Transparency and Anticorruption Reform Agenda of the Sofia Municipality of 2022–2027

I.   Introduction

Vulnerabilities to corruption, manifested in shortcomings in effective transparency, as well as in the ineffective use of integrity mechanisms, and low levels of civic engagement are perils to local democracy and citizens' trust in municipal institutions.

Building upon:

- the principled commitment to work for more transparency, accessibility, anticorruption measures, and citizen engagement as stipulated in the Municipal Pact for Anticorruption, signed by the Deputy Mayor Mr. Miroslav Borshosh on behalf of the Mayor of the Municipality of Sofia, Ms. Yordanka Fandakova on 19 July 2022 at the IRI National Conference "Combatting Vulnerabilities to Corruption at the Municipal Level", which took place in Sofia, Bulgaria;
and
- the findings and recommendations in the report "Assessing Municipal Vulnerabilities to Corruption in Bulgaria: An Examination of Ten Bulgarian Municipalities", published by IRI in July 2022;

this Transparency and Anticorruption Reform Agenda has been developed and adopted with consensus by the Working Group in the Municipality of Sofia, which brings together representatives of the municipal administration, the Sofia Municipal Council (SMC), and civil society.

This is a strategic document that suggests pragmatic short-term and longer-term reforms aimed at increasing effective transparency and citizen participation so as to address vulnerabilities to corruption. Each reform includes an overview of its rationale, objective, timeframe, and implementation process.

This Reform Agenda seeks to inform and stimulate a process of change through reform implementation in Sofia Municipality that will ultimately improve the lives of citizens.

II.   Short-term reforms [1]

---

[1] To be implemented within one year.

Reform 1: Implementation of an Anti-Bribery Management System (ABMS), in accordance with the standard ISO 37001:2016

Rationale for the suggested reform:
Sofia Municipality is unique in terms of scale and complexity in the Republic of Bulgaria. To avoid any doubt that administrative complexity can be used to exert corruption pressure, a standardized management system should be put in place to ensure a minimum level of anti-corruption measures.

Objective:
To develop and implement in Sofia Municipality an Anti-Bribery Management System (ABMS), in accordance with the standard ISO 37001:2016.

Process: *
- Plan for developing a manual for the ABMS ISO 37001:2016.
- Training internal auditors in accord with the International Standard ISO 37001:2016.
- Designation of Anti-Bribery Management Board in Sofia Municipality (ABMSSM).
- Rules of Organization and Procedures for the ABMSSM according to the international standard ISO 37001:2016.
- Implementation of the system.
- Certification of the system.

* some of the described activities have been completed as of 14.10.2022.

Resources:
- Financial resources for the development of ISO 37001:2016 by experts in the field
- Financial resources for training of internal auditors according to the international standard ISO 37001:2016.
- Human resources – experts from the different directorates/units of Sofia Municipality to take part in setting up and implementing the System.

Roles and responsibilities:
- In the implementation, the main role should be played by the managers of the directorates 'Finance and Health Division', 'Municipal administration', the Information Security Officer, and the 'Security Directorate'.

Reform 2: Development of detailed registers of municipal assets and expenses

Rationale for the suggested reform:
Sofia Municipality provides a vast amount of information on municipal assets and expenditures, but this information is often not easily accessible because it is not well organized, which prevents traceability and hinders public accountability. For example, it is difficult to find information on the status of municipal property and its use, and to track changes over time. Making this information available in a format that citizens can understand, especially in the form of registers, will improve functional transparency and will increase accountability and hence citizen trust and participation, too. Many suspicions of wrongdoing

arise precisely because this information is difficult to access and absent from the public debate.

Objective:
Updating of existing registers and, if necessary, creating new registers on the official electronic portal of the municipality.

This reform will improve the availability and accessibility of information as a tool for preventing and combating corruption.

For the purposes of the reform, the definition of a register is considered to be a formally regulated format for the provision of information, with clear rules and traceability for its maintenance and updating.

The reform is expected to achieve the following results:
- Less perception of mismanagement on the part of the municipality.
- Weaker perception of corruption.
- Increased confidence in municipal officials and Sofia Municipal Council members.

Process:
- **Regarding existing registers:**
- Review of existing registers, their regulation, completeness, and timeliness.
- Identify how data protection and transparency provisions affect the publication of relevant information.
- Update the registers in a format that allows them to be easily searched and easily published on the website (as a page or downloadable file).
- Update the website to clearly label and provide easy access to the registers.
- Establish processes and teams to ensure that records are kept up-to-date in a timely manner.
- **Regarding the establishment of additional registers:**
- A review of the need for the creation of new registers and their regulation by decisions of the Sofia Municipal Council.
- Where the need for new additional registers is identified:
  - in the period before the regulation of supplementary registers, it is desirable for the municipality to create databases and/or tabulated summaries with information and references to supplementary documents (e.g. regarding items of the expenditure part of the budget, such as tenders, competitions, with basic elements – value, winning bidder, etc.).
  - Develop a planned timetable for the adoption of regulations for the required additional registers.
  - Produce and publish the registers in a format that allows them to be easily searched and easily published on the website (as a page or downloadable file).
  - The newly created registers should be placed in the same section as the existing ones, in a clearly marked place on the municipality's website and easily accessible to citizens.
  - Establish processes and teams to ensure that the newly created registers are updated in a timely manner.

Resources:
- Administrative capacity and financial resources.
- IT infrastructure and software.

Roles and responsibilities:
- **Municipality:** Establish processes and teams to ensure that the newly created registers are updated in a timely manner.

Reform 3: Conducting civic education campaigns

Rationale for the suggested reform:
The complex administrative structure of Sofia Municipality, including its territorial division, makes it difficult for citizens and creates uncertainties regarding the division of responsibilities. Citizens need to be provided with easily accessible and well-organized information to help them navigate the powers of the municipal and district level authorities, and to learn about their rights and opportunities to participate in municipal decision-making.

Objective:
The aim of the reform is to inform citizens about their rights and opportunities to participate in municipal decision-making, including information about how these opportunities work, how citizens' proposals are considered and how they are taken into account in making informed decisions. This will increase civic trust, engagement and participation.

The reform seeks to achieve the following results:
- Increasing citizens' understanding of which local government structure is responsible for what at the municipal and district levels, and who they can contact with their needs and issues of interest.
- Increasing citizen participation in public consultations and monitoring of the work of the Sofia Municipal Council.
- Strengthening the legitimacy and credibility of Sofia Municipal Council members and municipal administration.

Process:
- Draw up a list of all the opportunities and ways in which citizens can participate in the decision-making process in the municipality. Draw up an overview of the powers and duties of municipal and district level institutions. Prepare an overview of the communication channels and contact information available to citizens.
- Development of (1) A comprehensive and easy-to-understand guide to citizen participation; (2) Informational materials with functions, duties and contact information for municipal institutions.
- Publication of the guide/materials on the e-portal of the municipality in a special section for civic education and their publication in the media and social networks.
- Develop an outreach plan that includes a calendar of activities (press conferences, live broadcasts, Q&As, general meetings, etc.).
- Implementation of information activities.

Resources:
- Administrative capacity.
- Expertese in public relations/communications.
- Experience in community mobilization, including the assistance and support of civil society (organizations).
- IT support, if necessary.
- Possible use of municipal premises.

Roles and responsibilities:
- **Municipality:** Subject matter experts, including experts in the field of public relations/communications, develop outreach materials and implement the outreach plan under the direction of the relevant line manager. The participation of council members should be on a voluntary basis.
- **Civil society:** The media has an important role to play in publicizing events. Social networking groups/mobile communication apps and local associations can further publicize the campaign's outreach calendar to their members. Community leaders can act as facilitators for outreach activities, alongside councilors and officials.

Reform 4: Development of an institutional communication strategy

Rationale for the suggested reform:
Modern communication encompasses various sources of information, including social networks and mobile communication applications, and it is necessary to respect the specifics of each communication channel. Beyond the expert work, it is important that it is properly presented to the public, so that citizens are aware of what is being done in their interests at municipal level.

The citizens lack an accurate perception of the true level of transparency in Sofia Municipality regarding the work of both the municipal administration and the Sofia Municipal Council and this is due to a number of reasons. This problem stems, in part, from a commonly adopted communication approach that encourages the provision of primarily technical information and the use of legal and expert language. At the same time, this approach also reflects an insufficient culture of openness, which discourages officials from acknowledging existing constraints and clearly explaining to citizens how municipal processes work in practice.

Objective:
Establish clear priorities and guidelines for city officials in terms of content, channels and audiences/stakeholders they should engage with.

Having a communication strategy in place will improve the accessibility of information and citizens' perceptions of the openness and responsiveness of the administration.

The reform seeks to achieve the following results:
- Municipal communication products appear more regularly and are more accessible.
- The relationship between municipal officials and the media is more interactive.

- Citizens better understand what the municipality and its districts do and why.

Process:
- An analysis of municipal communication needs based on a review of current media and social media presence, branding and image, messages and audiences.
- Develop a strategy including messages, content, channels (e.g. official municipality e-portal, social networks/platforms, press conferences, interviews and etc.), audiences and an action plan.
- Official adoption of the strategy.
- Training of the municipal staff to apply the strategy and provide additional resources as needed.
- Launch of strategy implementation.

Resources:
- Expert knowledge in communications, including media relations and social media management.
- IT support.

Roles and responsibilities:
- **Municipality:** Public Relations/Communications Officers lead the technical side of implementation, with the mayor formally approving the strategy and relevant line managers overseeing implementation. Once approved by the mayor, the strategy should be submitted to the Sofia Municipal Council for adoption.
- **Civil society:** Media representatives should be consulted throughout the process, as they are the main intermediaries in the communication strategy. Community members could be part of the communication needs analysis, providing insight into how citizens receive messages from the municipality. NGOs or companies with a media focus could provide technical advice and act as intermediaries and facilitators.

Reform 5: Holding regular meetings with citizens in local communities

Rationale for the suggested reform:
Greater visibility and emphasis on the regularity and timing of meetings between representatives of the municipal administration, the Sofia Municipal Council, and citizens will create predictability in communication and gradually help to build citizens' trust in local institutions. Introducing regularity and the possibility of meetings with staff who are specialists in relevant areas would benefit citizens and facilitate both communication and feedback.

Objective:
Adoption of more regular, consistent and coherent approach to meeting citizens both at the administrations and in the communities.

This will increase citizens' perceptions of the openness and responsiveness of municipal institutions, and will increase civic trust.

The reform seeks to achieve the following results:
- Municipal officials/Sofia Municipal Council members are more visible in the community.
- Community problems are solved more quickly and efficiently by the municipality.
- Citizens perceive their leaders as more responsive, trustworthy and legitimate.
- Citizens can expect to have regular opportunities to interact with municipal officials/Sofia Municipal Council members.

Process:
- Review the variety of community meetings that have been held in the past and identify those that should continue to be held (e.g. by area or neighborhood).
- Develop an approach that distributes effort between the mayor, line managers, Sofia Municipal Council members, and administration staff.
- Develop a calendar of meetings with citizens and publicize it online (website and social media) and through local media.
- Ensure that minutes are taken in meetings with members of the public, including of issues raised and contact details for possible follow-up.

Resources:
- Time of municipal employees.
- Municipal premises
- Platforms (social media) for online events.

Roles and responsibilities:
- **Municipality:** Public relations officers and administration staff develop the calendar and organise the logistics, while line managers in the administration and Sofia Municipal Council members conduct the meetings with citizens.
- **Civil society:** Local media and interested citizens help publicize the calendar of community activities to encourage participation. Civil society organisations can support the municipality and Sofia Municipal Council in implementing the calendar.

III.   Medium- and long-term reforms[2]

Reform 6: Reorganizing the municipal official e-portal from a user experience perspective

Rationale for the suggested reform:
Sofia Municipality provides a lot of information, but it is not always easy to use. This is also true of the municipality's official electronic portal, where information is often not structured in a user-friendly way or updated in a timely manner. There is also information provided by the municipality on the official electronic portal, but citizens consider it is missing because they cannot find it.

Objective:

---

[2] To be implemented within two to five years.

Carry out an analysis of citizens' use of the municipal official electronic portal and reorganize it to maximize accessibility, relevance, and ease of use. This will increase the accessibility of information and the perception of openness and responsiveness of the municipality.

The reform seeks to achieve the following results:
- The official electronic portal of the municipality is perceived as being more user-friendly and more accessible to citizens.
- The ease of use of the official electronic portal reduces the number of telephone and face-to-face inquiries to municipal officials.

Process:
- Develop a user experience analysis methodology with appropriate tools (e.g. survey, focus groups, usability testing).
- Implement user experience measuring tools and gather evidence.
- Analyze the results from the user experience tools.
- Design changes to the municipality's official electronic portal in line with the analysis.
- Roll out the reorganized official electronic portal of the municipality.

Resources:
- Methods for user experience analysis.
- Expertese of website/electronic portal development.
- IT infrastructure and software packages.
- Capacity to mobilize citizen participation in the analysis process.

Roles and responsibilities:
- **Municipality:** Public relations/communications experts lead the analysis of the user experience and the process of developing recommendations. IT staff is responsible for monitoring the website's update and deployment.
- **Civil society:** A usability analysis should be carried out to determine the information needed by citizens. Skills could also be contributed by community groups or local businesses with an IT focus.

Reform 7: Adopting a new approach to (1) consulting citizens earlier on investment priorities in the municipal budget and (2) expanding the citizen participation process in budgeting

Rationale for the suggested reform:
Despite Sofia Municipality's efforts to take significant steps towards broader citizen participation in decision-making, there is still a perception among citizens that decisions at the municipal level are made without their involvement – a perception that leads to civic disengagement. The administration and the Sofia Municipal Council should move towards greater citizen participation and active involvement of citizens in decision-making.

This is also true with regard to citizen participation in municipal budget planning. The budgeting of the capital city is a complex process. The adoption of the budget involves only

one public consultation with citizens, after the draft budget has already been prepared by the administration. Citizens should be involved in the development of priorities for the draft budget.

To improve the level of civic engagement and participation in the budget process, it is necessary to work in two directions:
1) Citizens should be consulted at an earlier stage on the priorities for investment projects in the budget. The consultation aims to gather feedback from citizens on what the priorities should be for the municipality, particularly in light of resource constraints.
2) Increasing the budget allocated by Sofia Municipality to the participatory budgeting process 'Sofia Chooses' and improving the approach to involve citizens in this budgeting process.

Objective:
Create a well-structured and accessible process for citizens to contribute to the development and implementation of the municipal budget. This will increase civic engagement and participation.

This reform seeks to achieve the following results:
- Citizens have a tangible influence on the priorities of the municipality's investment program.
- Some elements of the municipal budget are determined by citizens.
- Citizens see tangible benefits from their interactions with the municipality.

Process:
- Designate a working group (administration, Sofia Municipal Council, civil society) to explore potential methodologies for 1) citizen consultation on municipal investment priorities at an early stage and 2) expanding the existing practice of participatory budgeting 'Sofia Chooses'.
- Development of technical proposals, as those mentioned in point 2, including a higher budget ceiling, participatory approach and responsibilities.
- Consulting the proposals with citizens.
- Official adoption of the proposals.
- Designation of officials responsible for the activities related to points 1 and 2.
- Development of media materials to inform citizens about the new approach.
- Implementation of the approach of 1) citizen consultation on municipal investment priorities at an early stage; and 2) an expanded citizen participation process in budgeting before the next budget cycle.

Resources:
- Expertese in the area of participatory budgeting.
- Expertese in the area of community moderation/mobilization.
- Experience in financial planning/budgeting.
- IT support and instruments, for example international experience and good practices.

Roles and responsibilities:

- **Municipality:** The members of the working group (municipal officials and members of the Sofia Municipal Council) should familiarize themselves with the practices of early consultation on municipal investment priorities and participatory budgeting 'Sofia Chooses' and prepare substantiated proposals. Designated officials will oversee implementation, assisted as necessary by public relations and administrative experts.
- **Civil society:** For this approach to be effective, civil society must be involved throughout the reform process; national or international NGOs can provide technical expertise and support for participatory budgeting.

Reform 8: Adopting an approach for timely information and consultation with citizens and introducing a unified model for organizing and conducting public consultations on the territory of Sofia Municipality

Rationale for the suggested reform:

Starting the process of public consultation on policies of local importance at a sufficiently early stage of their development should be a priority for Sofia Municipality in general, and not only in terms of investment and budget formation and allocation. There is a need to diversify the ways in which citizens are consulted – to make them more accessible to different groups and in a language they can understand.

This process starts with timely information about the municipality's intentions, using a variety of communication channels, also tailored to the specifics of the stakeholders, and continues through the consultation phase. Public discussions play an important role in the public consultation process. Sofia Municipality has a well-developed legal framework that regulates which issues should be discussed and how public hearings should be held on its territory and includes:

1. Regulation on holding public consultations in Sofia Municipality, adopted in 2017;
2. Regulation on the conditions and procedure for public discussion of projects under Articles 4 and 5 of the Municipal Debt Act, adopted in 2006;
3. Regulation on the conditions and procedure for the preparation of the budget forecast for local activities for the next three years, for the preparation, adoption, implementation and reporting of the budget of Sofia Municipality, adopted in 2017;
4. Regulation on the Procedure and Method of Holding Public Hearings on Spatial Development and Planning of Sofia Municipality, adopted in 2018.

In order to be more effective, public discussions should be conducted according to a uniform model, adapted to the capacities of each structure/unit in the municipality. In order to achieve this objective, the work should be carried out in two main directions:

1) The introduction of a s*tandard format and sequence of steps* for organizing and conducting public discussions, regardless of the topic, including the formation of dedicated *teams* responsible for the process.

2) To promote the topic under discussion by carrying out communication activities appropriate to the topic and its scope.

Objective:

Improving and updating the already good regulatory framework to reach and actively involve as wide a range of stakeholders as possible, thereby enhancing the credibility of the institution.

This reform seeks to achieve the following results:
- Trust in the municipality increases.
- Citizens have more information and an active role in municipal decision-making.
- Citizens see tangible benefits from their interactions with the municipality.

Process:
- Municipal leadership and staff familiarize themselves with good practices in the organization and conduct of public consultations, and with recommendations for the effective implementation of consultation processes in general.
- Identification and formal adoption of specific proposals.
- Conducting training sessions for the implementation of the measures adopted, with the participation of the communication specialists of the municipality and its different districts.
- Establishment of a specialized unit at Sofia Municipality, comprising experts from various fields, with functions in the general management of public consultations, methodological support for the structures of the Sofia Municipality and the districts, coordination of processes and procedures, IT support for specialized platforms for public consultations and their management, regular training of the staff of the Sofia Municipality and the districts.
- Implementation of the adopted approaches.

Resources:
- Administrative capacity.
- Know-how in civic participation and consultative events.
- Know-how in community mobilization.

Roles and responsibilities:
- **Municipality:** The members of the working group, together with sectoral managers, members of the Sofia Municipal Council, experts, municipal officials, etc. should familiarize themselves with good practices in the conduct of consultation processes, including digital tools, and make specific recommendations on the conduct of public consultations. If some of these are subsequently adopted, line managers will monitor implementation, with the support of relevant experts as appropriate.
- **Civil society:** CSOs with experience in implementing specific mechanisms for citizen consultation can contribute with expertise and promotion of newly adopted models for public consultation. National or international NGOs can provide technical expertise and recommendations on the implementation of digital platforms for citizen participation.

--- end of document ---