

Chapter 7

Plan of action for the implementation of the OECD recommendations

This chapter presents a plan of actions for an adequate implementation of the OECD recommendations in the areas covered by this report, namely institutional set-up, culture of integrity, whistleblower protection, internal control and risk management, transparency, and integrity in public procurement. It provides a chart for the state administration 2017-23 to define the timeline and the units responsible for implementing the plan.

The chart below provides an indication of actionable steps to follow in order to facilitate the implementation of the recommendations covered in this review. Given the current transition time for the state government of Coahuila, where a new administration will take over on 1 December 2017, OECD suggests to analyse together with the incoming officials the timeline for implementation and the units which will be responsible for each of the recommendations and their actionable items. This could be done during the first trimester of 2018.

Toward a coherent and comprehensive integrity system

Proposal for action: The CLACS should ensure that integrity policies are mainstreamed through the whole-of-government and that they are linked with state-wide strategies.

Actionable items	Responsible unit	Timeline
1. Set up mechanisms to allow continuous consultation and co-ordination between the CLACS and all relevant actors of Coahuila's public sector not formally part of the Co-ordination Committee.		
2. Establish specific cross-government/sectoral working groups for the design of the State Anti-corruption Action Plan as well as the implementation of corresponding initiatives.		
3. Link the State Anti-corruption Action Plan with key state strategic documents (including Coahuila's State Development Plan, Coahuila's Programme for Administrative Modernisation, Audit and Accountability, Coahuila's Special Programme for Transparency, and Coahuila's Open Government Action Plan).		

Proposal for action: Nominate a contact point within each of the CLACS constituent institutions to strengthen the co-ordination with its governing bodies and favour the implementation of its activities throughout the government.

Actionable items	Responsible unit	Timeline
1. Establish rules and procedures on the responsibilities of CLACS constituent institutions, including on their participation in the system and the implementation of its decisions.		
2. Request that each CLACS constituent institution nominate a person or unit responsible for co-ordinating work with the bodies of the system and for ensuring follow-up and implementation of activities and decisions.		

Proposal for action: The CLACS could create an ad-hoc working group in charge of elaborating co-ordination mechanisms with municipalities and providing continuous support to build coherent municipal anti-corruption systems.

Actionable items	Responsible unit	Timeline
1. Ensure active involvement and participation of municipalities when discussing relevant pending legislation to be reformed or adopted within the NACS reform process.		
2. Establish a working group within the CLACS Executive Secretariat to design tools and instruments of co-operation between the state and municipalities, but also to encourage communication and information exchange among municipalities.		
3. Carry out a preliminary assessment of existing anti-corruption policies and structures in municipalities in order to map gaps, duplication of rules, and overlapping and low-quality regulations.		
4. Assess the status of existing integrity and anti-corruption-related co-ordination agreements with municipalities, and provide technical support to monitor their implementation and improve their effectiveness.		

Proposal for action: Ensure adequate planning and allocation of resources for CLACS implementation.

Actionable items	Responsible unit	Timeline
1. Carry out an assessment within CLACS constituent institutions and bodies to identify synergies and capacity needs in relation to new responsibilities, activities, and co-ordination mechanisms.		
2. Identify specific expertise criteria needed to fulfil the technical positions of staff within the CLACS Executive Secretariat.		
3. Discuss and plan the short- and long-term budget implications of the CLACS with all relevant institutions.		

Proposal for action: The political leadership in Coahuila should show visible commitment to facing the technical challenges involved, addressing political resistance, and favouring an inclusive transition into the new system.

Actionable items	Responsible unit	Timeline
1. Elaborate a roadmap establishing clear objectives and responsibilities for the adoption of the pending CLACS-related legislation and regulations.		
2. Adopt pending CLACS-related legislation and regulations through the full engagement and commitment of all relevant ministries, municipalities, and stakeholders.		
3. Put into motion the creation of the CLACS and, in particular, launch the member selection process for the Citizen Participation Committee.		

Proposal for action: Mechanisms should be introduced to define clear responsibilities of senior and middle managers in implementing the CLACS, and to hold them accountable throughout the reform process.

Actionable items	Responsible unit	Timeline
1. Carry out an awareness campaign among senior managers concerning the effects and changes needed to implement the CLACS-related reforms at the organisational level.		
2. Define specific responsibilities in the implementation of the reform for each management level.		
3. Set up tools to monitor and assess senior and middle managers' responsibilities in implementing CLACS-related reforms.		

Proposal for action: The appointment and renewal procedures for members of the Citizen Committee should be carried out in an open and transparent way.

Actionable items	Responsible unit	Timeline
1. The appointment procedure of the Citizen Committee should enable the participation of independent and reputable experts representing various components of civil society.		
2. All steps of the appointment process should comply with highest standards of transparency and guarantee fairness and inclusiveness.		
3. Make publicly available additional data on selected members of the Citizen Committee, including their relevant experience and knowledge as well as a signed declaration disclosing any conflict of interest.		

Proposal for action: Ensure broader participation of stakeholders into the local anti-corruption system of Coahuila in order to build a more inclusive and responsive public sector integrity system.

Actionable items	Responsible unit	Timeline
1. Establish specific working group(s) within the CLACS bodies such as the Co-ordination Committee and the Citizen Participation Committee. This will ensure wide multi-stakeholder participation in the CLACS (private sector, trade unions and media).		
2. Ensure continuous co-operation and commitment between the CLACS and external stakeholder organisations through agreements to be monitored by the Co-ordination Committee.		
3. Involve and consult external stakeholders when discussing remaining legislation to be reformed or adopted in relation to the NACS reform process.		

Building a culture of integrity in the public sector

Proposal for action: Following the model of the federal government, Coahuila could establish an ethics unit within SEFIR to harmonise existing policies across the administration. The ethics unit should have a counselling and guidance role.

Actionable items	Responsible unit	Timeline
1. Create the Specialised Unit for Ethics and Prevention of Conflicts of Interest (UEECPI) within SEFIR with the role of counselling and guiding public officials, but not sanctioning.		

Proposal for action: To ensure an effective implementation of integrity policies throughout the public administration, Coahuila could consider establishing Integrity Contact Points (or persons) within each public entity. The Integrity Contact Points should be responsible for public ethics and not for investigating breaches of integrity.

Actionable items	Responsible unit	Timeline
1. Determine size and budget of Integrity Contact Points/Person in each ministry.		
2. Create Integrity Contact Points and assign them a purely preventive role.		
3. UEEPCI could establish a network among the Integrity Contact Points in each ministry		

Proposal for action: The co-ordination agreement on collaboration on transparency and the fight against corruption between Coahuila and the federal Ministry of Public Function (SFP) could benefit from expertise on the federal level and could harmonise policies.

Actionable items	Responsible unit	Timeline
1. Leverage the co-ordination agreement on collaboration and transparency and the fight against corruption to support the implementation of the public ethics policies		

Proposal for action: The public integrity management framework could benefit from a more streamlined, duplication-free Code of Ethics and Conduct. Under the guidance of the Ethics Unit, Coahuila could consider the elaboration of manuals or guidance on practical examples and procedures for conflict-of-interest situations and ethical dilemmas.

Actionable items	Responsible unit	Timeline
1. Streamline the values included in the Code of Ethics and Conduct and ensure that links with sanctions are clear.		
2. Adapt the Code of Ethics and Conduct to introduce a provision on the management of conflict-of-interest situations.		
3. Develop guidance material that explains the Code's values through practical examples.		
4. Distribute guidance material throughout the entire administration, including municipalities, regulatory bodies, and state-owned enterprises.		

Proposal for action: A common overarching integrity management framework opens the opportunity to elaborate codes of ethics and conduct on the organisational level in a participative way, and implementing them more effectively.

Actionable items	Responsible unit	Timeline
1. Provide clear methodological guidance to assist the entities in developing their own specific Codes of Ethics and Conduct.		
2. Develop specific Codes of Ethics and Conduct in line ministries and public sector organisations respecting entity-specific risk according to a consensus-based approach.		
3. Develop relevant and concrete examples of values in the organisation's day-to-day business to which employees can easily relate.		

Proposal for action: SEFIR could develop specific guidelines for at-risk categories of public officials such as senior civil servants, auditors, tax officials, political advisors, and procurement officials.

Actionable items	Responsible unit	Timeline
1. Develop a manual on conflict-of-interest situations specific to public procurement and explain how public officials can identify conflict-of-interest situations.		
2. Establish specific conflict-of-interest policies and guidance for other remaining at-risk areas such as senior civil servants, auditors, tax officials, and political advisors.		

Proposal for action: A cross-departmental public ethics awareness campaign could be implemented as a shared and co-ordinated activity between the ethics unit, the Integrity Contact Points (or persons) and the human resources departments, including reaching out to the private sector, civil society, and citizens.

Actionable items	Responsible unit	Timeline
1. Identify key messages, communication channels, and expected outputs.		
2. Develop awareness-raising campaigns based on previous identification of messages, channels, and outputs.		
3. Implement awareness-raising campaign in entities.		
4. Periodically evaluate awareness-raising campaigns.		

Proposal for action: Under the lead of the SEFIR Ethics Unit, a public integrity training programme could be developed based on the results of the survey on training needs (Encuesta de Detección de Necesidades de Capacitación) applied in 2014. A public ethics and conflict-of-interest training when joining the public service could be made mandatory for all public officials, while specific tailored trainings could be provided on an annual basis.

Actionable items	Responsible unit	Timeline
1. Identify key messages, training format, and expected outputs for induction training and specific trainings for at-risk positions.		
2. Develop trainings based on previous identification of messages, channels, and outputs.		
3. Implement training activities.		
4. Periodically evaluate training efforts.		

Proposal for action: The impact of the existing Network of Trainers (Red Estatal de Instructores) could be amplified by formalising the network and building a pool of trainers in each ministry. As a form of recognition for their efforts, trainers could receive a formal qualification and/or remuneration.

Actionable items	Responsible unit	Timeline
1. Identify training needs to determine necessary number of trainers.		
2. Determine necessary skills and qualities for trainers.		
3. Develop formal public integrity trainer certification courses.		
4. Raise awareness with managers and public officials about opportunities to become a trainer.		

Proposal for action: The future Ethics Unit in SEFIR and Integrity Contact Points (or persons) in the entities could also consider to raise awareness of the conceptual overlap of managing a conflict-of-interest situation on an ad-hoc basis and the annual asset declaration.

Actionable items	Responsible unit	Timeline
1. Update guidelines for preventing and managing conflict of interest and distinguish conflict-of-interest policies from policies concerning submission of asset declarations.		
2. Identify existing awareness campaigns (internal and external) in which to embed a campaign on the disclosure system.		

Proposal for action: Adapting state regulations to the General Law on Administrative Responsibilities will entail modifications of the current asset disclosure system and will require all public officials to submit an asset declaration. Narrowing down the circle of public officials required to submit an asset declaration to those in senior positions and those representing a high corruption risk would ensure that no culture of distrust is created and would improve the system's cost-effectiveness.

Actionable items	Responsible unit	Timeline
1. Develop a clear and specific set of criteria to determine which public officials are required to submit an asset declaration.		
2. Ensure that size of potential filers is aligned with the resources and capacity of the disclosure agency.		
3. Mandate an entity to be responsible for interpretation of criteria.		
4. Build a list of filers and make sure it is frequently updated.		

Proposal for action: To detect illicit enrichment effectively, a systematic verification and audit process should be established. The electronic submission system could be leveraged by integrating the automatic verification of submission and automatic detection of “red flags”.

Actionable items	Responsible unit	Timeline
1. Develop a clear and specific set of criteria to determine which declarations are verified.		
2. Establish which methods are used in the verification process, and in which order.		
3. Determine which actions are taken when irregularities are found during the verification process.		

Proposal for action: Coahuila could co-ordinate with other State Comptrollers’ Offices through the National Permanent Commission of State-Federation Comptrollers (Comisión Permanente de Contralores Estados-Federación, CPCE-F) and the National Conference of Governors (Conferencia Nacional de Gobernadores, CONAGO) to establish agreements with other agencies to cross-check databases.

Actionable items	Responsible unit	Timeline
1. Map sources of information needed for effective verification.		
2. Establish agreements with other agencies to cross-check databases through the National Permanent Commission of State-Federation Comptrollers (Comisión Permanente de Contralores Estado-Federación, CPCE-F) and the National Conference of Governors (Conferencia Nacional de Gobernadores, CONAGO).		

Proposal for action: To enable the monitoring and evaluation of the implementation of the Code of Conduct and Ethics and the Law of Responsibilities and to publish annual progress reports, tools and processes and clear and transparent indicators need to be developed.

Actionable items	Responsible unit	Timeline
1. Define objectives at the output level for public ethics-related integrity policies.		
2. Consult entities and experts to identify relevant indicators for each objective.		
3. Develop clear, measurable, and realistic indicators.		
4. Examine existing databases for the applicability of these indicators and, if needed, create new methods to collect data.		
5. Create a monitoring report according to a pre-determined timeframe.		
6. Develop recommendations according to this monitoring report.		

Proposal for action: To monitor and evaluate the effectiveness of the asset declaration system, SEFIR could conduct a survey among the declarants and Internal Control Units to ensure user-friendliness and relevance of the requested information. Annual reports could be published to reassure the public of the effectiveness of the system.

Actionable items	Responsible unit	Timeline
1. Conduct a survey among the declarants and Internal Control Units to ensure user-friendliness and relevance of the requested information.		
2. Collect data on human and financial resources in relation to the asset declaration system’s effectiveness.		
3. Collect data on sanctions related to the asset declaration system.		
4. Centralise information and develop monitoring reports accordingly.		
5. Develop recommendations according to monitoring reports.		

Guaranteeing effective whistleblower protection

Proposal for action: To avoid fragmentation and ensure the effectiveness of the whistleblower protection provisions spread throughout different laws, Coahuila could enact a dedicated whistleblower protection law that avoids duplication and ensures clarity.

Actionable items	Responsible unit	Timeline
1. Collect current legislative duplication and identify gaps in whistleblower protection.		
2. Develop dedicated whistleblower protection law.		
3. Meet with stakeholders to ensure comprehensiveness and clarity of law proposal.		

Proposal for action: To mitigate the risk of having whistleblowers come forward with information that may not constitute protected disclosures, and to avoid potentially exposing them to unnecessary risks and overburdening the intake system with non-applicable cases, Coahuila could clarify the nature of a protected disclosure.

Actionable items	Responsible unit	Timeline
1. Develop clear criteria for a protected disclosure.		
2. Consult with stakeholders on comprehensiveness and clarity of criteria.		
3. Communicate criteria internally and externally through different communication channels.		

Proposal for action: Given the low trust in institutional safeguards, the possibility of reporting anonymously should be made available to facilitate the reporting of misconduct.

Actionable items	Responsible unit	Timeline
1. Include a provision in the law that makes anonymous disclosures possible.		
2. Communicate the possibility of anonymous disclosure internally and externally through different communication channels.		

Proposal for action: Coahuila could consider clarifying the overlap between witness and whistleblower protection and ensuring that disclosures that do not lead to a full investigation or to prosecution are still eligible for legal protection.

Actionable items	Responsible unit	Timeline
1. Establish protection for those disclosing information pertaining to an act of corruption that might not be recognised as a crime, but could be subject to administrative investigations.		

Proposal for action: Coahuila could provide more comprehensive protection to whistleblowers by specifically prohibiting dismissal of whistleblowers without a cause, or any other kind of formal or informal work-related sanction that has been exercised in response to the disclosure, if the information reported can reasonably be believed to be true at the time of the disclosure.

Actionable items	Responsible unit	Timeline
1. Design dedicated Whistleblower Protection Law to prohibit dismissal of whistleblowers without a cause and to prohibit any other kind of formal or informal work-related sanction that has been exercised in response to the disclosure.		
2. Communicate the scope of protective measures internally and externally through different communication channels.		

Proposal for action: Expanding the scope of the criminal prohibition to exercise reprisals on whistleblowers to a broader range of reprisals and to disclosures that are related to any breach of state laws could reinforce Coahuila's commitment to effective whistleblower protection and could reassure potential whistleblowers.

Actionable items	Responsible unit	Timeline
1. Establish in the Criminal Code the prohibition to exercise reprisals against whistleblowers in line with international standards.		
2. Expand the criminal prohibition of reprisals so that it does not only apply to alleged criminal acts.		
3. Establish in the Criminal Code the prohibition to disclose, or to threaten to disclose, the identity of a whistleblower.		

Proposal for action: Coahuila could introduce sanctions on individuals who exercise reprisals against whistleblowers who have disclosed misconduct in accordance with applicable rules.

Actionable items	Responsible unit	Timeline
1. Expand the scope of criminal prohibition to the threat to exercise reprisals against whistleblowers.		

Proposal for action: Coahuila could consider shifting the burden of proof to the employer to provide evidence that any sanction exercised on a whistleblower following a disclosure of misconduct is not related to that disclosure.

Actionable items	Responsible unit	Timeline
1. Reverse the burden of proof to the employer to provide evidence that a sanction is not related to a disclosure of misconduct.		
2. Adapt the criteria the disclosure needs to meet in order to shift the burden of proof to the employer.		

Proposal for action: Providing express civil remedies for civil servants who experience reprisals after disclosing misconduct as defined by the Law would add a further layer of protection to the whistleblower protection framework.

Actionable items	Responsible unit	Timeline
1. Include a comprehensive list of remedies in the Whistleblower Protection Law.		
2. Allow whistleblowers to introduce their own recourse before courts.		

Proposal for action: Coahuila could consider defining and formalising the communication channels for reporting misconduct to ensure public officials are fully aware of who they can contact if they decide to disclose misconduct, of how their anonymity or confidentiality will be protected, and of the remedies available to them if they experience reprisal.

Actionable items	Responsible unit	Timeline
1. Formalise a channel for disclosure of misconduct to senior public officials.		
2. Ensure that a choice of disclosure channels (internal, external to designated body, external to media/public) is available.		
3. Explain the steps to follow and the processes to abide by for each available channel.		
4. Design and conduct information campaigns that make public officials and the public aware of the different disclosure channels, how anonymity or confidentiality is protected, and which remedies would be available in the case of reprisals.		

Proposal for action: Establishing clear follow-up mechanisms and communication procedures between the whistleblower and the receiving agency would ensure the effective management of reports. This should include information about the receipt of the report, regular updates on the status of investigation, and the final outcome or explanation of reasons why an investigation has not been undertaken.

Actionable items	Responsible unit	Timeline
1. Utilising the future electronic platform, define a follow-up mechanism through which whistleblowers are kept informed of the proceedings.		
2. Regularly evaluate the procedural burden of the follow-up mechanism.		

Proposal for action: To strengthen trust in the procedures and guarantees of the whistleblower protection framework, Coahuila could create an independent agency mandated to receive and investigate reports on misconduct and provide remedies as necessary.

Actionable items	Responsible unit	Timeline
1. Review international good practices of independent whistleblower agencies.		
2. Create an independent body with the capacity to receive, investigate, and provide remedies for complaints related to retaliation. Alternatively, if adequate financial resources cannot be guaranteed due to budget constraints, create the position of an anti-corruption commissioner or trust attorney.		
3. Ensure that the agency is independent, that it has sufficient budgetary resources to enable it to operate effectively, and that it meets the objectives of the law.		
4. Obligate the agency to report to congress annually.		
5. Independently evaluate the agency on a regular basis.		

Proposal for action: To implement the law effectively, Coahuila could consider promoting a broad communication strategy and undertaking increased awareness efforts through various channels.

Actionable items	Responsible unit	Timeline
1. Identify key messages, communication channels, and expected outputs.		
2. Develop awareness-raising campaigns based on previous identification of messages, channels, and outputs.		
3. Implement awareness-raising campaigns in entities and externally.		

Proposal for action: Coahuila could consider including a mandate to review periodically its whistleblower protection scheme in the corresponding legislative bill so that the state government could evaluate the relevance of its objectives, implementation, and effectiveness. Coahuila could consider systematically collecting data and establishing robust indicators.

Actionable items	Responsible unit	Timeline
1. Define objectives at the output level for the goals of the whistleblower policies.		
2. Consult entities and experts to identify relevant indicators for each objective.		
3. Develop clear, measurable, and realistic indicators.		
4. Examine existing databases for the applicability of these indicators and, if needed, create new methods to collect data.		
5. Create a monitoring report according to a pre-determined timeframe.		
6. Develop recommendations according to this monitoring report.		

Strengthening the internal control and risk management framework

Proposal for action: Coahuila could strengthen its internal control standards and policies in order to place greater emphasis on corruption and fraud.

Actionable items	Responsible unit	Timeline
1. Integrate the existing internal control and risk management framework with additional guidance and information on how to deal with corruption risks.		
2. Align Coahuila's General Standard for Internal Control to the Standard Model of Internal Control adopted by the federal Ministry of Public Administration in 2016, introducing a principle dedicated to managing corruption risks as well as specific methodologies, risk factors, and mitigation strategies to address them.		
3. Adopt a set of dedicated procedures, standards, and tools to effectively prevent, detect, and respond to risks of fraud and corruption.		

Proposal for action: Coahuila could strengthen its “tone at the top” and its leadership’s commitment to integrity and an effective control environment.

Actionable items	Responsible unit	Timeline
1. Revise Coahuila's General Standard for Internal Control in line with the federal Standard Model of Internal Control, which codifies the principle that “the organisation demonstrates a commitment to integrity and ethical values”.		
2. Create a control environment non-conducive to corruption.		
3. Emphasise the value of role models through initiatives such as ethical screening of managers, seminars and awareness campaigns, communicating concrete compliance actions, self-assessment tools, and 360° evaluations for managers.		

Proposal for action: Management ownership and awareness of the internal control system and risk management should be improved.

Actionable items	Responsible unit	Timeline
1. Clarify the roles and responsibilities of managers in relation to internal control and risk management processes and activities through official channels or directives.		
2. Take measures to integrate internal control processes into the four phases of the management cycle (planning, execution, analysis, reaction).		
3. Complement the general guidelines provided through the Manual for General Application on Internal Control with ad-hoc guidance on risk-management arrangements, tools, and methodology.		

Proposal for action: Make better use of data to identify and address integrity risks, and thereby improve the quality of institutional risk maps and mitigation strategies.

Actionable items	Responsible unit	Timeline
1. Develop a concrete action plan to promote data quality and the use of data analytics tools for effective risk management.		
2. Use the Local Digital Platform to be created within the CLACS as a tool to test data analytics tools and strategies to improve internal control and risk assessment.		
3. Develop a strategy to move towards a more advanced use of data analytics for anti-corruption purposes such as to verify and validate transactions or to uncover potential and actual corruption.		

Proposal for action: Ensure that all ministries have an internal control unit in order to strengthen the internal audit function and improve the effectiveness of governance, risk management, and internal controls.

Actionable items	Responsible unit	Timeline
1. Gradually appoint internal control units in all ministries after elaborating a priority list based on a corruption risk-assessment.		

Proposal for action: Improve the internal audit function with regards to fraud and corruption investigations by scaling up professionalism and resources.

Actionable items	Responsible unit	Timeline
1. Improve SEFIR's internal audit function with regards to fraud and corruption investigations by scaling up training and capacity building efforts, especially in relation to the increased competence to conducting administrative proceedings for non-serious offences.		
2. Ensure, within SEFIR, adequate financial and human resources to improve effectiveness in its investigations and to be able to conduct administrative proceedings in relation to non-serious administrative offences.		

Enhance transparency and participation for effective accountability

Proposal for action: Coahuila could better exploit the data and information currently produced by public entities by improving data socialisation and developing on-line visualisation tools.

Actionable items	Responsible unit	Timeline
1. Elaborate and make public data more intelligible by presenting them in a plain, aggregated, and simplified format, also by means of online visualisation tools.		
2. Promote awareness-raising and capacity-building initiatives to narrow the digital divide and promote the use of public data among citizens.		

Proposal for action: Coahuila could identify a single transparency portal used to consult and request information in order to avoid gaps and overlaps created by existing tools.

Actionable items	Responsible unit	Timeline
1. Identify a single transparency portal providing comprehensive access to all the information and data provided by public institutions.		
2. Ensure that this single transparency portal is user-friendly and possesses a high level of usability and reusability of data and information.		

Proposal for action: Coahuila could improve awareness of existing tools for stakeholder participation and oversight, and could enable active engagement in innovative and interactive ways.

Actionable items	Responsible unit	Timeline
1. Improve the understanding of available stakeholder participation and oversight tools by devoting a specific section of its future single transparency portal to explaining, describing, and promoting them.		
2. Use ICTs to further enable the engagement of society in public life, for instance through a multi-channel platform.		

Proposal for action: Improve stakeholder engagement through a demand-drive approach based on dialogue, consultation, and data collaboration and inter-operability.

Actionable items	Responsible unit	Timeline
1. Organise periodic meetings among relevant institutions and social actors to identify additional typologies of information which could potentially enhance transparency and accountability of public institutions.		
2. Create a simple and user-friendly platform for citizens to submit ideas on how to improve transparency.		
3. Allow users to take full advantage of the existing open data platform by allowing them to enrich it with new datasets.		

Proposal for action: Coahuila could improve oversight over the transparency commitments of its institutions.

Actionable items	Responsible unit	Timeline
1. Create a transparency index measuring compliance of Coahuila's public entities with transparency obligations, and make the corresponding results public and easily accessible.		
2. Present the transparency index through visualisation tools and customisation options, and elaborate indicators not only related to compliance with the legal framework but also to the implementation and effectiveness of corresponding efforts.		

Integrity in public procurement

Proposal for action: Using participative techniques, Coahuila should develop a specific Code of Ethics or Conduct and specific guidance for procurement officials, and ensure that specific provisions to public procurement are included in the codes developed by ministries and municipalities.

Actionable items	Responsible unit	Timeline
1. Develop a plan to consult procurement officials and other stakeholders (internal and external) on what a Code of Conduct or Ethics for procurement officials should prescribe.		
2. Consult with procurement officials and stakeholders.		
3. Review the national (SFP) and international (OECD) experiences on integrity standards for procurement officials.		
4. Draft the Code of Conduct or Ethics for procurement officials, focusing on the risks implied by this activity.		
5. Draft guidance documents, tutorials, and training materials to illustrate how procurement officials should apply the values and principles included in the Code (comprising practical situations).		
6. Set up a team to support other entities and municipalities in the development of their own codes and integrity rules for procurement officials.		

Proposal for action: While the Code of Conduct and the Conflict-of-Interest Manifest are positive first steps in preventing corruption among suppliers, Coahuila should now leverage those tools to better identify integrity risks in public procurement processes.

Actionable items	Responsible unit	Timeline
1. Review the Code of Conduct for suppliers in an effort to balance values-based behaviours with the current rules-based approach.		
2. Organise a consultation, awareness-raising, and communication plan for the new Code of Conduct for suppliers and the Conflict-of-Interest Manifest (websites, during the application for the supplier registry, etc.).		
3. Organise a programme of integrity training for the supplier community, with possible leverage on business chambers to widen the outreach.		
4. Design a system to scrutinise Conflict-of-Interest Manifests provided by suppliers and cross-check them against procurement officials' declarations. Such scrutiny should be risk-based.		
5. Publish guidance for suppliers defining potential, real, and apparent conflict of interest (may want to use SFP and OECD materials and publications) and explaining to different audiences how to use the Conflict-of-Interest Manifests.		
6. Amend the conflict-of-interest declaration system to allow suppliers to update their manifests as required.		
7. Appoint contact points in the tendering institutions to provide advice to suppliers on how to fill out the Conflict-of-Interest Manifests.		
8. Evaluate periodically the effectiveness of the conflict-of-interest policy as applied to procurement operations.		

Proposal for action: In order to preserve public integrity, Coahuila should develop risk assessment tools to identify and address the threats to the proper functioning of the public procurement system and make sure that contracting authorities implement them.

Actionable items	Responsible unit	Timeline
1. Publicise and communicate more widely the manuals on internal control and risk management and raise awareness on the internal control strategy, including through training.		
2. Develop a risk mapping and a red flag system for procurement activities, including corruption and fraud risks, and anticipating mitigation measures. Specific templates should be used.		
3. Develop guidance and training on how to apply internal control in procurement activities.		
4. Evaluate and periodically update risk mapping, reviewing the criticality of each risk and the effectiveness of the mitigation measures.		

Proposal for action: Coahuila should support the implementation of the new integrity standards by streamlining and updating the legislation and by developing and implementing adequate communications strategies.

Actionable items	Responsible unit	Timeline
1. Review the regulatory framework governing integrity in public procurement to avoid dispersion and duplication.		
2. Develop a comprehensive communications programme on the integrity strategy for procurement operations, emphasising recent tools developed by the state and the federal governments, and targeting different audiences.		

Proposal for action: Coahuila should strengthen the culture of integrity among the procurement workforce by developing a clear integrity capacity strategy and implementing tailored training for procurement officials.

Actionable items	Responsible unit	Timeline
1. Identify the universe of public officials with procurement-related tasks		
2. Develop integrity training programmes for procurement officials to raise awareness about integrity risks and develop knowledge on ways to mitigate such risks. Trainings could take place as part of induction mechanisms and on an ongoing basis.		
3. Establish e-learning courses on integrity in public procurement.		
4. Design a certification/evaluation mechanism to assess the effectiveness of the training programmes and e-learning courses.		

Proposal for action: Coahuila should further engage with the private sector, developing co-operation agreements and integrity pacts in an effort to minimise corruption risks.

Actionable items	Responsible unit	Timeline
1. Promote and facilitate the development of integrity standards by supplier companies and/or the adoption of those standards upheld by the government of Coahuila.		
2. Develop a Business Integrity Programme, including codes of conduct, internal controls, compliance measures and monitoring, mirroring the efforts undertaken by SFP at the federal level.		
3. Include "no corruption" commitments in contracts to supply goods, services, or works to the state government.		
4. Amend the LAACSEC and the LOPSEC to include the figure of "integrity pacts".		
5. Establish co-operation agreements and integrity pacts with business associations to carry out joint actions in favour of integrity in public procurement.		

Proposal for action: Coahuila should create opportunities for direct involvement of civil society in the public procurement processes by implementing the social witness programme and other monitoring tools.

Actionable items	Responsible unit	Timeline
1. Accelerate the implementation of social witnesses, particularly in high risk tender procedures. This will require a process of selection and training of the individuals or organisations acting as social witnesses.		
2. Systematise the implementation of social comptrollership programmes and widen their application.		
3. Periodically evaluate the effectiveness of social witnesses and social comptrollership programmes and communicate the results widely.		

Proposal for action: Coahuila should consolidate the information related to public procurement through a unique online portal and ensure the visibility of the flow of public funds, from the beginning of the budgeting process through the public procurement cycle, in order to facilitate an adequate level scrutiny of public procurement processes.

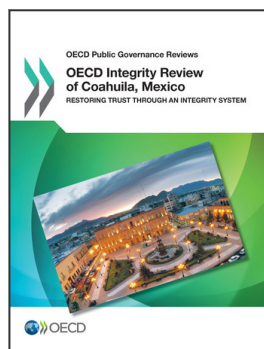
Actionable items	Responsible unit	Timeline
1. Create a specific public procurement page on the <i>Coahuila Transparente</i> website to consolidate procurement-related information and avoid dispersion. This page could be called "Coahuila Compra" and could include information from the pre-tender, tendering, and post-tender stages.		
2. Upgrade SITODEM to provide information about procurement operations, spending, and physical and budget exercise of public works.		
3. Include complaints boxes in <i>Coahuila Transparente</i> and SITODEM to report corrupt behaviours in public procurement.		
4. Run focus groups with different audiences (i.e., business chambers, civil society, academics, etc.) to identify useful procurement information that is not being published, and organise access to information websites in a more user-friendly manner.		

Proposal for action: Coahuila should continue maximising transparency in competitive tendering and take precautionary measures to enhance integrity, in particular for exceptions to competitive tendering.

Actionable items	Responsible unit	Timeline
1. Continuously monitor the choice for non-competitive procurement processes (i.e. direct awards) and restricted invitations to ensure proper justification is provided.		
2. Ensure that all the documentation pertaining to direct awards, including market analyses and justifications, are published, unless an exception applies under the Transparency and Access to Information Law.		

Proposal for action: Coahuila should consider the development of e-procurement solutions that cover the entire public procurement cycle in order to cut direct contact between public officials and suppliers and, therefore, decrease the risks of corrupt behaviour.

Actionable items	Responsible unit	Timeline
1. Finalise the implementation of the system for online supplier registration (REPROCO)		
2. Develop an e-procurement solution for purchases financed with state funds. This solution should encompass the full public procurement cycle (i.e. from procurement planning to contract management and payment to suppliers) and should include a module for reverse auctions.		



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