



# LIBENTER AND ITS INTEGRITY TOOL

*SOFIA, 11-14 JUNE 2024*

FONDAZIONE  <sup>®</sup> TICA

## Fondazione Etica & LIBenter: which kind of relationship between them

Fondazione Etica is a member of the association called **LIBenter**, founded by the Catholic University of Milan, Fondazione Etica itself and Libera, with the support of the Council of Economy and Labour (CNEL).

LIBenter has been created with **two purposes**:

1. supporting civil society in monitoring the implementation of the NRRP investment projects,
2. cooperating with Public Administration in order to make the execution of the Plan as transparent and effective as possible.

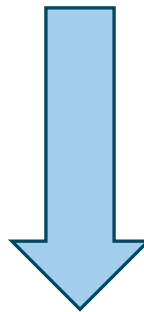
LIBenter is convinced that, only through the proactive involvement of citizens in the execution of the NRRP, it will be possible to undertake the true path of recovery that is hoped for our Country.

For this reason, **LIBenter aims to provide civil society with the tools** to actively contribute to a change:

- a **methodology based on the collection of public data based of some indicators**
- an **IT platform as a working environment for monitoring the activity of the Italian Public Administration**

## The contribution of Fondazione Etica and LIBenter to improve integrity policies

The aim of this Erasmus+ project is to improve policies in public sector organizations by providing Public Administration with **guidelines** and an **integrity assessment tool** capable of implementing behavioral insights that incorporate values, rules and attitudes useful for reducing opportunities for corrupt conducts and facilitate respect for integrity.



**Fondazione Etica** intends to bring to our Erasmus+ project the added value of its methodology, based on the **collection and processing of data**, in order to extract useful indicators to verify how our common objective can be achieved, referring to a dual context:

1. the objective one, i.e. the domestic public administration as made up of entities;
2. the subjective one, i.e. the single individual who works inside the public administration.

Fondazione Etica intends to use:

1. the wealth of data collected by the **two platforms it uses**, its own and the one built within *LIBenter*
2. the **methodology developed in its own core activity and in the one with LIBenter** for the purposes of civic monitoring of RRNP investment projects

## LIBenter and OECD indicators

LIBenter indicators share similarities with the OECD Public Integrity Indicators guidelines on anti-corruption.



LIBenter, Monitoring of RRNP projects:  
guide to the set of indicators



Anti-Corruption and Integrity  
Outlook 2024, OECD

## The structure of LIBenter civic monitoring tool

CUP:  Soggetto Attuatore:  Stato:

descrizione

Natura:  Settore:  Sottosettore:

Tipo  Missione e componente:

Categoria:  Costo:  finanziato:  Tipo prog.:

Usa \*.\* per decim Usa \*.\* per decim

[Vedi territori coinvolti](#)

Inizia a monitorare

Schede di monitoraggio per il progetto: B85B22000220006

CIG	Anagrafica (inizia da qui!)	1 Trasparenza generale	2 Trasparenza specifica	3 Appalti digitali	4 Progetto di fattibilità	5 Progetto esecutivo	6 Gara	7 Esecuzione
9547283B29 Marta Venturelli	<a href="#">Modifica</a>	<a href="#">Modifica</a>	<a href="#">Modifica</a>		<a href="#">Modifica</a>			
	+	+	+	+	+	+	+	+

- **1 cover sheet**
- **7 monitoring forms**

- **1 coversheet** aimed to gather all general **information** about the investment project.
- **2 monitoring forms** are geared toward the examination of the level of **transparency** of public administration websites.
- **1 monitoring form** dedicated to **digital contracts**.
- **4 monitoring forms** are dedicated to the evaluation of PA **accountability** in main of the stages of public **procurement** process.



TYPE OF PROCEDURE



NUMBER OF SUBCONTRACTS



TOTAL FINAL COST

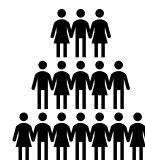


BASE VALUE OF THE  
PROJECT

# COVERSHEET



PROJECT REGISTERED  
NAME



NUMBER OF OFFERORS



EXPECTED DATE OF PROJECT  
TERMINATION

## LIBenter monitoring forms: the structure

Indicatore:  
Whistleblowing

**The indicator: a question** →

**Indications provided by us:**

- Law reference
- Indications on where to find the information
- Link
- Notes

**3 answers:**

1. Is the information available?
2. Was it easy to find?
3. Is the information updated?

**Possible notes of the monitoring agent** →

Indicazioni di LIBenter

L'ente attuatore ha predisposto canali interni?

Rif. normativo

Fonte dato	Link	Note
D.lgs. n. 165 del 2001 art. 54-bis (whistleblowing); N.B: L'art. 54-bis si applica solo fino al 14 luglio 2023, in seguito a tale data si applica il decreto legislativo n. 24/2023 art. 42 del d.lgs. n. 50 del 2016 (conflitto d'interessi)		

Risposta del monitorante

L'indicatore è presente? No

Facile da trovare? No

Dato aggiornato? No

Eventuali note

Non c'è una sezione del sito dedicata alla segnalazione degli illeciti (ne 'Whistleblower'). Cercando nella ricerca libera del sito sono riuscita a



## LIBenter indicators: 2 monitoring forms focused on PA transparency

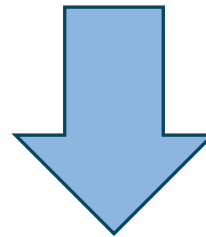
### LEVEL OF TRANSPARENCY OF A CONTRACTING AUTHORITY IN GENERAL:

- Is there a website section for the communication of NRRP projects?
- Is the «Amministrazione Trasparente» section of the website clear and usable?
- Are whistleblowers protected?
- Are declarations for the exclusion of conflict of interest published on the specific section of the website?

### LEVEL OF TRANSPARENCY OF A MONITORED PROJECT:

- Did the contracting authority sign an Integrity Pact for this project?
- Was the contracting carried out on the model of the alliance contracting framework?
- Did the contracting authority send information about the project to national authority databases?
- Are there civic access requests on the project? Did the contracting authority answer?

**LIBenter indicators:  
1 monitoring form on digital contracts**



**Not applied yet.  
It has to be adapted to the new Code of Public contracts, which  
requires the entire procedure being digitalized.**

## LIBenter indicators: 4 monitoring forms on the stages of procurement

### Technical-economical feasibility study:

- Do the commission for the evaluation of proposals have skills to evaluate planning proposals?
- Have the project manager excluded **conflict of interest**?
- Was the planning project available to economic operators?
- Have the contracting authority adopted measures for the communication of the project to society? Have there been a **public debate**?
- Is there a public official platform for the monitoring of the project?

### Final design of the project:

- Did the contracting authority planned to respect **DNSH**?
- Did the contracting authority planned to respect energy and environmental sustainability criteria (CAM)?
- Did the contracting authority respect the scheduled time for planning?
- Have the base value for the project been respected?
- Has the staff skills for the communication of the project?
- Is the report on the check of the final design publicly available?

### Bidding process:

- Do the commission for the evaluation of proposals have skills to evaluate project proposals?
- Have economic operators been asked to register on the **white-list against mafia infiltration**?
- Was the assignment of tasks carried out without conflicts of interest between the commissioned parties?
- Are there **performance indicators (KPIs)** in the tender to measure performance?
- Does the tender include a provision that guarantees a minimum of 30% of the employment opportunities are allocated for women, young and disabled people?

### Execution:

- Have the **technical and professional requirements** requested by the contracting authority been met?
- Has the total final cost increased?
- How many accidents occurred on the site?
- Have there been any variations or postponements during execution of the project?
- Have the payment deadlines been respected?
- Have there been any disputes during execution?
- Have DNSH and other environmental and social criteria been respected?

# OECD – Public Integrity Indicators

<https://oecd-public-integrity-indicators.org/>

- The OECD Public Integrity Indicators (OECD PII) establish a **new benchmark for government resilience to corruption risks** and **provide guidance on how to strengthen public integrity.**
- The OECD's first-ever standard indicators on public integrity and anti-corruption have been developed for and with governments, based on the [OECD Recommendation of the Council on Public Integrity](#). The scope of the Recommendation requires data collection from a wide range of actors across the executive, legislative and judiciary branches.
- The OECD PII represent a new generation of indicators, which provide data to support concrete action against corruption, and **allow countries to compare performance and identify best practices.**
- The objective, evidence-based and actionable data of the platform helps decision-makers **understand the strengths and weaknesses of national integrity systems, better allocate resources and target specific challenges.**
- The framework establishes standard indicators for the preparedness and resilience of the public integrity system at the national level to prevent corruption, mismanagement and waste of public funds, and to assess the likelihood of detecting and mitigating various corruption risks by different actors in the system.

# OECD – Public Integrity Indicators

<https://oecd-public-integrity-indicators.org/>



The OECD launched the first set of indicators on the quality of public integrity and anti-corruption strategies on 9 December 2021. Two more datasets have followed since and the next three datasets will be launched over the course of the next two years.

### QUALITY OF STRATEGIC FRAMEWORK

1. Coverage of strategic framework
2. Evidence-based problems analysis and use of diagnostic tools
3. Quality of strategy: minimum content in public integrity strategies
4. Consultation in practice: inclusiveness and transparency of intergovernmental and public consultations
5. Adequacy of implementation plan, structures and reports
6. Implementation of activities rates
7. Financial sustainability
8. Evaluation practices: transparency and use in decision making

### ACCOUNTABILITY OF PUBLIC POLICY MAKING

1. Regulation on open government
2. Regulations on transparency of policy influence
3. Open government in practice+
4. Open government decision-making
5. Public consultation in practice
6. Conflict of interest safeguards in practice
7. Political finance safeguards in practice
8. Lobbying safeguards in practice
9. Publication of datasets
10. Consultation of draft laws
11. Legislative stability
12. Public financing of parties
13. Post employment integrity in practice (ministers and top officials)
14. Trust in government
15. Trust in parliament
16. Legislative procedural scrutiny

### EFFECTIVENESS OF INTERNAL CONTROL AND RISK MANAGEMENT

1. Regulations on internal control
2. Regulations on internal audit
3. Risk management framework
4. Central functions for internal control and internal audit
5. Central reporting
6. Internal audit in practice
7. Risk management in practice
8. Organisations covered by internal audit
9. Organisations internally audited
10. Adoption of internal audit recommendations
11. Implementation of internal audit recommendations

## Comparison between LIBenter and OECD indicators

QUALITY OF STRATEGIC FRAMEWORK	
1. Coverage of strategic framework	
2. Evidence-based problems analysis and use of diagnostic tools	
3. Quality of strategy: minimum content in public integrity strategies	✓
4. Consultation in practice: inclusiveness and transparency of intergovernmental and public consultations	✓
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ACCOUNTABILITY OF PUBLIC POLICY MAKING	
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EFFECTIVENESS OF INTERNAL CONTROL AND RISK MANAGEMENT	
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11. Implementation of internal audit recommendations	✓

## Comparison between LIBenter and OECD indicators

**OECD - Strategy:** a strategic approach can lead to a coherent and comprehensive integrity system.



**LIBenter:** develops a strategy for the control and for the monitoring of transparency and Anticorruption.

**OECD - Conflict of Interest:** implementation and monitoring of submissions of declarations of interest.



**LIBenter – Conflict of Interest:** monitors the declarations of interest of managers of public procedures.

**OECD – Transparency of Public Information:** underpinned by the accessibility to information.



**LIBenter:** monitors the transparency of Public Administrations and verifies that all data are published and are updated.



## Whistleblowing: comparison

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OECD: Whistleblower protection is essential to safeguard the public interest and to promote a culture of public accountability and integrity.

LIBenter monitors whether:

