, Decision 599/2018 requires all central public authorities and institutions to draft corruption risks registers and to evaluate integrity incidents, which enables to establish anti-corruption measures as responses to the risks. This administrative act provides a methodology for evaluating and managing corruption risks, as well as a standard procedure for evaluating integrity incidents. It also includes annexes with guides on how to complete corruption risk and incidents registry formats.

The framework proposed in Decision 599/2018 follows standard practices recommended by the OECD and other international organisations. It was inspired by the Ministry of Internal Affairs, which had been applying its own similar procedure since 2014. The corruption risk registry and the integrity incident registry are designed to be complementary. The corruption risk registry is used to record preventive measures (Table 1.1), while the integrity incident registry is a post-evaluation tool to document disciplinary or legal breaches. When an integrity incident is registered by an organisation in the registry, it is used as an input to analyse the incident's causes, describe its circumstances and propose corrective measures. The technical secretariat of the NAS, embedded in the Department for Crime Prevention (*Direcția de prevenire a criminalității*) of the Ministry of Justice, collects integrity reports from each organisation and prepares an annual report that is shared with all and serves as an input for identifying corruption risks in the entities.

**Table 1.1. Corruption risk registry template of Decision 599/2018**

The field of activity in which the risk of corruption manifests	Risk description	Cause	Likelihood	Impact	Exposure	Description of the intervention measure	Responsibility for implementation	Deadline / Implementation duration

Source: Decision 599/2018.

According to Decision 599/2018, each ministry or central public authority capable of autonomous spending is required to carry out corruption risk assessments and keep integrity incidents registries. To adopt this methodology, the leader of each ministry or public authority, as well as its subordinated units, must create its own working group and issue its own procedures through an internal directive. For example, the Ministry of Education prepares its own corruption risk assessment and incident registries, and all its subordinated universities develop their own assessments and registries that are aligned with the ministry's internal directive.

The composition of the working group varies depending on the size, responsibilities and capacities of the organisation. The leader of each central public authority assigns a group of representatives from each area of the institution to implement the methodology. Where a subordinated authority does not have sufficient staff to form a working group, the corruption risk management process must be carried out by its superior institutions. For regular-sized organisations, the working group must include members of managerial capacities, leaders from integrity, internal control, disciplinary responsibility, internal audit, human resources, internal managerial control, public procurement and financial areas, the ethics advisor or the integrity advisor and any other members assigned by the head of institutions.

After the appointment of the working groups, the methodology suggests that public servants manage corruption risks by implementing the following seven steps, which are to be recorded in the risk registry template (Table 1.1):

1. **Risk identification and description:** The members of the working group search for activities previously involved in corruption incidents or define fields of activities that may be susceptible to corruption risks based on their experience. While the methodology is not clear on how to select such activities, during interviews public officials pointed out that it refers to the functional areas that support the organisation's mission as well as administrative operations. After these activities or areas are identified, Decision 599/2018 recommends identifying risks using the following sources: integrity incidents, internal audit reports, reports of the Court of Accounts, reports of control authorities, questionnaires to management or coordinators, press articles, complaints, petitions addressed to the institution, and/or court decisions. Following the documentary review, the group describes the nature of the risk and its causes. The review process can be done in a group, but it is usually done by each member of the working group, depending on their area of work, and then their findings are shared in regular meetings.
2. **Risk likelihood estimation:** The members estimate the likelihood of risk materialisation on a scale of 1 to 3. Level 1 is reserved for identified risks that have not yet materialised but could arise. Level 2 addresses risks where at least one case has occurred in a similar field of activity, but not in their own institution. Level 3 is for risks where at least one corruption case has occurred in their own institution in that field of activity. Where no previous corruption cases have occurred, a set of 15 contributing factors to corruption must be considered for each risk. The risk is deemed higher the more factors are present in that field of activity (Table 1.2).
3. **Impact assessment:** The working group assesses the magnitude of damage that each risk would generate by its financial or reputational impact on the institution. Members need to consider evidence or make estimates about the potential financial and reputational consequences associated with each corruption risk.
4. **Risk exposure:** The risk exposure is calculated as the product of the likelihood and the impact of the risk. This result is then assigned a low, medium, or high level. When the activity has a low-risk exposure, the working group should maintain the existing measures. If the exposure is medium or high, new measures must be implemented.
5. **Intervention measure design:** Decision 599/2018 provides 6 examples of interventions to consider for risk prevention: proposing amendments to legislation, conducting training activities, developing IT systems, implementing new working procedures, conducting periodic audits or control activities, and staff rotation. The head of the working group designates a person responsible for supervising each measure and establishes an implementation timeline.
6. **Monitoring and reviewing:** The working group must monitor the results of the intervention measures and the evolution of risks once a year. If new corruption risks arise, the members must repeat the entire process and incorporate it into the corruption risk register to determine risk exposure and establish new measures.

7. **Update the integrity plan:** Every two years, the working group reviews the results of the integrity plan. Based on the feedback, they update the integrity plan and send it to the SNA's technical secretariat for monitoring.

**Table 1.2. Criteria to classify risks according to Decision 599/2018**

Low likelihood	Intermediate likelihood	High likelihood
<ul style="list-style-type: none"> <li>There are no previous cases in your own institution, nor in other institutions, in similar fields of activity. Note, the historical assessment of the cases will be limited to the data existing in the institution, its establishment or organization/reorganization in the current organizational chart and based on the current regulation, if these details are relevant.</li> <li>A maximum of 3 favourable factors are present</li> </ul>	<ul style="list-style-type: none"> <li>There are cases of corruption in similar fields of activity or situations that present similarities with the defined threat.</li> <li>A maximum of 5 favouring factors are present.</li> </ul>	<ul style="list-style-type: none"> <li>There are cases of corruption in your own institution.</li> <li>There are multiple cases in similar fields of activity or situations that present multiple similarities with the defined threat.</li> <li>More than 5 favourable factors are present.</li> </ul>

Source: Adapted from Decision 599/2018

### 1.3. Challenges in the adoption of corruption risk management in Romania

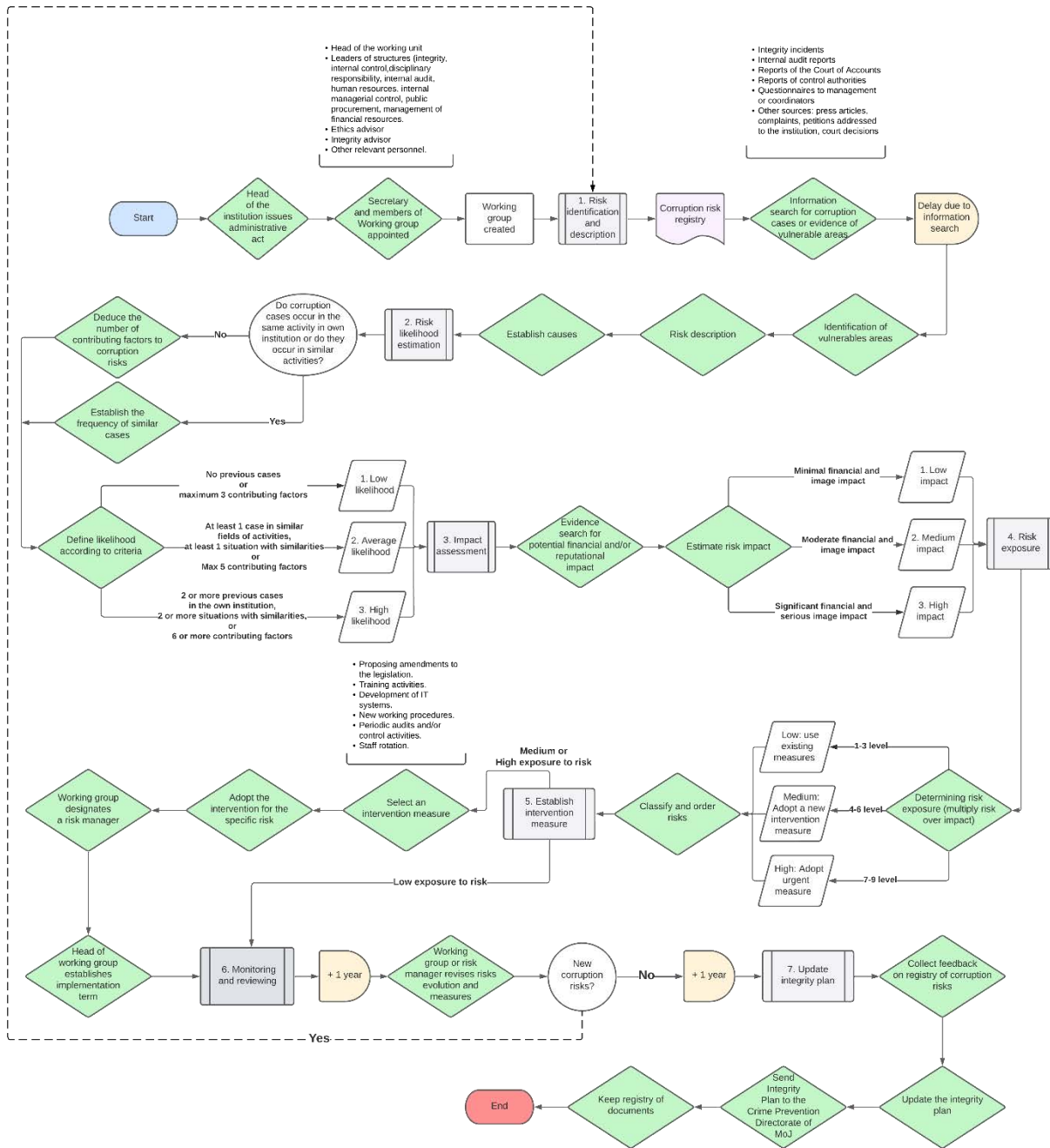
Despite the Romanian government's efforts to adopt a standardised methodology for corruption risk management, the OECD fact-finding mission in 2022 found varying levels of implementation of Decision 599/2018. Moreover, the COVID-19 pandemic has further delayed its adoption. Some public officials from Romanian anti-corruption agencies noted that corruption risk management is often seen as a redundant tool by several stakeholders interviewed. These accounts were contrasted by a revision of corruption and incident risk registries from a selection of ministries and their subordinated units.

This uneven adoption of Decision 599/2018 means that while some organisations correctly identify vulnerable activities, describe the risks and propose meaningful intervention measures, others lack comprehension of each step's requirements or do the minimum to comply with the regulation. To amend this, the Ministry of Justice offers support and assistance on demand, e.g. to raise awareness or share good practices. However, according to public officials interviewed, this support is not well known and not often requested.

Adoption challenges concerning Decision 599/2018 could result from its complexity. While the methodology proposes seven steps to manage corruption risk, a more detailed analysis by the OECD reveals that it requires substantially more effort and steps, which could explain its uneven implementation. The behavioural flowchart in Figure 1.2 illustrates the explicit and implicit steps needed to logically complete the process. A behavioural flowchart or journey map is tool commonly used in behavioural sciences to understand how easy or difficult it is to enact a behaviour (OECD, 2019<sup>[4]</sup>). Annex B provides guidance on how to use such flowcharts to map behaviours.

Figure 1.2 depicts each of the explicit seven steps in Decision 599/2018 which are marked by a grey rectangle with a consecutive number. The explicit and implicit behaviours for each step are illustrated by a green rhombus and a white circle depicts a decision point that leads to different risks and impact classification. The process starts and finishes in the blue and red ellipses, respectively, while time delays are shown as yellow half-ellipses.

Figure 1.2. Behavioural flowchart of the Romanian risk management methodology



Source: Based on Decision 599/2018, information provided by the Government of Romania and interviews carried out by the OECD.

In total, the flowchart reveals that there are at least 22 behaviours that must be performed to logically complete the process. These behaviours include gathering and reviewing information, deducing risks from corruption incidents, establishing event causes that are opaque and multi-causal, gathering information to have an awareness of how corruption affects other institutions, predicting the effects of intervention measures and collecting feedback on the evolution of risks, among others.

Given the challenges highlighted in the previous paragraphs, the uneven adoption of Decision 599/2018 is not surprising. As a result, the most common issues with its adoption include inconsistent identification of corruption risks, potential miscalculations of risk likelihood and impact, in addition to poorly designed intervention measures.



### **1.3.1. The fields of activities of corruption risks are not consistently identified across authorities**

After forming the working group, each authority must identify the threats of corruption and vulnerabilities in their “field of activities” (Table 1.1). However, the methodology does not provide a clear definition of what an activity means, nor does it show examples that can be used for guidance. This ambiguity can lead to errors where the context of these corruption risks may be identified as the organisational structure, mission processes, or mission objectives without distinguishing between them.

Organisational structure refers to the arrangement method of a group of people that work towards the same objective (Society for Human Resource Management, 2017<sup>[5]</sup>), such as the financial or the procurement department. Missional processes are the activities needed to achieve the outcomes of the organisation’s mission. For example, in the case of an educational institution, mentoring is an activity that allows its mission. Lastly, missional objectives are outcomes that an organisation defines to prove it complies with its mission. In the education sector, this could be to increase literacy rates or enrolment in graduate education.

Table 1.3 provides an example of how three different ministries characterise the “field of activities” of their corruption risks. Some institutions use the general and specific objectives of the NAS as a field of activities and then identify risks that prevent their achievement. This leads to examples where the field of activity vulnerable to corruption is the “adoption of the integrity plan”, which is an objective rather than an area vulnerable to corruption risks. In other cases, a risk is related to missional process, such as undue influence in the recruitment activities. Finally, other organisations identify their risk in their organisational structure, such as the Control Body and Public Procurement.

**Table 1.3. Examples of field of activities identified in a revision of corruption risk registries**

Type of context	Example of the field of activity identified
Organisational structure	“Public procurement”
Missional process	“Staff recruitment and selection process”
Missional objective	“Increasing the degree of anti-corruption education of employees and the impact of corruption on the activity of the ministry”

It could be argued that the nature of public institutions is very different and that this justifies having an ample definition of “field of activity” that can be adapted to each context. However, a revision of corruption risk registries shows that this creates confusion and lack of uniformity, which can develop into three problems. First, organisations may find it more difficult to learn from each other when some have risks related to objectives while others have risks related to organisational structures. Second, it is more challenging for the SNA’s Technical Secretariat to provide feedback for different corruption risk registries that should follow the same methodology. Third, given that this methodology is sequential, if a corruption risk context is incorrectly identified, it may create problems in subsequent steps.

### **1.3.2. Risk likelihood and impact are not assessed and estimated adequately**

The second challenge is related to the assessment of risk likelihood and impact. Corruption risk registries analysed for this OECD fact-finding mission revealed that most organisations assessed their risk with low likelihood and impact, while less examples showed high or medium risk exposure. Underestimating risk exposure can minimise the importance of new effective intervention measures in favour of existing ones. On the other hand, overestimating risks may cause the institution to use more resources than necessary to control certain risks while neglecting those most crucial. Both outcomes are undesired, but with the information currently available on the corruption risk registries, it is not possible to determine if they are correctly or incorrectly assessed.

Decision 599/2018 establishes the following rules to assess the risk likelihood and its impact. To assess the risk likelihood, the working group member must search for evidence of incidents in that field of activity, in their own institutions, or others with similar activities. If none are found, they need to consider at least the 15 contributing factors provided as examples in Annex 2 to Decision 599/2018 and to classify the risks according to their presence in that field of activity. Following that, working group members look for historical evidence or use their experience to match the indicators in the methodology and define if the risk impact is low, medium, or high. In the corruption risk registries reviewed, there is no mention of sources to show that previous incidents or contributing factors were used. The boxes for risk likelihood and impact only show a number. Even if the likelihood is assessed using the information on the incident registry, there is no straightforward manner to evidence if, in fact, it was used for that purpose.

Despite the absence of a clear method to determine if risk and impact are assessed correctly, a potential issue related to human cognitive limitations can be hypothesised. Dual-process theories propose that most human decision-making is performed by quick and effortless actions, not rational reasoning (Kahneman, 2013<sup>[6]</sup>). When faced with complex decisions, people often use mental shortcuts or make intuitive judgments (heuristics) to simplify their decision-making process and reduce cognitive effort. Such heuristics are often based on past experiences, biases, or generalisations, rather than a thorough analysis of all available information. While heuristics allow people to make decision quickly and efficiently, they can also lead to errors in judgment or biased decision-making when they are used inappropriately (Tversky and Kahneman, 1974<sup>[7]</sup>). Box 1.1 summarises the framework of dual-process theory and its relationship with heuristics and suboptimal choices.

### **Box 1.1. Dual process theory, heuristics, and biased decision-making**

The dual-process theory is a framework within the behavioural sciences that proposes that human decision-making and reasoning processes are governed by two distinct types of cognitive processes:

#### **Intuitive, automatic processes**

- Intuitive processes are fast, automatic, and require little cognitive effort. They rely on heuristics, or mental shortcuts, to quickly assess a situation and arrive at a decision. These processes are often unconscious and emotion-based and can be influenced by biases and past experiences.

#### **Reflective, deliberative processes**

- Reflective processes, on the other hand, are slower and require conscious effort. They involve logical reasoning and critical thinking and are often used to evaluate the validity of decisions made by the intuitive system. Reflective processes can override or modify the decisions made by intuitive processes and can help to correct biases and errors.

According to the dual-process theory, human behaviour is the result of an interaction between these two types of processes. Intuitive processes are often used to make quick, automatic decisions, while reflective processes are more likely to be used when making complex or important decisions that require more careful consideration.

Because the human brain is limited by the amount and time it needs to acquire and process information, people tend to simplify complex situations to make them more manageable. In doing so, they rely on heuristics to overlook important information, causing them to make suboptimal choices. The systematic use of heuristics that leads to flawed decision making is considered a cognitive bias.

Source: (Bazerman and Moore, 2012<sup>[8]</sup>) and (Kahneman, 2013<sup>[6]</sup>)

As previously mentioned, the behavioural flowchart in Figure 1.2 reveals that 7 steps and 22 behaviours are necessary to adopt Decision 599/2018. The second step, the estimation of risk likelihood, requires group members to perform at least three behaviours: establish the frequency of similar cases to the

corruption risk, deduce the numbers of contributing factors to corruption risks and define the likelihood score according to both previous decisions. The third step, impact assessment, asks them to search for evidence of the financial or reputational impact that a corruption incident has had in the past and to predict the level of damage it could cause.

The complexity of following steps 2 and 3 may lead working group members to use heuristics and simplify their decision-making. These shortcuts could cause them to overlook important information needed to correctly assess the risk likelihood and impact. For example, risk managers may judge that more familiar corruption cases are more probable without considering a broader scope of less known risks (Messick, 2018<sup>[9]</sup>). The use of this heuristic may drive them to fall prey to the availability bias (Tversky and Kahneman, 1973<sup>[10]</sup>), where they rely only on easily accessible information rather than reviewing all relevant evidence about corruption and integrity risks. This situation would result in common risks being considered more probable and more impactful, and result in working group members designing new intervention measures only for those risks they remember more easily.

### ***1.3.3. Intervention measures fall into commonplaces and are designed without a clear theory of change and action plan***

The implementation of intervention measures also encounters challenges in its design. Many of the reviewed corruption risk registries suggest intervention measures such as unspecified training, recommendations for compliance with existing legislation, staff rotation, periodic audits, or raising awareness of laws or ethical codes. The lack of expertise or knowledge of best practices could explain why working group members employ heuristics to reduce effort, save time, and simplify their decision-making.

As is the case with judging probabilities and impact, the choice of intervention measures can also be biased. Working group members may unconsciously consider only interventions they know and overlook some that are more effective but less familiar. Another possible explanation is that working group members prefer choosing known, “easy” intervention measures (such as “trainings”), rather than trying new ones. This form of status quo bias (Zeckhauser and William, 1988<sup>[11]</sup>) may explain why the same types of intervention are chosen frequently.

Anchoring could also explain intervention typologies being overly repeated. This cognitive bias leads judgment to be influenced by previous information that should be irrelevant to that choice (Tversky and Kahneman, 1974<sup>[7]</sup>). The suggestion in Decision 599/2018 to provide only 6 examples of intervention measures may unintentionally contribute to this bias. Because seeking additional information can be time-consuming, working group members might opt to consider only those six examples.

Another challenge in the design of interventions measures is that most of them have unspecified implementation timeframes. The most common term for the interventions reviewed is “permanent” with a few exceptions stating yearly or shorter periods of implementation. This choice of permanent timeframes may hint at two situations. First, that these risks arise in a context where external and internal risk factors cannot be mitigated. Second, it could also indicate that these interventions are being designed with no clear action plan.

The second scenario is more concerning because it implies that intervention measures lack a clear verification method. The corruption risk registry in Table 1.1 does not provide boxes for registering intermediate indicators such as the number of activities completed, the intermediate outcomes, or stating what is the intervention’s expected result. The lack of intermediate outcomes hinders the monitoring of whether interventions are effective in managing a given risk. Additionally, it necessitates that authorities seek further evidence to confirm if the interventions have been implemented as stated. On the other hand, without clear indicators, working group members cannot receive feedback on their efforts to control corruption, which, in turn, may decrease their intrinsic motivations to employ time and effort on this task and reduce the ability to learn from their actions (Locke and Latham, 2002<sup>[12]</sup>).

## **2 Strategies to promote corruption risk management in the Romanian central government**

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This chapter proposes four strategies to promote the adoption of the Romanian government's methodology for corruption risk management. First, the corruption risk register could be redesigned to include intermediate indicators for intervention measures. Second, a user guide for Decision 599/2018 could facilitate its implementation. Third, a web-based app could help to simplify many of the steps involved in corruption risk management. Finally, establishing a dedicated unit within each ministry to assist working groups could strengthen the quality of the corruption risk management process.

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## 2.1. A behavioural theory of change to understand the requirements to execute a specific behaviour

Chapter 1 described the Romanian government methodology for corruption risk management as laid out in Decision 599/2018 and currently implemented in the central government. It highlighted the three main challenges in its adoption and analysed the behavioural aspects that may explain these issues. Building on that, this chapter uses a behavioural change theory to understand what is needed for Romanian public officials to adopt Decision 599/2018 as expected. Following this analysis, the rest of the chapter proposes four avenues to promote its adoption based on behavioural insights.

A behavioural theory provides a framework to understand human behaviour. It sheds light on why individuals engage in certain actions, what factors influence their decisions and how these elements come together to shape people's behaviour. Theories can also be used to comprehend why an action has not occurred by examining the assumptions that make it possible. An individual cannot play an instrument if he or she does not possess the instrument or have the skills to use it. The same thought process can be used to understand what is needed for a public official to identify corruption risks, predict their likelihood, assess their impact and design intervention measures that can manage these risks.

To promote the adoption of Decision 599/2018 this section uses the COM-B model of behaviour change (Michie, van Stralen and West, 2011<sup>[13]</sup>) to consider the internal and external elements necessary for such decisions to take place. Box 2.1 explains how behaviours require internal capacities and motivations as well as the existence of external opportunities from the context, and how the interaction between these elements can make behaviours more or less likely to happen.

### Box 2.1. COM-B theory of behavioural change

The COM-B is a framework used to understand the determinants of human behaviour. The model states that behaviours are most likely to occur if individuals have the internal capacities (C) to act, are motivated (M), and if the context presents opportunities (O) that support the behaviour.

- **Capabilities:** Physical and psychological internal capabilities that allow a behaviour. For example, to play a sport an individual needs physical capability in the form strength and musculature for mobility, and psychological capabilities such as knowledge and training to master the skills for these routines.
- **Opportunities:** External opportunities that the physical or social environment provides and that make an action harder or easier to perform. Physical opportunities refer to time and monetary resources, infrastructure or any tangible element that influences the feasibility of a behaviour. On the other hand, social opportunities are the information provided by other people actions on how acceptable or reprehensible an action is. For example, if an individual's reference group usually speeds thru red-light traffic, she is more likely to follow the same behaviour and to rationalise that it is permissible given that nobody else respects that rule.
- **Motivation:** Internal drives that encourage or create the desire to act. These drives can be via conscious or unconscious cognitive processes. An example of a reflective motivation is an action plan that weights costs and benefits of an action, such as deciding what loan to acquire or how to spend a company's budget. Automatic motivations are impulses that lead to an action thru emotional responses or habits that do not require people's full attention. For example, people may avoid an action if it reminds them of a bad situation, produces boredom or has an unpleasant odour or sound. On the other hand, routinely actions such as brushing one teeth or driving are performed even if the individual is not actively thinking of how is done.

The model proposes that the three elements' interactions influence the chances of a behaviour taking place. For example, when the context provides more opportunities for a behaviour, via less friction or more social examples, people could feel more motivated to do it. Another case could be when people train themselves for an action, they could also sense they do it better and become more motivated.

This model's practicality lies in offering a comprehensive approach to consider the requirements for performing a behaviour and suggesting changes to address any missing elements. For example, if an individual does not know how to do an action more training may be needed. On the other hand, if people don't have the time to complete a demanding task a tool should be developed to facilitate the action. Finally, if people find a task boring the context could provide more opportunities in the form of rewards aligned with people's preferences.

Source: (Michie, Atkins and West, 2014<sup>[14]</sup>)

This analysis focuses on four of the seven explicit steps to manage corruption risks proposed by Decision 599/2018: risk identification and description, risk likelihood estimation, risk impact assessment, and intervention measure design. The steps are prioritised because they demand working group members to consider more information and exert greater cognitive effort than the others (Figure 1.2). Additionally, they produce more spill overs on the whole methodology. If risks are correctly identified, public officials would have more clarity for defining risk likelihood and impact. Similarly, if the risk likelihood and impact are assessed correctly, the need to design new interventions or keep existing ones could be correctly calibrated. Finally, if interventions measures are designed according to best practices and a clear action plan, the chances to mitigate or control risks will increase.

Using the COM-B lens to analyse the behaviours in Figure 1.2's flowchart, Table 2.1 summarises what is needed to enable the prioritised behaviours. To identify corruption risk, public officials need knowledge of their own and similar institutions and access to information related to corruption incidents or potential risks. They should be able to deduce risks from corruption incidents and conduct comparative analysis between other institutions and their own. Public officials should recognise the positive impact of risk identification on reducing corruption risks. They also need easy access to relevant information, time to process it, spaces for sharing knowledge and learning and a willingness to spend time on this task. Development of habits such as reading about corruption regularly can create a favourable mental state for risk identification.

To estimate the risk likelihood, working group members need similar capabilities, opportunities, and motivations as in risk identification, but they also require searching for formal and informal evidence on the 15 contributing factors that increase the likelihood score. The assessment of the impact if a risk materialises has coinciding needs. In this case, working group members need historical information on the impact of integrity incidents or to be able to use the criteria in Decision 599/2018 to predict the expected damage.

Finally, to design effective intervention measures, working group members need to understand how anti-corruption strategies work and have opportunities to learn and share information about best practices in this subject. They also must feel that their efforts have an impact on risk reduction on their own reputation and the institution's reputation.

Based on the analysis carried out by the OECD, Table 2.1 provides an overview of capabilities, opportunities and motivations required in four key steps: the identification and description of risks, the estimation of the likelihood of risks, the impact assessment of the risks and the design of intervention measures. In short, working group members need to possess substantial capacities, sufficient opportunities and ample motivations to perform those four steps. However, during interviews and focus groups with Romanian public officials, it was noted that working group members frequently rotate in and out of office, making it unlikely that they already possess the necessary abilities. Newly hired working group members may not know the formal and informal practices that increase corruption risks, and unexperienced public officials would need more opportunities to catch up and use their time to review

corruption incidents, participate in sharing activities, and learn from best practices in corruption risk management. Even if staff rotation is not a widespread issue, the time required to acquire those abilities could be substantial for public officials. The lack of abilities and opportunities may decrease their motivation to correctly adopt Decision 599/2018 and lead them to use heuristics. Those shortcuts would simplify their decision-making but result in compliance with the bare minimum.

**Table 2.1. Prioritised steps and what is required to enact each step**

	<b>Capability</b>	<b>Opportunity</b>	<b>Motivation</b>
<b>Risk identification and description</b>	Knowledge of the institution's functions and procedures.	Access to all relevant information sources.	Working group members must have a strong desire to review all relevant information and to accurately describe corruption risks within their own institution.
<b>Estimation of likelihood of risks</b>	Awareness of integrity incidents and other internal or external sources that highlight vulnerable areas.	Time to review all relevant information and sources recommended in Decision 599/2018.	Members must be aware of the consequences of not properly identifying corruption risks.
<b>Risk impact assessment</b>	The ability to deduce risks from corruption incidents.	Spaces to share risk identification and descriptions with members of similar institutions.	Developing the habit of being vigilant towards corruption incidents.
<b>Intervention measure establishment</b>	Capacity to perform comparative analysis between the institution and knowledge on anti-corruption measures.	Assistance from members with expertise in corruption risk identification.	Working group members must have a strong desire to review all relevant information.

## 2.2. Four behavioural-informed strategies to promote the adoption of the corruption risk management methodology

The Romanian government could consider four avenues to increase the adoption of the corruption risk management methodology:

- Redesign the risk registers to include intermediate indicators for intervention measures.
- Design a user guide for the adoption of corruption risk methodology in Decision 599/2018.
- Develop a web-based application to guide the management of corruption risks.
- Establish a dedicated unit or person within each ministry to assist working groups in the management of corruption risks.

These behavioural informed strategies would increase capacities, opportunities, and motivations from working group members to carry out the most important steps from Decision 599/2018. The following Table 2.2 summarises the COM-B elements that these strategies expect to alter.

**Table 2.2. COM-B elements to be altered by the behavioural strategies**

<b>Strategy</b>	<b>COM-B element altered</b>
Redesign the risk registers to include intermediate indicators for intervention measures	Capacity by more learning through feedback
	Opportunity to receive more feedback
	Motivation mediated by increased capacities
Design a user guide for the adoption of corruption risk methodology in Decision 599/2018	Capacity by user guides with instructions
	Opportunity to learn from best practices
Develop a web-based application to guide the corruption risks management	Opportunity to decrease the effort of looking for several sources of integrity incidents
	Opportunity to learn from best practices in the repository
Establish a dedicated unit or person within each ministry to assist working groups in the management of corruption risk	Capacity to learn from advice
	Opportunity to ask for advice to more senior public officers

### 2.2.1. Redesign the risk register to include the intermediate indicators for intervention measures

As argued in Chapter 1, the current corruption risk registry in Table 1.1 does not explicitly demand an action plan for the intervention measures. Without clear indicators, working group members cannot receive feedback on their efforts to control corruption. This is important for directing effort as it reduces the discrepancies between the current understanding and the actual performance (Hattie and Timperley, 2007<sup>[15]</sup>). When feedback is provided, it can inform decision makers on the nature of goals, their progress and the quality of that progress.

Going back to the COM-B model (Michie, van Stralen and West, 2011<sup>[13]</sup>), the inclusion of intervention measures may increase the chances for feedback, which in turn would increase subjects' psychological capacities to design better preventive measures. Because the lack of corruption is hard to measure, feedback could also be given as a measure of progress to the end goal. This means that feedback could come from the completion of activities, intermediate outputs and end results.

Regardless of final impact of preventive measures, which is usually beyond the control of the public official, the intermediate outcomes are direct results of the activities implemented. Outcome progress indicators could provide feedback on the implementation of measures. Better feedback could be provided if intervention measures are designed using a logical frame that connects activities, intermediate outcomes, and results. In this situation, short term indicators would increase the information on the intervention performance, allowing working group members to learn and increase their ability to design effective intervention measures that lead to the expected results.

Following the OECD (n.d.<sup>[16]</sup>) guidelines for drafting sectorial anticorruption strategies developed in the context for a project with Greece, this section proposes a new corruption risk registry that includes indicators for activities, intermediate outputs, and results. The inclusion of these indicators could guide working group members to elaborate a clear action plan for their control measures. Table 2.3 presents the proposed corruption risk registry. Unlike the current registry in Table 1.1, this includes three new columns: the intervention actions, the intervention outputs, and the results indicators. To produce adequate feedback, the columns need to detail the quantity of actions planned, the number of outputs that should be produced, and an observable result. They also need to specify the timeline for each indicator so that working group members can monitor their progress during the implementation. The "Deadline / Implementation duration" from the current registry has been removed as it is more important to monitor when results can be expected than to know for how long the strategy will be implemented.

**Table 2.3. Proposed corruption risk registry for the Romanian central government**

The field of activity in which the risk of corruption is manifested	Risk description	Cause	Likelihood	Impact	Exposure	Intervention measure description	Implementation responsible	Intervention actions indicators (including timeframe)	Intervention outputs indicators (including timeframe)	Results indicators (including timeframe)

Including three additional columns comes with its trade-offs. In practice, this increases the amount of time working group members need to spend on these tasks, which in turn, could reduce their motivation. Nevertheless, as is the case with promoting learning (Burgers et al., 2015<sup>[17]</sup>; Wisniewski, Zierer and Hattie, 2020<sup>[18]</sup>) and responsible gambling (Auer and Griffiths, 2015<sup>[19]</sup>), the use of informative feedback can increase individuals' motivation to perform a costly behaviour.



## 2.2.2. Design a user guide for the adoption of the corruption risk methodology in Decision 599/2018

To increase the capabilities and opportunities for social learning among working group members, the Romanian government could design a user guide that includes instructions on how to use the corruption risk registry. The guide should include recommendations and examples but be concise enough to not decrease working group members motivations to use it. A general principle in behavioural science is that simpler strategies are better for promoting use than lengthier or more complex measures (The Behavioural Insights Team, 2014<sup>[20]</sup>). This guide could be designed with or without the proposed corruption risk registry from the previous section, but to increase its effectiveness it would be better if it includes the modified version as proposed above in Table 2.3.

Concerning the challenge highlighted in Chapter 1, the guide should include a precise definition of what “The field of activity in which the risk of corruption is manifested” means, to avoid confusions on how each central authority understands the context. There are at least three typologies that can be used to define the context: organisational structure, missional processes or missional objectives. Regardless of the definition used, the guide should be consistent so that all examples use the same definition. The use of a case study could help working group member resolve their doubts by looking at how other institutions have addressed their corruption risks.

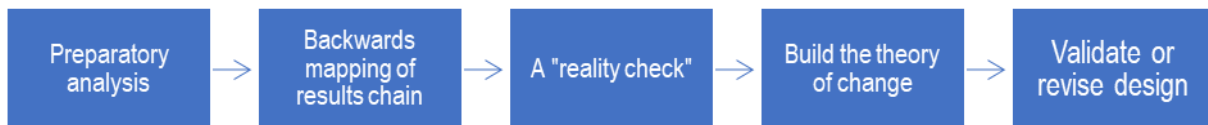
The user’s guide should include, amongst others, a step-by-step manual on how to design intervention measures using a theory of change. A theory of change is a tool that proposes a causal link between an intervention and a specific change and details the analysis and assumptions that make that causal link reasonable (UNDAF, 2017<sup>[21]</sup>). This method can help working group members design strategies that follow an internal logic linking interventions with expected outcomes.

To develop a theory of change for an intervention measures, the user’s guide could include the five steps proposed by (Johnsøn, 2012<sup>[22]</sup>) laid out in Figure 2.1 to design new interventions or to evaluate the logic of existing interventions:

- The first step to design a theory of change is to find out what works to reduce the identified corruption risk. This can be done through a literature review, through expert advice or support (within or outside the organisation as recommended below), or by consulting good practices from other private or public organisations. This analysis should consider the context and identify other actors, incentives and interests that may support or negatively affect the implementation of the measure.
- Second, the pathway to create change should be mapped by the working group members using a result chain that links the intervention activities (i.e. training, staff rotation) to the desired change (the goal). The goal should be stated as specific as possible. A result chain is elaborated working *backwards*, starting from the desired impact (the goal) and then identifying first concrete intermediate outcomes and/or outputs (products) needed to achieve the goal and, only at the end, the activities required to achieve these outputs or intermediate outcomes. These intermediate outcomes, outputs (products) and activities can be mapped by the working group members in a brainstorming.
- Third, working group members should assess the coherence and internal logic of the intervention measure by performing a reality check. The reality check consists in working through the result chain from the activities to the goal, while playing the devil’s advocate and challenging the underlying logic. This starts by formulating explicitly the causal pathway: “**if** this is implemented (activities), **then** this will happen (intermediate outcomes/products) and the goal will be achieved, **because** of the following reasons...”. Working group member should ask critical questions which could include, for example, asking if there are enough resources, if there is sufficient time available or asking if there might be internal or external factors that could negatively affect the causal logic.

- Fourth, based on the previous steps, the working group members can build a theory of change that identifies explicitly the conditions for success and the underlying assumptions regarding the causal pathway. A distinction should be made from the conditions which the organisation can control and address and those that fall outside the sphere of influence of the organisation. Nonetheless, these external conditions should be monitored knowing they might affect the success of the intervention.
- Finally, in the fifth step, after developing the intervention based on a theory of change, working group members should engage with various stakeholders to evaluate whether the intervention correctly identifies the necessary conditions for change. External commentators may provide valuable insights to strengthen the reasoning and could suggest additional activities to address conditions that could affect the success of the intervention.

**Figure 2.1. Steps to develop a theory of change**



Source: (Johnsøn, 2012<sup>[22]</sup>)

The advantage of following these steps is that building a theory of change makes explicit the conditions and assumptions underlying the proposed intervention to mitigate the identified integrity risk and mitigates the risk of, at best, ineffective interventions or, worse, resulting unintended consequences. Building a theory of change also makes it more difficult for working group members to just jump straight into “easy solutions”, such as “training”. This had been identified as one of the challenges affecting the quality of the current corruption risk management (Chapter 1). Indeed, the pathway stating that “**if** an integrity training programme on whistleblowing is implemented, **then** people will start reporting corrupt activities which will reduce risks of tailored terms of references in procurement processes” makes it clearly difficult to find a logic (“**because**”) that would easily enable linking the activity (training) with the intermediate outcome (increased reporting and reduced risk of corruption in procurement). Changing the behaviour of public officials who tailor terms of references to favour specific companies are indeed unlikely to change because of a training.

### **2.2.3. Develop a web-based application to guide the management of corruption risks**

Risk identification, likelihood and impact estimation as well as the design of control measures require substantial knowledge of formal and informal practices that may lead to corruption, a fair understanding of how public institutions work and information on the effectiveness of intervention measures in reducing corruption risk. Public managers typically do not have such expert knowledge and it would not be efficient trying to transform all public managers into anti-corruption experts. An IT tool could provide guidance and increase the opportunities for working group members to complete the corruption risk management steps and reduce the chances of defaulting to heuristics to simplify their work. As previously mentioned, these shortcuts could cause them to overlook important information and continue to use existing control measures that have no evidence of preventing corruption risks.

A web-based application could provide easy access for public managers to historical information on corruption incidents in both their own and similar institutions. This would reduce the time spent reviewing internal and external sources, deducing how such incidents are relevant to their organisations as well as estimating their likelihood of occurrence and their financial and reputational impact.

The tool could also include a repository of good practices in corruption prevention. The repository could display information on how control measures have been used, their implementation term, the challenges in their implementation and their effects on the institution. Such a tool would provide more opportunities for working members to access relevant information, which may increase their motivation to correctly adopt the corruption risk methodology and improve the quality of the risk management exercise.

The web-based app for Assisted Management of Corruption Risks (*Managementul Asistat al Riscurilor de Corupție*, MARC in Romanian) introduced by the Romanian Ministry of Internal Affairs provides an example of how this tool could be developed. The implementation of the MARC began in 2014 by having senior public servants fill an integrity incident registry database to identify the most vulnerable areas of the ministry. After an area was flagged as vulnerable, a new intervention measure had to be designed, and the intervention was inspected by an officer in charge of implementing MARC. This process reduces the cognitive effort required to identify corruption risks from multiple sources. Consequently, working group members could focus their limited time to the most important risks and to the design of effective control measures.

To be effective, this application would need dedicated personnel to prefill the integrity incident registry and classify the incidents according to the field of activity in which they occurred. Senior staff with extensive knowledge of public organisations should prefill the information of contributing factors for each field of activity or vulnerable areas. This would contribute to flagging areas where there have been no previous integrity incidents but where there are risks due to the certain contributing factors to corruption risk.

Given that all public institutions share the same support activities, such as procurement, human resources, IT, to give a few examples, a centralised task could be established to identify corruption risks relevant to such cross-cutting aspects that are relevant to virtually every public entity. This would allow the working group members from each organisation to focus more on identifying the risks in their specific mission fields of activities. During the OECD fact-finding mission, public officials from the National Integrity Agency (*Autoritatea Națională de Integritate*, ANI) proposed that each authority or institution with responsibilities for such cross-cutting tasks could provide a list of predefined risks, based on their respective legal competencies (e.g. the ANI for conflict of interest and incompatibilities etc.). In a next step, these risks could be introduced as an annex within the methodological framework to facilitate the identification of the predefined risks for other authorities and institutions.

#### **2.2.4. Establish a dedicated unit or person within each ministry or at sector level to assist working groups in corruption risk management**

To support the working groups in corruption risk management, each central public organisation could establish a dedicated person or unit. Alternatively, a dedicated unit could also provide guidance at sector level, for example this could make sense for the health or education sectors. As mentioned in the previous section, while working group members are experts in their respective departments, they may not have the necessary expertise regarding risk management or corruption. Therefore, a dedicated unit could provide guidance and support in risk identification, likelihood and impact assessment and the design of intervention measures. Dedicated persons or units could also play a crucial role in providing expert feedback on the risk assessment process. Their knowledge and experience could help identify potential areas of corruption. This person or unit would provide support and oversight activities on the use of the corruption risk management methodology and in the promotion of integrity measures (Box 2.2).

### Box 2.2. The three lines model of the Institute of Internal Auditors

The three lines model is a framework that outlines roles of organisation's areas to assure an effective management of risk. Different parts and levels of an organisation play different roles in risk management, and their interaction determines how effective the organisation is in dealing with risk. The roles of each line are as following:

- The first line includes the operational activities of an organisation, such as risk management, compliance and internal controls that are performed by front-line employees and managers.
- The second line involves activities that are conducted by specialists to provide complementary expertise, support, monitoring and challenge to those with first line roles.
- The third line, the internal audit function, includes independent and objective assurance to provide an objective assessment of an organisation's operations and controls. The third line of defence serves to provide additional assurance to stakeholders and to help ensure the overall integrity and accountability of an organisation.

Source: (The Institute of Internal Auditors, 2020<sup>[23]</sup>).

During the fact-finding mission in Romania, the OECD identified two ministries that have implemented dedicated units to assist their working groups in corruption risk management. The first example is the Anti-Fraud, Integrity and Inspection Directorate (*Direcția Antifraudă, Integritate și Inspekție*) from the Ministry of Energy. This unit is a specialised division in risk management counselling that merged the operational and corruption risk into a single division. The second example is the General Anticorruption Directorate (*Direcția Generală Anticorupție*) of the Ministry of Internal Affairs. The head of this permanent unit is the integrity plan coordinator and the leader of the working group. This unit is also in charge of supervising the use of MARC for the ministry and of assisting working group members in case they have any doubts when using the IT tool.

Both cases exhibited also the most mature corruption risk management practices among the entities interviewed by the OECD. The experiences from these two dedicated units could serve as a guide to standardise the functions of integrity units and promote their establishment across the public sector. This would allow the specialised public officials to better understand all the external and internal risk sources to the organisation or the sector. In addition, if the IT tool were to be implemented, this dedicated person or unit could provide support in pre-filling the integrity incidents, provide examples of best practices in intervention measure for its sector and assist public officials with any requirements regarding its use. The example of the Integrity Management Units in Brazil's federal public administration or the Peruvian Offices of Institutional Integrity are interesting practices that could be adapted to the Romanian context (OECD, 2022<sup>[24]</sup>; OECD, 2021<sup>[25]</sup>; OECD, 2019<sup>[26]</sup>).

As recommended in another OECD report (OECD, 2023<sup>[21]</sup>) and since the establishment of dedicated integrity units requires resources, Romania could also consider strengthening the existing ethics counsellors from this perspective. These ethics counsellors, required by Government Emergency Ordinance 57/2019, are appointed by the heads of public authorities and institutions. Through trainings on Decision 599/2018 aimed at developing their capacities in leading the corruption risk management process within their entities, they could in the future contribute to the role of internal drivers mentioned above. However, currently, these ethics counsellors are too weak, as they lack resources, have other functions in addition to the ethics counselling, are too often changed to build expertise and becoming known internally and lack decision-making powers (OECD, 2023<sup>[21]</sup>).

Not at least, the Government of Romania could consider designing and implementing a communication strategy to support the adoption and implementation of Decision 599/2018 as well as the any of the measures recommended above. Annex C provides some guidance on such a communication strategy (Annex C).

## Annex A. Instructions for a framed field experiment

Framed field experiments implement interventions or treatments in a real-world setting, aiming to observe their effects on specific outcomes (Harrison and List, 2004<sup>[27]</sup>). This research design is particularly valuable when studying complex phenomena, difficult to isolate and manipulate in a laboratory setting, such as social norms, attitudes and decision-making. Moreover, through placing an experiment in a real-world setting, interventions or treatments are likely to be more relevant and meaningful for participants.

In the area of public integrity, framed field experiments have been used, amongst others, to study the effects of monitoring and punishment in corruption (Armantier and Boly, 2011<sup>[28]</sup>), the use of information on voters and the effects of vote-buying on clientelism (Serra and Wantchekon, 2012<sup>[29]</sup>), and the effects of increasing wages in bribe taking scenarios (Armantier and Boly, 2013<sup>[30]</sup>).

In this report, four interventions based in behavioural insights have been proposed:

- Redesign the risk registers to include intermediate indicators for intervention measures.
- Design a user guide for the adoption of corruption risk methodology in Decision 599/2018.
- Develop a web-based application to guide the corruption risks management.
- Create a dedicated unit or person within each ministry to assist working groups in the management of corruption risk.

The first two strategies are simple, non-expensive and could be tested in a field experiment. The following paragraphs detail the main characteristic of such a potential experiment testing a **user's guide**:

- **Strategy design:** A user's guide for the corruption risk management could be developed following Chapter 2 recommendations.
- **Experimental task design:** The experiment could measure participants' capacity to identify corruption risks, design a control measure and register it in a corruption risk registry. A case study of a corruption risk would need to be drafted to provide the context for the task. This case could be associated with activities outside the central authority's primary mission and that are relevant to (almost) all organisations. Examples of such transversally relevant risks could include corruption in the human resources selection process or in the public procurement of office supplies.

Romanian anti-corruption authorities could design this case study of a corruption risk and then fill the corruption risk registry, including the risk identification, likelihood and impact assessment and an intervention measure to control the risk. Public officials' responses will be graded on their similarity to the corruption registry prepared by the anti-corruption authorities following a qualification grid that would need to be developed to guide the grading of the responses.

- **Base line collection and pilot:** To test the logistics of conducting an experiment, a random sample of 20 public officials from the central level could be recruited to participate in a 2 to 4 hour-long in-person session. Participants could be selected from a "convenient" sample of public officials. Participants would be divided randomly into two groups. In one group, participants would be asked to read the Decision 599/2018 and the corruption risk study case. In the other group, participants would be asked to read the User Guide and the corruption risk case. After reading both texts, they

will be asked to complete a corruption risk registry (Decision 599/2018, Annex 4). The demographics of the participants should be selected to be as close as possible to those of public officials appointed in the working groups. The results from this baseline will be used to assess the test score sample average. At the end of this pilot, participants from both groups could provide feedback on the experimental task and the User Guide through interviews or a focus group.

- **Experimental design:** Two groups of public officials from a sample population would be randomly assigned to a control group or an experimental group. The size of the sample needs to be determined by a power calculation. In the control group, participants will read Decision 599/2018 document and its annexes, the corruption risk case study and be asked to fill the corruption risk registry. In the experimental group, they will go through the same process, but instead of reading Decision 599/2018, they will read the user's guide. Both sessions will be identical except for the use of Decision 599/2018 or the user's guide.
- **Expected impact:** The experiment would test if the new user's guide for the corruption risk methodology increases participants' scores in the experimental tasks. A higher grade would mean that the participant is more able to identify risk and design a thorough control measure.

## Annex B. Step-by-step guide on how to design a behavioural flowchart

A behavioural flowchart is a tool used in data science, and other related disciplines, to illustrate how a process unfolds in practice. This helps to identify how easy or hard it is for someone to go through a process by making evident the steps needed to complete it. Moreover, this tool can help policy makers design public policies that promote desired behaviours that are easy to enact. As a general principle in (Behavioural Insights Team, 2014<sup>[31]</sup>) behavioural science, a behaviour is more likely to occur when it is easier to enact than its alternative. This principle considers human resistance to burdensome processes and how, without oversight or heavy reinforcement, people are likely to desist if a process is seen as complex. This is true even for processes that are seen as socially desirable.

Flowcharts use a defined set of arrows and shapes to represent activities and relationships in a process. The goal of the diagram is to show how the steps in a process fit together by breaking it down into individual activities and illustrating the relationships between them, as well as the flow of the process (OECD, 2019<sup>[4]</sup>). Their simplicity makes them useful tools for understanding and sharing processes within teams, as well as for analysing them in an effort to identify crucial decision points, potential loose ends and friction points that inhibit the efficiency and reliability of the process (OECD, 2019<sup>[4]</sup>).

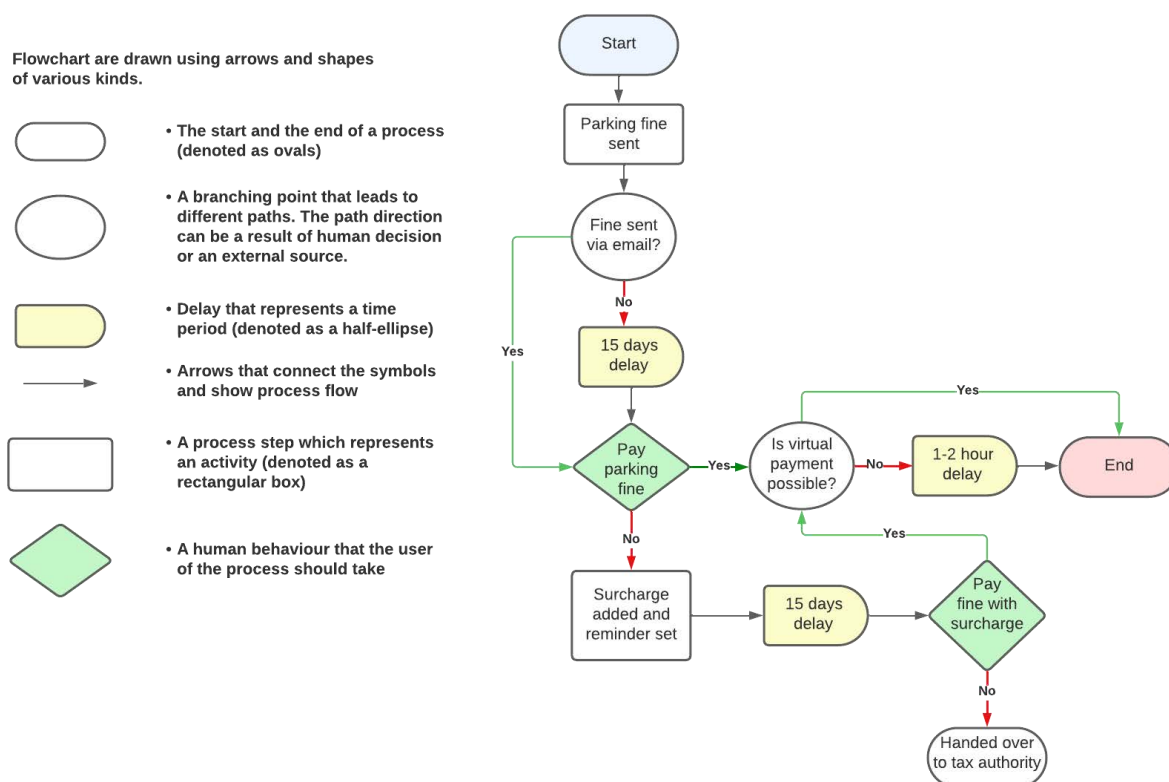
There is no single formula to create a flowchart and it is up to the user to choose how to represent the process. However, the BASIC toolkit for applied behavioural insights suggests using shapes to represent decision points, delays, and processes (OECD, 2019<sup>[4]</sup>). A useful convention is to use green rhombuses for human behaviours and describe them with verbs like 'Pay,' 'Collect,' 'Walk,' etc. Activities performed by someone other than the main user can have a different shape, such as a white rectangular box. To highlight how long a process takes, delays should also be shown. Finally, if there are different paths to follow, a circle can be added to explain why these diverse routes are possible. The flowchart can be as detailed as the designer wishes, but there should be an effort to illustrate all non-obvious activities, delays, and behaviours.

Flowcharts can serve both to create new processes from scratch or to analyse existing ones. For instance, in Figure 1.2 in Chapter 1, grey rectangles with consecutive numbers are employed to illustrate the 7 explicit steps proposed by Decision 599/2018 to manage corruption risk. The elements between these rectangles depict the implicit activities, delays and behaviours required to progress to the next step. Utilising a flowchart simplifies the identification of critical decision points and potential obstacles that make the process mentally taxing and time-consuming. This approach can help in understanding the challenges involved in its adoption and help to design simplified process that are more user friendly but achieve the same desired behaviours.

Figure A B.1 provides an example of a flowchart illustrating the process of paying a parking fine. The process begins with a blue ellipse and proceeds to an action carried out by an organisation responsible for issuing the parking fine. The white circle indicates a decision point where the process diverges based on the chosen delivery method. If the authority sends the fine via email, there is no delay. However, if it is sent through physical mail, a 15-day delay is expected. After receiving the fine, the individual must decide whether to pay it on time or not, leading to a new branch in the process. If the individual chooses to pay, another branch opens based on the availability of a virtual payment option. If virtual payment is not

possible, the user must visit a tax office in person, dedicating some time to the process. If the individual fails to pay on time, the authority adds a surcharge and sends a reminder. Ultimately, the individual must decide whether to pay the fine along with the surcharge. If not, the authority forwards the case to a tax collection authority.

**Figure A B.1. Symbols and sample behavioural flowchart**



Source: Adapted from (OECD, 2019<sup>[4]</sup>).

Using a flowchart to depict the fine payment process makes it clear that the user, the person receiving the fine, has two possible courses of action based on their decisions. Additionally, it highlights that the process's duration may vary depending on the chosen delivery method and the availability of virtual payment channels.

To decrease the chances of the user abandoning the process, the authority could introduce virtual channels for sending fines and facilitating payments. This initial step simplifies the process, reduces its duration, and makes it more user-friendly, increasing the likelihood of the desired behaviour. Additionally, they could incorporate extra stages (represented by white rectangular boxes) where weekly reminders are dispatched to prompt timely fine payments. This secondary measure, in turn, does not simplify the process but reinforces the urgency of the action, recognising that the user may forget to complete an important task even if they have the right motivation to do so.



# Annex C. Raising awareness on corruption risk management in Romania

## Context

Implementing proactive risk management tools is crucial in preventing corruption and maintaining integrity in public institutions. Public officials play a key role in ensuring that these tools are fully utilised. An effective communications strategy can both raise awareness and aid in the co-ordination and implementation of risk management strategies amongst public officials.

Through Decision 599/2018, the government of Romania has begun the implementation of a corruption risk management methodology, requiring all central public institutions to create anti-corruption strategies for their organisations. Since the passing of Decision 599/2018, the adoption of the corruption risk management methodology has been uneven across institutions. Approaching the challenges to the adoption of Decision 599/2018 from a behavioural perspective has the potential to improve the overall use of the risk management methodology.

## Strategy

### *Objectives*

Public officials play a key role in managing government risk. Ensuring that they have the capabilities and motivation to identify and manage corruption risk can be done through internal awareness raising campaigns.

Shaping an effective awareness raising campaign on strategies for public officials to manage corruption risk requires a look at the current behaviours of officials. Evidence suggests that reminders of ethical behaviour can lead to moral reflection. Such reminders can aid in a more effective implementation of a corruption risk management strategy (OECD, 2018<sup>[32]</sup>). Assessing the implementation of Decision 599/2018 using behavioural insights can help to create more targeted awareness raising initiatives that have the potential to improve both the capabilities and motivation for public officials to carry out the implementation of the Romanian risk management strategy more effectively.

### *Target audience*

Public officials tasked with the creation, implementation and management of anti-corruption strategies for central government organisations in Romania.

### *Key message*

**Effectively identifying corruption risks:** Understanding how to correctly and systematically identify potential corruption risks based on likelihood and impact estimation, avoiding heuristics. Communications materials can promote the creation of a new web-based application or database for guiding officials in determining risk likelihood and impact or a new user's guide, for example.

## *Communications channels and tools*

Communicating to an internal audience requires employing widely used tools within the organisation. When information is communicated through channels that personnel access every day, the message is more likely to be received, understood and put into use and incorporated into the organisational culture (OECD, 2020<sup>[11]</sup>).

Internal communications channels could include:

- **Internal email notices** – Short, simple messages on corruption risk management tools can be highlighted in internal email notices. For instance, inclusion in an organisation’s internal knowledge sharing email, internal staff newsletter or other announcement emails that would reach the public officials involved in the implementation and management of anti-corruption strategies.
- **Intranet page and advertisements** – Key strategy information, resources and good practices can be published on an internal webpage. An infographic or simple visual can then be added to the intranet homepage to draw officials to the webpage.
- **Staff events** – Brownbag lunches, short seminars and townhall sessions can be used as a more participatory way to convey the key message, answer questions and further discuss strategy tools and good practices.

Communication tools

- **Infographics** – Infographics highlighting key issues, new tools or new developments can capture complex ideas in easy-to-understand visuals that can be used for both print and web-based communications products. For example, the behavioural flowchart in Chapter 1 (Figure 1.2) could be used for that purpose.
- **Q&A’s and blogs** – Short written pieces can reinforce an official’s comprehension of the strategy and provide examples of practical applications of the strategy as well as demonstrate new ways of approaching and analysing corruption risk.
- **Presentations** – Brief presentations on good practices can be used at staff events as a short introduction to the topic and the basis for a broader discussion among event participants.

## *Proposed activities*

**Internal webpage creation:** This webpage can be hosted on the intranet and can outline the processes for identifying risks, their likelihood and their impact. The page can highlight good practices and provide a record of previous corruption incidents across public institutions in Romania. Infographics outlining the steps to take in carrying out corruption risk assessments can be created and featured on this page. The proposed web-based app can either be hosted on this page or linked to it.

**Blog post:** This blog post can be written and linked to the intranet webpage. The post can highlight the relevance of correctly assessing risk using available incident data, including an example of best practice from one of the public institutions adopting the Romanian risk management strategy.

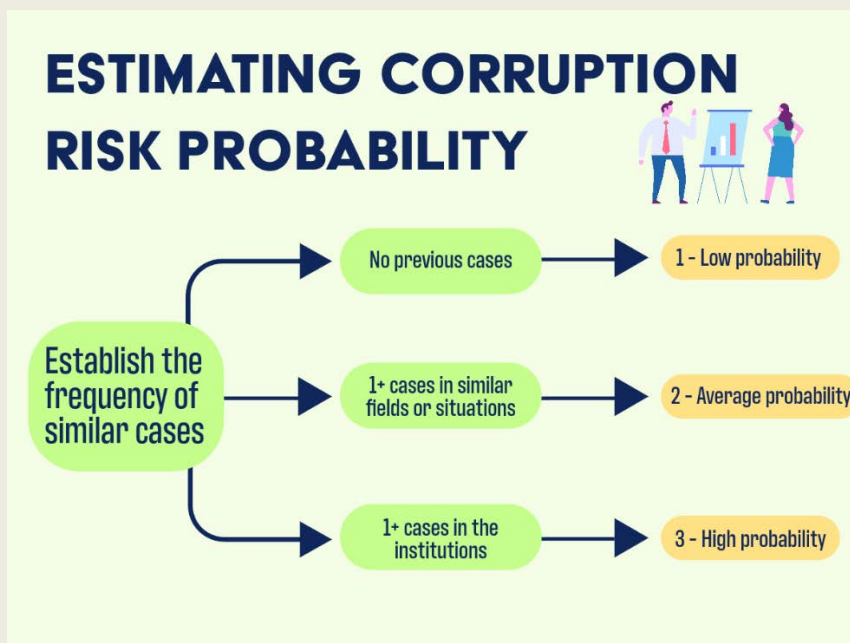
**Internal email tips:** Short tips with accompanying infographics can be included in staff-wide emails. These can serve as small nudges to continue motivate officials to make data-driven decisions rather than defaulting to heuristics.

**Brownbag event:** Hosting an informal event for officials to attend to learn more about strategies for corruption risk identification and likelihood and impact estimation. The event can also be used to promote the rollout of the proposed web-based app, for example.

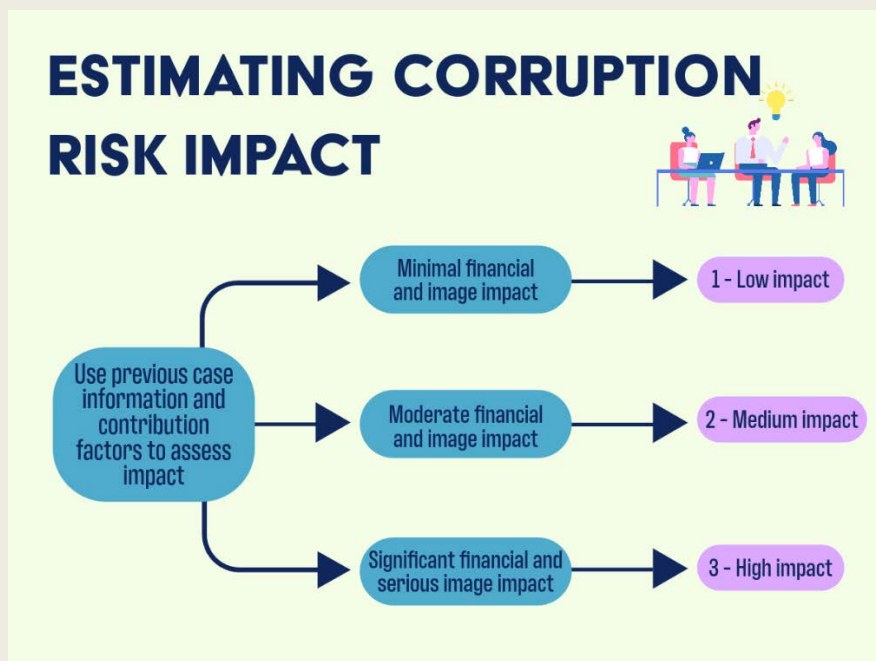
### Box A C.1. Example for internal email to raise attention and provide information

**New tool alert! Our new web-based app can help determine risk exposure in 3 steps.**

Step 1: Use the app to determine the frequency of similar cases and situations across government institutions. This case repository can be used to calculate risk probability.

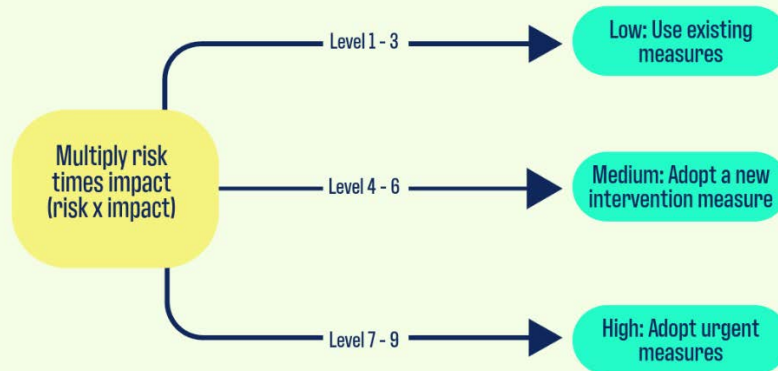


Step 2: Research on specific case information in the web-based app can provide evidence on the potential financial and reputational impact of a corruption risk.



Step 3: Risk exposure can be determined by multiplying the risk probability score by the risk impact score. This final score can assist in determining intervention measures.

## DETERMINING CORRUPTION RISK EXPOSURE



Source: Prepared by the OECD

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# **Promoting Corruption Risk Management Methodology in Romania**

**APPLYING BEHAVIOURAL INSIGHTS TO PUBLIC INTEGRITY**

A risk management approach is important for promoting public integrity efficiently and effectively. This report reviews the current corruption risk management methodology in the Romanian central government through the lens of behavioural science. After introducing the Romanian corruption risk management methodology and analysing the challenges related to its implementation, the report provides four concrete avenues for its adoption and implementation. Behaviourally inspired strategies are designed to improve public officials' capacities, opportunities, and motivations to identify corruption risks, assess their probability and impact, and design more effective control measures.

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