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INTEGRITETA
DRUŠTVO ZA ETIČNOST JAVNEGA DELOVANJA



NATIONAL INTEGRITY SYSTEM ASSESSMENT
SLOVENIA

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KEY FINDINGS & CONCLUSIONS

KEY FINDINGS

National Integrity System Assessment provides an analysis of the legislative framework and its implementation in practice by the thirteen key institutions (pillars) which are responsible for preventing corruption in Slovenia. The research provides an assessment of independence, transparency, accountability and integrity mechanisms in the areas of social, political, economic and cultural context. The assessment is not intended to provide an in-depth analysis but to give a broader perspective and to highlight the causes for dysfunctional and robust nature of institutions and examine how they are interrelated. Any deficiencies in the functioning of one of the pillars can jeopardize the stability of the whole system. On the other hand, an understanding of interactions and interrelations can help establish key priority actions in certain areas. National Integrity System Assessment offers a ground-breaking holistic insight into the functioning of the system in Slovenia both in theory and in practice.

The research adopted the methodology developed by Transparency International and included data from the last two years (at least). The analysis was conducted by reviewing available sources, doing extensive interviews, conducting field inspections to check the access to information of a public nature and by verifying the findings and assessments provided by the researchers, TI Slovenia (Društvo Integriteta), the consultative group, TI Secretariat and the reviewer. All the findings and assessments were presented on a technical consultation where key recommendations and priority corrective actions on preventing corruption were also established. They will be referred to the government, civil society and other institutions that fight corruption. The aim of the research is to identify key deficiencies in the Slovenian Integrity System and thereby provide effective solutions.

The NIS research showed that recent political events before and after the elections affected the country's Integrity System, especially in the fields of prosecution, police and judicial administrations, which is discussed in the chapter "Foundations of the NIS". The political situation during and after the elections suggests poor political culture and represents a threat to the National Integrity System. After the party Positive Slovenia (PS) won the elections, the President of the State nominated Zoran Jankovic as prime minister who later failed in the coalition negotiations (Gregor Virant's Civic List refused to enter into coalition). Therefore, in the secret vote that took place in the National Assembly Janković was a few votes short of being elected. The battle for votes and the alleged "buying" of votes ultimately resulted in some deputy groups boycotting the vote. For the second round of voting, the President of the State did not nominate any candidate for prime minister and refused to nominate the president of the second-placed party, Janez Janša, because he felt that Janša lacked full legitimacy to run for the position of prime minister as he had been charged with being involved in the Patria bribery affair. On 25 January 2012, the parties SDS, NSI, Gregor Virant's Civic List, SLS and DeSus signed a coalition agreement and proposed Janez Janša as PM to the National Assembly where Janša later secured a majority of 52 votes and was officially appointed as prime minister and leader of the Slovenian coalition government. Main threats to the stability of the National Integrity System lie in several points of the coalition agreement, notably in the reduction of the number of ministries and moving the state prosecution to the Ministry of Internal Affairs. This action provoked a strong reaction of the general public and experts. There is a strong belief that such an act is alarming or even in contradiction to the Constitution and represents a threat to the independent functioning of the institutions.

SLOVENIAN INTEGRITY SYSTEM IS MODERATELY STABLE

Major deficiencies in certain areas can hamper the power of the system which requires us to be especially vigilant about the cracks in the system. One of the research's main findings is that there is a significant gap between the existing legal framework and actual functioning of the institutions in the fight against corruption.

These differences suggest there is a lack of appropriate control over the implementation of the legislation. As a result, the system encounters many cases of inappropriate, unethical and unacceptable behaviour of key decision-makers and members of political parties. The causes can be found in low personal integrity, attitude towards public interest and many opportunities to abuse the system. When it comes to areas where the legislation might be weak or inadequate, decision-makers and public officials must also rely on their personal integrity in order to protect the public interest and are also expected to call attention to any irregularities. Therefore, the existing gap also reveals some concerns about the practices of reporting corruption as the protection of whistleblowers is very unsystematic although it has been guaranteed under the Integrity and Prevention of Corruption Act. Fear of retaliation still discourages people from reporting suspected corruption. But a good integrity system can provide them effective protection. In this context it should also be highlighted that there is a lack of active CSOs that would issue criticism of the misconduct of the government and political parties. Political apathy and distrust of the public reflect low support

for current governmental and political agenda. On the other hand, there is high public confidence in the Commission for the Prevention of Corruption, in public media and law enforcement agencies but their role in the fight against corruption is limited.

The analysis also revealed that the majority of the pillars face great challenges when securing adequate resources and funds for their operation. Furthermore, access to information of a public nature is still not adequately provided, despite Slovenia having one of the world's best regulatory frameworks governing this particular area.

The analysis identifies the system's weak points, particularly in the areas concerning independence of the public sector and media, transparency of public procurement system, the role of the police and prosecution authorities in countering corruption, transparent and accountable governance of political parties and the engagement of civil society. The civil society has not enough power to issue systematic criticism of the misconduct of government and political parties, partially also due to the lack of resources and capability of independent operation. Some weaknesses can also be found in the system of awarding contracts to private and public sector entities and in the control over the expenditure of public funds that is inadequately covered by the legislation, as well as implemented in practice. Accountable governance of the executive authorities in practice is critical, while independency and integrity mechanisms are impaired especially due to inadequate execution of the legislation. The research also revealed that Slovenia is facing the phenomenon of "state capture".

The National Integrity System graph shows assessments of the pillars in three different aspects. There are clear differences in terms of the power of status, management and operation of pillars and foundations. The text below identifies key findings on the examination of the Slovenian Integrity System in general, which apply to the foundations and individual pillars. These findings are further concretized in the conclusion.

HOW STRONG ARE THE FOUNDATIONS OF THE NATIONAL INTEGRITY SYSTEM

In recent years, the State has identified economic crime and corruption as significant areas in terms of protection of public good, however, the analysis observed only moderately increased political will (which is related to internal and external pressures) to establish regulatory frameworks for those areas and undertake institutional reforms addressing corruption. Slovenia has adopted a new Integrity and Prevention of Corruption Act (passed in 2010 and amended in 2011) and other regulatory frameworks addressing corruption, gave more power to the Commission for the Prevention of Corruption, established the National Bureau of Investigation and passed a law on Mayor/deputy Conflict of Interest, increased the accountability of government officials and started a debate on the reverse burden of proof. And last but not least, Slovenia has noted a rise of public awareness about corruption and the right of access to information of a public nature and also the beginnings of the development of civil society in terms of establishing standards of ethics and integrity within the society. Nevertheless, the research revealed that political institutions in Slovenia only partially encourage and support effective functioning of the Integrity System in practice.

Irresponsible Behaviour of Politicians

In terms of political, social, economic and cultural context, the research has shown that there is an apparent apathy of the public towards the country's leading decision-makers and politics in general because the public feels politicians acted in opposition to the will of the voters. Politicians are perceived as being egoistic and non-altruistic individuals who are only trying to satisfy their greed. Public criticism of political and capitalist elitism is too often passive and on top of that there are complicated procedures and over-extensive regulation which prevent access to information of a public nature despite an otherwise adequate legislative framework. Although the recession didn't hit hard on Slovenian economic foundations, there are strong indicators that GDP and economic performance drops are not caused solely by the world's economic crisis, as shown in the research, but also by the systemic corruption.

People in Slovenia Passively Critical

Even though Slovenians are disappointed with the current situation in the country, there remains a high level of political apathy and a tendency to "go with the flow", which means that demonstrations and uprising are not considered a possible solution (there is also no confidence that early elections could improve the country's situation). This social apathy also contributes to the lack of active CSOs that would respond to the existing problems of inadequate political and social governance in the country. Another trend that can be noticed is a strong influence of institutionalized religious communities on the general public and policy-makers.

A comparison between official data on poverty, income inequality and unemployment and annual reports from the

Human Rights Ombudsman, Red Cross, Caritas and the Social Work Centres also revealed some interesting facts. There are sharp discrepancies between official statistics on one side and statistics of those who work directly with people in need on the other. This raises some concerns about the accuracy of the official data. Because it is becoming increasingly difficult to maintain a proper standard of living (as social security benefits are becoming payable), some people lower their ethical standards (they use social networks and personal connections in order to benefit from social security, they avoid paying taxes, do undeclared work, abuse their authorities etc.) to obtain a higher standard. In spite of that, Slovenians value fairness and honesty and integrity is also increasing in value and is being demanded from the power holders. Political apathy and low level of public confidence in the rule of law reflect low support for the government, political parties and current political regime in general. The public perceives corruption as a major national problem and sees the Commission for the Prevention of Corruption, media and, in part, law enforcement agencies as key institutions for combating corruption.

State Capture and Informal Networks

External (foreign) reports on the state of corruption do not portray Slovenia as a corrupt country but as a country with relatively low rates of corruption which are reflected in relatively positive assessments although Slovenia has recently obtained lower scores on the Corruption Perceptions Index (CPI) which compares EU countries. Nevertheless, the results of several domestic and foreign public opinion surveys show that Slovenians feel corruption is increasing, despite the official crime statistics showing otherwise. An important finding of the research is that there are strong indicators of the existence of systemic corruption (Commission for the Prevention of Corruption) and state capture (academicians), conflicts of interest and networking between public officials and private businessmen. There are thus major discrepancies between official statistics on corruption and actual trends, which are due to the fact that statistical data is incomplete. Politicians and ministers are not willing to accept the accountability which has become an informal trend in Slovenian politics that refuses to adhere to the codes of ethics and integrity.

Too Many Discrepancies between Legal Framework and Practice

In order to improve the National Integrity System, institutions must reduce the discrepancies between legislation and practice, support the development of civil society and the independence of the media, adopt regulations governing the financing of political parties and ensure control over their implementation, introduce and control an effective and transparent public procurement system, enable economic development and establish control over the entities that do business with the state.

According to the analysis, the challenges related to corruption are unique due to the fact that Slovenia has a legislative framework for the prosecution of corruption cases and for addressing corruption-related unethical acts but in practice, the sovereignty of the institutions in this context remains weak. In addition, there are few individuals and institutions that exercise good judgement on what integrity and public good are and how to protect and adhere to the system. In the end, it is not only a question of adhering to the written rules but also a question of the moral and ethics of each individual.

THE MOST INFLUENTIAL PILLARS ARE…

According to the graph, the most influential pillars of the Slovenian National Integrity System are voting authorities – the National Voting Commission, Human Rights Ombudsman, the Court of Audit, judiciary and the Commission for the Prevention of Corruption.

Civil Society, the Media, the Private Sector and Prosecuting Authorities the Most at Risk in the System

According to analysis, the weakest pillar of the Slovenian National Integrity System is **civil society**, especially because of a poorly (assessed and) set legal basis (however, some other pillars have adequate or good legal bases, thus there is a problem only with compliance in practice). The civil sector in Slovenia is underdeveloped, it lacks the resources and funding for operation, and it is unable to influence important social issues of society and political topics as well as decisions (assessment 25), and it is not influential in reform policies (assessment 0), because state-forming institutions do not recognize it as an equal partner. The legislation does not encourage the development of the CSO which would dare to criticize the state during its work. Their independence and financial stability should also be questioned. In addition, ensuring transparency, accountability and integrity within the CSO is weak. Even if people are susceptible to social problems, sensitive to corruption and dissatisfied with the operation of the state, at the same

time they are not prepared to financially support organizations which are engaged in the detection of irregularities or activities in fighting corruption.

The role of **prosecuting authorities** (especially the prosecution) in investigating cases of corruption is estimated as ineffective, though the public trusts the prosecution and the police, but according to official statistics, the institutions are unsuccessful. The prosecution has a two-dimensional reputation – on the one hand, it works well professionally and has high integrity, but on the other hand, it is often believed to be a culprit for poor prosecution of major corruption in the executive power and in the other pillars. The research findings show that with the establishment of the National Bureau of Investigation and with the new Prevention of Corruption Act, significant foundations are being established from which we expect improvement in future. The police and the national prosecution together with courts (small number of convictions for corruption is the key weakness) and other mechanisms of financial control do not operate optimally in the field of a more demanding economic and public finance crime and corruption; thus connection between institutions is weak as well. The Commission for the Prevention of Corruption, the Court of Audit and courts play a key role in connecting prosecuting authorities, governmental and supervisory institutions in the investigation of corruption.

The analysis shows a very poor general assessment of **the media** (the third lower rated pillar) because, due to endangered independence (assessment 25), it could also endanger correct, objective and impartial information of the public about corruption, the functioning of government, the private sector and power holders. We notice that a dangerous condition could be created which would weaken awareness and information of the public, and with that (a desire for change) improvements in politics, corruption and integrity. The independence and freedom of the media are seriously endangered due to political and economic pressures, lack of transparency, the impacts of media ownership and the amount of advertising. The conditions of employment for journalists threaten the development of quality journalism. Investigative journalism is still under-developed, nevertheless, the media are still a key source of information on corruption and abuses mostly in politics and economy. Another problem arises at this point, as according to different researches, the media are a key factor in detecting and preventing corruption, even if the assessment indicates that its own integrity system is not maintained in practice (assessment 25).

Political parties, which are actually able to influence key decision-makers, are also poorly assessed in terms of the general role. The research proves that the legal framework of control and funding of political parties remains inadequate despite promises to the appeals of the GRECO on the earliest possible regulation. We notice the possibilities of abuse of influence and power, in other words, the accountability in practice obtained the lowest assessment (assessment 0). Citizens´ trust in their functioning is one of the lowest. The power of political party representatives on local and national level and in the public sector is often abused for private interests. The NIS indicators evaluate social characteristics and integrity, and this way show that even a good business success does not always mean a good organizational, ethical and integral business practice.

Imperfections in **the private sector** are perceived practically in all three dimensions. Transparency, integrity, responsibility and anti-corruption activities obtained very low assessments. The interplay between public and private sectors above all denotes public procurements and the possibility of influencing the system. The economy is unable to develop due to inadequate conditions, and competitiveness is threatened. Consequently, the state does not appropriately evaluate, appreciate and support innovation, even though that would allow greater competitiveness. The private sector is moderately associated with civil society, especially in ethics and improving the standards for good management.

The analysis clearly shows the limited autonomy in the functioning of **the public sector** in practice which is reflected by only average interest in the development of anti-corruption measures and proactive activities. The research finds numerous irregularities in the execution of public procurement in practice. The pressures and influences of political parties and informal networks on public procurements and staffing affect the quality of executed procedures and non-compliance with the legislation. The regulation of lobbying is still in its early stages since the law on integrity and corruption prevention is not taken seriously. It is similar with mandatory preparation of integrity plans since most of the public sector and related institutions perceive those plans as a paper evil. Despite the training of civil servants, the knowledge of integrity and the purpose of plans is too weak, and their irresponsibility is not regulated although the normative field is well organized.

Insufficient financial resources for civil service institutions signify a major opportunity for corruption (also in public procurements). One of the key factors of funding, and with this of corruption in the broader sense, is also reflected in hiring outside the sector for the performance of work.

The executive branch of government has enough funding and resources to perform work, and on the normative level

it has established an effective control over the work process. However, it has gained really low assessment in the fields of transparency (assessment 50) and accountability (assessment 25). In other words, it has an inefficient control of the general public over financial assets of members of the government; there are no sanctions for abuse of position. The integrity mechanisms are given really low assessment (assessment 25), and this indicates a low level of the integrity of the government; it provides a number of suspicions that these are abuses of position and corruptive actions. It is moderately capable of managing the public sector, and the legal system only obtained an assessment 50.

The financial autonomy of the **legislative branch of government** is weak; for example, we can perceive so-called "privatisation of the legislation" and (too) big influence of lobbies on the content of the legislation, according to the assessment. The penal immunity of deputies of the National Assembly is too broad, the National Assembly does not adequately control supervisory bodies, something which is being exploited for political gain. As shown in the analysis, the public's trust is low because of the low level of integrity of some of the National Assembly deputies. A complete integrity mechanism is not maintained.

Despite intensive work over the last decade, successes, the change of legislation in this field, and the expanded authorisations of **the Commission for the Prevention of Corruption**, the analysis shows that it still does not have sufficient resources for functioning and raising public awareness in practice. The investigation of corruption and reduction of the gap between legislation and practice are still weak. But the Commission for the Prevention of Corruption has a strong role in preventing corruption and controlling the authorities. The application Supervizor has opened up new possibilities for the verification of state operation with companies over a certain period, and for the analysis of the impact of politics and the use of public money and prosecution.

The best assessed among all three branches of power is **the judicial branch**. Given the role we have been assessing, we would expect higher assessments of all of them when it comes to control over the executive branch, legal reforms, public sector governance, legal system, the control of the judicial over the executive branch, and corruption prosecution. As the analysis indicated, the effectiveness of the judiciary is weak, due also to the non-compliance with their provisions by civil services. Despite the high assessment, legislative and executive branches do not always take judicial opinions and verdicts into account. On this occasion, we stress that even the decisions of the Court of Audit are too often ignored which reduces the public reputation of such an important institution.

Otherwise, the functioning of **the Court of Audit**, as far as integrity is concerned, is evaluated as very good but challenges are noticed in the options for conducting preventive financial audits and detecting irregularities, as well as sanctioning subjects and developing new methods because of understaffing, and the fact that there is no legislation which would regulate this field. The Court of Audit is also weak in the control of funding political parties as it lacks jurisdiction due to insufficient legal framework.

The pillars **Human Rights Ombudsman** and **Voting Authority – the National Voting Commission** are the strongest in the integrity system because of their reputation. The assessments indicate that these two authorities play the biggest role, show a strong structure, and have sufficient resources and funding for their work, though a model of good practice is undermined by poor implementation of legislation in practice. The National Voting Commission is the best assessed pillar, nevertheless, within the instability of the operation of political parties it should be mentioned that parties' voting campaigns and candidates are not under the jurisdiction of the national voting commission. In Slovenia, elections are carried out properly and transparently. The Ombudsman´s low assessment only in connection with enforcement of the legislation in practice indicates that he is not as proper a "role model of good practice" as he could be.

Key Challenges

Considering a full report under discussion, several overlapping problems can be seen. Overall, it is thus possible to perceive a large gap between legislation and compliance in practice. Challenges of independence, funding and general performance are emerging.

The Dangers of a Lack of Adequate Resources and Funding

The adequate provision of resources and funding is crucial for the independence of every pillar. Slovenian institutions could carry out the activities for which they were designed, as they were mostly graded as strong in the assessment of capability with an overall assessment above 60. Lower assessments are given to the media, civil society, prosecuting authorities and the public sector.

The most obvious example of poor funding provision is seen by a closer look at the pillar of civil society. This field has

the least legally regulated funding and the CSO does not actually obtain enough resources and funding to operate in practice. Due to an inadequately developed funding system of the CSO, it most commonly acquires state resources to function, and in this way surrenders to the impact of politics and economy.

The independence of operating media ownership and of advertising is also very important for fighting corruption; this affects the content and inhibits the development of investigative journalism. According to assessments, operating independence is the lowest here (in legislation 50 and in practice 25), otherwise, the assessment of institutions' independence is generally high (between 75 and 100) in the legal framework. There is a gap between the public sector and civil society (assessments 75/25 and 100/50).

The Commission for the Prevention of Corruption, which, in this composition with extended powers and duties is not able to guarantee full implementation of the legislation, is endangered in the system. In this context the government restricts it from carrying out its important role, the fight against corruption.

Although the prosecution and the police enjoy great public support, as far as corruption prosecution is concerned, the official statistics of prosecution are very poor, even if the police is one of the best in Europe in prosecuting general crime. We notice that the prosecution is reproached for its inability to effectively prosecute corruption. We can conclude that the lack of independence and an external political pressure on these institutions contribute to that. According to the research, despite the establishment of the National Bureau of Investigation and the provision of some financial resources for prosecution of corruption and economic crime, the police and the prosecution are still understaffed and financially unsecure. Transposing problem-solving onto courts only and an excuse by the authority that it is looking for "scapegoats" in institutions of repression is irresponsible, as it is necessary to provide adequate financial resources for the operation of institutions.

Moreover, adequacy of funding of the judicial branch of power is questionable, although it has sufficient resources and funding for its operation (meaning that it can operate with resources at its disposal, though in their eyes very limited).

The human rights ombudsman is even seen as "over-funded", because he does not spend all funding per year, but it is interesting that for a proper in-depth study, which would reveal the true dimensions, (and (un)successful work of the ombudsman), financial resources are insufficient.

Insufficient financial resources allow corruption, as well as hiring external partners and services in the public sector. Because of that, the corruption in public procurements is also expanding.

The biggest gap between the legal framework and practice in this field is reflected in political parties, according to the assessment, although they have means of financing provided by the law. However, in practice it is only moderately respected, not least because of all the trouble with the control over financing as the Court of Audit, for example, passes judgements very late within the legal deadline after an election, for resources that were, for example, used for the election campaign or it does not have the authorization over control of the content of reports and proportions of the spent money. Political parties are almost never held accountable for their actions (although the legal framework offers levers and opportunities – assessment 50 – these are not realized in practice); therefore, the accountabilities of political parties in practice are assessed with 0. Political parties are shown as problematic in the entire NIS report, especially because of their unethical behaviour and overwhelming influence. It seems they can extend their influence to almost every pillar in the NIS, that is to say on some more directly than on others. The challenge for the proper progress in the field of lobbying is the lack of political will. The civil sector is not recognised as an equal partner in changing the method of solving broader social issues or influencing it. Some other institutions (the Commission for the Prevention of Corruption, the Court of Audit) which could warn and which highlight the problem of lobbying, of entrapment of the country or so called "state capture", and corruption in a broader sense, have achieved that corruption is not more widespread.

In the context of independence and transparency, the Court of Audit is assessed with the highest grade. The highest assessments were obtained by the National Voting Commission in the field of transparency, and by the Human Rights Ombudsman in the field of transparency in practice and the accountability in legislation. The executive power has a good legislative basis but its realization is weak in all fields. The private sector only moderately exceeds the assessment in transparency in legislation and in providing the resources.

The analysis thus indicates that the key factors for fighting corruption with conferred powers are prevented by the government, and that it is difficult for them to execute proper and good work in the prosecution of economic crime and corruption.

Informal Networks Rebut the Independence of Institutions

Slovenia defines some criminal acts of corruption under criminal law, but there are more acts of corruption defined as corruption in a broader sense: nepotism, cronyism, achieving influence through connections and acquaintances, informal networks, abuse of lobbying contacts, the emergence of "revolving doors", and conflict of interests. Such practices, which are present according to the analysis, are not criminal, and this is why the expectation that the courts will solve these cases is not justified; such cases must be dealt with by supervisory institutions, appropriate legislation and prevention. The analysis clearly shows that we have adopted a bunch of regulations in Slovenia which correspond to informal networks that dominate the country and provide various forms of corruption in a broader sense.

The process of privatizations enables political influence on the business world (in the form of employment and management). Privatization was incomplete as some individuals with good connections and acquaintances in economy and politics gained control over previously state-owned companies. The shift from politics to management or supervisory bodies in these companies is therefore quite noticeable. The state (and politicians) can influence decision-making in some companies with the Pension Fund Management - KAD (company limited by shares) and Slovene Compensation Fund - SOD, as it has a huge control through funds, and in most of the biggest companies it has important, even controlling share owners. This means it can determine political leadership in the mentioned companies. The government still has no strategy on what to expect from its investments which should remain in the function of ensuring the public interest (concern for pensions and compensations). Otherwise, larger Slovenian companies are characterised by a highly concentrated ownership structure which is often still indirectly or directly controlled by the state.

The public sector is also left to this influence, because before and after every election, one can notice so-called political tsunamis which bring the replacement of employees in public and even private establishments, institutions and agencies. This is how the significant (state) positions are occupied by people who are more important to the so-called elite, but are not always the best qualified and the most appropriate. The "division of chairs" shakes the functioning of the national system and threatens Slovenia's external competitiveness from the economic and business point of view. The application Supervizor (Commission for the Prevention of Corruption) is the first step towards greater transparency. Political (direct) influence is also seen in the judiciary because there are efforts made to end the life mandates of the judges. A more politically direct influence is seen in the appointment of the supreme state prosecutor.

The analysis indicates that the influence of politics and informal networks on the entire public sector should be abolished, and the prosecution authorities and the judicial branch should be provided independent function. Too frequent changes of laws and leading employees denote a problem of corruption of the system in Slovenia. The legislative discrepancy among individual institutions and a lack of cooperation of institutions are exposed, which otherwise depends too often on leading government officials. The consequence is lobbying in a negative sense. The external advisors prepare laws for the government in a way (and they are often adopted in the parliament in a summary proceeding or past consultation with the public, because the deadlines are too short or the public cannot participate), so that they are defective. These advisors later on advise the private sector, for example, how to bypass or abuse the law.

The lack of operation of supervisory institutions is also seen in the field of conflicts of interests, and in indistinct boundaries between private and public matters. Many issues touch the operation of local administration. This time it was not included in the assessment, but it should be given more attention in further research because it is right here that we can see the problem of corruption in a broader sense.

The problems of staffing on the basis of connections and acquaintances, and the influence of politics in promotion within the institutions themselves are highlighted as a special challenge for all pillars. As a result of what has already been said, institutions do now work independently. Within institutions it is also usual to set priorities according to the interests of informal networks, not according to the interests of the discipline.

Due to different pressures and interests, the cooperation between institutions is insufficient, so they defend the objectives of individual interest groups, and not the objectives of a democratic society. The interdisciplinary cooperation of institutions from all pillars, which is based on the integrity of an individual and an institution, can be seen as a key deficiency in tackling corruption.

Integrity Mechanisms Often a Dead Letter on Paper

The assessments indicate that integrity mechanisms do not work well enough in practice. They are carried out soundly

by the judicial branch of power, the Human Rights Ombudsman, National Voting Commission (the practice is better assessed than the legal framework) and the Commission for the Prevention of Corruption. We have assessed them with 75, however, the media and the executive branch of power got a lower assessment 25. Still, nine pillars of integrity have a strong legislative basis for obtaining better assessments. Contrary to civil society, which does not have a legislative basis, and because internal integrity mechanisms are not systematically performed, the assessment 50 indicates a too low awareness of civil society. The media does not have effective integrity mechanisms and the integrity level in government and the private sector represents a concern, especially in connection with the responsibility which is otherwise assessed with 25 in that very pillar.

KEY RECOMMENDATIONS

The relatively good assessment of the integrity system achieved by Slovenia in this analysis and operation revision is the consequence of the fact that the state has a good legislative framework that formally ensures the integrity in public activity. This is the reason why the potentially higher assessments of individual pillars must not be misleading, as the laws, number of institutions in charge of control, repression and other controlling and managing principles alone are by far not sufficient. The biggest challenge indicated by this research lies within the fact that these mechanisms do not function well in practice and are only partially used, as they proved to be useless, not connected to one another and too complicated. It can be concluded that there is some sort of a framework for establishing a system of integrity but the system itself is missing as this framework is not sufficiently fulfilled in practice. Realization of activities listed here can moderate and solve problems presented in detail in each of these chapters. Nevertheless, a certain amount of political will is necessary to reach all the aforementioned. Formation of a stable national system for integrity and prevention of corruption are ambitious challenges that require the start of multi-horizontal actions. The government and the parliament are key players in coordination of systemic activities that deal with such challenges. This undoubtedly signifies that a consistent introduction of harmonized state policy practice, to reach high standards of management and to fight corruption, must take place. This does not exist currently. The assessment reveals weaknesses in key pillars of integrity in Slovenia: civil society, the media, the private sector, the public sector, the political parties and the law enforcement authorities. In all these fields there is a lack of commitment and decisiveness that would guarantee the stability of forming and developing mechanisms. These mechanisms are to lead towards better management and a more efficient fight against corruption in future. Therefore, the political and individual commitment to integrity.

The key advantages, weaknesses and recommendations for individual pillars are given in the conclusion at the end. In this summary, several key recommendations for realization and reinforcement of the existing system in general and several conclusions shall be presented:

Establish a More Accountable and More Transparent Operation of Institutions in Public and Private Sectors in Practice

The possibilities to establish integrity in the context of social bases are satisfactory, but the assessment of the political and economic context shows distrust in the rule of law and institutions. Although the analysis shows that people value honesty and integrity in society, the tolerance of illegal and morally controversial actions that can lead to nepotism, conflict of interests and abuse of public status also by the accountable institutions, is too vast. The political and economic pressures on the operation of the public and private sector have to be limited. To establish a system of integrity it is very important that preventive mechanisms as well as informing and practical education are introduced. Inside the legislative framework, it is also necessary to establish personal accountability of managers and public officials.

Guarantee Transparent Use of Public Funds

It is necessary to guarantee transparency (also through web insight) in systems of public procurements and employment in public sector as well as suitable control. This action would also prevent political tsunamis, political staffing and other possible influences. An independent expert body should be established to provide a suitable judgment on an appropriate candidate for special offices. Similar criteria should apply to public procurements, as the commissions that prepare public tenders and choose contractors should be separated and politically independent. The transparency could also be guaranteed by consistent and correct execution of legislation connected to accessing public information. Supervizor enables an insight into operations of the state with the private sector. An upgrade of this system will enable an even higher level of transparency. The Court of Audit should have a broader jurisdiction. It would also be reasonable to establish an efficient mechanism for control of public procurements. The state has to

provide an efficient system and control over the operation of companies owned by the state.

Guarantee Independently Functioning Civil Society

The civil society is important not only for external, independent control of government activities and institutions, but also in searching for 'real life' solutions in existing and suggested legislation. The government does not sufficiently value its knowledge and work, which is why the third sector does not have enough possibilities for constructively influencing the shaping of policies that would bring public good and has no influence over reforms. The government would need to develop and plan activities that would concentrate on improving public life also by assuring independent operation of the civil society. Furthermore, it would also be sensible to strive towards the support action of so-called 'watchdog' organisations and those who specialise in establishing standards of good management, ensuring them their financial independence. By accepting their own standards of quality and mechanisms of integrity, CSOs could also simply take care of their own reputation.

Establish Independence of the Media and Education of Investigative Journalists

The media are exposed to political and economic pressures and influences of the owners and advertisers. The procedures for control over the ownership of the media have to be carried out in full. It is necessary to systematically limit media monopoly and properly control political connections. The influences on the editorial policy have to be limited by separation of the decision-making process and suitable non-political staffing. It is also necessary to prevent formation of political editing or editing of contents in the public media groups. Advertising can also be a means of influencing the content, as the policy affects the companies and companies indirectly influence content by their advertising, because media cannot function without funds. The accountability of journalists and their integrity are not to be regulated by legislation. Ethic duty is part of the profession. Therefore, faculties have to develop better education programs for (investigative) journalists and emphasize the significance of public awareness and personal integrity. Qualifications for investigative journalists are a logical solution for quality reporting on economic crime and corruption. It is necessary to introduce suitable mechanisms for sanctioning inappropriate contents or the editing work. If the administration will respect the 'codex' and they will not interfere in the work of journalists and editors, respecting their independence, the 'codex' will also be respected by the latter. The integrity has to be built from top to bottom.

Prevent State Capture and Systematically Evolve the State Governed by the Rule of Law

Administrative corruption typical of state capture would be limited by educating public officials and functionaries. The influence of companies and individuals on the legislation and the regulator needs to be restrained by making the operation of the state more transparent and by reducing overregulation. Due to a large number of complicated solutions and solutions inappropriate for real life that are stated in the laws and implementing regulations, the chances for takeover by the state are greater. It is necessary to strengthen the development of economics. The state ownership of companies enables an even stronger connection between public and private; this field has to be regulated. Legislative and executive powers have to assume the accountability for the phenomenon of state capture. To prevent state capture, it is necessary to regulate legislation finally, as Slovenia has committed to GRECO, to guarantee transparent funding of political parties and control of elected politician's activities. The current arrangements enable hiding and concealing of financial operations. The non-governmental organizations would have to follow the campaigns of political parties, asses their use of funds and compare that to the official information. This will be possible when the parties will be obliged to publish all the information and detailed reports which will then be at disposal to be reviewed by the Court of Audit or any other institution. The time period for revisions after elections is too long and renders the democratic aspect of this process impossible. It is necessary to establish a system in which the clients will have to answer for irregularities and will be sanctioned right away. In this way, the public has to control political promises and activities of the political parties. For this matter, civil society has to evolve further. The judiciary system has to be given more funds for undisturbed functioning. Different workshops for enlarging integrity have to be prepared and suitable education for future judges has to be developed (they sometimes lack knowledge in the fields of criminal investigation, sociology and psychology). The decisions of constitutional judges have to be respected. It is necessary to introduce measures to reduce the amount of indirect political pressure on judges and future law academicians. It is sensible to preserve the lifelong mandates. It is necessary to establish control over law preparation and enable a bigger influence of the expert public on the contents. The non-governmental organizations have to adapt to the foreign practices and perform their own expert revisions of the public use for public procurements that need to be compared with official information.

Make Public Information More Easily Accessible

With its excellent Access to Public Information Act, Slovenia ranked second in the vast international research. But in practice, the institutions do not respect the law, wrap themselves in silence, have inappropriate answers or shift their accountability onto others. Respecting the regulations has to be ensured by education and sanctions, and in this way also the public awareness of justice being done is reinsured. The independent institutions should develop mechanisms that enable a public insight into the operation of the state, the black list of companies that are forbidden to do business with the state, review of fund use and access to the processes of public procurements and lists of companies that had been assigned the funds. The institutions are accountable for education of the public on the significance of the information and its interpretation.

CONCLUSIONS

The analysis shows that the key in the fight against corruption are strong, independent and transparent institutions that can establish a system of integrity and withstand the pressures of politics, economy and informal networks. One of the crucial aspects in the matter is the education of youth and society in general about the negative consequences of corruption; a large role is also played by the independent media. The institutions' refusal to solve the problems results in endangering the strong system of integrity. It is important to provide the appropriate sources and means for the institutions, in order for them to complete the tasks defined by legislation.

The good aspect of the work of the institutions (the Commission for the Prevention of Corruption, the Court of Audit, CSO, the Media), who warn about the phenomenon of state capture and other forms of corruption in the wider context, is that they point out the problems and therefore make it possible to restrain the corruption and educate the public about its consequences. The public's awareness of the stage of corruption is also high due to media reports; these are also crucial in preventing more serious forms of corruption. That is why the media are under a lot of pressure on the part of politics and the owners.

A challenge for the future will be the enforcement of the rule of law, ensuring the independence of the judicial branch of power, and establishing new values which will be founded on the integrity of the intellectual elite, who will, by means of their uncorrupted behaviour, set an example for the functioning of society. Therefore, the measures to eliminate and prevent corruption cannot only be based on repression and persecution of the corruption from the past, but preventive measures that will prevent its development have also to be set up. This has to be based on assessment of the risk in Slovenia and foresee the development and the appearance of corruption. The assessment of the national system of integrity enables the institutions to improve its operation in all the areas and ensure a stronger system.

To enable preventive work in all pillars should eliminate the influence of policies and informal networks on the public sector as a whole; to be able to act independently and thus establish integrity from the inside, the responsible heads of institutions should offer support to the judges and prosecutors in their decisions. Frequent changes of the laws and the leading officials show the problem of systemic corruption in Slovenia. Inconsistency of legislation among institutions and the lack of their cooperation stand out; the latter depends too often on the leading official. There are two consequences: lobbying in the negative sense, and the fact that laws are written by external advisors, who then advise those who misuse the law.

Based on the analysis and the assessments, the key advantages, weaknesses and recommendations for each pillar are defined individually below. The summary of the analysis is provided in the chapter Key Findings; it is presented in the report individually for each pillar.

LEGISLATURE

ADVANTAGES:

- A stable constitutional framework for independence, efficiency and accountability.
- An appropriate framework of control over the executive branch.
- Incentive normative and institutional reforms for the prevention of corruption and the establishment of a high-quality national integrity system.

WEAKNESSES:

- Insufficient financial autonomy.
- Establishment of a comprehensive mechanism to ensure integrity is too slow.
- The phenomenon of the so called "partitocracy".
- A (too) big influence of lobbies on the content of legislation and the phenomenon of the so called "privatisation of legislation".
- Paying little regard to the experts and public opinions.
- Disrespect and neglecting some of the decisions of the Constitutional Court.
- Immunity from criminal law is too wide.
- Insufficient communication between the deputies of the National Assembly and the Ombudsman.

- Insufficient performance by the legislator's supervisory bodies, as they are being abused for achieving political ends.
- Distrust of the public because of a low level of integrity among some of the deputies.

RECOMMENDATIONS:

- Caution in the matter of possible escalation of austerity measures.
- Tighter control over the lobbying of deputies.
- Include the so-called legislative trail among the mandatory components of the bills.
- Abolish the non-professional criminal immunity of deputies.
- Reduce the influence of authorities and prominent members of the party on the decisions made by the deputies.
- Depoliticise the discharge of the supervisory function.
- Resolve the question on the role of the National Council, which will not weaken the mechanism of "checks & balances".
- Pass a more transparent legislation and provide public access to the more comprehensible legislation.
- Adopt a Code of Conduct for the deputies.
- Continue and intensify the process of legal reforms.
- Mandatory training of the deputies on ethics and integrity.

EXECUTIVE

ADVANTAGES:

- Sufficient financial, human, and technical resources and funds.
- Online public access.
- Efficient operation control established on a normative level.

WEAKNESSES:

- Inefficient control by the general public over the assets of the members of government.
- Low level of integrity of the members of the government, which incites a number of suspicions about the misuse of office and acts of corruption.
- In practice, the absence of sanctions for the misuse of office.
- Selective consideration of the Court of Audit appeals to the prime minister for dismissal of ministers.

RECOMMENDATIONS:

- Supervisory authorities have to provide a more efficient control over the assets of the members of government.
- Education and mandatory training of the deputies on ethics and integrity.
- Demand a higher level of integrity of the members of government under oath.
- Increase the level of political culture.
- Systematic approach to the investigation of reasons for the inefficient discharge.

JUDICIARY

ADVANTAGES:

- Relative financial stability.
- Reduction of court backlogs.
- Satisfactory level of integrity of the judges and the judicial branch.
- Comparatively efficient control over the performance of the executive and the legislative branches.

WEAKNESSES:

- Inconsistency of the judicial salaries with the directives of the Constitutional Court.
- Indirect influences and media pressure on the process of the judicial decision-making.
- Isolated cases of threats to the security of the judges and expression of intolerance of the role of the judiciary.
- Weaknesses in the catalogue of public information.
- Problem of insufficient control over the work of the judges.
- Low level of public trust (except in the Constitutional Court).
- Delays in reforms for a more efficient judging in criminal matters, related to corruption.

RECOMMENDATIONS:

- Appropriate solution for the spatial and human resources issues.
- Bring the judicial salaries into line with the directives of the Constitutional Court.
- Preserve the permanent judicial mandate.
- Provide direct public access to concrete information about the introduced and executed disciplinary proceedings against judges.
- Ensure responses to the applications for provision of public information.
- Increase control over the work of the judges without encroaching upon their independence.
- Ensure availability of information related to any procedures, imposed under the Code of judicial ethics.
- Efforts to improve the public image of the judiciary.
- Intensify organizational and other measures and reforms targeted to the trying of matters related to corruption.

PUBLIC SECTOR

ADVANTAGES:

- Sufficient resources and funds, but problematic distribution.
- On the normative level, independence and integrity of the public sector employees are generally assured.
- Better access to the materials and online activity.

WEAKNESSES:

- Poor execution of the legislation.
- Intervention of political parties, different informal networks and lobbies jeopardize the independence.
- Phenomenon of "state capture".
- Influence of policies on public procurement and recruitment.
- In practice, low accountability and integrity of public officials, few disciplinary proceedings.
- Complicated procurement of public information about the assets of officials and too frequent silence by authorities.
- Only bigger budget users have internal audit commissions.
- Adaptation of conditions in the tenders and public procurements for certain people and contractors and inefficient control, as the commissions for preparation and selection are one and the same; the system is inappropriate, as it rarely detects corruption.
- The public has no access to the black list of the companies which are forbidden to cooperate with the government.

RECOMMENDATIONS:

- Ensure greater independence of the public sector from political pressures in practice.
- Public officials have to be accountable for their actions.
- Improve the performance of internal and external supervisory institutions.
- Provide access to the black list of companies and ensure transparency of the measures taken and cooperation with these companies.

- Transparency of the system for spending public funds and access to the information.
- Ensure execution of the law on access to public information.
- Establish a coordinated system for protection of those who report corruption, establish channels for uncovering and encouraging.

LAW ENFORCEMENT AGENCIES

Advantages:

- Established legislative framework for the integrity and accountability.
- Transparency of the police work.
- Establishment of the National Bureau of Investigation shows progress in pursuing economic crime.

Weaknesses:

- Inefficiency in pursuing corruption; poor cooperation between the law enforcement agencies and other institutions.
- Insufficient funds and resources for police work.
- Political recruitment for the leading offices influences the work and independence of prosecutors and police.
- The prosecutor's office is less transparent in communication with the public.
- Inappropriate legal framework enables manipulation of legal matters on the part of the prosecutor's office.
- Lack of cooperation of the civil representatives and the informal control and their integration into the control over the work of the law enforcement agencies.

RECOMMENDATIONS:

- Strengthen the cooperation and ensure efficiency in pursuing offences of corruption.
- Adopt a Code of Conduct for the state prosecutors.
- Improve the execution of the legislation in practice.
- Ensure enough work resources and funds.
- Reduce the influence of policies in recruiting.
- Increase the independence of authorities, improve the transparency and mechanisms of integrity.
- Ensure more transparent work of the prosecutor's office in practice and the execution of the law on access to the public information.
- Prevent manipulation of legal matters in the proceedings of the prosecutor's office and police.
- Include civil representatives and other forms of informal supervision into the control proceedings for the work of the law enforcement agencies.

ELECTORAL MANAGEMENT BODY

ADVANTAGES:

- Ensures adequate legality of elections.
- High level of work transparency.
- No complaints over the election results.
- No serious pressure on the work of the voting authorities to be seen.

WEAKNESSES:

- Limited financial and human resources.
- No education and training of the members of different voting commissions.
- Inefficient spending of funds when organizing elections and referendums because of an irrationally large number of polling stations.

- Members of the National Voting Commission can jeopardize independence; risk of replacing members of the national commission for political reasons.

RECOMMENDATIONS:

- State has to provide more stable financial and human resources.
- Ensure education and training for the members of different voting commissions.
- Rationalize spending of funds when organizing elections and referendums by reducing the number of polling stations.
- Ensure a systemic solution to reduce the influence of politics.

OMBUDSMAN

ADVANTAGES:

- Adequate legal frameworks for independence, accountability and transparency.
- Integrity of the ombudsman is on a comparatively high level.
- No obvious political pressures.
- Proactive education of the public and the power holders about the importance of ensuring high standards of ethics and the actions of the latter.
- Comparatively high level of public trust.

WEAKNESSES:

- Vague prerequisites for the election of the ombudsman.
- The ombudsman's public reputation increases directly proportional to his insusceptibility or passivity to the human rights violations of the minorities or specific social groups.
- Inconsistencies in legislation dealing with the principle of confidentiality of the procedure.
- Insufficient public commitment of the present ombudswoman to certain burning issues on disrespect of human rights.
- Responsiveness to the conclusions, critiques and recommendations of the ombudsman is insufficient and/or too slow in some cases.

RECOMMENDATIONS:

- Ensure possibility to introduce analyses of work efficiency.
- Ensure wider actual independence and non-conformity of the institution of ombudsman by eliminating the possibility of re-election.
- Widen activity on the issues of Romani discrimination, the rights of the Izbrisani ("The erased persons"), situation and rights of migrant workers and homosexuals.
- Competent national authorities and other subjects should respond more rapidly to the ombudsman's interventions.
- Study the ombudsman's initiative to create a National Human Rights Institution.
- Study the relevance of a possible adoption of a Code of Conduct.

COURT OF AUDIT

ADVANTAGES:

- In addition to a good legal basis and independence, a highly transparent, independent and accountable performance in practice as well.
- Renown of the institution and high-quality personnel.

WEAKNESSES:

- Insufficient personnel, consequently lack of funds.
- Questionable independence because of the pressures of the legislative branch and political influence.
- Limited jurisdiction in some of the key domains.
- Insufficient education of the employees on integrity.

RECOMMENDATIONS:

- Government has to provide sufficient funds for recruiting new auditors to perform revisions of prevention.
- Ensure legislation and wider jurisdiction according to international recommendations for prevention of Corruption (including financial control over political parties and certain spenders of public money).
- For efficient and comprehensive improvement of financial management of the public sector, we should begin with a systemic approach to performing revisions; the revisions are performed in stages by individual authorities, that is why improvements are partial as well and the possibility for systemic improvement of financial management is being neglected.
- Ensure systemic education of the employees on integrity.

COMMISSION FOR THE PREVENTION OF CORRUPTION

ADVANTAGES:

- Selection of the president and deputies is now designed in a way to reduce the political influence.
- Commission strives for transparency and facilitation of access to public information by introducing the application supervisor.
- High public trust in the commission.
- Good cooperation with other institutions.

WEAKNESSES:

- Insufficient funds and personnel.
- In practice, the system for protection of people who report corruption does not work.
- A specially created supervisory body for regular control of the commission's work does not exist.

RECOMMENDATIONS:

- According to the extended powers, assured by the new law, government should provide more funds and sufficient human resources for the work of the commission.
- The state should provide a systemic and coordinated regulation to heed the legal directives for protection of those who report corruption.

POLITICAL PARTIES

ADVANTAGES:

- Adequate legal basis for creation, management and work of political parties.

WEAKNESSES:

- Funding of political parties and nature of the expenses are not transparent.
- The state has not provided adequate legislation, created a system or an efficient supervision and does not meet the demands and recommendations of the GRECO.
- Method of distribution of funds among the parties favours the parliamentary parties in the political race.
- Independence of the deputies is often jeopardized in practice, as party leaderships control and direct their voting in the National Assembly.
- Relations between the parties and different interest groups are 'clientelistic'.

- Electoral participation is low in all stages, citizens have no trust in political parties.
- Political parties do not inform the public about their financial management on their own initiative.

RECOMMENDATIONS:

- Government has to implement the recommendations of the GRECO, institutions have to increase control over the financial management of the parties (transparency of the sources of funding and the nature of the expenses, the possibility of loans, disclosure of financial management of the party's internal organisational units, limitation of the party's funding by entities related to the party, access to complete annual reports of the parties, etc.)
- The Inspectorate for the internal affairs of the Republic of Slovenia and the Ministry of Finance have to implement the system in practice and impose the legislation for financial penalties for infringements; it is necessary to create an institution or give more powers to the Court of Audit.
- Political parties have to ensure independence of the elected deputies in parliament.
- Representatives of political parties have to ensure their own integrity, as we can observe a gap between public promises for their ethical principles and their actions.

MEDIA

ADVANTAGES:

- Media is an essential factor for preventing and revealing corruption as well as other discrepancies in use of public resources and other state activities.
- Access to information and media pluralism is guaranteed, the constitution also ensures the right to correction and reply.

WEAKNESSES:

- Freedom of the media is threatened by political pressure, influences and ownership of the media; there are also no sanctions for violation or restriction of independent functioning of media.
- The quantity of advertising is rising and with it also the pressure created by companies and lobbyists which affects the journalistic contents that depend on these facts.
- Access to public information is de facto bad.
- Journalists are not adequately qualified for investigative journalism.
- The state does not provide suitable funds for development or preservation of journalistic quality.
- From an economics point of view, the system environment is not inclined to quality and investigative journalism, as the conditions in professionalization and employment of journalists are not regulated.
- Ownership of the media is not transparent.
- Journalists report on editors, economic and political threats and pressures while performing their work and being censured.

RECOMMENDATIONS:

- It is necessary to establish a suitable legislative framework that will protect the plurality, diversity and variety of media contents.
- The state has to withdraw from ownership of all the media.
- Universities, CSO, ministries and media groups must establish a system for education and employment of investigative journalists, the state has to ensure funds for development of journalism.
- The regulator has to strictly supervise the granting of licenses and advertising to ensure quality.
- Media groups and legislation must ensure professionalization of journalism.
- CSO and government have to establish a system to protect journalists against threats and pressures.
- Government and other services have to guarantee more transparent and faster access to public information.

CIVIL SOCIETY

ADVANTAGES:

- Quantity of volunteer work is rising.
- Registration procedure for CSOs is simple.
- Certified system of good management is accessible.
- Trade unions are powerful and partially have a good influence.
- Donations are exempted from taxes, a part of income tax can be assigned to NGOs that act in the public interest.

WEAKNESSES:

- Legislative framework for CSOs' functioning is out-of-date and deficient, tax legislature (illiquidity of CSOs, equal status as companies) is also not well-regulated.
- Unstable financial position, CSOs' dependence on project work and adaptations to notices, funds for financing basic operations are inaccessible and cause dependence on donators (pressures on the contents of their work, originating above all from the state), moderate level of professionalism.
- CSOs are not capable of influencing the work of government and parliament.
- Transparency and prevention of corruption in their own work are ignored, the CSOs are also not very active in the fight against corruption.

RECOMMENDATIONS:

- Government has to update tax and legislative framework for more efficient operation of CSOs.
- Government has to ensure an equal partnership of civil society in sociopolitical decision-making.
- Government has to ensure more opportunities and mechanisms for CSOs that have an important influence on policy-making; among other things it also has to ensure regular public announcements of document drafts so that the CSOs have enough time for comments and they are also included into the policy-making process early on.
- The state has to establish a mechanism of financing the basic operation of important CSOs from independent sources.
- CSOs have to develop ways of scattered funding that increase their independence and ensure a suitable stable structure of their operation.
- CSOs have to increase their activities in the field of influencing anti-corruption policy.
- Religious institutions should be separated from the state and a reasonable regulation for ways of financing their activities should be established.

PRIVATE SECTOR

ADVANTAGES:

- The field of economics is quite diverse.
- Progress in persecution of economic and financial crime and corruption is significant.
- More and more companies are aware of the fact that high integrity and transparency in their operation bring them a better competitive position.
- Application Supervisor was established to control the use of public funds.

WEAKNESSES:

- Political influences can cause 'state capture'; private sector operates according to the changes in the government in power.
- Obvious issues are unsuitable financing, inefficient state bureaucracy, rigid labour market and too high taxes.
- Equity holding of the state in larger companies causes significant influence of the public sector on their operation.
- The non-regulated field of public procurement causes great damage to the state budget.
- Misuse of mutual acquaintances of businessmen, public officials and government officials when doing

business (favours, cronyism, nepotism) harms the health of the field of economics.

- Phenomena of 'revolving doors' and 'rotation' (division chairs) cause irresponsible company management and misuse.
- The quantity of economic crime is rising, persecution is not effective (no judicial sequel).
- State supervision of further payments of previously acquired services is not suitable and insufficient.
- Compulsory settlements and bankruptcy have proved to be ineffective in practice.
- Establishing mechanisms of integrity is not included in companies' main priorities.
- The private sector has poor connections with civil society when dealing with corruption prevention.

RECOMMENDATIONS:

- The state has to ensure improvement of the legislative framework for economic crime persecution, carry out education for investigators, upgrade the system of cooperation (enable connections between investigators of taxation, finances and repressive institutions) and guarantee the independence of courts and judicial sequel.
- The state has to ensure financing, more efficient state bureaucracy, establish a more flexible labour market, relieve taxation and ensure control over the complete chain of service payments in practice.
- The state has to regulate the state's equity holdings in larger companies suitably.
- Government has to regulate the field of public procurements and sanctions of misuse suitably.
- Private sector should connect with civil society when preventing corruption.
- Regulate the field of reversal of the burden of proof.