

Three-Year Plan for Transparency and Prevention of Corruption – 2022-2024 Update

The national legislator put in place a complex mechanism involving several actors and instruments to prevent corruption in Italy. In particular, Law No. 190/2012 introduced a risk-management system based on two-tier plans: the National Anti-Corruption Plan (a.k.a. *PNA*) adopted at national level by ANAC (the National Anti-Corruption Authority), and the Three-Year Plan for Transparency and Prevention of Corruption (a.k.a. *PTPCT*) adopted by each public administration at decentralised level. Both plans have three-year mandates, are updated on an annual basis, and must be coordinated with each other and with the other planning/programming tools adopted by public administrations. The mentioned National Anti-Corruption Plan provides guidance and lays down the directives that regulate the three-year plans for transparency and prevention of corruption.

Following the appointment of the current Compliance Officer¹ (in charge of transparency and anti-corruption tasks)¹, the Three-Year Plan for Transparency and Prevention of Corruption of the Territorial Cohesion Agency (ACT) was fully revised and repatterned through essential risk-prevention and management tools such as the mapping of most risky processes and the risk register. The amendments thus made are commended by ANAC.

The Plan update for 2022-2024 follows up in line with the two plans previously approved, upon conclusion of the previous three-year period, aimed at significantly improving planning and monitoring actions for corruption prevention. Although limited to those areas most exposed to risks, mapping the procedures in force enabled enhancing administrative transparency, also through designation of reference officers. The Transparent Administration section on the ACT institutional website was extensively revised and updated in recent years, also thanks to the information flow established between the heads of offices and the Compliance Officer in charge of transparency and prevention of corruption. Eventually, the monitoring activity performed allowed for thorough focus on documents contents and compliance. As a result of the activities implemented with the methodological support ensured by OIV (the independent assessment body), further attention was paid for enhanced mapping of such risky areas and their related processes.

The monitoring outcomes were subsequently discussed with the ACT Offices, within internal consultation sessions also involving the designated officers and the OIV.

The main domains requiring greater focus and cooperation between all the subjects working within and with the Territorial Cohesion Agency include:

1. Ongoing updating and training of staffs on anti-corruption and transparency issues;
2. Increased controls on staff selection activities (employees, external collaborators, and NUVEC members);
3. Vigilance and stricter controls on compliance with the rules on non-eligibility and incompatibility of appointments or conflicts of interest for all staffs (also with reference to "*pantouflage*" phenomena);

¹ Giulia Amato, civil servant director at the Territorial Cohesion Agency (ACT), was appointed Compliance Officer for Transparency and Prevention of Corruption via DDG No. 216 of 6 Dec. 2018 (Decree issued by the DG of the ACT), and subsequently confirmed via DDG No. 120 of 12 May 2021.

4. Greater collaboration with the Compliance Officer both in the phases of preparation and implementation of the Plan;
5. Strengthening the integration between the Performance Plan and the Three-Year Plan for Transparency and Prevention of Corruption through an assessment system itemising specific guidelines and objectives for transparency and prevention of corruption;
6. Temporal realignment between the Performance Plan and the Three-Year Plan for Transparency and Prevention of Corruption and, more generally, adoption of planning and performance-related documents within the terms established by law.

Both for corruption prevention and transparency purposes, the mandatory actions provided for by the 2022-2024 Plan update draw upon ongoing monitoring of documentations collected within the relevant Offices and performance of *ad-hoc* checks. The latter are coordinated with other control functions, in order to ascertain correct management of those domains exposed to higher corruption risks and compliance with the principles of transparency and information/publicity.

Giulia Amato

Compliance Officer for Transparency and Prevention of Corruption