



Integrity Plans and Anti-Corruption Risk Assessment Methodology in Italy

*EU Directive on Anticorruption and Rule of Law reforms
in Albania*

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AGENDA:

Brief Overview of anti-corruption prevention regulations and mechanisms in the Italian context

Integrity Plans (PTPCT) and PIAO

ANAC methodology for risk management:

Process phases: Context, Assessment, Treatment, Monitoring and Control

Case Study: Recruitment and Personnel Selection

Section 1:

The Italian Anti-Corruption prevention system

– A Two-Level approach

Law 190/2012 establishes an Integrated Two-Level Anti-Corruption Architecture



National Level

Strategy implemented through National Anti-Corruption Plans (NAP) adopted by ANAC.

NAP constitutes binding guidance for public administrations.

Defines methodologies and general risk areas.



Decentralized Level

Each administration defines its anti-corruption strategy in Integrity Plans (PTPCT/PIAO)

Plans adopted under national guidance have to be adapt to specific context

Corruption Prevention Officer coordinates local planning.

Section 2: Integrity Plans and PIAO – Operational prevention tools

**Integrity Plans and PIAO represent the operational heart of the system:
they translate national strategy into concrete and measurable actions for each administration**



PTPCT is the Three-Year Tool that implements each entity's anti-corruption strategy

1

Acronym

Three-Year Plan
for Anti-
Corruption
Prevention and
Transparency
(PTPCT)

2

Obligated subjects

Public-controlled
companies, schools,
independent
administrative
authorities, public
economic entities

3

Adoption

By January 31st
of each year

4

Mandatory content

Identification of specific corruption risks, preventive measures, dedicated Transparency section with data publication responsibilities

PIAO integrates Anti-Corruption planning into a Unified Programmatic Document



Annual adoption by: Ministries, Municipalities, Universities, National and Regional Health Service entities (Legislative Decree 80/2021)

Added value: Overcoming planning fragmentation and ensuring cross-cutting strategic coherence

Both Plans share common requirements that guarantee systemic effectiveness

TIMING

Annual adoption by January 31st; simplified regime for small PA.

RISK ANALYSIS

Identification based on NAP by ANAC.

MEASURES

Indication of measures with responsible parties and deadlines.

TRANSPARENCY

Dedicated section with publication responsibilities.

GOVERNANCE

Plan drafting by Integrity Manager, adoption by governing body, stakeholder consultation.

Plan Governance requires involvement of the entire organizational structure

1

LEVEL 1 - Governing Body

Formally adopts the plan and assumes political and institutional responsibility.

2

LEVEL 2 - Corruption Prevention Officer (RPCT)

Drafts the plan and coordinates the planning process.

3

LEVEL 3 - Office Directors

Provide information, identify high-risk activities, propose measures (obligation under D.P.R. 62/2013).

4

LEVEL 4 - All Staff and ANAC

Active collaboration, stakeholder consultation, methodological guidelines.

Section 3: ANAC Methodology

– A Qualitative approach to Risk Management

ANAC has developed an innovative qualitative approach that overcomes the limitations of purely quantitative models, valuing expert judgment and organizational context

The Annex n. 1 to 2019 National Anti-corruption Plan introduced a Qualitative approach that transcends numerical model limitations

1

ORIGIN

ANAC established a Working Group to review risk assessment methodology

2

DOCUMENT

Annex n. 1 to 2019 PNA – *"Methodological guidance for managing corruption risks"* – sole binding document

3

APPROACH

Assessments supported by data, not reduced to numbers; expert judgment is central

4

APPLICATION

Sole methodological reference for preparing integrity plans

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The Risk Management Process articulates into Five Sequential and Cyclical Phases



1

PHASE 1 - Context Analysis

External analysis (economic, social, judicial data); Internal analysis (organization, process mapping)

2

PHASE 2 - Risk Assessment

Identification, Qualitative Analysis, Risk weighting

3

PHASE 3 - Risk Treatment

Measure identification and programming

4

PHASE 4 - Consultation and Communication

Engagement of internal and external stakeholders

5

PHASE 5 - Monitoring and Review

Verification of implementation and effectiveness; cyclical logic with continuous improvement

Operational Phases – From Context Analysis to Risk Treatment

The three operational phases (**Context, Assessment, Treatment**) constitute the methodological core of Integrity plans/PIAO anti-corruption subsection and require analytical rigor and multidisciplinary engagement.

Phase 1 – External Context: Situating corruption phenomena in territory and sectors

OBJECTIVE

Acquire preliminary knowledge of territory and sector

TERRITORIAL DATA

Economic, social, judicial analysis, economic crime rates, relevant proceedings

STAKEHOLDER RELATIONS

Mapping and assessing potential for undue influence (e.g., healthcare entities/pharmaceutical companies)

INTER-INSTITUTIONAL COOPERATION

ANAC encourages cooperation among PP.AA. to assess risks in homogeneous areas (healthcare, contracts, public procurement)

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Phase 1b – Internal Context and Process Mapping: Deep Organizational Knowledge

STEP 1: Organizational analysis

Description of central and territorial structures; personnel census with roles and responsibilities

STEP 2: Process mapping

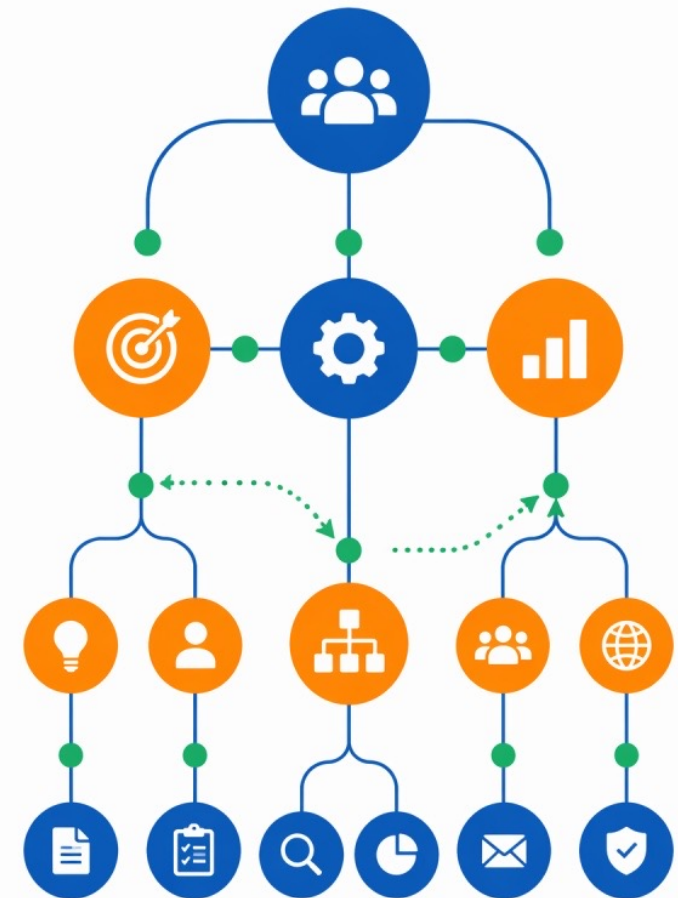
Identification of all organizational processes and activities, not only high-risk ones

STEP 3: Gradual approach

Starts from general areas (public contracts, hiring, grants, permits); progressive expansion to sector-specific areas; ultimate goal is complete mapping

STEP 4: Who conducts mapping

Dedicated working group coordinated by RPCT; office managers have to provide information and propose measures (D.P.R. 62/2013); all staff participation



Phase 2 – Risk Assessment: Identify, Analyze and Weight Risks using Qualitative Approach

Guiding principle: Transparency, documentation and motivation – not mechanical.

STAGE 1 - Risk Identification

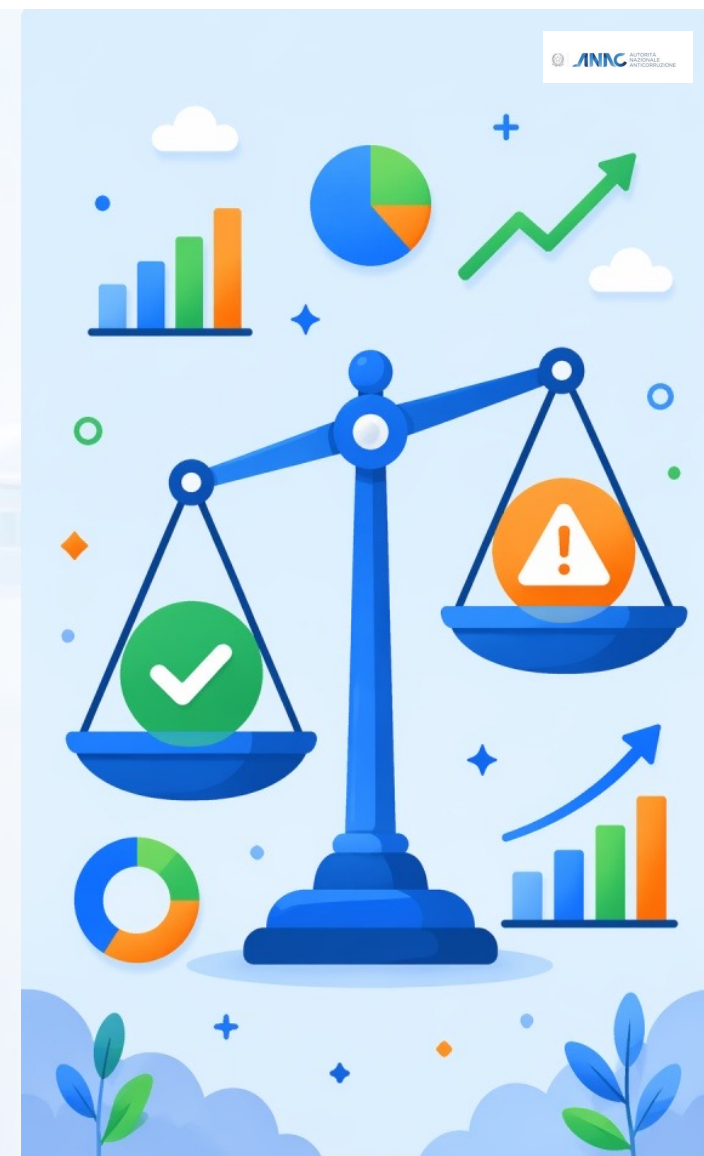
Risks identified relative to individual activities of each mapped process; specific risk events and enabling factors identified.

STAGE 2 - Risk Analysis (qualitative approach)

Probability and impact estimated through motivated assessments supported by evidence; expert judgment contextualization valued.

STAGE 3 - Risk Weighting

Measurement of overall risk exposure level; formulation of summary judgment orienting intervention priorities.



Phase 3 – Risk Treatment: Effective, Realistic Measures Proportionate to identified risks

1

CRITERIA FOR MEASURES

SELECTION

Specific and targeted with reasonable deadlines based on priorities and resources;
Appropriate to the risk they must prevent;
Capable of neutralizing enabling factors;
Economically and organizationally sustainable;
Adapted to organization's specific characteristics.

2

MEASURE TYPES

Control, Transparency, Regulation, Simplification, Training, Job rotation, Conflict of interest management (GENERAL MEASURES);

SPECIFIC MEASURES.

3

PRACTICAL WARNINGS

Plans must be realistic – at least one measure per activity;
avoid proliferation of abstract measures;
quality prevails over quantity.

Measure programming requires Defined Responsibilities, Timelines and Indicators for each action

Type of Measure	Implementation Indicators
Control	Number of inspections carried out / total proceedings
Transparency	Presence or absence of specific acts, data, or information subject to mandatory publication
Regulation	Verification of adoption of specific procedure or internal regulation
Simplification	Presence or absence of documentation simplifying processes
Training	Number of participants / total employees involved
Rotation	Number of assignments rotated / total assignments
Conflict of interest	Specific provisions on typical conflict cases

Methodological note: For each measure define implementation phases, timeline, responsibility and monitoring indicators.

Monitoring and Control

– Verifying Measure effectiveness over time

An effective anti-corruption system does not end with plan adoption: systematic monitoring is essential to ensure measures produce real effects.

The Plan must define What, How Often, and How adopted measures will be verified

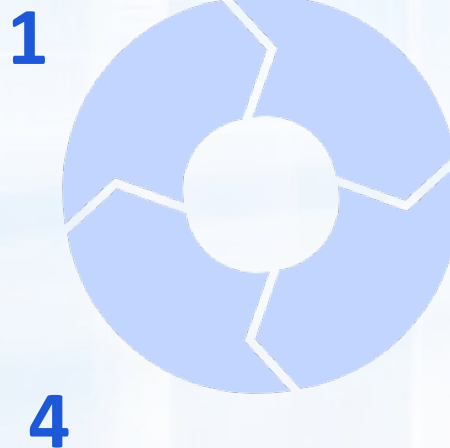
WHAT TO MONITOR

Processes and activities subject to verification, selected using rotation principle, priority for high risks and ANAC recommendations

TWO-LEVEL STRUCTURE

First level = self-assessment by implementing structure;

Second level = RPCT verification with staff support and internal control structures. Cycle concludes with plan update, measure review, reporting to ANAC



HOW OFTEN

Frequency proportional to risk level – higher risk requires higher inspection frequency

HOW TO MONITOR

Use of quantitative and qualitative indicators; request for documents and implementation evidence; periodic meetings with responsible managers

ANAC's surveillance and sanctioning powers guarantee system effectiveness

MONITORING FUNCTION

ANAC dedicated office monitors adoption and effectiveness of Plans adopted by administrations and obligated subjects.

CONTROL TOOLS

Documentary analysis of plans; requests for information and clarifications; verification of coherence between identified risks and programmed measures.

SANCTIONING AND GUIDANCE POWERS

In case of non-adoption, administrative sanction from €1,000 to €10,000 (graduated based on severity and entity size); issuance of recommendations, guidelines and guidance acts for improving plan quality.

Section 4: Case Study

An example of application of the risk methodology: competitions and selection procedures for hiring staff (risks and measures)



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Case Study: Recruitment and Personnel Selection – Applying Methodology in a High-Risk Area

STEP 1 - Area and Mapping

Personnel hiring and public competitions; identify key activities: notice preparation, commission appointment, exam conduct, candidate evaluation, ranking approval

STEP 3 - Qualitative Analysis

Probability and impact assessment of each risk event with motivated judgment

STEP 2 - Risk Identification

Commission selection criteria alteration; tailored notice preparation; exam management irregularities; ranking manipulation

STEP 4 - Measures and Monitoring

Mandatory commission rotation; incompatibility regulations; procedure verification through indicators and periodic audits (random checks by RPTC of notice)

Thank You for your attention!

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