



Asset and Interest Disclosure (AID) Systems in EU Member and Candidate States

Report with the qAID methodological toolkit



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Asset and Interest Disclosure Systems in EU Member and Candidate States.
Report with the qAID methodological toolkit

Project: qAID - Towards contemporary knowledge and innovative tools for assessing and enhancing effectiveness of Asset and Interest Disclosure (AID) systems in EU Member and Candidate States

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1. Executive Summary

Effective prevention and detection of corruption require robust, transparent, and well-functioning Asset and Interest Declaration (AID) systems. Across the European Union (EU) and Candidate States, these systems are a critical pillar of public sector integrity, yet significant weaknesses persist in their design, verification, and enforcement. The AID Assessment Toolkit developed by the Center for the Study of Democracy addresses this gap by providing a structured, scalable, and practical methodology for evaluating the effectiveness and impact of national AID systems.

The Toolkit combines quantitative and qualitative assessment instruments to capture both formal compliance with legal requirements and the real-world functioning of AID systems. It enables stakeholders to systematically analyze legal frameworks, institutional capacities, verification mechanisms, sanctions, transparency levels, and cooperation practices, both domestically and across borders.

Drawing on extensive desk research, good practices identified by international organizations such as the OECD, the Council of Europe, the World Bank and the Regional Anti-Corruption Initiative (RAI), the Toolkit has been rigorously tested and refined.

The Toolkit is intended for use by public institutions, oversight bodies, anti-corruption agencies, civil society, and policy researchers. By supporting evidence-based assessments and cross-country comparisons, it facilitates peer learning, identification of good practices, and targeted reforms to strengthen AID systems.

Ultimately, the Toolkit contributes to improving the integrity, accountability, and transparency of public administration across EU Member States and Candidate States. It supports the broader anti-corruption agenda by enhancing the detection of illicit enrichment, conflicts of interest, and hidden assets, increasing deterrence, promoting public trust, and fostering greater inter-agency and international cooperation.

2. Introduction

2.1. Background and Rationale for Assessing AID Systems

Asset and Interest Disclosure (AID) systems are widely recognized as **vital tools in the fight against corruption**.¹ Their primary objective is to promote transparency and integrity by requiring public officials – especially those in senior or politically exposed positions (PEPs) – to declare their income, assets, liabilities, and interests. Despite these goals, in practice, AID systems often **suffer from superficial implementation, with limited verification and enforcement**.² As a result, declarations are frequently inaccurate, incomplete, or intentionally misleading.

Illicit enrichment among PEPs continues to be widespread and under-detected. A key reason is that corrupt officials often conceal wealth using proxies – such as family members – or through offshore accounts and foreign-held assets.³ Traditional declaration checks do not always detect these sophisticated evasion strategies. This lack of effectiveness weakens public trust, contributes to a sense of impunity, and reduces the deterrent power of AID systems.

However, when properly designed and implemented, AID systems can have a strong preventive effect – by increasing the perceived likelihood of detection, and a deterrent effect – by raising the expected costs of hiding illicit wealth.⁴ In addition, **detailed checks, including lifestyle audits and automated risk-based analysis**, can directly lead to the detection and sanctioning of unlawful enrichment, conflict of interest, and abuse of office.

Several countries already demonstrate effective practices in these areas, which can serve as both examples and inspiration for other countries in the region and beyond.

Box 1: Ukraine's e-declaration system and risk analysis

The National Agency for Corruption Prevention (NACP) in Ukraine has developed a robust and systematic approach to collecting and analysing e-declarations. Under Orders No. 553/21 and 381/20, the NACP is empowered to monitor timely submission, check the completeness and correctness of declarations, perform logical and arithmetic control (LAC), and conduct full verification where necessary since 1 January 2020. Declarations undergo automated internal and external checks based on 137 indicators, with each discrepancy assigned a weighted coefficient to generate a risk score. The platform's integration layer uses standardized XML and JSON formats, which allow declarations to be cross-checked in real time or through scheduled verification cycles. This design also supports interoperability with customs and financial intelligence data, helping identify potential illicit

¹ Council of Europe, [Practitioner Manual on Processing and Analysing Income and Asset Declarations of Public Officials](#), 2014.

² Regional Anti-Corruption Initiative (RAI), [International Treaty on Exchange of Data for the Verification of Asset Declarations](#), RAI Secretariat, 2021.

³ World Bank, [Automated Risk Analysis of Asset and Interest Declarations of Public Officials: A Technical Guide](#), 2021.

⁴ Council of Europe, [Practitioner Manual on Processing and Analysing Income and Asset Declarations of Public Officials](#), 2014.

enrichment, false valuation of assets, and hidden beneficial ownership.^{5,6} The software enables automated verification of large data volumes – up to 100,000 electronic declarations in approximately fifteen minutes.⁷ The basic discrepancies checked refer to risks detectable within the declaration itself (value, quantities, internal consistency, etc.), while an additional list is utilised to detect discrepancies by comparing the declaration to external registers (property registers, vehicle registries, tax, customs, etc.). High-risk declarations are prioritized for full verification, examining valuation, potential conflicts of interest, sources of income, and possible unjustified enrichment, while lower-risk cases can be cleared through automated checks. The system employs clear thresholds for real estate, land, vehicles, corporate rights, monetary assets, expenditures, valuable movable property, luxury items, and other patterns, ensuring a structured and data-driven assessment. This combination of legal authority, technical methodology, automated risk scoring, and targeted verification demonstrates a comprehensive framework that other countries can draw inspiration from to enhance the efficiency, transparency, and effectiveness of their own AID systems. Some of the redflags and corresponding thresholds NACP uses are:

- Real estate total value (excluding leased and other rights of use): UAH 100 million (EUR 2.08 million);
- Total area of land plots: 200,000 square meters;
- Total area of declarant’s real estate (excluding land plots) and unfinished construction objects: 10,000 square meters;
- Total value of vehicles: UAH 10 million (EUR 207,520);
- Corporate rights (ownership in companies): UAH 10 million (EUR 207,520);
- Total monetary assets: UAH 50 million (EUR 1,037,600);
- Total amount of expenditures: UAH 5 million (EUR 103,760);
- Valuable movable property (more expensive than UAH 202,700 or EUR 4,206) acquired during public service: 5 items;
- Possession of certain luxury items: 2 or more watches, 2 or more pieces of jewellery, 2 or more weapons;
- Foreign currency in banks accounts with no funds in hryvnia (UAH) accounts;
- Acquisition of a vehicle of 2015 year of manufacture (or higher);
- Real estate worth less than UAH 399,000 (EUR 8,280) or not specified.⁸

Full lists of indicators are available at European Union Anti-Corruption Initiative’s Final Report 2024.⁹

France has also developed a structured and multi-layered system for monitoring the asset and interest declarations of public officials, led by the independent High Authority for Transparency in Public Life (HATVP). Further details of the approach used is presented in the box below.

Box 2: France’s risk-based monitoring of public officials’ declarations

In France, the process begins with formal verification to ensure that submissions are complete and that declarants fall within the legal scope, followed by a substantive examination that assesses the

⁵European Union Anti-Corruption Initiative (EUACI), [Final Report: Business Process of Verifying E-Asset Declarations at NACP Ukraine](#). Kyiv: EUACI, 2024.

⁶ Organisation for Economic Cooperation and Development (OECD), [Fifth Round of Anti-Corruption Monitoring of Ukraine: Follow-Up Report](#), 2024.

⁷ United Nations Development Programme (UNDP), [UNDP transfers software for automatic verification of e-declarations to the National Agency on Corruption Prevention \(NACP\)](#), 2018.

⁸ TI-Ukraine, [Logical and Arithmetic Control of Declarations: How NACP Will Go about It](#), 2020.

⁹European Union Anti-Corruption Initiative (EUACI), [Final Report: Business Process of Verifying E-Asset Declarations at NACP Ukraine](#). Kyiv: EUACI, 2024.

coherence, plausibility, and completeness of declared assets and interests. This risk-based approach prioritizes declarations for closer scrutiny based on factors such as the sensitivity of the position, timing, unusual changes in wealth, or external alerts. HATVP's monitoring is supported by inter-institutional cooperation with tax authorities, anti-money-laundering service (TRACFIN), prosecution offices, and the French Anti-Corruption Agency (AFA), as well as by sophisticated internal data systems that consolidate official registries (e.g. real-estate values, cadastral information, and bank accounts), open-source records, and media monitoring. The process includes a contradictory procedure, ensuring officials can provide explanations or corrections, which reinforces procedural fairness while promoting transparency and compliance.

The system also serves as a preventive and corrective mechanism for conflicts of interest. Through detailed declarations of professional activities, financial holdings, and related-party interests, HATVP identifies relationships or activities that could compromise impartiality. Legal authority under the 2013 Law on Transparency allows HATVP to recommend preventive measures, such as recusal or divestment, and to issue formal injunctions when necessary. Non-compliance with these injunctions can lead to criminal sanctions, including a fine of EUR 15,000 and imprisonment, demonstrating France's integration of preventive oversight with enforceable corrective actions to strengthen integrity, accountability, and public trust in government.^{10,11}

2.2. Policy and Institutional Context

Across EU Member States (MSs) and Candidate States (CSs), AID systems vary significantly in terms of legal frameworks, responsible institutions, and verification practices. In some countries, dedicated oversight bodies exist with strong verification powers.¹² In others, disclosure checks are managed internally by public sector institutions with limited resources or independence, often undermining their effectiveness.

The level of **public access to declarations** also differs. Some systems are fully transparent, allowing civil society and journalists to conduct independent oversight, while others restrict access or redact sensitive fields, reducing public accountability. **Verification methods** range from manual random sampling to advanced, automated risk-based systems that cross-check declarations against tax records, property registries, and financial databases.¹³ The Council of Europe (GRECO) and the European Commission have repeatedly highlighted the need for stronger enforcement, enhanced verification mechanisms, and greater transparency in many Member States and Candidate States.³

Even where declarations are submitted regularly, follow-up is often insufficient. Sanctions for non-compliance or false declarations are rarely applied, and verification processes are often superficial. This significantly undermines the deterrent effect of AID systems and weakens public trust. Moreover,

¹⁰ High Authority for Transparency in Public Life (HATVP), [What is the monitoring process?](#), 2025.

¹¹ High Authority for Transparency in Public Life (HATVP), [Preventing conflict of interest](#), 2025.

¹² Regional Anti-Corruption Initiative (RAI), *International Treaty on Exchange of Data for the Verification of Asset Declarations*, RAI Secretariat, 2021.

¹³ World Bank, [Automated Risk Analysis of Asset and Interest Declarations of Public Officials: A Technical Guide](#), 2021.

cross-border coordination remains limited, which hampers the detection of undeclared assets held abroad – an increasingly common method for concealing illicit wealth.¹⁴

2.3. Objectives of the Methodological Toolkit

This Toolkit offers a tailored yet scalable methodology for **assessing the effectiveness and impact of AID systems**. Its main objectives are to:

- **Provide a structured and practical approach for assessing the performance of national AID systems.** The methodology combines quantitative and qualitative assessment tools to capture both formal compliance and real-world effectiveness. It enables users to evaluate legal frameworks, institutional capacity, verification processes, sanctioning mechanisms, and transparency standards.
- **Support the identification and dissemination of good practices.** By systematically analyzing the design and operation of AID systems, the Toolkit facilitates the identification of effective approaches, legal provisions, institutional arrangements, and technological tools that have demonstrated success in preventing and detecting illicit enrichment and conflicts of interest. These good practices can then be shared across countries, contributing to peer learning and policy improvement.
- **Enhance the effectiveness and efficiency of anti-corruption agencies and oversight bodies.** The Toolkit is intended to help anti-corruption institutions identify gaps, prioritize reforms, and optimize the use of limited resources. By providing a clear methodology for evaluating risk factors, verification strategies, and enforcement outcomes, it contributes to building more resilient, credible, and efficient oversight mechanisms.
- **Enable meaningful comparison across countries and facilitate regional cooperation.** While tailored to the legal and institutional context of each participating country, the Toolkit applies a harmonized set of indicators and assessment criteria. This comparability allows for cross-country analysis, supports evidence-based policy discussions at the EU and regional level, and informs initiatives to strengthen cross-border cooperation, particularly in detecting concealed assets and beneficial ownership structures.
- **Contribute to strengthening the overall integrity framework across EU Member States and Candidate States.** AID systems do not operate in isolation. They are a critical component of broader public sector integrity strategies. By providing a tested and adaptable methodology for evaluating and improving AID systems, the Toolkit contributes to raising integrity standards, promoting accountability, and building public trust in institutions across the region.

¹⁴ Regional Anti-Corruption Initiative (RAI), *International Treaty on Exchange of Data for the Verification of Asset Declarations*, RAI Secretariat, 2021.

3. Conceptual Framework

3.1. Definition of Impact in the Context of AID Systems

AID systems play an essential role in strengthening transparency, integrity, and accountability in public institutions. Their impact is multidimensional, encompassing preventive, detection, sanctioning, and cooperative functions.

At the **preventive** level, requiring public officials to declare income, assets, liabilities, and interests reduces the risk of illicit enrichment and undeclared conflicts of interest. This preventive impact is enhanced when declarations are subject to rigorous verification and sanctions are imposed for non-compliance.

Detection is another critical function of AID systems. Through systematic cross-checking of declarations with tax, property, and company registries, authorities can uncover discrepancies, hidden wealth, or suspicious transactions. Several countries have integrated automated risk-based screening and data analytics to improve detection rates.¹⁵ Civil society and investigative media also contribute to detection by scrutinizing publicly available declarations.

Sanctioning reinforces the credibility of AID systems. Administrative penalties and disciplinary measures for false declarations strengthen deterrence.¹⁶ Romania's National Integrity Agency (ANI) provides a practical example of how an independent body can effectively verify declarations and apply sanctions. In addition, the use of comprehensive risk indicators, as recommended in recent studies on politically exposed companies¹⁷ and asset declarations, significantly enhances the capacity to detect hidden wealth and conflicts of interest.¹⁸

Cross-border cooperation is increasingly important. The *International Treaty on Exchange of Data for the Verification of Asset Declarations*, coordinated by the Regional Anti-Corruption Initiative (RAI), facilitates information exchange among countries.¹⁹ This treaty enhances the ability of authorities to trace concealed wealth held abroad and underscores the transnational dimension of AID system effectiveness.

¹⁵ World Bank, [Automated Risk Analysis of Asset and Interest Declarations of Public Officials: A Technical Guide](#), 2021.

¹⁶ Regional Anti-Corruption Initiative (RAI), *International Treaty on Exchange of Data for the Verification of Asset Declarations*, RAI Secretariat, 2021.

¹⁷ “Politically exposed company” is a private company or state-owned enterprise (SOE), whose decisions could be influenced by politically exposed persons (PEPs). For the purposes of the current toolkit, the main indicator used to define politically exposed companies is the participation of a PEP or their immediate relatives in the company or state-owned enterprise.

¹⁸ Mineva, D. et al. [Rolling Back State Capture in Southeast Europe Implementing Effective Instruments for Asset Declaration and Politically Exposed Companies](#). Center for the Study of Democracy, 2023.

¹⁹ Regional Anti-Corruption Initiative (RAI), *International Treaty on Exchange of Data for the Verification of Asset Declarations*, RAI Secretariat, 2021.

3.2. Theory of Change: How AID Contributes to Anti-Corruption Goals

Effective AID systems are grounded in a theory of change that links legal clarity, institutional capability, and enforcement to measurable reductions in corruption and illicit enrichment among public officials. This theory adopts a phased, evidence-based approach, emphasizing that systemic change depends not only on legislative frameworks but also on the operational integration of AID tools within a broader ecosystem of governance and accountability.

At the core lies the creation of a **robust legal framework** that defines the scope and substance of declaration obligations. This includes identifying which categories of officials are covered, what types of assets and interests must be declared, and the timing and frequency of submissions. International best practices also recommend that declarations be made publicly accessible in a controlled manner, balancing transparency with data protection and privacy obligations.

However, law alone does not ensure impact. **Building institutional capacity** is the second strategic pillar. This involves empowering oversight bodies to verify declarations and pursue non-compliance effectively. These bodies require skilled personnel, secure digital systems, and seamless access to third-party data sources such as tax files, property registries, company ownership records, and financial intelligence. Countries that adopt automated verification and risk-based screening tools typically achieve more efficient use of resources and better prevention outcomes.

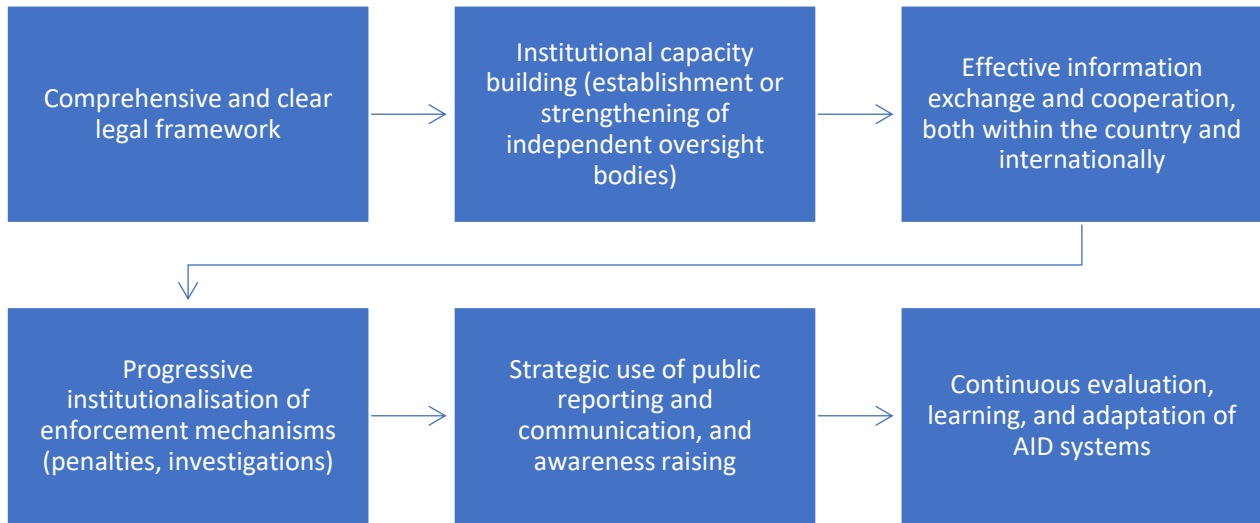
The third component focuses on **inter-agency coordination and international cooperation**. AID systems are significantly more effective when aligned with complementary institutions such as tax authorities, anti-corruption agencies, public procurement bodies, and financial intelligence units. Cross-border data exchange is particularly important in identifying concealed offshore assets or illicit enrichment patterns that span jurisdictions.

Enforcement mechanisms represent the fourth strategic layer. These must include a range of proportionate sanctions – from administrative penalties for delayed or incomplete filings to criminal investigations for intentional misreporting or concealment of wealth. To maintain public trust, sanctions must be applied consistently, transparently, and without political interference.

Public reporting is the final operational driver within this theory of change. Regular publication of enforcement actions, trends, and systemic findings fosters deterrence and encourages compliance. It also empowers civil society and the media to hold institutions accountable and push for reform.

Sustainable impact requires continuous learning. Legal and institutional frameworks must be **updated in response to emerging risks** such as cryptocurrencies, beneficial ownership networks, and evolving concealment techniques. Incorporating research findings and feedback loops ensures AID systems remain adaptive and credible. When implemented iteratively, AID systems evolve from check-the-box exercises into dynamic governance tools that promote accountability, prevent corruption, and strengthen the rule of law. The figure below provides a visual summary of the theory of change.

Figure 1. Key steps towards effective AID systems



Source: qAID 2025.

To operationalize these strategic pillars, the following logic model breaks down the Toolkit's causal pathways into actionable components.

Table 1. Implementation logic and evaluation framework

Category	Description	Key Elements
1. Inputs and Foundations	Foundational elements required to initiate the process.	<ul style="list-style-type: none"> • Legal Frameworks – National laws on AID and conflict of interest • Institutional Structures – Oversight bodies, FIUs, AROs, judiciary • Toolkit Instruments – Surveys, interview guides, indicator framework • International Standards – OECD, GRECO, RAI, World Bank guidance • Ethical Protocols – Consent, anonymization, data protection
2. Activities and Mechanisms	Core actions enabled by the Toolkit.	<ul style="list-style-type: none"> • Legal-Institutional Mapping – Scope, mandates, enforcement powers • Quantitative Surveys – Compliance behavior, usability, deterrence • Qualitative Interviews – Verification workflows, bottlenecks, incentives • Secondary Research – Legal harmonization, expert consultation • Cross-Checks & Risk Indicators – Automated screening, registry access • Stakeholder Engagement – Public officials, civil society, media

3. Outputs	Immediate results from implementation.	<ul style="list-style-type: none"> • Assessment Reports – Country-specific findings and recommendations • Indicator Scores – Implementation and impact metrics • Good Practice Identification – Successful models and tools • Policy Dialogue – Reform priorities and peer learning • Instrument Refinement – Improved tools based on pilot feedback
4. Intermediate Outcomes	Behavioral and institutional changes resulting from Toolkit use.	<ul style="list-style-type: none"> • Improved Verification – More systematic and automated checks • Consistent Sanctioning – Enforcement of penalties for non-compliance • Enhanced Data Use – Integration of tax, property, and ownership records • Greater Transparency – Public access to declarations and enforcement actions • Inter-agency Cooperation – Domestic and cross-border coordination
5. Long-Term Impact	Broader systemic changes supported by the Toolkit.	<ul style="list-style-type: none"> • Reduced Illicit Enrichment – Early detection and deterrence • Strengthened Integrity – Ethical conduct and accountability in public service • Increased Public Trust – Confidence in institutions and rule of law • Regional Cooperation – Asset tracking and recovery across borders • Adaptive Governance – Continuous learning and system evolution

3.3. The Expected Impact

The expected impacts of well-functioning AID systems include:

- **Enhanced detection of undeclared wealth, conflicts of interest, and illicit enrichment.** AID systems equipped with systematic verification mechanisms – such as automated cross-checks, risk-based screening tools, and access to external databases – significantly increase the likelihood of detecting false, incomplete, or misleading declarations. By comparing declared information with tax records, land registries, bank account data, and corporate ownership databases, oversight bodies can identify inconsistencies, hidden assets, or complex schemes used to disguise illicit enrichment or conflicts of interest. The integration of advanced risk indicators for politically exposed companies, as recommended in recent research, further enhances detection capacity by providing clear red flags for investigators and oversight bodies.²⁰ This combination of technology, risk-based methodologies, and targeted indicators

²⁰ Mineva, D. et al. [Rolling Back State Capture in Southeast Europe Implementing Effective Instruments for Asset Declaration and Politically Exposed Companies](#). Center for the Study of Democracy, 2023.

enables early intervention, facilitates the identification of complex concealment schemes, and increases the overall effectiveness of detection efforts.

- **Increased deterrence, as officials perceive a higher risk of detection and sanctioning.** The mere existence of a robust and actively enforced AID system creates a powerful deterrent effect.²¹ When public officials are aware that their declarations will be scrutinized, cross-checked, and verified – both domestically and, where applicable, internationally – they are less likely to engage in corrupt behaviour, conceal assets, or abuse their positions. This deterrence effect is amplified when authorities demonstrate a consistent track record of detecting irregularities and applying sanctions, including administrative fines, disciplinary action, or criminal prosecution in cases of illicit enrichment.²¹ Moreover, publicized enforcement actions, media coverage of investigations, and high-profile prosecutions reinforce the message that misconduct carries real consequences, thereby fostering a culture of accountability and integrity in public administration.
- **Improved public trust in institutions through transparency and visible enforcement.** Public access to declaration data, combined with transparent enforcement practices, builds confidence in the fairness and accountability of public institutions. When citizens, civil society organizations, and investigative journalists can access and scrutinize declarations, and when oversight bodies visibly act on detected violations, public perceptions of impunity are reduced. Over time, this contributes to restoring trust in political institutions, public administration, and the rule of law. Transparency also empowers the media and watchdog groups to investigate potential conflicts of interest or illicit enrichment, thereby strengthening external accountability and enhancing public confidence in state institutions.
- **Strengthened integrity standards across the public sector.** AID systems, when embedded within broader integrity frameworks, promote a culture of accountability, ethical conduct, and conflict of interest prevention. Regular declarations, combined with clear rules, verification processes, and the application of sanctions, signal that integrity is a core expectation for public officials. Over time, well-functioning AID systems contribute to professionalizing public administration, reducing tolerance for corruption, and embedding ethical standards across government structures. This includes fostering ethical leadership, improving merit-based recruitment, and ensuring that individuals in positions of public trust are held to the highest standards of conduct.
- **Greater inter-agency and international cooperation, facilitating asset tracking and recovery, particularly across borders.** The effectiveness of AID systems is significantly enhanced when supported by structured cooperation between domestic oversight bodies, tax authorities, financial intelligence units, and law enforcement agencies. Integrated databases, information-sharing protocols, and joint investigations increase the system's efficiency and detection capacity. Furthermore, international cooperation mechanisms – such as the *International Treaty on Exchange of Data for the Verification of Asset Declarations* promoted by RAI – enable authorities to trace assets, beneficial ownership, and conflicts of interest that extend beyond national borders.²² This cross-border cooperation is particularly critical in detecting hidden

²¹ World Bank, [Asset and interest declarations: A technical guide for implementation](#), 2021.

²² Regional Anti-Corruption Initiative (RAI), *International Treaty on Exchange of Data for the Verification of Asset Declarations*, RAI Secretariat, 2021.

wealth held abroad, dismantling transnational corruption schemes, and facilitating the recovery of illicitly acquired assets, thereby reinforcing global efforts to combat corruption and promote financial integrity.

4. Methodology Design

4.1. Methodological Approach

The conceptual framework outlined in Chapter 3 establishes the underlying logic of how Asset and Interest Declaration (AID) systems generate impact - through preventive, detection, sanctioning, and cooperative functions - and identifies the expected outcomes. Building on this foundation, the methodology presented here translates these theoretical premises into a structured and operational approach.

The theory of change, stakeholder mapping, and expected impacts defined above provide the reference points against which the methodology is designed. The surveys, interviews, and secondary research instruments are directly aligned with the identified impact pathways: they measure compliance and deterrence, capture implementation bottlenecks, and assess the effectiveness of verification and enforcement mechanisms. Likewise, the selection of stakeholder groups for data collection reflects the interdependent roles described in the conceptual framework, ensuring that evidence is drawn from all relevant institutional and societal actors.

In this way, the methodological design operationalises the conceptual framework by moving from normative expectations to measurable indicators and practical assessment tools. The linkage ensures that the Toolkit is not only theoretically grounded but also empirically robust, capable of generating findings that speak directly to the anticipated impacts and reform needs of AID systems.

This Toolkit adopts a pragmatic mixed-methods design combining:

- (a) **structured surveys** to generate comparable quantitative evidence on how Asset and Interest Declaration (AID) systems function in practice,
- (b) **semi-structured interviews** to surface implementation realities, incentives, and bottlenecks that are not visible in administrative statistics, and
- (c) **systematic secondary research** with expert consultation to situate findings in the national legal-institutional context and preserve cross-country comparability.

The approach is modular and scalable: it supports a one-off baseline in a single country or repeated applications across jurisdictions to track reform progress and enable peer learning. Surveys provide breadth and comparability; interviews add depth and explanatory power; desk research and expert input ensure legal/institutional accuracy and fill known data gaps. Implementation findings (e.g., verification coverage, sanctions applied) are explicitly linked to impact questions (e.g., deterrence, disclosure integrity, public engagement), connecting processes to outcomes in line with the Toolkit's implementation and impact indicators.

Quantitative component

Structured surveys

Two survey instruments are used: (i) a questionnaire for public officials and administrative users of AID systems, focusing on compliance behaviour, perceived incentives/deterrents, usability, and verification practices; and (ii) a questionnaire for civil society actors and investigative media on access, use, and perceived impact of AID information. Both combine closed items (dichotomous, multiple choice) and Likert-type scales for statistical analysis and cross-country comparison, complemented by a small number of open questions for context.

Sampling deliberately targets stakeholder groups that are structurally relevant to AID functioning—oversight bodies, FIUs/AROs and law enforcement, the judiciary, public officials across branches/levels, civil society and media, and high-risk domains (e.g., procurement, health). A minimum analytic sample per country should include: (a) oversight/integrity bodies; (b) at least one justice-sector node (FIU/ARO/prosecution/courts); (c) a spread of public institutions responsible for filing and internal checks; and (d) active watchdogs/journalists engaging with declarations.

Surveys are preferably administered online to maximise coverage and standardisation, with targeted follow-ups to improve completion among priority institutions. Where appropriate, mixed administration (online plus assisted paper/phone) may be used for hard-to-reach respondents. Instruments are translated and legally harmonised to national terminology before launch. Pilots verify comprehension of technical terms (e.g., beneficial ownership, conflict-of-interest remediation).

Core survey items are mapped to the indicator framework so each question feeds a specific metric: submission compliance and sanctions; content-verification coverage and automation; conflict-of-interest checks and follow-up; illicit-enrichment triggers and referrals; information-access performance; and impact metrics on filing behaviour, disclosure integrity, and public engagement (**Annex 1**). Where administrative statistics are unavailable, survey responses serve as clearly flagged perception- or self-reported proxies.

Qualitative component

Semi-structured interviews

Interviews elicit operational detail on workflows (e-submission, risk-scoring, cross-checks), data-sharing protocols, resourcing, institutional independence, and practical barriers (e.g., registry access, legal admissibility thresholds). They are essential for interpreting quantitative signals and stress-testing the plausibility of implementation and impact claims. The assessment uses purposive selection across oversight bodies, FIUs/AROs, prosecution/judiciary, public bodies, and investigative journalists/CSOs, with systematic documentation and a standard summary template.

Each country assessment should **target 5–10 interviews** to ensure institutional and functional diversity (central/local, policy/operations, with attention to gender balance where feasible). Interview guides (**Annex 2**) provide structure but remain flexible to probe country-specific features (e.g., recent reforms, court rulings). Consent, anonymisation, and secure storage are mandatory.

Secondary research and expert consultation

Each assessment begins with a structured legal and institutional mapping: legal bases for AID and conflict-of-interest regimes; scope of coverage; submission cycles; verification mandates and powers; sanctioning toolkit; transparency/access rules; inter-agency data-sharing; and cooperation mechanisms (domestic and cross-border). Sources include statutory texts, prior assessments, oversight annual reports, and publicly available administrative datasets. This anchors interpretation of indicators and survey/interview evidence within the national integrity framework.

To ensure accuracy and feasibility, drafts of the mapping, survey adaptations, and preliminary findings are circulated to national experts (oversight bodies, legal scholars, investigative journalists) for factual verification and contextual nuance. This iterative validation and verification – via workshops and bilateral briefings – enhances credibility and institutional uptake.

Indicator framework and operationalisation

Building on the foundational legal and institutional mapping, as well as insights from expert validation, the assessment transitions from context-setting to measurement. The next step operationalises this understanding through a structured set of indicators designed to evaluate both implementation practices and system impact. These indicators are directly informed by the institutional realities and constraints identified during the mapping phase, ensuring relevance, accuracy, and applicability across diverse country contexts.

- **Implementation indicators** cover submission compliance, sanctioning practice, verification coverage and automation, conflict-of-interest checks and remediation follow-up, illicit-enrichment triggers/referrals, and information-access performance.
- **Impact indicators** track filing timeliness/failures, incomplete filings, sanction incidence, suspicious-finding rates, compliance with conflict-of-interest remediation, and public engagement (information requests, portal traffic, external signals). System-generated statistics are the primary source; where gaps exist, survey and interview data fill them with transparent caveats.

Piloting across countries shows that many AID administrators, police, and prosecution services do not consistently track investigations triggered by declarations, constraining impact measurement. Accordingly, the assessment treats data-collection gaps as findings in their own right and proposes a minimal administrative dataset (e.g., annual counts of verification actions, referrals by legal basis, and outcomes).

Cross-country analysis is conditioned by system maturity and stability, legal access rules, declarant scope, and the degree of centralisation of collection/verification. These comparability moderators are recorded up front and used when interpreting differences between countries and over time.

Fieldwork and analytic plan

To minimise burden and align with institutional capacity, the assessment proceeds through: (1) legal-institutional mapping and expert scoping; (2) instrument adaptation and piloting; (3) surveys and interviews; (4) administrative data requests and reconciliation; (5) triangulated analysis; (6) validation; and (7) reporting and reform road-mapping.

Interview evidence explains outliers (e.g., a spike in suspicious-finding rates due to a one-off audit) and clarifies mechanisms (e.g., lack of tax-data access undermining verification). Each quantitative

indicator in the results chapter is accompanied by a brief qualitative interpretation box drawing on triangulated sources.

Where oversight bodies maintain operational statistics, these are the primary inputs for the corresponding indicators; where gaps persist, the assessment documents them and, where appropriate, uses survey/interview proxies. System-generated statistics and perception-based evidence are clearly delineated in the analysis and visualisation.

To validate results, preliminary findings are presented in a structured stakeholder workshop and bilateral meetings for factual correction and feasibility screening of recommendations, ensuring practicality and uptake.

Ethics and data protection

All activities comply with GDPR and applicable national law. Participation is voluntary and based on informed consent. Interview reporting is carefully anonymised. Conflicts of interest are declared by all team members, and independent peer review is sought for sensitive findings.

4.2. Target Stakeholder Groups

The identification and engagement of key stakeholder groups are essential to the design and successful implementation of the methodology for evaluating Asset and Interest Disclosure (AID) systems. These stakeholders represent a diverse set of institutional and societal actors, each with specific roles, responsibilities, and expertise that directly influence the effectiveness, credibility, and sustainability of AID systems.

Their inclusion in the methodological process ensures that the tools and indicators developed are grounded in practical realities, responsive to legal and administrative contexts, and reflective of the multiplicity of perspectives necessary for a comprehensive and reliable assessment. Moreover, the meaningful participation of these stakeholders contributes to the legitimacy, relevance, and potential institutional uptake of the methodology across both EU Member States and Candidate States.

Public Officials, including civil servants, elected representatives, and politically exposed persons (PEPs), are at the core of AID systems as the primary subjects of disclosure obligations. Their willingness to comply fully and accurately is the foundation of an effective AID system, yet compliance also depends on legal clarity, user-friendly systems, and public accountability. Their cooperation is critical for understanding how declarations are submitted, maintained, and perceived within institutional frameworks. Engaging a representative sample across branches, seniority levels, and sectors allows the methodology to evaluate filing behavior, perceived deterrence, usability, and perceptions of proportionality and fairness.

Oversight Bodies, such as anti-corruption agencies, integrity commissions, ethics committees, ombudsman institutions, and audit authorities, are central to ensuring the credibility, deterrence, and effective supervision of AID systems. These institutions typically receive and verify declarations, issue sanctions, and promote integrity within the public sector. Their engagement provides access to administrative data and strategic insights into how AID systems operate and align with broader national integrity frameworks.

Law Enforcement and Judicial Actors, including judges, prosecutors, Financial Intelligence Units (FIUs), Asset Recovery Offices (AROs), and specialized anti-corruption police and courts, play a pivotal role in determining the enforcement effectiveness of AID systems. They rely on asset declarations during investigations and legal proceedings – particularly in cases involving illicit enrichment, money laundering, or conflicts of interest. Their feedback helps assess whether AID systems are legally actionable, interoperable with investigative databases, and capable of meeting evidentiary standards. Effective cooperation between these actors and oversight bodies is critical to accountability and deterrence.

Civil Society Organizations (CSOs) and Investigative Journalists provide essential external oversight. They identify gaps, test transparency, and hold institutions accountable through independent monitoring and public reporting. Research shows that strong civil society engagement correlates with higher institutional trust and responsiveness. Their insights are valuable for assessing public access, institutional transparency, and the real-world impact of AID systems, particularly in uncovering hidden wealth and conflicts of interest.

Whistleblowers, while not engaged directly through surveys, contribute indirectly through case-based evidence and secondary research. Their disclosures often expose systemic weaknesses – such as asset concealment through proxies or shell entities – and inform the development of risk indicators that capture institutional capture and impunity.

IT and Data Management Staff are critical to the digital infrastructure supporting AID systems. Their expertise in automation, cybersecurity, and data interoperability enables the assessment of technical capacity, digitalization maturity, and the feasibility of implementing risk-based verification and red-flag tools. Their participation is particularly relevant for understanding usability, data quality, and information-sharing mechanisms across institutions.

International Partners, including the European Commission, GRECO, OECD, and the Regional Anti-Corruption Initiative (RAI), contribute comparative benchmarks, peer review insights, and regional cooperation frameworks. While not surveyed directly, their perspectives are integrated through targeted interviews and secondary research to ensure alignment with international standards and best practices in asset declaration regimes.

Sector-Specific Stakeholders, such as officials in healthcare, public procurement, infrastructure, and education, provide insights into compliance and integrity challenges in high-risk domains. Their inclusion enhances the methodology’s ability to detect sectoral variations in compliance, risk exposure, and institutional safeguards – facilitating cross-sectoral benchmarking and the tailoring of recommendations.

The effective functioning and ultimate impact of AID systems depend on the coordinated engagement of this broad and interdependent network of stakeholders, each contributing distinct but complementary perspectives to the overall integrity framework.

The table below summarizes which instruments are used with each stakeholder group, clarifying the role of surveys, interviews, and secondary research in the overall assessment.

Table 2. Methodology Matrix: Instruments by Stakeholder Group

Stakeholder Group	Surveys	Interviews	Secondary Research and Expert Consultation
Public Officials (civil servants and elected representatives)	✔ Yes – filing behavior, perceived deterrence, usability	✘ No – typically surveyed only	✔ Yes – compliance rates, internal controls
Oversight Bodies (anti-corruption agencies, integrity commissions, ethics committees)	✔ Yes – compliance behavior, verification practices, usability	✔ Yes – workflows, mandates, data-sharing, enforcement challenges	✔ Yes – legal mandates, institutional powers, performance reports
Law Enforcement and Judicial Actors (judges, prosecutors, FIUs, AROs)	✔ Yes – use of declarations in judicial proceedings, inter-agency cooperation	✔ Yes – enforcement practices, evidentiary standards, asset tracing	✔ Yes – rulings, sanction records, registry access, legal thresholds
Civil Society Organizations & Investigative Journalists	✔ Yes – access to declarations, perceived impact	✔ Yes – use of data, barriers to oversight, reform priorities	✔ Yes – media reports, watchdog findings, public engagement
IT and Data Management Staff	✘ No – not surveyed directly	✔ Yes – digital platforms, automation, data integrity	✔ Yes – system architecture, digitalization status
International Partners (EC, GRECO, OECD, RAI)	✘ No – not surveyed directly	✔ Yes – standards, peer review insights, regional cooperation	✔ Yes – comparative frameworks, treaty participation, evaluations
Sector-Specific Stakeholders (e.g., health, procurement, infrastructure, education)	✔ Yes – sectoral compliance patterns, risk exposure	✔ Yes – institutional safeguards, implementation challenges	✔ Yes – sectoral audits, procurement data, risk assessments

5. Data Collection Instruments

5.1. Question types and scales

The Toolkit uses a combination of **closed- and open-ended questions** to achieve both quantitative measurability and qualitative depth. This mixed-question design generates robust, comparable data while capturing nuanced perspectives from respondents.

Closed-ended questions include:

- **Likert-type scales** measuring perceptions such as deterrence, usability, independence, and data access.
- **Frequency scales** capturing the occurrence of specific events, such as verification encounters, information requests and denials, or sanction application.

- **Dichotomous and multiple-choice items** addressing legal and institutional features, including the presence of automation, types of checks performed, and availability of APIs or bulk data downloads.

Open-ended questions allow respondents to provide concrete examples of workflows, cross-checks, cooperation challenges, and reform proposals, adding explanatory depth to the quantitative signals. Filter and routing rules ensure that specialized modules reach only relevant respondents - for instance, detailed verification items are directed exclusively to oversight and compliance personnel.

This combination of question types enhances the **validity and reliability** of the data. Closed-ended items provide measurable, comparable indicators, while open-ended responses offer context, highlight practical challenges, and capture good practices or innovative approaches. Together, they provide a comprehensive understanding of how AID systems function in practice and how they are perceived by key stakeholders.²³

5.2. Surveys

Survey among Public Officials. This instrument (**Annex 1**) examines how declaration rules operate for those who file, administer, or verify AID, with an emphasis on behaviours, incentives, and frictions that shape compliance and verification in practice. It pursues four objectives: to measure filing behaviour such as timeliness, completeness, and subsequent corrections and to capture perceptions of deterrence; to document exposure to verification and follow-up, including risk scoring, cross-checks, and conflict-of-interest remediation; to assess the usability of systems, forms, portals, guidance, and helpdesks; and to surface institutional enablers and barriers relating to data sharing, automation, resources, and independence. The primary respondents are public officials responsible for AID, who work in relevant ministries and agencies, and administrators in oversight bodies who manage intake, screening, or verification.

Content is organised into interconnected modules that the analysis treats as a single evidentiary stream. Coverage and obligations clarify who must declare, which events trigger updates, and how well legal bases are understood. Filing behaviour and its drivers consider self-reported timeliness and completeness alongside perceived risk of detection, ethical considerations, sanction awareness, audit pressure, and reputational risk. Verification exposure records whether and how declarations have been checked, distinguishing internal consistency testing, over-time comparisons, registry cross-links, and lifestyle checks, and noting outcomes such as queries, corrections, or referrals. Sanctions and remediation documents experiences with warnings and fines and the follow-through on conflict-of-interest management plans. Process and usability examine difficult items such as beneficial ownership and valuation, the clarity of guidance, the stability of IT systems, and available support. Cooperation and data access describe practical access to tax, land, corporate, banking, and beneficial-ownership data and identify bottlenecks and admissibility issues. Capacity and integrity climate reflect staffing, training, and automation tools, as well as perceived leadership support and institutional independence.

²³ World Bank, [Automated Risk Analysis of Asset and Interest Declarations of Public Officials: A Technical Guide](#), 2021.

5.3. Interview Guides

Purpose and Scope

Semi-structured interviews are a core qualitative component of the AID Assessment Toolkit. They provide in-depth insights into the perceptions, experiences, and operational challenges faced by key stakeholders involved in the design, implementation, and oversight of national AID and Col systems. Interviews are conducted with three main groups:

1. **Anti-Corruption Bodies** – including anti-corruption agencies, integrity commissions, and parliamentary ethics committees.
2. **Prosecution** – encompassing specialised anti-corruption units, general prosecution offices, courts routinely handling Col or corruption cases, and related law enforcement actors.
3. **Civil Society and Media** – investigative journalists, anti-corruption CSOs, transparency organisations, policy think tanks, and other watchdog actors engaged in monitoring and advocacy.

Sampling Approach

The recommended sampling is purposive, prioritising function and experience over formal titles. Respondents are selected based on their institutional role, direct involvement with AID/Col processes, and professional expertise. Sampling should ensure diversity across institutional level (national vs. local), seniority, technical expertise, and case types, including both central and regional jurisdictions. Within civil society, the focus is on organisations and journalists actively using AID/Col data in monitoring, investigations, or reporting. A minimum of **10–15 interviews per country** is advised to capture a broad and representative set of perspectives.

Interview Structure and Content

All interviews follow a semi-structured guide (**Annex 2**), organised around three analytical dimensions: **relevance, efficiency, and effectiveness**. Interviewers are encouraged to adapt follow-up questions to responses while ensuring that all core topics are addressed.

- **Anti-Corruption Bodies and Prosecution:** Discussions explore how AID/Col information is accessed and used in practice, the adequacy of declarant coverage, legal loopholes (e.g., exemptions for relatives or senior officials), and the role of automation or digital tools in verification. Respondents are asked to provide concrete examples of cross-checks, inter-agency cooperation, case outcomes, lifestyle audits, sanction application, and observed impacts on deterrence and enforcement. Clarifying prompts help elicit details where initial responses are brief or general.
- **Civil Society and Investigative Journalists:** The focus is on the accessibility and usability of AID/Col data, barriers to access (e.g., legal restrictions, technical limitations, delays, or refusals), practical workflows for monitoring or investigative use, cross-border data sharing, and perceptions of impact on accountability. Respondents are also invited to comment on feedback mechanisms that influence system improvements, such as changes in portals, data formats, or processing procedures.

Documentation and Ethical Considerations

Comprehensive documentation is essential for the reliability and transparency of the findings. Interviewers must produce detailed notes or transcripts for each interview, recording the respondent's functional role, organisational context, and tenure in relevant positions. Notes should capture key statements, illustrative examples, and emerging themes mapped to **relevance, efficiency, and effectiveness**. Particular attention should be paid to describing how AID/Col data are applied in practice, cooperation with other actors, and any noted institutional gaps or loopholes.

All data must be **anonymised** to protect participants' identities, and **consent** for participation, recording, or note-taking must be obtained in accordance with ethical standards and data protection requirements. Secure storage of interview materials is mandatory. A standard interview summary should be used to record core findings, notable quotes, and any additional material volunteered by respondents. These summaries form the basis for qualitative analysis and feed into implementation and impact indicators, providing rich contextual detail on how transparency and disclosure are translated into accountability in practice.²⁴

Specialised Modules and Routing

Where relevant, filter and routing rules ensure that specialised modules are directed to appropriate respondents. For example, detailed verification items and questions about investigative use of declarations are asked only of oversight and prosecution personnel. Civil society modules focus on access, data quality, and practical applications outside government. This design maintains comparability across countries while accommodating differences in national contexts and institutional structures.

6. Indicators

6.1. Implementation and Impact Indicators

The proposed indicators for assessing the effectiveness and impact of AID systems are adapted from a set of indicators initially developed by the World Bank and UNODC summarizing good international practices in the design and functioning of disclosure systems for public officers within StAR - the Stolen Asset Recovery Initiative.²⁵ Surveys based on the adapted set of indicators were carried out in six case study countries²⁶, and feedback from respondents was taken into consideration in the final selection of indicators proposed below.

The indicators for assessing AID systems are divided into two groups, one focusing on the capabilities and performance of the systems, or **implementation** indicators (

²⁴ OECD, [Verifying Asset Declarations in Greece: Guidelines for Standard Procedures and Oversight Bodies](#), 2017.

²⁵ World Bank (2012). *Public Office, Private Interests: Accountability through Income and Asset Disclosure*. The World Bank; UNODC: Stolen Asset Recovery Initiative.

²⁶ Bulgaria, Croatia, Georgia, Italy, Moldova, Romania.

Table 3) and one focusing on what **impact** the systems generate (or could generate) on public officers and society (Table 4).

Both the implementation and the impact indicators require inputs from a variety of stakeholders and institutions, as explained in the chapter *Methodology Design*. The indicators listed in the tables below are core indicators that can apply to most national AID systems. Depending on the context and specific needs, additional indicators may prove useful when designing tools for assessing state of the art and progress of each national AID system.

Table 3. Core implementation and impact indicators

Indicator	Description	Data sources	Calculation method
Submission compliance	The effectiveness and overall impact of an AID system are directly contingent upon the comprehensive compliance of all Politically Exposed Persons (PEPs). Compliance, in this context, extends beyond the mere submission status (submission vs. non-submission) of the required declaration(s). It critically encompasses the completeness and accuracy of all information furnished within the submitted declaration. While the rate of non-submission typically remains within a low, single-digit percentage, the completeness and accuracy of submitted declarations represent a dynamic variable requiring continuous and rigorous monitoring. The inherent capacity of an AID system to autonomously identify and flag incomplete or inaccurate data entries serves as a paramount indicator of its efficiency and effectiveness.	Operational statistics generated by the AID system.	<ul style="list-style-type: none"> • % of PEPs who do not submit a declaration • % of incomplete/inaccurate declarations of all submitted • % of automatically flagged vs. manually flagged (if applicable)
Sanctions for submission non-compliance	The number of sanctions imposed on PEPs for non-compliance with submission requirements, along with the severity of sanctions (usually fines or other administrative measures), are an indicator of the potential of an AID system to achieve complete compliance. For comparison purposes, a	Operational statistics generated by the AID system.	<ul style="list-style-type: none"> • % of PEPs who have been sanctioned (from those non-compliant) • % of various sanctions applied

	useful indicator can be the share of sanctioned PEPs from all non-compliant PEPs.		
Content verification	The effectiveness and impact of an AID system is highly dependent on its capacity to verify the content of submitted declarations. The level of automation of the content verification process is one of the indicators to consider and can be measured by the share of automatically verified declaration. Other indicators include the capacity of an AID system to apply the following checks: 1) internal consistency in responses; 2) comparing declarations of a given PEP over time; 3) ability to cross-check the content of declarations with external databases (real estate registers, tax authorities, vehicle registration, banking, etc.); 4) detection of conflict of interest; 5) capacity to perform lifestyle checks.	Operational statistics generated by the AID system; survey/interviews with AID system operators.	<ul style="list-style-type: none"> • % of declarations subject to manual check (sample size, if applicable) • Number of external databases linked to automated checks • Checks for internal consistency (yes/no) • Comparing declarations over time (yes/no) • Conflict of interest detection (yes/no) • Life style checks (yes/no)
Specifics of conflict-of-interest checks	The indicators applied to asset declaration (submission compliance, sanctions for non-compliance and content verification) are also applicable to conflict of interest declarations. Critical issues for the effectiveness of such declarations include: 1) availability of a clearly defined procedure for reviewing declarations for incompatibilities between public function and private interests; 2) capacity of the respective agency to carry out checks on all or a sample of the submitted declarations, and the level of automation for such checks; 3) capacity of the respective agency to follow up on remediation measures once conflict of interest has been identified.	Operational data from the agency monitoring conflict of interest declarations; survey/interviews with agency's operators	<ul style="list-style-type: none"> • Clearly defined procedures for identification of conflict of interest (yes/no) • % of submitted declarations that are checked (manually and automatically) • % of PEPs on whom remediation measures have been imposed • % of follow-ups for remediation measures imposed

Illicit Enrichment	Asset declarations can expose discrepancies between a PEP's wealth and his or her legitimate income, prompting an administrative or criminal sanction. Depending on a country's legal framework, the number of illicit enrichment investigations triggered by its AID system can serve as an indicator of the system's effectiveness. AID systems may also be consulted in illicit enrichment investigations which have been triggered by signals from other sources.	Operational data from the AID system; data from investigation / prosecution sources	<ul style="list-style-type: none"> • Number of illicit enrichment cases triggered by the AID system checks (per year) • Number of illicit enrichment investigations for which the AID system has been consulted (per year)
Investigations	Similar to detected cases of illicit enrichment, the number of investigations that have been based on or triggered by suspicious findings is an indicator of the effectiveness of the AID system. A distinction can be made between cases where an administrative investigation was performed, and cases where the findings supported the launching of a criminal investigation (i.e. cases forwarded to the police/prosecution for further action).	Operational data from the AID system	<ul style="list-style-type: none"> • Number of administrative investigations triggered by the AID system (per year) • Number of cases referred to police/prosecution, other than for illicit enrichment (per year)
Information access	The way an AID system makes information available to its stakeholders, including to the general public, is an important indicator of its effectiveness and its impact on society. The following set of indicators can be applied: 1) response time for requests for information (a distinction can be made between requests from state institutions, civil society organisations, media and individuals); 2) time needed to make AID information publicly available (from time of filing); 3) type of information released to the public (aggregate data on submission/content verification	Survey/interviews with AID system operators; survey/interviews with stakeholders (state institutions, investigative journalists, NGOs, oversight agencies)	<ul style="list-style-type: none"> • Average (usual) response time for request for information • Months required to make AID information public • Is aggregate data released to the public (yes/no) • Are names of non-compliant / investigated PEPs made public (yes/no) • Are AID performance reports made public (yes/no)

	findings; names of PEPs who are not in compliance; names of PEPs under investigation; 4) reports on the performance of the AID system from oversight agencies.		
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Table 4. Impact Indicators

Impact indicators		Data sources	Calculation method
Filing compliance	The set of indicators related to filing compliance measures how the existence of an AID system and the sanctions it can impose are impacting the behavior of PEPs. Most of these indicators are quantitative and data should be generated by the AID system. They include: 1) percentage of declarations received on time; 2) percentage of filing failures (late submission or complete failure to file a declaration); 3) percentage of incomplete declarations; 4) overall submission compliance rate; 5) percentage of PEPs to whom were subject to: a) administrative sanctions; b) fines; c) other, incl. criminal sanctions. The above indicators are most relevant when the impact of a given AID system is assessed over time.	Statistical data generated by the AID system (historical data over the years)	<ul style="list-style-type: none"> • Change in the % of declarations received on time • Change in the % of filing failures (late submission or complete failure to file a declaration) • Change in the % of incomplete declarations • Change in the % of PEPs subject to: a) administrative sanctions; b) fines; c) other sanctions, incl. criminal investigations
Disclosure integrity	Disclosure integrity refers to the impact on the behavior of PEPs that the obligation to file a declaration can generate over time. In quantitative terms, the impact can be measured by the number/percentage of declarations with various suspicious findings, or the number/percentage of PEPs who fail to adhere to conflict of interest remediation measures.	Statistical data generated by the AID system (historical data over the years)	<ul style="list-style-type: none"> • Change in the % of declarations with suspicious findings • Change in the % of PEPs who do not comply with conflict of interest remediation measures
Public engagement	The level of public engagement refers both to the information that an AID system provides to the public and the level of engagement of the public with the AID information. Indicators for public engagement measure the frequency with which civil organization, media or other stakeholders access AID information. Such indicators can be the number of requests for information an AID receives	Operational data from the AID system, including online access statistics	<ul style="list-style-type: none"> • Number of information requests to the AID system (broken down by type of requesting entities, per month or year) • Number of visits to online resources

	<p>on a monthly or annual basis, the number of visits to public online resources provided by the AID system, and the number of signals received from the public in regards to the content of declarations.</p>		<p>provided by the AID system (per month or per year)</p> <ul style="list-style-type: none"> • Number of signals received in the AID system from external stakeholders
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6.2. Data Sources and Operationalisation of AID System Assessment

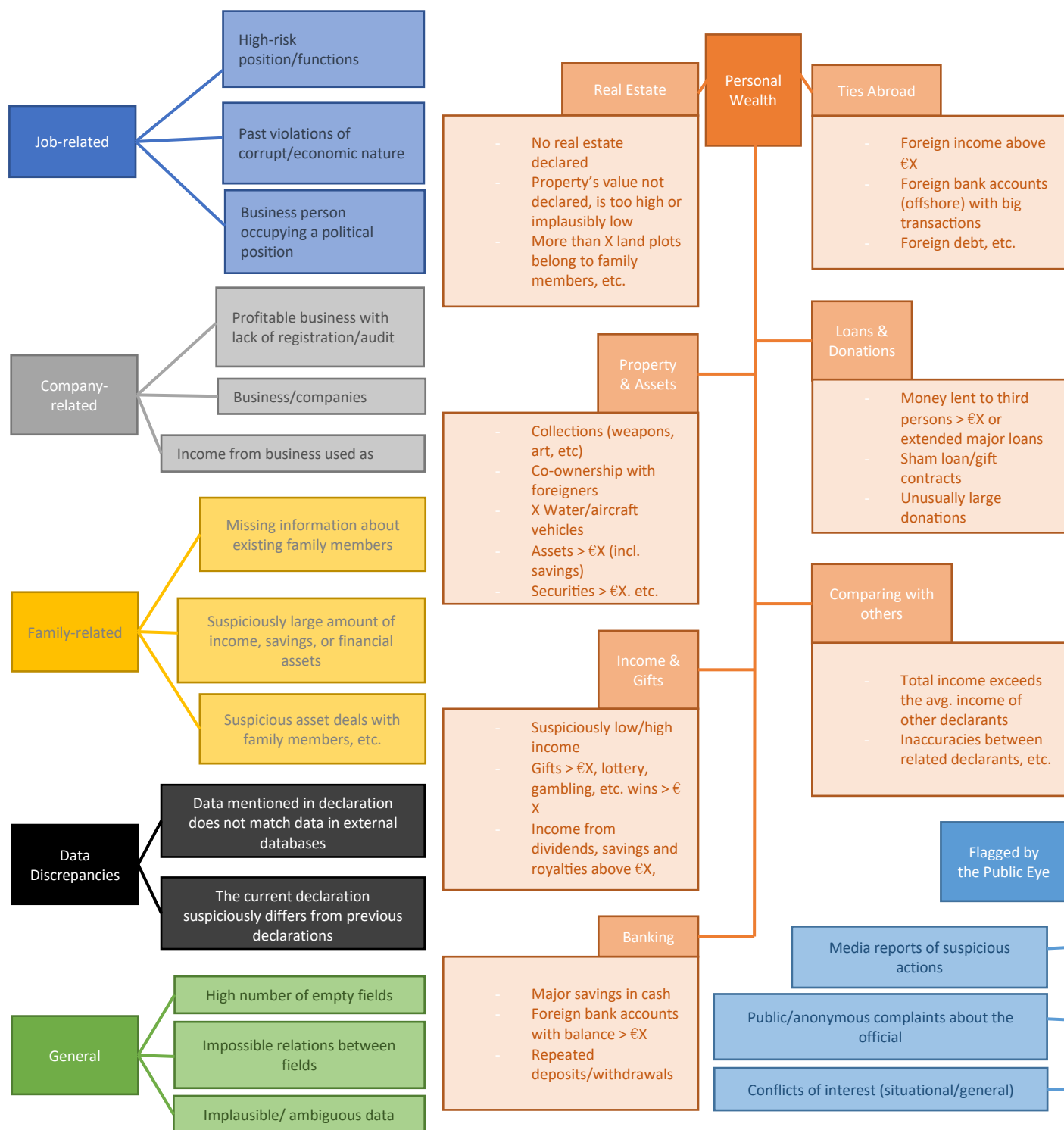
The proposed set of indicators to assess the efficiency of the AID systems should ideally be based on system-generated statistics – either produced by the AID system itself or drawn from comparable records maintained by relevant stakeholders (e.g. revenue authorities, police, prosecution services). Where such data are not readily available, alternative methods such as surveys and in-depth interviews may be employed to collect the necessary information (see chapter *Methodology Design* and Annex: *Survey Instruments*, for further details).

A key limitation identified during the piloting of the indicators in six countries was the lack of systematic quantitative data on the performance of AID systems. The collection of operational statistics from AID system administrators is a prerequisite for conducting initial assessments and for tracking progress over time. In the short term, this data gap may be partially addressed through the collection of qualitative information from end users and system operators. However, the long-term effectiveness and impact of the AID system cannot be ensured without establishing robust data collection mechanisms aligned with the core indicators outlined below.

The piloting phase also revealed that critical stakeholders - such as the police and prosecution services, which are responsible for sanctioning discrepancies in asset and conflict of interest declarations - currently do not collect or maintain statistics on investigations triggered by such declarations. Without the systematic collection of this data, a comprehensive assessment of the AID system’s performance and impact remains unattainable.

Thus, it is strongly recommended that all public institutions adopt a standardized set of data sources and red flags, as well as a harmonized verification procedure. This approach would enable national authorities to target their scrutiny more effectively, concentrating on a smaller number of high-risk individuals and related entities, thereby enhancing the efficiency of anti-corruption agencies and internal integrity units. To make this possible, it is essential that all countries in the region build the necessary analytical and data-processing capacities for collecting and interpreting relevant information. Guidance from the World Bank, OECD, Council of Europe, and the Government Transparency Institute offers a solid foundation for such efforts, as summarized in the figure below, which presents an example of a comprehensive set of risk indicators for verifying asset declarations.

Figure 2. Example of a comprehensive list of risk indicators for checking asset declarations



Source: CSD, [Rolling Back State Capture in Southeast Europe. Implementing Effective Instruments for Asset Declaration and Politically Exposed Companies](#), 2023, based on The World Bank, [Automated Risk Analysis of Asset and Interest Declarations of Public Officials: A Technical Guide](#), 2021; Council of Europe, [Practitioner Manual on Processing and Analysing Income and Asset Declarations of Public Officials](#), 2014; Poltoratskaia, V., [Use of Asset Declarations and Procurement Data](#)

to Identify Risk, Presentation at the workshop “[Developing Risk Indicators for Assets Declaration and Public Procurement Data](#)”, Government Transparency Institute / Central European University, Armenia, Yerevan, 15-16 June 2022; OECD, [Verifying Asset Declarations in Greece: Guidelines for Standard Procedures and Oversight Bodies](#), 2017.

A similar list of indicators to detect potential conflicts of interest could also be created based on OECD Toolkits, GRECO and World Bank guidelines.

Figure 3. Example of a comprehensive list of risk indicators for detecting potential conflicts of interest

PEP holds a managerial, director, or shareholding role in a private company	Family member or close associate of a PEP receives public procurement contracts, licences, or concessions from a body the PEP oversees	PEP has private interests in suppliers, contractors, or regulated firms (directly or through relatives or intermediaries)
Former PEP joins a private firm that benefited from decisions taken under their tenure, without a cooling-off period	PEP or senior official provides paid or unpaid consultancy, advisory, or board services in sectors they regulate or fund	Relatives or close associates of a PEP occupy management or ownership positions in companies competing for or receiving public funds under that PEP's supervision
PEP uses or authorizes use of state resources (staff, equipment, vehicles, communication channels) for private or commercial purposes	Procurement contracts awarded non-competitively or repeatedly to companies connected to the PEP or their associates	Tender specifications or selection criteria designed to favor a specific supplier linked to a PEP
Significant involvement of a PEP in decisions or committees affecting entities in which they or their relatives have interests	PEP participates in regulation, licensing, oversight, or lawmaking processes that affect sectors or entities in which they or their close associates have financial or private interests	Family members of PEPs serve on boards of companies receiving government contracts, subsidies, or regulatory privileges
PEP has received or accepted gifts, hospitality, travel, or other benefits from potential or current contractors or regulated entities	PEP exerts informal influence over hiring, appointments, or promotions in public bodies where relatives or associates work or contract	Public-private partnerships or state-owned enterprises managed by PEPs show overlap between official responsibilities and personal business ties

Source: CSD, based on OECD, [Toolkit on Managing Conflict of Interest in the Public Sector](#), 2005; G20, [High-Level Principles for Preventing and Managing ‘Conflict of Interest’ in the Public Sector](#), 2021; World Bank, [Integrity Compliance Guidelines](#), 2011.

Once the data has been collected and the red-flag methodology is adopted, the next critical step is for the relevant authorities to analyze the information using statistical, logical and arithmetic control, and other risk-based methods, conduct lifestyle audits of PEPs where necessary, and leverage AI tools where appropriate.

6.3. Considerations for Comparability across Contexts

The following factors should be considered when performing comparative analysis of national AID systems and their efficiency.

System Maturity: This dimension encompasses both the chronological duration of the system's operation and the sophistication of its user interface and accessibility. Furthermore, it incorporates the degree of awareness and preparedness exhibited by individuals obligated to submit declarations, alongside the robustness of the support mechanisms available for declaration preparation.

System Stability: The inherent dynamics of an AID system, particularly those undergoing structural modifications, and the effectiveness of communication concerning these changes to system users, can significantly influence perceptions and assessments of the system's performance. This impact is particularly salient when comparing a system in flux to those exhibiting greater operational stability.

Level of Digitalisation: Digitalisation can influence the ease with which declarations are submitted, processed, verified, and accessed by oversight bodies and, where applicable, the public. Highly digitalised systems often feature automated cross-checking with external databases, user-friendly submission interfaces, and real-time analytics, which enhance data accuracy and reduce administrative burdens. Conversely, systems with low levels of digitalisation may rely on paper-based processes or fragmented digital tools, leading to inefficiencies, higher error rates, and increased opportunities for non-compliance.

Legal Framework and Public Access: The parameters governing public access to information collected by AID systems exhibit considerable variation across jurisdictions. This ranges from nations providing broad public access to those restricting access to specialized bodies specifically authorized for declaration review and verification. Moreover, the utility of publicly available AID information is contingent upon external contextual factors, such as the degree of media freedom and the vigour of civil society organizations.

Scope of Declaration Obligation: The scope of public officials mandated to submit declarations significantly impacts both the resource allocation required by the monitoring authority and the quality of the submitted declarations. Consequently, direct comparative analyses between countries with disparate definitions of individuals subject to AID system monitoring are inherently challenging.

System Centralization: The organizational structure of an AID system, specifically its degree of centralization in terms of declaration collection and verification, can yield divergent outcomes. For instance, a more centralized model may lead to a reduced sample size of audited declarations; however, such checks may simultaneously exhibit enhanced objectivity and independence compared to internal verification processes conducted within individual institutions (e.g., law enforcement agencies, judicial bodies, or governmental departments).

7. Testing and Validation Results

The development and application of the AID Assessment Toolkit followed a rigorous testing and validation process to ensure its methodological soundness, practical relevance, and adaptability to diverse national contexts. The process involved the translation, piloting, and practical application of the Toolkit's core components, including surveys, interview guides, and the indicator framework.

7.1. Translation and Local Adaptation

The first stage of the testing process focused on the accurate translation and contextual adaptation of the data collection instruments. Given the legal and institutional complexity of AID systems, precise translation was essential to preserve the integrity of terminology and ensure alignment with national legal definitions and administrative practices. Particular attention was paid to sensitive terms such as politically exposed persons (PEPs), beneficial ownership, conflicts of interest, and verification mechanisms to avoid misunderstandings and ensure conceptual consistency.

Professional legal translators were engaged, and translated instruments were reviewed by national experts, oversight bodies, and, where appropriate, civil society stakeholders to guarantee accuracy, clarity, and relevance. Adaptations were made to reflect country-specific institutional structures, legal terminology, and administrative processes, while preserving the comparability of core indicators across different jurisdictions. This step also helped to build initial stakeholder engagement and institutional buy-in, laying the foundation for successful fieldwork.

7.2. Piloting and Fieldwork Implementation

Following translation and adaptation, the instruments were piloted to test their clarity, usability, and relevance. The piloting phase included a limited set of surveys and semi-structured interviews with representatives of key stakeholder groups, including public officials, oversight body representatives, law enforcement personnel, civil society organisations, and investigative journalists.

The piloting revealed several critical insights. In some instances, certain technical terms – particularly those related to beneficial ownership structures and offshore assets – were unfamiliar to some respondents, especially among civil society and media representatives. To address this, explanatory notes and simplified examples were incorporated to improve comprehension.

Challenges were also observed in securing the participation of high-ranking public officials and representatives of certain law enforcement bodies, reflecting persistent institutional reluctance to engage on asset declaration issues. This observation aligns with recent research highlighting institutional resistance as a significant barrier to effective AID system implementation.

Despite these challenges, the piloting phase confirmed the overall functionality of the instruments. Minor adjustments were made based on feedback before broader fieldwork was launched. The full-

scale fieldwork combined quantitative surveys and qualitative interviews, administered by trained researchers in line with strict ethical and data protection protocols.^{27,28}

The fieldwork provided comprehensive data on AID system operation and stakeholder perceptions, capturing both structural challenges and emerging good practices.

7.3. Observed Challenges and Lessons Learned

The testing and validation process identified several recurring challenges with important implications for future application of the Toolkit:

- **Institutional Resistance and Limited Cooperation.** Some oversight bodies and public institutions expressed hesitancy or limited cooperation, citing concerns over reputational risks or data sensitivity. This reflects broader trends of weak institutional accountability and reluctance to disclose information, as highlighted in research on state capture risks.
- **Gaps in Data Availability and Access.** The absence of accessible, comprehensive public declaration databases created obstacles for verification and cross-checking. This reinforces the need to strengthen transparency mechanisms and ensure the enforceability of AID systems.
- **Need for Context-Specific Interpretation of Results.** While the core indicators proved effective, the complexity of national contexts required complementary desk research and qualitative analysis to accurately interpret findings.

7.4. Adjustments to Instruments and Methodology

In response to the lessons learned during testing, several important adjustments were made to the Toolkit to enhance its clarity, effectiveness, and practical relevance:

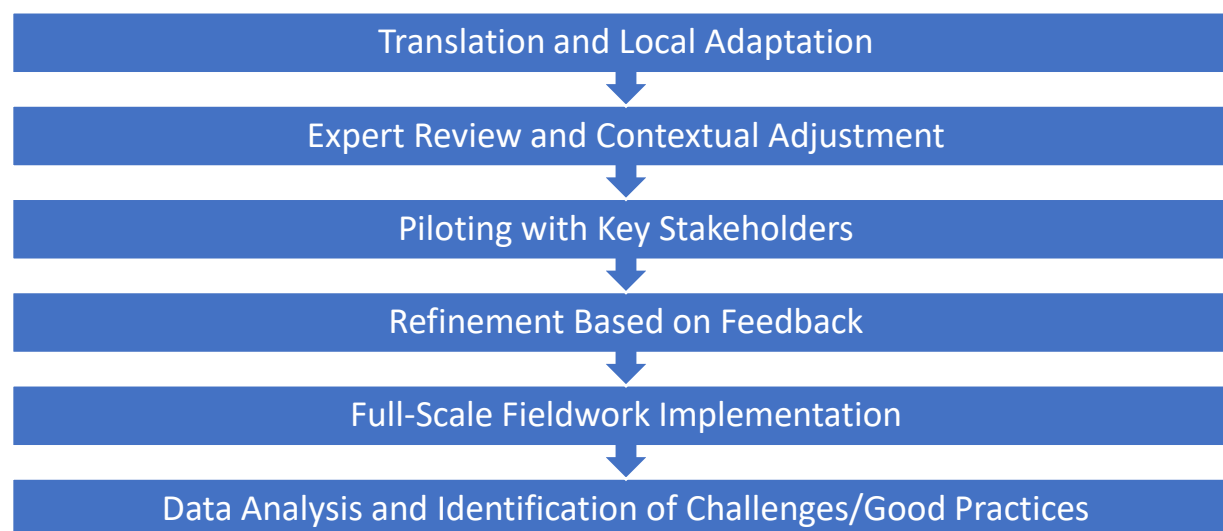
- **Refinement of Survey Instruments.** Legal terminology was simplified where appropriate, and explanatory notes were added to clarify complex concepts such as beneficial ownership, offshore structures, and conflicts of interest. The structure of the surveys was streamlined to reduce respondent fatigue and increase completion rates.
- **Enhancement of Interview Guides.** New prompts were introduced to explore risk-based verification practices, cross-border cooperation, and the practical application of red-flag indicators for PEPs, drawing on good practices from recent research.
- **Strengthening of Risk Indicators.** The indicator framework was updated to incorporate comprehensive risk factors for detecting hidden wealth through complex corporate structures, as recommended in literature on tackling state capture and politically exposed companies.
- **Improved Ethical Safeguards and Data Protection.** Data handling protocols, informed consent procedures, and confidentiality measures were reviewed and reinforced to comply with GDPR requirements and international good practice standards.

²⁷ OECD, [Verifying Asset Declarations in Greece: Guidelines for Standard Procedures and Oversight Bodies](#), 2017.

²⁸ World Bank, [Asset and interest declarations: A technical guide for implementation](#), 2021.

Through this structured, iterative testing process, the AID Assessment Toolkit has been validated as a practical, adaptable, and methodologically sound instrument for evaluating the effectiveness and impact of AID systems. The lessons learned provide valuable insights for its future application and underline the importance of continuous refinement and active stakeholder engagement.

Figure 4. Key steps during the testing and validation of results



8. Guidelines for Application

8.1. Step-by-step Guide for Implementing the Toolkit

The successful implementation of the AID Assessment Toolkit requires a structured, phased approach that takes into account national legal frameworks, institutional arrangements, available resources, and the specific context of each country. The methodology outlined in this guide reflects international good practices as promoted by the World Bank^{29,30}, the OECD³¹, and the Council of Europe³², while also drawing on lessons from previous assessments carried out by qAID. The following steps are designed to ensure a comprehensive, systematic, and practical application of the toolkit across different national settings.

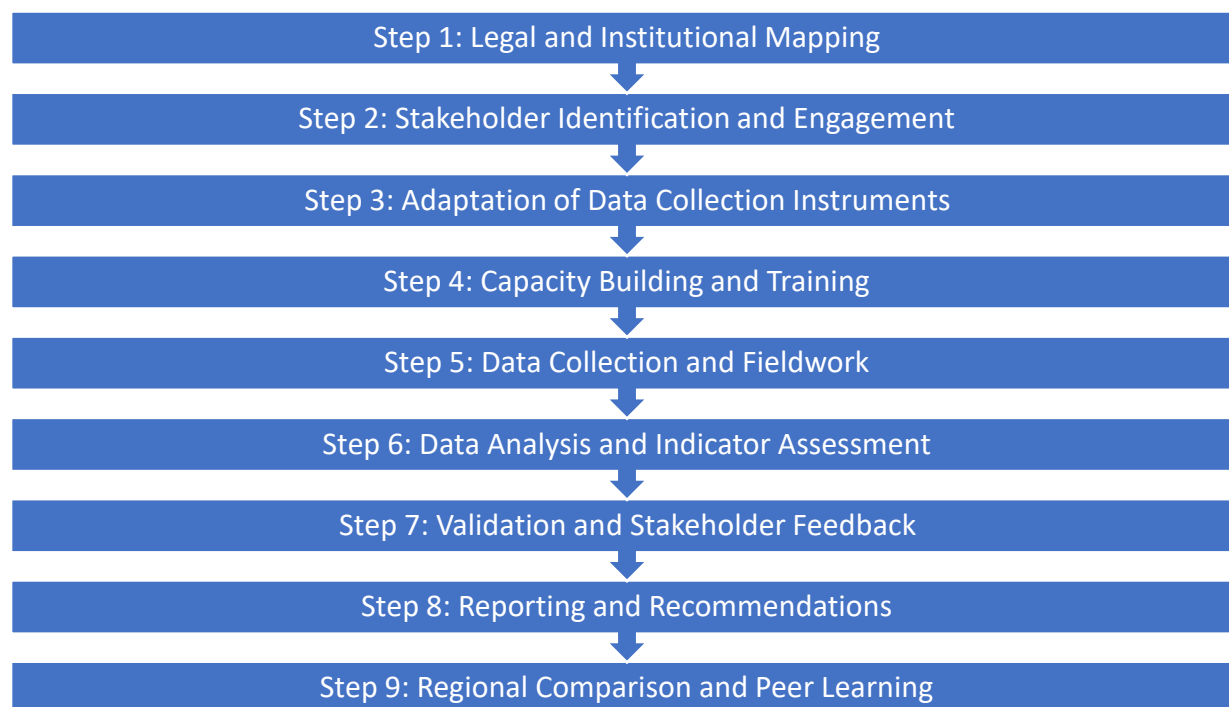
²⁹ World Bank, [Automated Risk Analysis of Asset and Interest Declarations of Public Officials: A Technical Guide](#), 2021.

³⁰ World Bank, [Asset and interest declarations: A technical guide for implementation](#), 2021.

³¹ OECD, [Verifying Asset Declarations in Greece: Guidelines for Standard Procedures and Oversight Bodies](#), 2017.

³² Council of Europe, [Practitioner Manual on Processing and Analysing Income and Asset Declarations of Public Officials](#), 2014.

Figure 5. Key steps for implementing the toolkit



The following table explains the main steps for implementing the toolkit, providing detailed timelines, responsible entities, and operational tasks for each phase of implementation.

Table 5. Toolkit Implementation Phases

Phase	Timeline	Lead Entity	Purpose	Key Steps
Phase 1: Strategic Planning and Stakeholder Mobilization	Week 1-2	Project Lead / National Oversight Body	Establish foundational alignment, secure institutional buy-in, and prepare for context- specific adaptation.	<ul style="list-style-type: none"> • Legal-Institutional Mapping Initiation: <ul style="list-style-type: none"> - Identify national legal bases for AID and conflict-of-interest regimes. - Map responsible institutions and declaration cycles. • Stakeholder Identification and Engagement: <ul style="list-style-type: none"> - Define target groups: oversight bodies, FIUs/AROs, judiciary, public officials, CSOs, media. - Convene inception meetings to clarify roles and expectations. • Assessment Scope Definition: <ul style="list-style-type: none"> - Determine geographic coverage, institutional nodes, and priority risk domains (e.g., procurement, health). • Ethical Protocol Setup: <ul style="list-style-type: none"> - Draft consent procedures, anonymization protocols, and secure data handling plans.

Phase 2: Toolkit Adaptation and Instrument Localization	Week 3–4	Technical Team / Legal Experts	Customize Toolkit instruments to national terminology, legal context, and operational realities.	<ul style="list-style-type: none"> • Translation and Harmonization: <ul style="list-style-type: none"> – Translate survey and interview instruments. – Align terminology (e.g., beneficial ownership, politically exposed companies). • Legal Review and Validation: <ul style="list-style-type: none"> – Ensure instruments reflect national declaration obligations and verification mandates. • Digital Configuration: <ul style="list-style-type: none"> – Set up online survey platforms and secure data storage. • Pilot Instrument Testing: <ul style="list-style-type: none"> – Conduct cognitive testing of survey items and interview guides with sample respondents.
Phase 3: Pilot Fieldwork and Data Collection	Week 5–6	Field Coordinators / Partner Institutions	Deploy Toolkit in selected pilot sites to test instruments and gather initial data.	<ul style="list-style-type: none"> • Sampling and Recruitment: <ul style="list-style-type: none"> – Select pilot institutions across branches and levels. – Ensure diversity in oversight, justice-sector, and civil society representation. • Survey Administration: <ul style="list-style-type: none"> – Launch online surveys with targeted follow-ups. – Use mixed modes (online, assisted paper/phone) for hard-to-reach groups. • Interview Implementation: <ul style="list-style-type: none"> – Conduct 5–10 semi-structured interviews per country. – Document workflows, verification practices, and institutional barriers. • Field Monitoring: <ul style="list-style-type: none"> – Track response rates, data quality, and technical issues.
Phase 4: Feedback Analysis and Methodological Refinement	Week 7	M&E Specialist / Expert Panel	Analyze pilot results, identify bottlenecks, and refine instruments for full deployment.	<ul style="list-style-type: none"> • Data Quality Review: <ul style="list-style-type: none"> – Assess completeness, consistency, and comprehension of survey responses. – Evaluate interview depth and thematic coverage. • Stakeholder Debriefing: <ul style="list-style-type: none"> – Share preliminary findings with pilot institutions. – Gather feedback on usability and relevance. • Instrument Adjustments: <ul style="list-style-type: none"> – Revise survey items and interview guides. – Update sampling strategy and administration protocols.

Phase 5: Full-Scale Deployment	Week 8–10	Regional Managers / Oversight Bodies	Implement Toolkit nationally across all selected institutions and stakeholder groups.	<ul style="list-style-type: none"> • Nationwide Rollout: <ul style="list-style-type: none"> – Launch surveys across all target institutions. – Coordinate interview scheduling and field logistics. • Capacity Building: <ul style="list-style-type: none"> – Train enumerators and interviewers on ethical protocols and technical procedures. • Monitoring and Troubleshooting: <ul style="list-style-type: none"> – Provide real-time support for respondents. – Resolve access, comprehension, or technical issues. • Data Consolidation: <ul style="list-style-type: none"> – Aggregate survey and interview data for analysis.
Phase 6: Evaluation, Reporting and Policy Dialogue	Week 11–12	M&E Specialist / Policy Team	Analyze findings, generate actionable insights, and inform reform strategies.	<ul style="list-style-type: none"> • Indicator-Based Analysis: <ul style="list-style-type: none"> – Apply implementation and impact indicators (e.g., verification coverage, sanctions applied, deterrence metrics). – Use perception proxies where administrative data is unavailable. • Cross-Country Comparison: <ul style="list-style-type: none"> – Benchmark findings against other EU/Candidate States. – Highlight good practices and reform gaps. • Final Reporting: <ul style="list-style-type: none"> – Produce national assessment report with visualizations and policy recommendations. • Dissemination and Dialogue: <ul style="list-style-type: none"> – Present findings to government, civil society, and international partners. – Facilitate peer learning and regional cooperation.

A detailed description of each phase is presented below.

Phase 1: Strategic Planning and Stakeholder Mobilization

A thorough understanding of the national context and early engagement with key actors is essential before applying the Toolkit.

- **Legal and Institutional Mapping**

Implementing bodies review all relevant legislation concerning Asset and Interest Declarations (AID) and Conflict of Interest (CoI) regulations. They identify institutions responsible for collection, verification, and enforcement. Map existing data-sharing protocols with tax authorities, land registries, corporate registries, Financial Intelligence Units (FIUs), and Asset Recovery Offices (AROs). This mapping exercise reveals both strengths and gaps, forming the basis for targeted recommendations.

- **Stakeholder Identification and Engagement**

Identify key stakeholders, including:

- Oversight bodies (e.g., anti-corruption agencies, ethics commissions)
- Public officials and Politically Exposed Persons (PEPs)
- Civil society organizations, investigative journalists, watchdogs
- Judiciary, law enforcement, FIUs, and AROs
- International partners (e.g., EC, GRECO, OECD, RAI)
- Develop a stakeholder engagement plan with:
 - Introductory meetings to present objectives and methodology
 - Regular communication channels to build trust
 - Feedback loops to validate findings and enhance legitimacy
- **Ethical Protocol Setup:** Draft consent procedures, anonymization protocols, and secure data handling plans to ensure compliance with data protection standards.

Phase 2: Toolkit Adaptation and Instrument Localization

To ensure contextual relevance without compromising comparability, the Toolkit instruments must be tailored to the national setting.

- **Translation and Harmonization:** Translate surveys and interview guides using professional legal translators. Review terminology to ensure alignment with national legal definitions.
- **Customization of Instruments:** Adapt questionnaires and interview guides to reflect country-specific institutional structures and stakeholder groups. Retain core indicators to preserve cross-country comparability.
- **Expert Feedback Integration:** Incorporate input from national experts and stakeholders to refine instruments before deployment.
- **Digital Configuration:** Set up secure online platforms for survey administration and data storage.

Phase 3: Pilot Fieldwork and Data Collection

Once instruments are adapted and teams are trained, the Toolkit is piloted in selected sites to test functionality and gather initial data.

- **Sampling and Recruitment:** Select pilot institutions across branches and levels, ensuring diversity in oversight, justice-sector, and civil society representation.
- **Survey Administration:** Distribute surveys to public officials and oversight institutions. Use mixed modes (online, assisted paper/phone) to maximize reach.
- **Interview Implementation:** Conduct 5–10 semi-structured interviews per country with key stakeholders. Document workflows, verification practices, and institutional barriers.
- **Field Monitoring:** Track response rates, data quality, and technical issues. Supplement primary data with administrative sources (e.g., declaration databases, sanction records).

Phase 4: Feedback Analysis and Methodological Refinement

Pilot results are analyzed to identify bottlenecks and refine instruments for full-scale deployment.

- **Data Quality Review:** Assess completeness, consistency, and comprehension of survey responses. Evaluate interview depth and thematic coverage.
- **Stakeholder Debriefing:** Present preliminary findings in workshops and bilateral meetings. Gather feedback from oversight bodies and decision-makers.
- **Instrument Adjustments:** Revise survey items and interview guides. Update sampling strategies and administration protocols based on pilot insights.

Phase 5: Full-Scale Deployment

In this phase, the fully refined Toolkit is implemented at scale across all selected institutions and stakeholder groups. The goal is to generate comprehensive data for national-level assessment while ensuring quality, consistency, and ethical compliance.

- **Nationwide Rollout:** Coordinate the full deployment of surveys and interviews across the entire target sample. This includes finalizing fieldwork schedules, managing logistics, and ensuring all participating institutions are prepared for data collection.
- **Capacity Building and Training:** Deliver targeted training sessions for all personnel involved in implementation, including:
 - Oversight staff responsible for managing or verifying declarations
 - Researchers and enumerators conducting surveys and interviews
 - IT personnel managing digital platforms and data security

Training should cover:

- The Toolkit’s methodology, objectives, and indicator framework
- Proper administration of survey and interview instruments
- Use of risk-based verification tools and red-flag indicators
- Ethical standards, including informed consent, confidentiality, and data protection protocols
- **Monitoring and Troubleshooting:** Establish real-time support mechanisms to assist respondents and field teams. Address technical issues (e.g., access problems, platform errors) and comprehension challenges (e.g., unclear terminology or survey items) as they arise.
- **Data Consolidation:** Collect, clean, and securely store all survey and interview data in preparation for analysis. Ensure that data from different sources (e.g., online platforms, paper forms) are harmonized and anonymized according to ethical standards.

Phase 6: Evaluation, Reporting and Policy Dialogue

This phase focuses on analyzing findings, validating results, and translating insights into actionable reforms.

- **Data Analysis and Indicator Assessment**

Use the Toolkit’s indicator framework to assess:

- Legal and institutional performance
- Verification effectiveness and sanctioning consistency
- Gaps in enforcement, transparency, and cross-border cooperation
- Apply risk-based tools and indicators (e.g., for politically exposed companies) to enhance detection of undeclared wealth and conflicts of interest.

- Validation and Stakeholder Feedback

Organize **validation workshops and bilateral consultations**. Refine recommendations based on stakeholder input to ensure contextual relevance.

- **Reporting and Recommendations**

Prepare a comprehensive **national assessment report** (see **Annex 3**) including:

1. Executive summary of key findings (0.5 page)
2. Detailed Assessment of Legal Frameworks and Institutional Practices (2–3 pages)
3. Relevance of the AID and Col systems (1–1.5 pages)
4. Efficiency of the AID and Col systems (1–1.5 pages)
5. Effectiveness of the AID and Col systems (1.5–2.5 pages)
6. Conclusion and Policy Recommendations (1 page)
7. Regional Comparison and Peer Learning (1–1.5 pages)

Share standardized data and indicators for cross-country comparison. Participate in regional workshops and expert exchanges. Disseminate good practices and lessons learned to support EU-wide and regional anti-corruption efforts.

Examples of a regional comparison is provided in the tables below.

Table 6. Review staff of asset and Col declarations

Country	Annual Declarations	Review Staff	Notes
Bulgaria	~9,000 (National Revenue Agency), ~3,500 (High Judicial Council)	10–20 (National Revenue Agency; High Judicial Council)	Staff-to-declaration ratio ~1:175 to 1:350
Croatia	~3,600 (non-election)	3 (Commission)	Very low capacity; no full lifestyle audits possible
Italy	300 (national), ~42,857 (local)	8–17 (national)	Adequate at small scale; not scalable
North Macedonia	~3,620	3 (SCPC)	Mostly formal checks, limited capacity
Romania	~500,000 (up to 1.5M)	20 (National Integrity Agency)	Extremely overloaded system

Source: qAID 2025.

Table 7. Use of automation and digital tools

Country	Status of declarations 'digitalisation and automation
Bulgaria	Manual processing, minimal IT integration
Croatia	Partially digital, improvements in progress
Italy	No automation; declaration handling is manual
North Macedonia	IPA-supported digitalisation initiative ongoing
Romania	Active AI-driven tools

Source: qAID 2025.

8.2. Ethical Considerations and Data Protection

The implementation of this methodological toolkit requires strict adherence to ethical principles and data protection standards to ensure the credibility, legitimacy, and long-term sustainability of the assessment process. Given the sensitive nature of the information collected – particularly regarding the assets, interests, and potential conflicts of interest of public officials – it is essential that all activities are conducted with full respect for individual rights, legal obligations, and public trust.

Participation in surveys, interviews, and other data collection activities must be entirely voluntary. All respondents, including public officials, representatives of oversight bodies, civil society actors, and other stakeholders, should be clearly informed about the purpose of the data collection, the intended use of the information, and the scope of confidentiality. Informed consent must be obtained prior to participation, and individuals should have the right to refuse participation or withdraw at any point without facing negative consequences.

Ensuring anonymity and confidentiality is a fundamental requirement. Personal data collected through surveys, interviews, or supplementary research must be anonymised to prevent the identification of individuals. Under no circumstances should individual responses or sensitive information be disclosed in reports, presentations, or public documents. All collected data must be stored securely, with access strictly limited to authorised personnel involved in the assessment process.

The implementation of the toolkit must be fully compliant with relevant data protection legislation, including the European Union's General Data Protection Regulation (GDPR)³³ and applicable national laws. Where required, Data Protection Impact Assessments (DPIAs) should be conducted in advance to identify and mitigate any risks associated with personal data processing. Data management protocols should be in place to ensure the secure collection, storage, and eventual disposal of personal data, in accordance with legal and ethical standards.

³³ World Bank, [Asset and interest declarations: A technical guide for implementation](#), 2021.

Table 8. Common data protection challenges and mitigation strategies

Challenge	Example	Mitigation Strategy
Re-identification risk from small samples	In a small oversight body with only 3–5 staff, survey responses could inadvertently reveal identities.	Aggregate responses at a higher level (e.g., by institution type or region) and suppress any identifying metadata.
Unsecured data transmission	Survey responses are collected via email or unencrypted online forms.	Use encrypted survey platforms (e.g., HTTPS-enabled tools), and avoid collecting sensitive data via email.
Inadvertent disclosure in reports	A case study includes enough detail (e.g., job title, location, case outcome) to identify a respondent.	Apply strict anonymization protocols and conduct a disclosure risk review before publication.
Consent fatigue or misunderstanding	Respondents quickly click through consent forms without reading them.	Use plain-language summaries, visual consent checklists, and verbal confirmation during interviews.
Data access by unauthorized parties	Field researchers store interview notes on personal devices without encryption.	Require password-protected, institution-issued devices and encrypted storage. Conduct regular data security audits.
Pressure on whistleblowers or journalists	A whistleblower shares sensitive information that could expose them to retaliation.	Avoid recording identifiable details, use pseudonyms, and exclude high-risk disclosures from public outputs.
Cross-border data transfer issues	Data is stored on servers outside the EU without proper safeguards.	Ensure hosting providers comply with GDPR adequacy decisions or use Standard Contractual Clauses (SCCs).
Unclear data retention policies	No timeline is set for deleting raw data after analysis.	Define and communicate a clear retention schedule (e.g., delete raw data 6 months after final reporting).

Particular care should be taken to prevent potential harm to participants, especially those in vulnerable positions, such as whistleblowers, journalists, or individuals providing sensitive information. The research and field teams must be trained to avoid causing reputational, legal, or professional risks to participants and to handle sensitive information responsibly. Reference to good practices recommended by the Council of Europe³⁴ and the OECD³⁵ can support this process.

Maintaining transparency and accountability throughout the assessment process is equally important. The objectives, methodology, and intended use of the toolkit should be clearly communicated to all stakeholders. Oversight bodies, research teams, and partner institutions must be prepared to address concerns or questions from participants or the wider public regarding the process. The World Bank has further emphasised the importance of integrity safeguards in the collection and analysis of asset and interest declarations.

³⁴ Council of Europe, [Practitioner Manual on Processing and Analysing Income and Asset Declarations of Public Officials](#), 2014.

³⁵ OECD, [Verifying Asset Declarations in Greece: Guidelines for Standard Procedures and Oversight Bodies](#), 2017.

Finally, appropriate safeguards must be established to avoid conflicts of interest. All individuals involved in the implementation of the toolkit, including field researchers, institutional representatives, and experts, should declare any real or perceived conflicts of interest. The use of independent verification, peer review, and external oversight is encouraged to ensure the objectivity, impartiality, and credibility of the results.

By integrating these ethical and data protection principles into the assessment process, the toolkit contributes not only to the technical evaluation of AID systems but also to building public trust and reinforcing the integrity of the institutions involved.

8.3. Recommendations for Timing, Sequencing, and Stakeholder Engagement

While the theory of change provides a strategic vision, the actual implementation of AID systems requires detailed planning around timing, sequencing, and the orchestration of multi-stakeholder involvement. Experience shows that successful reforms proceed in deliberate, manageable phases, allowing institutions to build capacity, adapt procedures, and foster broad-based buy-in.

The following **recommendations** outline priorities for the timing, sequencing, and stakeholder engagement in current and future AID assessments.

The initial phase should prioritize **legal and institutional setup**. This includes adopting legislation that clearly defines declarable assets and interests, specifies submission deadlines and thresholds, and identifies the categories of public officials subject to disclosure. Concurrently, countries must **designate competent verification authorities** with strong legal mandates and the independence to operate without undue influence. Institutional credibility at this stage hinges on access to essential third-party data sources – such as tax records, land registries, and corporate databases.

The second phase should focus on **infrastructure and human capital development**. Investment in digital platforms for submission, storage, and analysis is essential. Systems must be secure, user-friendly, and capable of integrating risk-scoring tools. Oversight personnel should be trained in both legal and data analysis, while IT teams ensure operational reliability. Inter-agency protocols for data sharing must also be formalized at this stage to support cross-verification and systemic oversight.

Once a baseline infrastructure is in place, countries can begin rolling out **risk-based screening and automated verification mechanisms**. These may include red-flag algorithms, batch data comparisons, and logic checks. This stage also marks the beginning of more proactive stakeholder engagement. **Outreach to civil society, investigative journalists, and academic partners** is key for increasing transparency and promoting external accountability. Public access to selected declaration data, supported by explanatory resources, can facilitate meaningful citizen oversight.

Stakeholder engagement must go beyond formal consultation. Actively **involving public officials in early design stages** helps surface implementation challenges and increases cooperation. Civil society organizations and media actors play a watchdog role and should be included through co-monitoring activities, capacity-building workshops, and reporting partnerships. International institutions such as the OECD, GRECO, and the European Commission can provide technical guidance and comparative standards. Coordination with the judiciary and law enforcement is also crucial for ensuring that violations are appropriately investigated and prosecuted.

The activation of enforcement mechanisms should follow only after **verification capacity and legal clarity are securely in place**. A phased approach may begin with warnings and administrative sanctions for non-compliance and gradually progress to disciplinary or criminal penalties in serious cases. This reduces the risk of politicization or premature backlash.

Transparent communication of enforcement outcomes contributes to public trust and reinforces the deterrent effect of the AID system. Publishing information on detected violations, applied sanctions, and institutional responses signals that the system is operational and credible.

Finally, **ongoing monitoring and evaluation** – supported by periodic reviews and stakeholder feedback – are essential to ensure responsiveness to new risks such as complex corporate structures or asset transfers via digital platforms.

When implemented through a carefully sequenced and inclusive approach, AID systems become not only instruments of compliance but powerful tools for strengthening integrity, exposing hidden wealth, and reinforcing public trust in governance.

9. Annex 1 – Survey Instruments

Information is gathered by a survey in a table format. The survey collects key quantitative data to assess the performance and impact of Asset and Interest Disclosure (AID) and Conflict of Interest (Col) systems in EU Member States and Candidate Countries. Its primary objective is to understand how these systems function in practice - focusing on institutional capacity, compliance levels, enforcement effectiveness, and public transparency. By gathering recent and comparable data from national anti-corruption and integrity bodies, the survey aims to identify strengths and weaknesses in current systems. The results will inform the development of a practical, evidence-based toolkit to support the assessment and improvement of AID systems, helping to enhance their role in preventing corruption and promoting accountability.

1.1. Instructions to the respondents

Dear respondent,

Thank you in advance for your time and attention. This survey is part of the European project “qAID - Towards contemporary knowledge and innovative tools for assessing and enhancing effectiveness of Asset and Interest Disclosure (AID) systems in EU Member States and Candidate States.” Before starting the questionnaire, please find below some information you may find useful.

What is the objective of project qAID?

The general objective of the qAID project is to provide EU Member States (MSs) and Candidate States (CSs) with contemporary knowledge and innovative tools to assess and improve the impact of national asset and interest disclosure (AID) systems.

Who finances project qAID?

The project is co-funded by the European Commission, Directorate-General for Migration and Home Affairs – Internal Security Fund (2021-2027).

Who is involved in project qAID?

The project is coordinated by the Centre for Security and Crime Sciences, the Joint Research Centre of the University of Trento and the University of Verona (Italy), and carried out in partnership with the Romanian National Agency for Integrity (Agenția Națională de Integritate), the Regional Anti-Corruption Initiative (RAI) Secretariat, the Italian Anticorruption Authority (Autorità Italiana Anticorruzione), and the Centre for the Study of Democracy (Bulgaria).

What is the aim of this survey?

This survey aims to conduct an inventory and analysis of the current risk assessment protocols for AID systems in EU Member States and candidate countries. The results of this survey will then inform the development of a common user-friendly methodological toolkit for assessing the impact of AID systems in EU MS and CS countries.

Instructions:

You can see three excel sheets on the bar below. Please only fill in the boxes on the sheet which applies to the organisation you represent.

We may specify that should you answer 'No' in the first columns, then please leave non-applicable (N/A) for the remaining columns. If answer is yes, please fill in data.

We are seeking as recent data available as possible. For instance, if you are sharing the number of employees at a checking institution (Q1), please specify in the comments section which year this data is from. You may also use this column for any additional comments you may have.

To complete this survey, this should be sent to the relevant police and prosecution authorities. We would be grateful if you could send this survey to contacts you may have in your countries' police and prosecution services.

For anti-corruption agencies, we would greatly appreciate if you could return this document with the completed first column ('Do you collect this data') by **(date)**.

If you have any additional queries concerning this survey, please contact:

Table 9. Questions for Anti-corruption authorities

Questions	Data collection template for anti-corruption/integrity authorities	Do you collect/ have this information collected?	If not, can you extract this information?	Please provide the data if available	Comments
	Submission Compliance				
1	What is the overall number of employees at the checking institution (total overall number, not just the ones engaged in checking IAD Declarations and/or Col Declarations)?				
2	What was the number of officers assigned to check AID declarations for completeness?				
3	How many IAD declarations were made?				
4	How many COI declarations were made?				
5	How many persons were obliged to submit IAD declarations?				
6	How many persons were obliged to submit COI declarations?				
7	How many persons submitted with a delay or failed to submit IAD Declarations?				
8	How many persons submitted with a delay or failed to submit COI Declarations?				
9	What was the average number of working days required to check one declaration for completeness?				
10	Number of persons for whom the IAD Declaration has been checked by the relevant authority (basic/initial check)				

11	What is the number of persons for whom the Col Declaration has been checked by the relevant authority (basic/initial check)				
12	What is the number of persons for whom the Col Declaration has been checked by the relevant authority (detailed check)				
	Sanctions Filing Failures (both IAD and Col declarations)				
1	How many administrative sanctions have you imposed due to IAD filing failures?				
2	How many of these sanctions were actually enforced?				
3	What was the total amount in fines that were collected for filing failures?				
4	How many of the established filing failures resulted in referring the case to police or prosecution service for criminal investigation?				
5	How many persons have been referred for criminal investigation?				
6	What is the size and range of the sanctions for late or incorrect filing of IAD Declaration, according to the law (e.g. administrative fine of EUR 500, Suspension of salary (until submission), Publication of the sanctioning decision, Dismissal (until sub-mission)				
7	What is the size and range of the sanctions for late or incorrect filing of Col Declaration, according to the law?				
	Col review for incompatibilities				
1	How many Col declarations are subject to review for incompatibilities?				
2	What was the number of officers assigned to review the submitted Col declarations for incompatibilities?				
3	What was the average number of working days required to review a Col declaration for incompatibilities?				
4	How many registries are checked to verify each Col declaration?				
	Sanctions for Col Incompatibilities				
1	How many administrative sanctions have you imposed due to Col incompatibilities?				

2	How many of these sanctions were actually enforced?				
3	What was the total amount in fines that were collected for false declarations?				
4	How many of the established incompatibilities resulted in referring the case to police or prosecution service for criminal investigation?				
	IAD Verification				
1	How many IAD declarations are subject to content verification?				
2	What was the number of officers assigned to verify the content of the submitted IAD declarations?				
3	What was the average number of working days required to verify the content of an IAD declaration?				
4	How many registries are checked to verify each IAD declaration?				
	Sanctions False Disclosures				
1	How many administrative sanctions have you imposed due to IAD false disclosures?				
2	How many of these sanctions were actually enforced?				
3	What was the total amount in fines that were collected for false disclosures?				
4	How many of the established false disclosures resulted in referring the case to police or prosecution service for criminal investigation?				
	Public Engagement				
1	If IAD/COI data are proactively made available online, what is the overall number of visits to the webpage for the last year?				
2	What is the overall number of complaints filed, regarding the content of IAD / Col declarations?				
3	How long are IAD Declarations kept online, after the public official leaves the post?				
4	How long are Col Declarations kept online, after the public official leaves the post?				
5	In what format are IAD Declarations published online - not published at all, hand-written				

	photocopies, in machine-readable (e.g. PDF format), in XML, JSON.				
6	In what format are Col Declarations published online - not published at all, hand-written photocopies, in machine-readable (e.g. PDF format), in XML, JSON.				
7	Can these be downloaded in bulk or case by case ?				

10. Annex 2 – Interview Guidelines

The overall aim of the interviews is to explore the impact of the current **Asset and Income Declarations (AID)** and **Conflict of Interest (CoI)** system, with a specific focus on its **relevance, efficiency, and effectiveness**. These aspects are assessed by answering the following questions:

Relevance: Does the existing AID and CoI system adequately address the identified needs for curbing corruption and preventing conflicts of interest?

Efficiency: Does the system have sufficient resources - such as staff, hardware/software, and access to necessary information - to fulfill its functions? If yes: Are these resources being used efficiently, and what benefits are being generated? If not: What are the constraints, and what potential remedies could improve performance? Additionally, is the system effectively designed to respond to information requests? How efficient is access to information, and how long does it typically take to obtain it?

Effectiveness: Is the current system achieving its intended goals? What types of checks, audits, or enforcement mechanisms are in place? Is the public aware of the system and its outcomes? Is the system useful for investigative journalists or civil society organizations in efforts to detect and expose corruption or conflicts of interest? How can overall system performance be improved?

The interviewer should aim to obtain comprehensive responses to as many of these questions as possible. Clarifying questions should be asked when answers are incomplete, unclear, or overly general.

1.1. Anti-Corruption Bodies

INTRODUCTION

Identify the role of the interviewee (position, department, institution) and for how long their work has been related to combatting corruption and conflict of interest.

RELEVANCE

1. Is the group of persons required to submit declarations adequate? Please provide both narrative explanation and assessment according the following scale:
 - Not at all adequate
 - Partially adequate
 - Mostly adequate
 - Fully adequate
2. Would the system work better if this group is extended or reduced?
3. Are there any loopholes for offenders to evade disclosure? Please provide both narrative explanation and assessment according the following scale:
 - No loopholes exist
 - Minor loopholes exist, rarely exploited
 - Moderate loopholes exist, sometimes exploited
 - Significant loopholes exist, frequently exploited

4. Have there been instances of public figures being exposed to taking advantage of loopholes to avoid investigation and prosecution (e.g. alleged corrupt behaviour offences involving close relatives who are not required to submit AIDs)? Please provide both narrative explanation and assessment according the following scale:
- Never
 - Rarely
 - Occasionally
 - Frequently

EFFICIENCY

5. Is the number of employees directly checking declarations sufficient in regards to the number of submitted declarations? Please provide both narrative explanation and assessment according the following scale:
- Not at all sufficient
 - Somewhat insufficient
 - Adequate
 - More than sufficient
6. Does your institution have adequate access to information (e.g. digital public registers) to perform checks of submitted declarations? Please provide both narrative explanation and assessment according the following scale:
- Very inadequate
 - Somewhat inadequate
 - Adequate
 - Very adequate
7. Does your institution have the technical resources (work stations, software) to perform its functions efficiently? Please provide both narrative explanation and assessment according the following scale:
- Strongly disagree
 - Disagree
 - Agree
 - Strongly agree
8. Is there any automation of risk assessment and review of AID and Col declarations? Please provide both narrative explanation and assessment according the following scale:
- No automation
 - Limited automation
 - Partial automation
 - Extensive automation
9. Can you share statistics about:
- Number of employees directly checking declarations
 - Number of declarations submitted per year
 - Number of secondary checks/audits per inspector (annual)

EFFECTIVENESS

10. In your opinion, does the existing AID and Col system fulfil its goals? (If yes, please provide examples of positive impacts; if no, please discuss major reasons/deficiencies.) Please provide both narrative explanation and assessment according the following scale:

- Not at all
- Partially
- Mostly
- Fully

11. Does your institution have targets for number of audits or % of submitted declarations that are audited? If yes, are these targets met?

- Existence of targets:
 - No targets
 - Some targets
 - Clear targets
- Achievement of targets:
 - Never met
 - Sometimes met
 - Mostly met
 - Always met

12. What would trigger an audit: 1) regular checks of all declarations; 2) risk assessment; 3) random sample; 4) whistle-blower or other signals. Please explain the choice of methods.

13. Are comprehensive lifestyle audits performed? If yes, please explain how often and what results have been obtained.

14. How do you ensure compliance with the AID and Col requirements? What is the percent of persons who fail to submit a declaration?

15. In your opinion, what are the main improvements that need to be introduced to make the AID and Col system more effective?

At the end of the interview, interviewees should be invited to share any additional information that they consider important for evaluating the AID and Col system.

1.2. Prosecution

INTRODUCTION

Identify the role of the interviewee (position, department, institution) and for how long their have work has been related to combatting corruption and conflict of interest.

RELEVANCE

1. In your practice, have you used information from the Asset and Income Declarations (AID) and/or the Conflict of Interest (Col) systems in relation to cases of corruption or other offences

committed by public figures who are required to submit such declaration? Please provide both narrative explanation and assessment according the following scale:

- Never
 - Rarely
 - Occasionally
 - Frequently
 - Very frequently
2. If yes, has the information obtained from the AID or Col systems proved useful? Please provide both narrative explanation and assessment according the following scale:
- Not at all useful
 - Slightly useful
 - Moderately useful
 - Very useful
 - Extremely useful
3. Have there been instances of public figures being exposed to taking advantage of loopholes to avoid investigation and prosecution (e.g. alleged corrupt behaviour offences involving close relatives who are not required to submit AIDs)? Please provide both narrative explanation and assessment according the following scale:
- Never
 - Rarely
 - Occasionally
 - Frequently
 - Very frequently

EFFICIENCY

4. Does your institution have adequate technical access to information contained in the AID or Col systems (e.g. digital access to declarations)? Please provide both narrative explanation and assessment according the following scale:
- Very inadequate
 - Somewhat inadequate
 - Adequate
 - Very adequate

EFFECTIVENESS

5. In your practice, have signals about corrupt behaviour by declarants triggered investigations (in the cases where the signal has indicated a criminal offence)? How many instances of such signals are you aware of? Please provide both narrative explanation and assessment according the following scale:
- Very rarely
 - Rarely
 - Occasionally
 - Frequently

- Very frequently
6. In relation to signals involving AID or Col declarants, how effective has been your cooperation with the anti-corruption authority in your country? Please provide both narrative explanation and assessment according the following scale:
 - Very ineffective
 - Somewhat ineffective
 - Moderately effective
 - Very effective
 - Extremely effective
 7. In your opinion, does the existing AID and Col system fulfil its goals? (If yes, please provide examples of positive impacts; if no, please discuss major reasons/deficiencies.) Please provide both narrative explanation and assessment according the following scale:
 - Not at all
 - Partially
 - Mostly
 - Fully
 8. In your opinion, what are the main improvements that need to be introduced to make the AID and Col system more effective?

At the end of the interview, interviewees should be invited to share any additional information that they consider important for evaluating the AID and Col system.

1.3. Civil Society, Media (Investigative Journalists)

INTRODUCTION

Identify the role of the interviewee (position, organization, media) and for how long their work has been related to combatting corruption and conflict of interest.

RELEVANCE

1. Does the existing AID and Col system meet your needs in terms of persons required to submit declarations? Please provide both narrative explanation and assessment according the following scale:
 - Not at all
 - Partially
 - Mostly
 - Fully
2. Have you encountered in your work limitations in terms of the scope of persons covered or the time declarations are available for investigative purposes? Please provide both narrative explanation and assessment according the following scale:
 - Never
 - Rarely
 - Occasionally

- Frequently
 - Very frequently
3. Have you revealed any loopholes in the AID and Col system that allow public figures to avoid investigation and prosecution (e.g. alleged corrupt behaviour offences involving close relatives who are not required to submit AIDs)? Please provide both narrative explanation and assessment according the following scale:
- Never
 - Rarely
 - Occasionally
 - Frequently
 - Very frequently

EFFICIENCY

4. Have you experienced any difficulties in obtaining information from the AID and Col system due to its insufficient resources (e.g. response time is too long due to excessive workload of respective officials processing requests, or access to information is limited due to technical capacity of the system)? Please provide both narrative explanation and assessment according the following scale:
- Never
 - Rarely
 - Occasionally
 - Frequently
 - Very frequently
5. Are the quantity and the format of the information provided by the current AID and Col system relevant and adequate to your professional needs? Please provide both narrative explanation and assessment according the following scale:
- Not at all adequate
 - Partially adequate
 - Mostly adequate
 - Fully adequate

EFFECTIVENESS

6. In your opinion, does the existing AID and Col system fulfil its goal to curb corruption and reveal irregularities and offences by public figures? (If yes, please provide examples of positive impacts; if no, please discuss major reasons/deficiencies.) Please provide both narrative explanation and assessment according the following scale:
- Not at all
 - Partially
 - Mostly
 - Fully
7. How often in your work do you access information contained in the AID and Col system? Please provide both narrative explanation and assessment according the following scale:

- Very rarely
 - Rarely
 - Occasionally
 - Frequently
 - Very frequently
8. Do you consider the AID and Col a reliable and important source of information in your investigative work? Please provide both narrative explanation and assessment according the following scale:
- Not at all reliable
 - Slightly reliable
 - Moderately reliable
 - Very reliable
 - Extremely reliable
9. In your opinion, is the public aware of the existence of the AID and Col system and is the system trusted? Please provide both narrative explanation and assessment according the following scale:
- Not at all
 - Slightly
 - Moderately
 - Very much
10. In your opinion, what are the main improvements that need to be introduced to make the AID and Col system more effective?

At the end of the interview, interviewees should be invited to share any additional information that they consider important for evaluating the AID and Col system.

11. Annex 3 – Example for Contents of an Assessment Report

1. Executive summary of key findings (0.5 page)

Instructions: Provide a concise synthesis of the main insights and conclusions emerging from the surveys, stakeholder interviews and desk analysis. Summarise the key findings regarding the relevance, efficiency, and effectiveness of the national AID and Col system, highlighting both strengths (e.g., transparency tools, cooperation mechanisms, digitalisation progress) and weaknesses (e.g., coverage gaps, limited verification, or poor accessibility). Briefly note any divergent views between institutional and non-governmental actors. The summary should give readers a clear snapshot of the system’s overall performance and set the stage for the detailed analysis that follows.

2. Detailed Assessment of Legal Frameworks and Institutional Practices (2–3 pages)

Instructions: Analyse the national legal and institutional framework governing the AID and Col systems, focusing on how laws, regulations, and institutional mandates enable or constrain effective implementation. Examine the clarity, coherence, and enforcement of relevant legislation, including coverage, declaration procedures, verification powers, sanctions, and appeal mechanisms. Assess whether institutional roles are clearly defined and coordinated, and identify any overlaps, gaps, or conflicts of competence between oversight bodies, law enforcement, and other actors. Highlight examples of good practice, reforms, or challenges in applying the legal provisions in practice. Use interview evidence and documentary sources to illustrate how formal rules operate in real contexts, including through short boxes or case examples where appropriate.

3. Relevance of the AID and Col systems (1–1.5 pages)

Instructions: Assess whether the AID and Col system addresses key corruption risks and meets the needs of different users.

Questions to address:

- Is the scope of individuals required to file declarations adequate, or are there important gaps?
- Do loopholes exist (e.g., exemptions for close relatives or senior officials)?
- Is the system relevant and useful to prosecutors in real investigations?
- Does civil society/media find the system meaningful for exposing misconduct?
- Are the declaration periods and data retention timelines aligned with investigative needs?
- Any other relevant points.

Instructions:

- Compare and contrast views across stakeholder groups.
- Include any cases/examples where lack of relevance undermined the system (e.g. in boxes).
- Highlight whether stakeholders view the system as credible and fit-for-purpose.

Example:

Box 1: Use of asset declarations to initiate media investigation

Text

4. Efficiency of the AID and Col systems (1–1.5 pages)

Instructions: Analyse whether the system functions optimally with its current resources and design.

Questions to address:

- Do responsible institutions have enough staff and technical infrastructure?

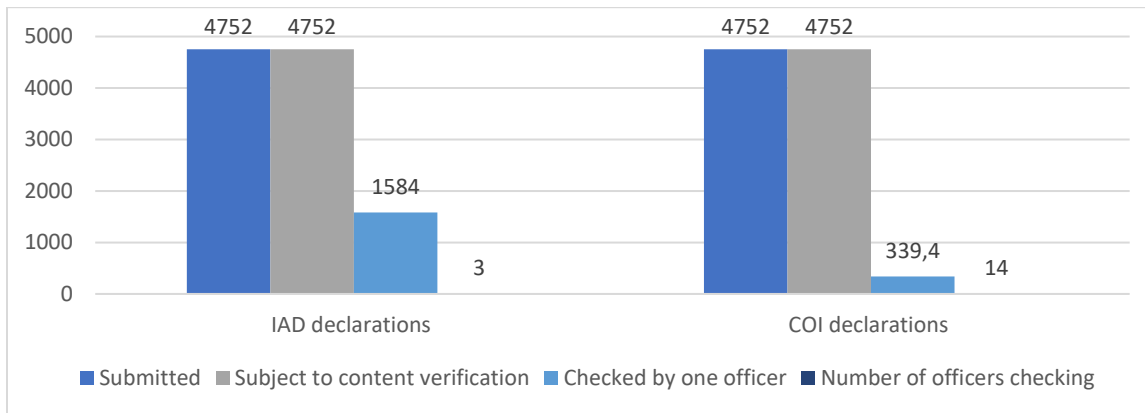
- Is access to information (internal for authorities and public for CSOs/media) timely and user-friendly?
- Are there bottlenecks due to limited technical capacity or excessive workloads?
- Does automation or risk-based review exist to support efficient operation?
- Are formats and data delivery adequate for professional use by media and NGOs?
- Any other relevant points.

Instructions:

- Provide **quantitative info** if available (e.g., staff-declaration ratios).
- Reflect on systemic inefficiencies that reduce impact.
- Indicate whether data is accessible to media/CSOs within reasonable timeframes.

Figure 1. Volume of declarations and human resources, year X (e.g. 2024)

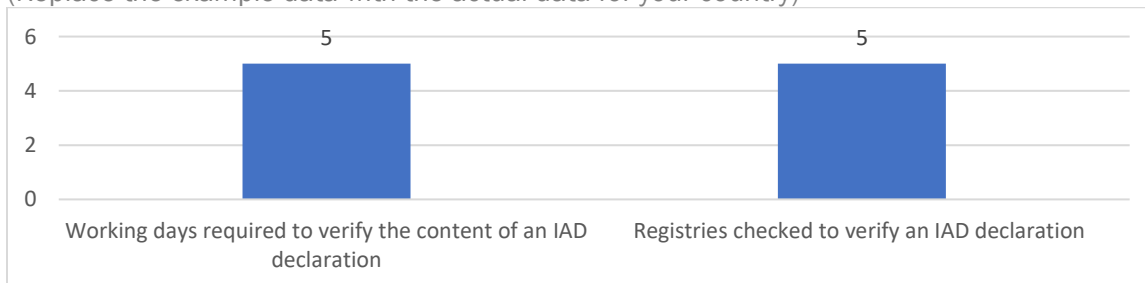
(Replace the example data with the actual data for your country)



Source:

Figure 2. Access to national registers and duration of a detailed IAD verification

(Replace the example data with the actual data for your country)



Source:

5. Effectiveness of the AID and Col systems (1.5–2.5 pages)

Instructions: Evaluate the outcomes and actual performance of the AID and Col system.

Questions to address:

- Have AID/Col systems contributed to detecting and preventing corruption? Have corruption levels decreased as a result of the use of the AID/Col systems?
- Are audits or lifestyle checks performed regularly? With what results?

- Are audit targets set and met?
- How often are declarations used in real investigations or prosecutions?
- Are there whistle-blower-triggered or risk-based checks?
- Is the public aware of and engaged with the system?
- Are prosecutors and anti-corruption bodies cooperating effectively?
- Are journalists or NGOs actively using the information to trigger accountability?
- Any other relevant points.

Instructions:

- Draw on examples from interviewees to support conclusions (could be in boxes).
- Note divergence between formal goals and actual impact.
- Include feedback on inter-agency cooperation or lack thereof.

Table 1. Frequency of utilising different triggers to initiate checks

Instructions: Based on the interviews, please indicate in the table below which are the main triggers for initiating a detailed check or investigation related to Col or to unexplained (possibly illicit) wealth in politically exposed persons – if checks are initiated mainly after tips/whistleblowing reports – indicate “very frequently”, and the other two options risk-based and random – e.g. rarely. However, if the anti-corruption body has a system of redflags to decide who should be checked and frequently uses it – write “frequently” in the second option “Risk based analysis”. Same for “Random check”. Please indicate this for asset declarations (middle column) and Col (last column). Include the main conclusions with 1-2 sentences also in the narrative text above the table.

	IAD	COI Declarations
Tips and whistleblowers’ reports	Never Rarely Occasionally Frequently Very frequently <i>(leave only one option, delete the rest)</i>	Never Rarely Occasionally Frequently Very frequently <i>(leave only one option, delete the rest)</i>
Risk-based analysis	Select one of the above options	Select one of the above options
Random checks	Select one of the above options	Select one of the above options

Source:

Table 2. Frequency of using declarations in media investigations or prosecutions

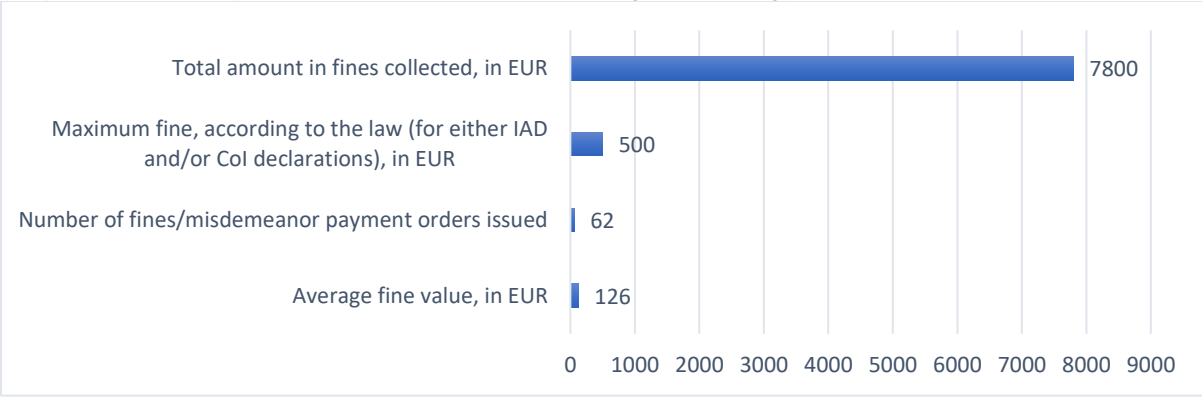
Instructions: Based on the interviews, please indicate in the table below how often the two types of declarations are used as a basis or as a starting point for media investigations and/or by the prosecution. Include the main conclusions with 1-2 sentences also in the narrative text above the table.

	IAD	COI Declarations
Used by the prosecution	Never	Never

	Rarely Occasionally Frequently Very frequently <i>(leave only one option, delete the rest)</i>	Rarely Occasionally Frequently Very frequently <i>(leave only one option, delete the rest)</i>
Used by investigative journalists	Select one of the above options	Select one of the above options
Other (if relevant) – delete this row if needed	Select one of the above options	Select one of the above options

Source:

Figure 3. Sanctioning provisions and implementation, year X
(Replace the example data with the actual data for your country)



Source:

6. Conclusion and Policy Recommendations (1 page)

Instructions: Provide concise conclusions and evidence-based recommendations to improve the AID and CoI system in the country.

- Summarise 4–6 key recommendations derived from the issues raised in the previous sections.
- Each recommendation should be clear, actionable, and tied to observed weaknesses (e.g., "Expand coverage to include close relatives," "Introduce automated red-flag system," "Ensure 72-hour public access rule for journalists", "Interconnect your national registers").
- Indicate which stakeholders (government, agencies, civil society) should act.

7. Regional Comparison and Peer Learning (1–1.5 pages)

Instructions: Compare the country’s AID and CoI system with those of selected regional peers to identify common challenges, innovative solutions, and transferable practices. Highlight areas where the national framework aligns with or diverges from regional and international standards (e.g., GRECO, OECD, EU). Summarise relevant comparative data or examples from neighbouring or similar governance contexts, focusing on lessons that could strengthen the national system’s relevance, efficiency, and effectiveness. Emphasise practical peer learning opportunities such as digital verification tools, inter-agency coordination models, or civil society engagement mechanisms that could inform policy recommendations and future reforms.