



**REPUBLIKA E KOSOVËS**  
REPUBLIKA KOSOVA | REPUBLIC OF KOSOVO  
**AGJENCIA PËR PARANDALIMIN E KORRUPSIONIT**  
AGJENCIA ZA SPREÇAVANJE KORUPCIJE  
AGENCY FOR PREVENTION OF CORRUPTION



# CORRUPTION RISK ASSESSMENT METHODOLOGY

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# PURPOSE AND LEGAL BASIS

## **1. Purpose of Methodology**

This Corruption Risk Assessment Methodology (hereinafter the Methodology) seeks to provide a structured and systematic approach to identifying and assessing corruption risks and the probability of their occurrence, as well as their impact, should they occur.

This Methodology constitutes a systematic approach and set of techniques used to identify, analyze and assess the possibility and potential impact of corruption risks within a particular organization, sector or context. It incorporates a structured examination of various factors, deficiencies and indicators that may contribute to corruption practices and legal violations, in order to understand risks and plan preventive measures.

## 2. Legal basis on preparing the Corruption Risk Assessment Methodology

The legal basis for the preparation and adoption of this Methodology is set out in Article 26, paragraph 4 of Law No. 08/L-017 on the Kosovo Agency for Prevention of Corruption<sup>1</sup>. The Methodology shall be adopted by the Director of the Agency for the Prevention of Corruption (hereinafter the Agency) and shall be effective upon its publication.

Article 5, para. 1, item 1.2.5, and Article 26 of the Law No. 08/L-017, awards the Agency for Prevention of Corruption full powers to perform and oversee corruption risks assessment in various fields or sectors.

The risk assessment can be carried out in fields or sectors that are considered particularly exposed to corruption risks and in fields or sectors suggested by public organizations, according to the procedures and criteria established by this Methodology.

## 3. Scope

This Methodology shall be applicable to the exercise of the Agency's function in assessing corruption risks in different fields or sectors prioritized for assessment under this Methodology. The Agency shall be responsible for performing and overseeing the assessment during all stages foreseen by this Methodology. All institutions and stakeholders shall be obliged to cooperate and offer their assistance in the risk assessment process. The above-mentioned Law No. 08/L-017 does not establish any follow-up mechanism that would require the organizations and institutions involved in the CRA to act on the Agency's findings in the CRA process, however, according to the provision of Article 25, para. 7 of this Law, the Agency shall monitor the implementation of integrity plans and shall provide recommendations for amending and supplementing the integrity plans and their implementation in the institution, therefore, the recommendations and results of the CRA process can be included in the integrity plans of the relevant sectoral institutions, as a follow-up mechanism. Also, according to the provision of Article 27 of this Law, the findings on legal gaps in a particular legal framework may be used by the Agency for the assessment of the legislation of that framework against corruption. Furthermore, the results of the CRA process can also be incorporated in the drafting and adoption of the National Anti-Corruption Strategy and Action Plan, with the participation and professional assistance of the Agency provided to the Government in the drafting process.

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<sup>1</sup> <https://gzk.rks-gov.net/ActDetail.aspx?ActID=60591>

## 4. Definitions

For the purposes of this Methodology, the following definitions shall have the following meanings:



**Corruption Risk Assessment** - is a structured process based on official documentation and information, which is used to identify, analyze, assess and prioritize corruption risks within specific sectors that include public sector bodies and entities exercising public authority or delegated public functions, through the review of functions, procedures, decision-making processes and control mechanisms, as well as through the design of proportionate risk prevention, control and mitigation measures<sup>2</sup>.



**Corruption** – includes not only criminal offenses related to corruption and economic issues, but also situations or other forms of behavior and practices that, in a documentable or measurable manner, may create conditions for misuse of public functions, resources or decision-making processes, such as undeclared or unaddressed conflicts of interest, undue influence, favoritism, procedural manipulation, as well as other practices that have not been declared, dealt with or addressed according to the relevant procedures and that violate integrity, transparency, accountability and impartiality.



**Public Organization** - means central and local public institutions and public enterprises.



**Organizations suggesting fields and sectors for CRA** - means public, non-governmental and intergovernmental organizations.

<sup>2</sup> <https://gzk.rks-gov.net/ActDetail.aspx?ActID=60591>



**Risc** - possibility of occurrence of an event with a negative impact on the achievement of the objectives of the public organization in a particular field or sector.



**Risk factor** - any attribute, feature, or exposure of an individual, institution, or process that increases the likelihood of corrupt behavior or other legal violations, which may have negative effects on the objectives and goals of a public organization in a particular field or sector.



**Interest group** - an interest group should be understood as a stakeholder that interacts with the selected institution, is influenced by its decisions or exercises a regulatory, representative or oversight function relevant to the field or sector under assessment. These may include regulated entities, chambers of licensed professionals, service users, civil society organizations, business associations, chambers, trade unions or other relevant actors, depending on the relevant field or sector.



**Field** – means functional activities, processes, public policies or horizontal topics, which can extend to more than one institution or sector. A field is not necessarily limited to a single institution, but to an activity where corruption can occur (i.e., public procurement, public assets management, employment and recruitment in the public sector, etc.).



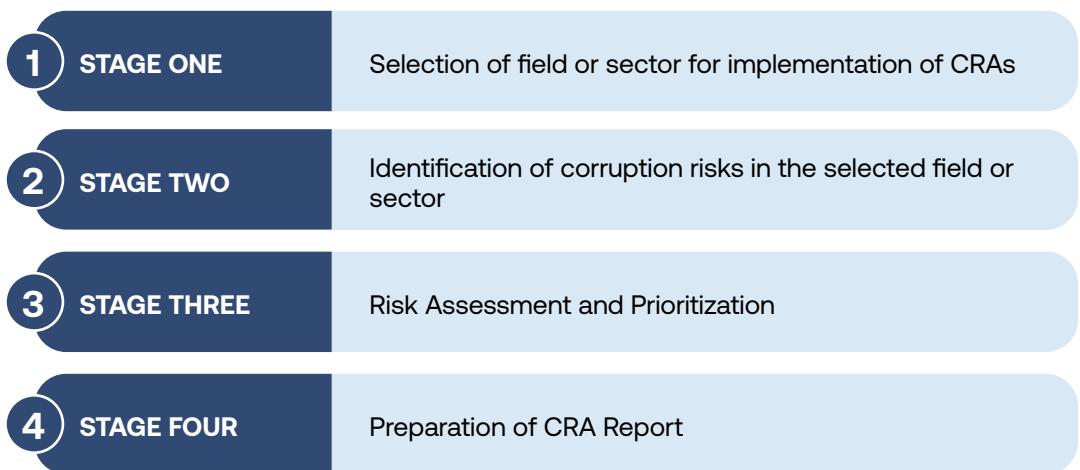
**Sector** – means branches of public administration, the economy or public services, wherein operate particular institutions. A sector is centered around an institutional system or industry (i.e., health sector, education sector, energy sector, etc.).

# CORRUPTION RISK ASSESSMENT PROCEDURE

## 1. Corruption Risk Assessment (CRA)

The Corruption Risk Assessment process shall be performed through a structured approach divided into clear stages. Each stage shall have a specific purpose and shall be related to the subsequent stage, ensuring that the selection of the field or sector, the identification of risks, their assessment and the preparation of the report, are performed in an organized, documented and comparable manner.

The CRA stages are:



## STAGE ONE

### 1.1 Selection of Field or Sector for Implementation of CRAs

At the end of the calendar year or in its performance plan for the following year, the Agency may select one or more fields or sectors that will be subject to Corruption Risk Assessment during that year. The selection shall be made on the basis of a preliminary analysis of the relevant risk factors, in order for the assessment to be focused, reasoned and effective.

For this purpose, the Agency shall analyze factors such as the importance of the field or sector, level of exposure to the risk of corruption, potential impact on the public interest, volume of services or decision-making that affect citizens and businesses, findings from previous reports, information from oversight institutions, as well as the resources and capacities available for carrying out the assessment.

The selection of fields or sectors shall be documented in the annual CRA Work Plan. This plan shall be designed taking into account available resources and the need to ensure that assessments have a practical impact on preventing and reducing corruption risks.

#### 1.1.1 Field or Sector Selection Criteria

Taking into account the diversity, number and functional differences of institutions within the public domain or sector, the Agency will prioritize fields or sectors and public institutions for Corruption Risk Assessment based on a structured set of risk-based selection criteria.

The selection will focus on fields or sectors that fall under one or more of the following criteria:

### **Statistical and Vulnerability Criterion**

This criterion assesses the level of exposure to corruption risks based on available indicators, including but not limited to:

- perception-based data;
- documented cases of corruption;
- audit findings;
- complaints from citizens, businesses or representatives of interest groups;
- data about disciplinary cases;
- NGO and media reports;
- other objective red flags of irregularities.

### **Structural and Regulatory Complexity Criterion**

This criterion evaluates fields or sectors characterized by complex regulatory frameworks, large number of actors, fragmented responsibilities or technically complex processes. Particular attention shall be paid to fields or sectors that involve multiple intermediaries, subcontracting chains or highly specialized decision-making processes, which may increase the risk of non-transparent or non-open practices.

### **Discretionary Powers and High-Impact Decision-Making Criterion**

This criterion assesses the extent to which officials exercise discretion that affects economic rights, obligations, or interests. Special attention shall be paid to fields or sectors that include, but are not limited to:

- issuing licenses, permits, certifications, consents;
- inspections and decisions about compliance;
- subsidy instruments, donations and grants;
- sanctions and enforcement measures;
- allocation of benefits, subsidies or public resources;
- approval or authorization procedures.

### **Interaction with Citizens, Businesses or Service Users Criterion**

This criterion assesses the existence of direct contact and, without limitation:

- frequency of interaction;
- level of dependence of citizens or businesses on the service;
- urgency, sensitivity or essential nature of the service provided, etc.

### **Financial Services Criterion (subsidies and other financial support instruments)**

In applying this criterion, the Agency will take into account the following criteria, without limitation:

- volume and frequency of financial transfers including public procurement contracts, subsidies, grants, donations or other financial instruments;
- level of discretion in determining eligibility or approving payments;
- clarity and transparency of selection criteria;
- existence of verification and control mechanisms;
- risk of political or external influence on the allocation process;
- complexity of the application, evaluation and payment procedures;
- budget expenditures in relation to the budget allocated to all budget lines.

## **1.1.2 Selection of Public Institutions from a Selected Field or Sector**

When selecting institutions from the field or sector subject to Corruption Risk Assessment, the Agency shall apply a representative and risk-oriented approach. Where the sector contains a limited number of institutions, all institutions will be involved. In larger fields or sectors, the Agency shall select a representative sample, prioritizing institutions that:

- manage significant public funds or assets;
- exercise discretionary powers in decision-making (such as issuing licenses, inspections or allocating benefits);
- have frequent or high-impact interactions with citizens or businesses; or
- present other relevant risk indicators based on available data.

The selection shall also ensure representation at different levels of size, geographical coverage and institutional hierarchy within the field or sector.

The Agency shall approve and document the final list of institutions and interest groups that will be included in the CRA, including a brief reasoning of the selection approach used.

### **1.1.3 Communication with and Formal Inclusion of Institutions**

After the preliminary selection of institutions within the selected field or sector, the Agency shall formally communicate with the relevant institutions to inform them about the planned Corruption Risk Assessment and the expected level of cooperation.

The agency shall issue to each institution:

- a notification that they have been identified for inclusion in the CRA;
- a brief explanation on the purpose, scope and timelines of the assessment;
- a description of the expected responsibilities, including participation in working groups, provision of data and appointment of contact persons.

Each institution will be asked to confirm its readiness to cooperate in the CRA process and appoint the responsible officials who will participate in the assessment.

Based on the responses received, the Agency shall examine the level of institutional commitment and, when justified, can adjust the composition of the representation of institutions in the working group. After this step, the Agency shall issue a formal decision on the approval of the final list of institutions and interest groups that will be included in the CRA for the selected field or sector.

The decision shall include:

- list of participating institutions;
- scope of the assessment; and
- basic timeline for implementation

This decision shall serve as a formal basis for the establishment of working groups and the start of the CRA process.

## STAGE TWO

# 1.2 Identification of corruption risks in the selected field or sector

## 1.2.1 Risk Identification Procedures

Corruption risks are identified through the collection and analysis of information and documentation covering the field or sector and enabling the identification of potential corruption risks that may arise within that field or sector:

- analysis of legal resources;
- audit reports;
- analysis of field or sector statistics;
- previous corruption cases;
- interviews and surveys with interest groups.

During this stage, corruption risks within the selected field or sector will be systematically identified, using the above methods and analyzing all the corruption risk factors which are addressed below.

### Corruption Risk Factors

After selecting the field or sector, the Agency will identify the corruption threats (risks) in public institutions of the selected field or sector and the factors that cause these risks. There are several categories of risk factors:

#### Normative Framework (laws and procedures)

This category includes the analysis of the legal and procedural framework that governs the field or sector. The objective is to identify unclear provisions, excessive discretion, procedural gaps or discrepancies between formal rules and actual practice.

The analysis may cover, among other things:

- applicable laws and bylaws;
- specific regulatory acts on the field or sector;
- internal regulations of institutions;
- Standard Operating Procedures (SOPs);
- memoranda of understanding;
- internal instructions;
- checklists and operating instructions.

Special attention can be paid to the following, without limitation:

- fields where decisions are made without clear criteria;
- procedures that do not have timelines or documentation requirements;
- overlapping or contradictory legal provisions;
- process steps that depend on the discretion of a single official;
- discrepancies between formal procedures and actual practice.

Internal rules and operational guidelines often reveal practical weaknesses, informal practices or discretionary spaces that are not apparent at the level of primary legislation.

### **Control Findings (audits and inspections)**

This category includes findings from internal and external oversight mechanisms. These resources provide objective information on weaknesses in financial management, compliance, and internal control.

The analysis may include, among other things:

- external audit reports;
- internal audit findings;
- inspection reports;
- reports of oversight bodies;
- other internal control assessments.

The working group can identify, among other things:

- recurrent or systemic irregularities;
- recommendations that have not been implemented;
- areas where controls are weak or missing;
- processes where non-compliance is frequent.

Audit and inspection findings often highlight concrete vulnerabilities that may not be apparent through legal analysis alone.

## **Operational Data (statistics and performance indicators)**

This category includes statistical and administrative data that reflect how the field or sector functions in practice. This data may reveal anomalies, patterns, or discrepancies that may indicate corruption risks.

The analysis may include, among other things:

- sector or field statistics;
- performance indicators;
- administrative and operational data;
- complaints and information from whistleblowers, including:
  - formal complaints;
  - reporting through hotlines;
  - integrity reports.

The working group may examine, among other things:

- unusual variations in decisions or work outcomes;
- unexplained delays or refusals;
- concentration of decisions in certain units or officials;
- repeated complaints about specific processes or services.

Data from complaints and whistleblowing often serves as an early warning signal of systemic problems or irregularities within the field or sector.

## **Factual Cases or Incidents**

This category includes documented cases or incidents of corruption or other conduct related to violations. The objective is to identify typical corruption schemes, patterns and vulnerabilities that have already materialized.

The analysis may include, among other things:

- corruption-related criminal cases;
- disciplinary procedures;
- administrative sanctions;
- other documented violations within the field or sector.

The working group, without limitation, can:

- identify the type of illegal behavior;
- determine the process or decision where the violation occurred;
- assess the damage or impact caused;
- examine how the case was discovered and addressed.

Previous cases or incidents provide concrete examples of how corruption risks materialize in practice and should be used to identify similar potential risks.

### **Perceptions and Practical Experience (interviews and surveys)**

This category includes qualitative information obtained from parties with practical experience in the field or sector. It helps identify risks that may not be reflected in formal documents or statistics.

Information may also be collected through:

- interviews with institutional staff;
- workshops with working groups;
- surveys with employees, citizens or businesses;
- consultations with relevant interest groups.

The purpose of these consultations is to:

- identify processes that are perceived as vulnerable to corruption;
- understand informal practices or pressures;
- collect examples of problematic situations; and
- validate findings from other sources of information.

### **Use of Collected Information**

Based on the information collected from the above five categories, the Agency and the working group will:

- Identify key processes and decision-making points within the field or sector;
- Discover areas where discretion, financial value or weak controls create opportunities for corruption;
- Formulate concrete corruption risk scenarios related to specific processes or functions;
- Record the identified risks in the sectoral or field risk register.

The identification of risks will be based on both quantitative data and qualitative inputs. When information from different sources points to the same weakness or pattern, the issue will be treated as a higher priority corruption risk.

This structured approach ensures that risk identification is based on multiple sources of evidence and that findings are comparable across fields or sectors.

## 1.2.2 Risk Identification

Based on the collected documents, the following two categories of information are identified in a separate document – the register of corruption during a work process:

- Any type of corruption-related violation that has occurred in a field or sector in the past or that could theoretically occur. Such cases or incidents are grouped according to their content and their identification number in terms of a corruption scheme, along with the damages they have caused and the process of responding to them, are recorded. Specific corruption risks stem precisely from these violations.
- Once the actual and potential corruption-related violations described in the previous paragraph are found to be corruption risks, the causes for each individual risk must be determined. The causes can be related to the legislation as well as weaknesses in its implementation, low level of employee awareness, weakness of oversight mechanisms, etc.

Consequently, the identified corruption risks should be grouped by categories to simplify their management in the future. For example:

- Conflict of Interest;
- Accepting and giving bribes;
- Misuse of office or official authority, etc.

For each risk identified at this stage, its scope must be defined, in other words, who may be associated with specific risks: management of the institution, internal structural units of an institution, or legal entities depending on the institutions.

As an appendix to this Methodology, Annex 1 provides non-exhaustive explanations regarding the identification of risks.

## STAGE THREE

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### 1.3 Risk Assessment and Prioritization

This stage includes assessing the identified corruption risks, identifying existing control mechanisms, prioritizing risks, and creating a risk register based on the information obtained during the previous stages.

#### 1.3.1 Risk Assessment Indicators

Each identified risk will be assessed based on two indicators:

- Probability – likelihood of occurrence of risk event
- Impact (consequence) – degree of negative outcome if the risk event occurs.

To ensure consistent and comparable assessments across fields or sectors, probability and impact levels are interpreted according to the following general guidelines.

#### Probability (chances of occurrence)

- **Very Low Probability:** Risk is almost impossible to occur due to the very strong legal and procedural framework, advanced and fully functional internal controls, continuous and effective oversight, high institutional transparency, as well as the complete absence of complaints, audit findings, irregularities or previous corruption cases.
- **Low Probability:** Risk is unlikely to occur due to clear legal rules, strong internal controls, effective oversight and lack of complaints, audit findings, or previous corruption cases.
- **Moderate Probability:** Risk may occur due to some procedural weaknesses, inconsistent controls, occasional complaints, or previous isolated incidents.
- **High Probability:** Risk is likely to occur due to considerable discretion, weak or lacking controls, repeated complaints, audit findings, or previous corruption cases.

- **Very High Probability:** Risk is most likely to occur due to the high level of discretion, lack or serious weakness of internal controls, ineffective oversight, frequent and repeated complaints, multiple audit findings, and the existence of previous cases or persistent indications of corruption.

### Impact (severity of consequences)

- **Very Low Impact:** Risk would have minimal and almost negligible consequences, causing only very small procedural deviations with no impact on the normal functioning of processes, no financial or completely limited damage, and no impact on the quality of services or public trust.
- **Low Impact:** Risk would result in limited financial damages, minor procedural irregularities, or negligible impact on service delivery or public trust.
- **Moderate Impact:** Risk would result in significant financial loss, disruption of services, unfair treatment of beneficiaries, or reputational damage to the institution.
- **Major Impact:** Risk would result in large financial losses, systemic distortion of decision-making, serious harm to public interest, or significant loss of public trust.
- **Very High Impact:** Risk would result in critical consequences, causing large financial losses, failure of key institutional processes, systemic distortion of decision-making and governance, serious violation of public interest, as well as significant loss of public trust with a long-term impact on the functioning of the institution.

## 1.3.2 Probability and Impact Assessment

The probability of each risk will be assessed based on a structured analysis, among others, in the following areas:

### Legal and regulatory environment

- clarity and consistency of legal provisions;
- level of discretion granted to officials;
- existence of procedural safeguards and timelines.

#### Process design and controls

- number and complexity of decision-making points;
- existence of checklists, automated controls or digital systems;
- Division of tasks and approval levels.

#### Institutional integrity and oversight

- effectiveness of internal controls and supervision;
- level of oversight and accountability mechanisms;
- staff training and awareness on ethics and integrity;
- previous cases or incidents and signals;
- corruption cases;
- disciplinary measure;
- complaints, audit findings, or integrity reports.

When determining each risk's probability level, the working group can take these areas into account in a combined way.

### **Use of Data and Professional Judgment**

In assessing probability and impact, the working group will rely on a combination of available data and professional judgment. Relevant resources may include:

- statistical data;
- audit and inspection findings;
- complaints and whistleblower reports;
- previous corruption cases;
- interviews, workshops and surveys with stakeholders in the field or sector.

Where statistical data are limited or missing, the assessment will be based on qualitative inputs from relevant actors and documented risk factors.

In such cases, the working group may collect inputs from:

- management representatives;
- operational staff involved in key processes;
- internal auditors or control officers, and
- relevant external parties, as the case may be.

## Risk Matrix and Prioritization

Following the determination of probability and impact levels, each risk will be classified using a simple Risk Matrix. The combination of probability and impact will determine the overall risk level and its priority for mitigation measures.

The Risk Matrix (see table below) will be used to ensure consistent prioritization across fields or sectors.



The Risk Matrix (risk assessment table) is based on the combination of two main elements: probability of occurrence and possible impact of risk. Through the multiplication of these two factors, a risk index from 1 to 25 is generated, which is then classified into five (5) main risk categories. These categories guide the institution's response level and the measures to be taken.

**Category One** is very low risk (1–5), presented in green. These are risks with very limited impact and probability which do not pose a potential threat to the functioning of the institution. Their management requires only case monitoring and the implementation of existing standard controls, without the need for additional intervention.

**Category Two** is low risk (6–10), presented in yellow. These are risks with limited impact and probability, which do not pose an immediate threat to the functioning of the institution. Their management requires routine monitoring and implementation of existing standard controls, without the need for additional intervention.

**Category Three** is moderate risk (11–15), presented in orange. These risks require greater attention, as they can affect the performance of processes if not addressed in time. In this case, it is recommended to review existing controls and undertake improvement measures to reduce the probability or impact.

**Category Four** is high risk (16–20), presented in red. These risks have significant potential to affect the institution's objectives and require concrete mitigation measures. Their management should be active, with regular monitoring and clear responsibilities for the implementation of preventive actions.

**Category Five** is critical risk (21–25), presented in purple. This category includes risks with very high probability and/or impact, which may seriously impair the functioning of the institution or the achievement of strategic objectives. These cases require priority intervention and immediate measures, often at the management level, to minimize the consequences and restore control over the situation.

Risk assessment, using this table, is based on professional and objective judgment, taking into account the institutional context and the available information.

## STAGE FOUR

### 1.4 Preparation of the Report

The final stage of the CRA process is the preparation of the Corruption Risk Assessment Report for the selected field or sector. The report will present the results of the entire CRA process and can serve as a key reference document for the implementation and monitoring of anti-corruption measures within the evaluated field or sector.

Each CRA Report will follow a standard structure and include, at a minimum, the following elements:

#### **Overview of the Field or Sector**

A brief description of the field or sector, the public organizations involved in the assessment and the main functions or services analyzed.

#### **Methodology and Process**

A brief explanation of the Methodology applied, stages of CRA, sources of information used and composition of the working group.

#### **Process Analysis**

An overview of the main processes and decision-making points considered during the assessment, with particular attention to areas involving discretion, financial flows or interactions with citizens or businesses.

#### **Corruption Risks Identified**

A structured presentation of the main corruption risks, including: a description of each risk scenario, main causes or risk factors, institutional units or interest groups, etc.

## **Risk Assessment and Prioritization**

Results of probability and impact assessment, including overall risk level and risk prioritization.

## **Mitigation Measures**

A set of concrete measures aimed at reducing the identified risks. Each measure will be:

- directly related to a specific risk and its causes;
- practical and operational;
- proportional to the risk level;
- determining the responsible institution or entity; and
- including an indicative implementation timeline.

The final version of the risk register will be attached to the report as the main annex. The risk register will follow a standard format and will include, at a minimum:

- list of risks identified;
- main causes or risk factors;
- estimated levels of probability and impact;
- overall risk level or priority;
- recommended mitigation measures;
- responsible actors; and
- proposed timelines.

Prior to finalization, the draft CRA Report will be circulated with the participating public organizations for comments. Upon reviewing their comments, the Agency approves the final report and submit it to the public organizations involved and may publish it. The Agency shall also inform the body that oversees the work of those authorities.

The report approved by the Director of the Agency can serve as a reference document for the drafting of the Action Plan for the implementation and monitoring of the recommended measures within the assessed field or sector.

The collection of information for each stage can be performed via electronic means, when possible. In cases where this is not possible, the process is carried out manually, through e-mail communication and other official forms of communication.

# Aneksi 1

## ILLUSTRATIVE EXAMPLE – LICENSING PROCESS

This annex has been prepared for illustration and practical guidance purposes only. The example presented below does not represent a realistic assessment of a particular field, sector or institution and should not be understood as a mandatory or exhaustive model. Its intended purpose is to show, in a simplified manner, how the Methodology can be applied in practice, from information collection, process mapping, identification of risk scenarios, risk factors and up to the preparation of the risk register.

In the practical implementation of CRAs, steps, sources of information, risk scenarios and risk categories should be adapted to the nature of the field or sector being assessed, the mandate of the relevant institutions, the available data and the concrete institutional context. For this reason, the example should only be used as a Methodological orientation and not as a substitute for the factual analysis of each specific case.

### STEP 1 Information Collected (Section 1.2.1)

SOURCE CATEGORY	SOURCE	KEY FINDING
<b>REGULATORY FRAMEWORK</b>	Legal Analysis	Law allows for broad discretion in approving licenses; there are no clear deadlines for decision-making.
	Internal Regulation	There is no standardized checklist for document verification.
	SOPs Review	Different departments apply different procedures for the same type of license.
	Operating Instructions	Some steps are dealt with informally without written evidence.

<b>SOURCE CATEGORY</b>	<b>SOURCE</b>	<b>KEY FINDING</b>
<b>CONTROL FINDINGS</b>	External Audit Report	Repeated delays in processing licenses; lack of justification for refusals.
	Internal Audit	Incomplete application files are accepted and processed.
	Inspection Report	Uneven application of technical criteria between regions.
<b>OPERATIONAL DATA</b>	Sector or field statistics	High percentage of rejected applications without detailed explanation.
	Performance Indicators	Average processing time exceeds the legal standards by 40%.
	Complaint Logs	Numerous complaints about delays and requests for informal payments.
	Integrity Hotline	Two anonymous reports of officials demanding payments.
<b>FACTUAL CASES OR INCIDENTS</b>	Criminal cases	Two bribery cases involving licensing officials.
	Disciplinary measure	An official sanctioned for manipulating files.
	Administrative sanctions	One license revoked due to false documentation received by staff.
<b>PERCEPTIONS AND PRACTICAL EXPERIENCE</b>	Staff interviews	Officials report pressure to expedite certain applications.
	Survey with businesses	Approvals are reportedly faster through intermediaries.
	Stakeholder workshops	Document verification is identified as the most vulnerable stage.

**STEP 2 Mapping Key process and Decision-making Points**

PROCESS STEP	RESPONSIBLE UNIT	KEY DECISION-MAKING POINT	DISCRETION LEVEL
Application submission	Receiving Office	Application acceptance or rejection	Moderate
Document verification	Licensing Unit	Determination of validity and whether it is complete	High
Technical Evaluation	Institutional Commission	Assessment of compliance with criteria	High
Final approval	Department Head	Granting or Refusal of License	High
Granting of License	Administration	Formal granting and registration	Low

**STEP 3 Identifying Corruption Risk Scenarios**

PROCESS STEP	RISK SCENARIO	DESCRIPTION
Acceptance of application	Acceptance of application without complete documentation	In some cases, the application may be accepted even when the documentation is not fully completed, creating space for unequal treatment of applicants.
Document verification	Procrastination in verification process	The verification process can take longer than the usual timelines, due to the administrative burden or lack of standardization of the procedure.
Technical Evaluation	Different interpretation of the criteria	During the technical evaluation, there may be different interpretation of the criteria or technical requirements by the responsible staff.
Final approval	Impact on the decision-making process	The final decision may be influenced by various institutional or administrative factors that are not fully documented in the file.
Granting of License	Differences in processing duration	The timing of license issuance may vary between applicants due to operational prioritizations or other procedural factors.

**STEP 4** Identifying Key Risk Factors

<b>RISK SCENARIO</b>	<b>MAIN RISK FACTORS</b>
Receiving incomplete files	Lack of checklist; poor supervision; high discretion
Delays to solicit bribes	Lack of legal deadlines; dependent on the applicant
Manipulated evaluations	Unclear criteria; lack of peer review
Impacted decisions	Concentration of authority; poor oversight
Preferential issuance	Lack of monitoring of processing time; low transparency

**STEP 5** Risk Register

<b>PROCESS</b>	<b>RISK SCENARIO</b>	<b>RISK FACTORS</b>	<b>ACTORS INVOLVED</b>	<b>RISK CATEGORY</b>
Acceptance of application	Acceptance of incomplete application against payment	Lack of checklist; weak controls	Receiving Office staff	Bribery
Document verification	Delay in requesting payment	Lack of deadlines; high discretion	Licensing officials	Bribery / abuse of office
Technical Evaluation	Approval despite discrepancy	Weak criteria; lack of oversight	Technical Commission	Abuse of office
Final approval	Decision influenced by external actors	Concentrated authority; weak controls	Department Head	Conflict of interest / abuse
Granting of License	Preferential processing	Lack of monitoring; lack of transparency	Administrative staff	Favoritism

**STEP 6** Grouping Risks by Category

<b>RISK CATEGORY</b>	<b>RELATED RISKS</b>
Bribery	Acceptance of incomplete files; delay to solicit payment
Abuse of office	Manipulated evaluations; approvals under influence
Conflict of Interest	Decisions influenced by personal or political ties
Favoritism	Preferential processing of selected applicants





