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Y-ACT TOOLKIT

Developed in the Youth Against Corruption: Tools for Transparency (Y-ACT) project

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1. Introduction: Why Y-ACT?

Corruption is often presented as a distant problem involving national politics or major financial scandals. Young people usually experience its consequences much closer to home: through access to education, first employment, housing, transport, youth facilities, green spaces and local services. It can influence who receives an opportunity, which neighbourhood receives investment, what information is made public and whether a public decision can be explained.

In this toolkit, corruption includes bribery and theft of public resources, but also favouritism, nepotism, clientelism, undisclosed conflicts of interest, manipulated procurement, misuse of authority and selective access to information. Not every administrative mistake, weak decision or unpopular policy is corruption. Y-ACT therefore encourages informed questions and responsible participation rather than suspicion toward every institution.

The need for this work remains visible in Slovenia. In the 2026 Special Eurobarometer, 90% of respondents in Slovenia considered corruption widespread, compared with 71% across the EU, while 36% said that corruption affected them personally in daily life, compared with an EU average of 30%. These are perceptions rather than findings about individual cases, but they influence trust and willingness to participate (European Commission, 2026).

Y-ACT starts from the position that young people should not be treated only as recipients of public policy. They have a right to understand how decisions are made, obtain public information, participate in local discussions and contribute to the integrity of the communities in which they live.

1.1 About the Y-ACT project

Youth Against Corruption: Tools for Transparency – Y-ACT is a Slovenian youth-participation and civic-education project led by the Association EPEKA, Social Enterprise. It was implemented from September 2025 to July 2026, with activities connected to Maribor, the Pohorje region, Jakobski Dol and Ljubljana. Particular attention was given to young people from rural and peripheral areas, regional centres and groups whose voices are often underrepresented in public life.

The project responds to two connected needs. First, young people may recognise that a process appears unfair without knowing how municipal budgets, public procurement, access-to-information rules or reporting channels work. Second, they may have few realistic opportunities to turn a concern into constructive participation.

Y-ACT therefore combines:

- non-formal learning on corruption, integrity and transparency;
- practical tools for following local decisions, public money and public information;
- youth-led awareness activities and educational materials;
- dialogue between young people, civil society and public authorities;
- a local, rural and environmental perspective on public integrity.

The project is locally rooted. It links integrity with transport routes, housing development, youth funding, environmental decisions, community facilities and the use of public space. Young people are contributors to the learning process, not investigators. The objective is to strengthen their ability to distinguish evidence from rumour, ask precise questions, communicate responsibly and develop realistic proposals.

Participation opportunities are not distributed equally. Outreach through trusted youth workers, community organisations and local mentors is particularly important for Roma youth, LGBTQ+ young people, migrants, young people not in employment, education or training, and those facing socioeconomic disadvantage. Inclusion in Y-ACT is therefore not an additional topic; it is part of how credible participation is organised.

1.2 Why corruption matters to young people

Young people depend on public institutions during major life transitions. Education, a first job, mobility, access to housing and participation in cultural or community life are shaped by decisions taken by schools, employers, municipalities, ministries, public institutes and publicly funded organisations. When transparent criteria are replaced by hidden influence, existing disadvantages can deepen.

Education, employment and housing

Integrity risks may arise when admissions, scholarships, internships, public-sector recruitment, student accommodation, housing lists or access to publicly owned premises are influenced by personal connections, political loyalty, gifts or undisclosed conflicts of interest. Manipulated procurement can also reduce the quality of school equipment, renovations, housing projects and youth programmes even when young people are not directly involved in the contract.

Housing independence is a particular challenge. In 2024, young people in Slovenia left the parental home at an average age of 28.9 years, and 79.7% of residents aged 16–29 lived with their parents (Statistical Office of the Republic of Slovenia, 2025). This does not make every planning or housing decision an integrity issue, but it increases the importance of clear criteria, transparent public-private arrangements and understandable explanations of who benefits from public land and investment.

Mobility, services and youth infrastructure

Transport determines whether a young person can reach school, work, health care, a youth centre or a municipal meeting. Questions of integrity may concern the selection of transport operators, route planning, maintenance contracts or the criteria used to decide which settlements receive regular services. A consultation may be formally open while remaining practically inaccessible to young people who have no evening transport home.

Youth infrastructure includes youth centres, meeting rooms, sports facilities, rehearsal spaces, libraries, cultural venues and the staff and programmes that make those places useful. Transparency matters when municipalities allocate grants, premises, staff positions or investment. Young people should be able to see which organisations receive support, which criteria are applied and whether rural settlements can realistically access the funded activities.

Environment, public space and local development

Young people will live longest with the environmental consequences of decisions taken today. Land-use

changes, waste management, energy projects, forestry, flood protection, transport and the use of green-transition funds all involve long-term public interests. Integrity risks may arise through hidden relationships, manipulated assessments, weak inspections, tailored procurement or the misuse of environmental language to conceal poor outcomes.

Public space and local development are equally important. Parks, playgrounds, squares, community buildings and abandoned sites influence whether young people feel that they belong. Transparent governance requires early information, understandable reasons, fair procurement and opportunities to participate before the main decision has effectively become final. Chapters 4 and 5 provide the practical methods for examining these issues.

1.3 Why rural and regional communities require attention

Rural communities are not inherently more corrupt than cities. They often have strong solidarity, local knowledge and close relationships between residents and institutions. Certain structural conditions can nevertheless make independent scrutiny more difficult and increase the personal cost of raising a concern.

These conditions can include:

- fewer independent media, civil-society organisations and specialist support services;
- close personal, political and employment networks in which the same people meet in several roles;
- public information that is technically available but difficult to locate or understand;
- meetings and services concentrated in the municipal centre;
- fear that speaking up may damage relationships, reputation or future opportunities;
- limited structured channels through which young people can influence decisions.

Transparent procedures protect both communities and honest officials. Written criteria, declared conflicts of interest, accessible minutes and reasoned decisions reduce the suspicion that every outcome is based on friendship or political loyalty. They also make it easier to distinguish deliberate opacity from limited administrative capacity.

Safe participation cannot rely on telling young people simply to “speak up”. Collective questions, anonymous feedback, facilitated dialogue and requests for general public information may be safer starting points than public accusations. The Council of Europe has called on member states to remove barriers to the social, economic and political participation of rural youth (Council of Europe, 2025). Chapter 3 examines these conditions in detail, while Chapter 6 addresses responsible documentation and reporting.

1.4 Who the toolkit is for

The toolkit is intended for people and organisations that want to strengthen local transparency without requiring prior legal or anti-corruption expertise:

- young people and informal youth groups exploring a local issue or preparing questions for an institution;
- youth workers, teachers, trainers and mentors facilitating safe and balanced learning;
- youth centres, schools and civil-society organisations integrating integrity into civic education, environmental work or volunteering;
- community organisations and local initiatives working on transport, housing, public space, culture, rural development or environmental protection.

Organisations can also use the toolkit to examine their own transparency, including participant selection, funding decisions, conflicts of interest, personal-data protection and responses to concerns.

1.5 How to use the toolkit

The toolkit is a flexible resource rather than a fixed curriculum. Users may read it from beginning to end or select the sections and printable tools that correspond to a specific need.

It can be used:

- as an individual reference guide for terminology, warning signs, public information and action options;
- for a 60–90-minute workshop combining one concept, one fictional case, one exercise and a final reflection;
- as a sequence of sessions moving from integrity concepts to public information, evidence, action and dialogue;
- to follow one clearly defined local issue through documents, meetings and institutional responses;
- to prepare evidence-based questions and realistic recommendations for a municipality or other public body.

Before discussing a real situation, users should separate verified fact, reasonable interpretation, unanswered question and unsubstantiated allegation. Monitoring should focus on systems and procedures, avoid publishing personal data and remain proportionate to the evidence and the group's capacity.

The Y-ACT approach can be summarised in six connected steps:

1. Learn: understand how local decisions and public resources are managed.
2. Observe: identify facts, information gaps and integrity risks.
3. Ask: request explanations and public information.
4. Discuss: involve peers, communities and responsible institutions.
5. Act: develop safe, evidence-based and realistic proposals.
6. Follow up: record responses, commitments and remaining questions.

Chapter takeaways

- Corruption can affect the opportunities, services and local decisions that shape young people's daily lives.
- Not every poor, secretive or unpopular decision is corruption; responsible action begins by separating facts, interpretations, questions and allegations.
- Y-ACT connects public integrity with Slovenian local governance, rural and regional participation, and environmental decision-making.
- Young people are partners in democratic oversight, not investigators or substitutes for competent authorities.
- Participation should be inclusive, supported and safe, especially where close local networks increase the personal cost of speaking up.
- The toolkit moves from learning and observation to asking questions, planning action, institutional dialogue and follow-up.

Selected sources and further guidance

- [European Commission \(2026\). 2026 Rule of Law Report – Country Chapter on Slovenia.](#)
- [Statistical Office of the Republic of Slovenia \(2025\). International Youth Day.](#)
- [Council of Europe \(2025\). Recommendation CM/Rec\(2025\)3 on the social, economic and political participation of rural youth.](#)
- [European Commission \(n.d.\). Rural opportunities.](#)
- [Council of Europe \(n.d.\). Youth participation.](#)

2. Understanding corruption, integrity and transparency

Corruption is often discussed as though everyone knows exactly what it means. In practice, however, people may use the word “corruption” for many different situations: an unfair decision, an unexplained delay, political favouritism, poor management, a conflict of interest or simply a decision they strongly dislike. These situations can all damage trust, but they are not legally or ethically identical.

Being able to distinguish between them is important. It helps young people ask better questions, avoid unsupported accusations and choose an appropriate response. It also shifts attention away from rumours about individuals and towards the quality of the decision-making process: Who had authority? Which rules applied? Was a private interest involved? Was the process open and documented? Could the decision be reviewed?

2.1 What corruption means

A practical definition

In simple terms, corruption is the misuse of entrusted power, authority, resources or influence to obtain an undue private, financial, personal or political advantage.

The power involved does not have to belong to a national politician. It can be held by:

- a mayor or municipal councillor;
- a public official processing applications;
- a school, health centre or public institution manager;
- a member of a grant-selection committee;
- a person responsible for public procurement;
- an inspector or permit-issuing authority;
- the manager of a public company;
- someone responsible for distributing public property, subsidies or services.

The advantage does not always involve cash. It may include:

- a job or promotion;
- a public contract;
- a grant or subsidy;
- favourable access to municipal land, housing or premises;
- faster administrative treatment;
- avoidance of an inspection or penalty;
- a gift, discount, free service or paid trip;
- an advantage for a relative, friend, business partner or political ally;
- campaign support, votes, loyalty or influence;
- information that is not available to other applicants;
- protection from accountability.

Under Slovenia's Integrity and Prevention of Corruption Act, corruption includes a violation of expected conduct by officials or responsible persons, or by people who encourage or benefit from that violation, for the purpose of obtaining an undue benefit for themselves or another person. The Slovenian definition therefore covers both the person misusing their position and the person offering, requesting or receiving the advantage (Commission for the Prevention of Corruption, ZIntPK, Article 4).

Source: *Commission for the Prevention of Corruption (2020), Integrity and Prevention of Corruption Act (unofficial English translation).*

Three elements to look for

A useful youth-friendly test is to ask whether three elements are present:

1. Entrusted power or resources

Someone has been given authority, public money, information, property or decision-making responsibility that should be used for a defined public purpose.

2. Misuse or distortion of that responsibility

The person acts contrary to the applicable rules, purpose, ethical duties or public interest. This may involve an unlawful act, but it can also involve manipulation, hidden influence or an improper use of discretion.

3. An undue advantage

The conduct benefits the decision-maker, another person, a company, a family member, a political network or an organisation that should not have received that advantage through a fair process.

All three elements should be examined carefully. A bad outcome does not by itself prove corruption. A road project may be delayed because of weak planning, severe weather, technical problems or corruption. The result may look similar, but the explanation and appropriate response are different.

Corruption is broader than bribery

Bribery is one form of corruption, but corruption can occur without an envelope of money changing hands.

For example:

- a councillor pressures a committee to employ a political supporter;
- an official shares confidential tender information with a preferred company;
- a municipal employee overlooks an environmental violation committed by a relative;
- public equipment is used for a private construction project;
- grant criteria are changed so that only one favoured organisation can qualify;
- a permit is delayed until the applicant agrees to use a particular consultant;
- public funds are directed to places that promise political support rather than places with the greatest need.

These examples may involve favouritism, abuse of office, conflict of interest, clientelism, fraud or other integrity violations. Whether a specific act is criminal corruption is a matter for competent authorities, not for a workshop group or an individual citizen to determine conclusively.

Important principle

Citizens do not need to prove a criminal offence before asking questions or reporting a concern. At the same time, a suspicion, rumour or warning sign should not be presented publicly as established guilt.

Corruption in rural and green decision-making

In rural communities, entrusted power often concerns resources that are highly visible and personally important:

- agricultural or rural-development subsidies;
- access to forests, water sources and municipal land;
- waste collection and illegal dumping;
- road construction and public transport;
- renewable-energy projects;
- tourism development;
- land-use changes;
- environmental permits and inspections;
- protection of rivers, habitats and agricultural land;
- allocation of village halls, markets and public spaces.

A corrupt or improperly influenced decision in these areas may create long-term environmental and social harm. For example, overlooking illegal waste disposal may benefit one operator immediately but leave the entire community with contaminated soil, polluted water and future clean-up costs. A non-transparent change in land use may increase the value of privately owned land while reducing agricultural capacity, access to nature or protection against flooding.

Environmental corruption can be difficult to recognise because the benefit may be concentrated in a small group while the harm is delayed, dispersed or experienced collectively.

2.2 Corruption, poor administration or an unpopular decision?

Not every unfair, secretive or badly managed situation is corruption. The following distinctions can help participants analyse community concerns more accurately.

Situation	What it means	What makes it different from corruption?	Example
Corruption	Entrusted power or resources are misused to obtain an undue advantage for a person, organisation, business or political network.	It includes a link between misuse of responsibility and an improper benefit.	An inspector accepts free building work in return for ignoring illegal dumping.

Conflict of interest	A person's private interests influence, or appear capable of influencing, the impartial performance of their public duties.	A conflict can exist before any improper decision is made. When it is declared and properly managed, it does not automatically amount to corruption.	A councillor is asked to vote on a contract involving a company owned by a close relative.
Favouritism	Preferential treatment is given to a person or organisation because of personal connections rather than objective criteria.	It can be unethical or unlawful and may become corruption when public authority is deliberately misused to provide an undue advantage.	A municipal hall is repeatedly allocated to organisations connected to local officials.
Nepotism	A form of favouritism involving relatives or family relationships.	Family connections alone do not prove wrongdoing. The concern arises when they replace fair, merit-based procedures or are hidden from the decision-making process.	A manager appoints a relative to a public position without an open competition.
Clientelism	Public jobs, services, contracts or other benefits are exchanged for political loyalty, votes, influence or continued support.	The exchange is often informal and part of a continuing political network rather than a single payment.	Access to seasonal municipal work is offered mainly to families expected to support the ruling group.
Poor management	Resources are used inefficiently because of weak planning, inadequate skills, unclear responsibilities or poor supervision.	There may be serious harm but no improper private or political advantage.	A playground renovation exceeds its budget because estimates were unrealistic and the project was poorly supervised.
Lack of transparency	Information about a process, criteria, participants, spending or reasons for a decision is missing, inaccessible or published too late.	Secrecy increases corruption risk but does not by itself prove that corruption occurred.	A municipality announces grant recipients but does not publish the criteria, scores or reasons for selection.
Administrative error	A mistake occurs while applying rules, recording information, calculating points or processing an application.	The mistake is unintentional and is normally corrected once identified. Repeated "errors" benefiting the same party require closer examination.	A youth organisation loses points because one page of its application was accidentally omitted during scanning.
Lawful but unpopular decision	A competent authority makes a decision within the law and follows the required procedure, but some citizens disagree with its priorities or effects.	Disagreement, disappointment or political opposition does not establish corruption.	After public discussion, a municipality lawfully reduces funding for a festival and redirects it to flood protection.

Conflict of interest requires early action

Conflict of interest is particularly important because it is often misunderstood. Under Slovenian law, it exists when the private interest of an official person influences or appears to influence their impartial and objective performance of public duties. Private interest can include financial or non-financial benefit for the official, their family or people and organisations with whom they have personal, business or political relations. Slovenian rules require officials to pay attention to actual and potential conflicts, disclose them and, where necessary, stop participating in the matter (Commission for the Prevention of Corruption).

Source: *Commission for the Prevention of Corruption (n.d.), Conflict of interest*.

A conflict of interest is therefore not the same as proven corruption.

Consider two versions of the same situation:

Version A: A member of a municipal grant committee realises that one applicant is an organisation led by their partner. They declare the relationship, leave the discussion, do not see confidential scoring information and take no part in the decision.

This is a conflict of interest that has been recognised and managed.

Version B: The committee member hides the relationship, helps design the criteria, shares information with the applicant and gives the organisation the highest score.

This is an unmanaged conflict of interest and may also involve favouritism, abuse of authority or corruption.

Favouritism, nepotism and clientelism

These practices are especially difficult to discuss in small communities because people naturally know one another. A relative, neighbour or former classmate may genuinely be the most qualified candidate. The existence of a relationship is therefore not enough to establish wrongdoing.

The relevant questions are:

- Was the relationship disclosed?
- Were clear criteria used?
- Could other qualified candidates participate?
- Was the decision documented?
- Did the connected decision-maker withdraw?
- Was the selected person objectively the strongest candidate?
- Would the same decision have been made without the personal or political relationship?

Clientelism goes beyond a single friendship or family connection. It creates a continuing system in which benefits are exchanged for loyalty. People may feel that access to jobs, grants, services or public spaces depends on being “with the right group”. Such systems weaken equal citizenship even when the exchange is difficult to document.

Poor administration can still cause serious harm

Distinguishing poor management from corruption does not mean excusing it.

Poor administration can waste public money, exclude citizens, damage the environment and undermine trust. A municipality may repeatedly miss funding deadlines, fail to consult residents, maintain incomplete records or inadequately supervise contractors without anyone personally benefiting.

The correct response may involve:

- better procedures;
- staff training;
- clearer responsibilities;
- improved record-keeping;
- stronger supervision;
- an administrative complaint;
- an audit or evaluation;
- greater public participation.

The response to suspected corruption may instead require conflict-of-interest review, an integrity procedure, external oversight, reporting to a competent authority or investigation.

Lawful decisions can still be debated

Public institutions must often choose between competing needs. A municipality may have enough funding for only one of several priorities: a youth centre, safer roads, a wastewater system, public transport or flood protection.

A decision is not corrupt merely because:

- one village receives funding before another;
- a popular project is rejected;
- taxes or fees increase;
- a permit is lawfully denied;
- a council majority adopts a policy opposed by part of the community;
- environmental restrictions prevent a desired development.

Citizens still have the right to question whether the decision was wise, fair, inclusive or environmentally responsible. Democratic disagreement is legitimate. The key distinction is that an unpopular lawful decision should be based on public criteria, adopted by the competent body, explained and open to review.

A practical diagnostic test

Before describing a situation as corruption, ask:

1. Who held entrusted power, responsibility or resources?
2. What rule, duty, procedure or public purpose may have been breached?
3. Who received an advantage?
4. Was the advantage improper or unavailable through an equal process?
5. Was a private, family, business or political interest involved?
6. Was that interest declared and managed?
7. Was the conduct intentional, negligent or an isolated mistake?
8. Is there a pattern, such as repeated benefits for the same people?
9. Is the decision documented, reasoned and open to review?

10. What facts are known, and what is still only assumed?

These questions will not always produce a final answer. Their purpose is to improve analysis and identify what additional information may be needed.

2.3 Common forms of corruption and integrity risks

Corruption risks are not equally distributed across public administration. They are usually higher where decisions involve valuable resources, significant discretion, limited competition, weak supervision or information unavailable to the public.

At EU level, public procurement is built around transparency, equal treatment, non-discrimination, open competition and sound procedural management. These principles are intended to ensure that public resources are used fairly and effectively. Conflicts of interest that distort procurement can breach equal-treatment and transparency requirements even when a direct bribe has not been identified (European Commission; Directive 2014/24/EU).

Source: European Commission (n.d.), Public procurement thematic factsheet.

Public procurement

Public procurement is the process through which authorities purchase works, services and supplies. At local level, this may include:

- road construction and maintenance;
- school meals;
- waste collection;
- public transport;
- energy renovation;
- water infrastructure;
- IT services;
- playgrounds and sports facilities;
- landscaping and management of green spaces;
- studies, communications and consultancy.

Common integrity risks include:

- technical specifications written to fit one preferred supplier;
- deadlines too short for genuine competition;
- unjustified use of direct awards or exceptional procedures;
- dividing a larger contract into smaller contracts to avoid stricter rules;
- sharing confidential information with one bidder;
- evaluation criteria changed after bids are received;
- evaluators with undisclosed links to bidders;
- coordinated or artificial bids;
- repeated selection of the same supplier despite poor performance;
- contract prices or quantities increased significantly after award;
- payment for incomplete, low-quality or non-existent work;
- weak monitoring of environmental or social obligations.

Rural example: A municipality publishes a tender for maintaining local roads. The machinery requirements match the equipment of only one local company, whose owner is closely connected to a decision-maker. This is a warning sign, not automatic proof. Relevant questions include whether the requirements were objectively necessary, whether the relationship was disclosed and whether other suppliers had a realistic opportunity to compete.

In Slovenia, citizens can examine procurement notices, decisions, contracts and certain lower-value procurement information through the national Public Procurement Portal. ERAR also provides information on public-money flows and related procurement data (Slovenian Public Procurement Portal; Commission for the Prevention of Corruption).

Source: *Public Procurement Portal of the Republic of Slovenia (n.d.)*.

Employment and public appointments

Public institutions should recruit and promote people according to clear requirements, merit and equal treatment.

Integrity risks include:

- a position created for a predetermined candidate;
- unusually specific requirements matching one person's profile;
- information about the selection process shared with a preferred candidate;
- panel members with undeclared personal or political relationships;
- interviews or scores manipulated after the process;
- temporary appointments repeatedly used to avoid open competition;
- pressure to employ party supporters, relatives or business associates;
- qualified candidates excluded for minor reasons while similar deficiencies are ignored for the preferred candidate.

Rural example: A small public institution argues that open recruitment is unnecessary because "everyone already knows who can do the job". Familiarity and limited labour supply may be real local factors, but they do not remove the need for objective criteria, documentation and management of personal relationships.

Distribution of grants and subsidies

Municipalities and public bodies distribute grants for youth work, culture, sport, environmental projects, agriculture, social services and community development.

Integrity risks include:

- criteria designed around a preferred applicant;
- different interpretations of the same rule for different applicants;
- applications changed after the deadline;
- conflicts of interest among evaluators;
- political pressure on selection panels;
- unexplained differences between scores and final decisions;
- funding awarded for activities that are not implemented;
- personal or party promotion presented as a public-interest project;
- the same costs financed from more than one public source;
- monitoring reports accepted without supporting evidence.

Green example: A grant is awarded for biodiversity restoration, but most of the budget is spent on promotional material and events connected to local political figures. The planned restoration is not completed, but the final report is approved without a site visit.

Housing, municipal land and public property

Municipal housing, agricultural land, business premises, village halls and other public property may be scarce and valuable.

Integrity risks include:

- unclear waiting lists or allocation criteria;
- priority given to connected individuals;
- below-market rental or sale without adequate justification;
- property information shared privately before a public call;
- municipal land transferred shortly before a profitable land-use change;
- repeated allocation of public premises to politically connected groups;
- rules applied strictly to some users and informally to others;
- inadequate valuation of public property.

Rural example: A piece of municipal land is sold at a low price to a company linked to a local official. Several months later, the land-use designation changes and the property becomes much more valuable. Each decision may have a formal explanation, but their sequence requires careful examination of valuation, disclosure, participation and conflicts of interest.

Permits, planning and inspections

Authorities issue permits and conduct inspections in areas such as construction, land use, environmental protection, food safety, forestry and waste management.

Risks include:

- bribes or favours to speed up a permit;
- delaying an application to pressure the applicant;
- selective enforcement;
- inspections announced informally to one operator;
- repeated failure to act on documented violations;
- inspectors with personal or business links to the regulated entity;
- improper political pressure on technical decisions;
- environmental assessments treated as formalities;
- important impacts omitted from documentation;
- penalties reduced or avoided without an objective reason.

Green example: Residents repeatedly report illegal dumping near a stream. Inspections are postponed, records are incomplete and the operator has close links to local decision-makers. These circumstances are red flags. Further facts are needed to distinguish corruption from limited staffing, poor coordination, legal uncertainty or administrative failure.

Allocation of public spaces

Public squares, parks, sports grounds, markets, community rooms and cultural venues should be allocated under fair and understandable rules.

Integrity risks include:

- no published application procedure;
- politically connected organisations receiving priority;
- different fees for comparable users without explanation;
- public space used for private commercial activity without appropriate payment;
- environmental or accessibility conditions enforced selectively;
- long-term exclusive use granted without periodic review;
- opposition or minority groups denied access on vague grounds.

In small communities, access to a single hall or public square may determine whether a youth group can organise activities at all. Transparent allocation is therefore not a minor administrative issue; it affects participation and local pluralism.

Public-private partnerships and concessions

Local authorities may cooperate with private companies to build or manage parking, energy systems, waste services, tourism facilities, public transport or social infrastructure.

Risks include:

- decisions based on unrealistic financial forecasts;
- private profits guaranteed while public authorities carry most risks;
- future costs hidden from councillors and residents;
- inadequate comparison with public-sector alternatives;
- confidential negotiations covering information that should be public;
- contracts difficult to modify or terminate;
- decision-makers moving into employment with the private partner;
- weak monitoring of public-service, environmental or affordability obligations.

Green example: A long-term concession is granted for a tourism facility in a protected natural area. The public is told that the project will create jobs, but the contract, environmental conditions and projected public costs are not made accessible. Lack of transparency does not prove corruption, but it prevents meaningful scrutiny and increases integrity risks.

Use of EU and national funds

EU and national funds may support rural development, green transition, energy renovation, youth participation, transport, social inclusion and infrastructure. Risks include:

- false information about beneficiaries or activities;
- inflated prices or quantities;
- fictitious participants or deliverables;
- forged invoices or attendance records;
- double funding of the same expenditure;
- hidden ownership links between beneficiaries and suppliers;

- procurement manipulated by the grant recipient;
- conflicts of interest in project selection or verification;
- project outputs used mainly for private or political benefit;
- pressure on officials to approve incomplete documentation;
- failure to recover funds after irregularities are identified.

Fraud and corruption overlap but are not identical. A beneficiary submitting a false invoice may commit fraud without the involvement of a public official. When an official intentionally helps approve the false claim in exchange for a benefit, the case may involve both fraud and corruption.

EU financial-management rules require conflicts of interest to be prevented and addressed in all implementation of the EU budget. OLAF identifies procurement fraud, corruption in EU-financed tenders and double funding among recurring risks affecting EU expenditure.

Source: *European Commission (2021), Guidance on avoiding and managing conflicts of interest under the Financial Regulation.*

2.4 Integrity and accountability

What integrity means

Integrity means consistently using entrusted power for its proper purpose and prioritising the public interest over private interests.

It is more than personal honesty. A well-intentioned person can still make biased decisions if conflicts of interest are not recognised, rules are unclear or supervision is weak. Integrity therefore depends on both individual conduct and institutional systems.

Slovenia's Integrity and Prevention of Corruption Act defines integrity through the conduct and responsibility expected from individuals and organisations in preventing and removing risks that authority or decision-making power will be used contrary to law, a legitimate purpose or ethical rules. The OECD similarly describes public integrity as consistent adherence to shared ethical values and the prioritisation of the public interest over private interests.

Source: *OECD (2020), OECD Public Integrity Handbook.*

What transparency means

Transparency means that relevant information about public decisions is available, understandable, timely and usable.

Publishing a large quantity of technical documents is not enough when citizens cannot identify:

- what decision is being made;
- who is responsible;
- which criteria are being used;
- who applied or participated;
- how public money will be spent;
- what interests or relationships were declared;
- why one option was selected;
- how the decision can be questioned or reviewed.

Transparency has limits. Personal data, legitimate commercial secrets, security information and protected investigative material cannot always be published. However, these exceptions should not be used as a general excuse to hide decision-making.

Slovenia's Access to Public Information Act seeks to ensure that the work of public bodies is open and that people can obtain information held by public authorities. It also identifies transparency and responsible management of public resources as core purposes of access-to-information rules (Information Commissioner of the Republic of Slovenia).

Source: Information Commissioner of the Republic of Slovenia (n.d.), Access to Public Information Act.

What accountability means

Accountability means that decision-makers must explain and justify their actions, that their decisions can be reviewed and that consequences or corrective measures follow when rules are breached.

Transparency makes decisions visible. Accountability determines what happens next.

A municipality is not fully accountable simply because it publishes a contract. It should also:

- identify who approved it;
- preserve the evaluation and decision records;
- monitor implementation;
- answer legitimate questions;
- correct errors;
- investigate credible concerns;
- recover funds where appropriate;
- impose proportionate consequences for violations;
- improve procedures to prevent repetition.
- What ethical and transparent local governance looks like

An integrity-centred municipality or public institution should demonstrate the following qualities.

1. Clear and public rules

Criteria, deadlines, procedures and responsibilities are established before decisions are made. Rules are written in understandable language and are applied consistently.

2. Decisions based on the public interest

Officials can explain how a decision contributes to legitimate community needs rather than personal, business or political interests.

3. Conflicts of interest are declared and managed

Officials recognise both actual and apparent conflicts. Disclosures and exclusions are recorded rather than handled through informal assurances that "everyone knows each other".

4. Fair access and equal treatment

Comparable applicants are treated according to the same criteria. Information is not privately shared with selected individuals.

5. Decisions are reasoned and traceable

Records show who participated, what information was considered, how criteria were applied and why a particular option was chosen.

6. Information is actively disclosed

Budgets, calls, procurement information, grants, council documents and decisions are published early enough for citizens to use them.

7. Participation is meaningful

Residents, including young people and people from outlying villages, can contribute before key choices are finalised. Participation should not consist only of presenting a completed decision.

The OECD Public Integrity Handbook links open government, access to information, open data and stakeholder participation with stronger accountability and protection of the public interest.

Source: *OECD (2020), OECD Public Integrity Handbook: Participation.*

8. Green and long-term impacts are considered

Economic benefits are assessed together with environmental, social and intergenerational effects. Short-term private gains should not override protection of water, soil, forests, public space, climate resilience or community health.

9. Complaints and reports are handled safely

People know where they can ask questions, challenge administrative decisions or report suspected wrongdoing. Confidentiality and protection against retaliation are respected.

10. Mistakes are acknowledged and corrected

Integrity does not mean that institutions never make errors. It means that they identify them, communicate honestly, correct the damage and learn from them.

Seven questions for an integrity-centred decision

A local decision can be tested against seven principles:

1. Legality: Is the decision within the authority's legal powers?
2. Public interest: Who benefits, and how does the decision serve the community?
3. Impartiality: Were private interests disclosed and managed?
4. Fairness: Were comparable people and organisations treated equally?
5. Transparency: Can the public understand the process and reasons?
6. Traceability: Is there a reliable record of who decided what and why?
7. Correctability: Can the decision be reviewed, challenged or corrected?

The Slovenian integrity framework

Slovenia adopted a new national Resolution on the Prevention of Corruption on 28 March 2025. Its objectives include eliminating conditions that allow corruption to develop, strengthening the legal and institutional environment, enforcing accountability, promoting education and applying internationally recognised standards. The corresponding implementation action plan was adopted by the Commission for the Prevention of Corruption on 23 June 2025 and covers public institutions, the political system, the economy, civil society, the media and the wider public.

Source: *Commission for the Prevention of Corruption (2025), Resolution on the Prevention of Corruption.*

For young people, this is an important message: integrity is not only the responsibility of police, prosecutors or anti-corruption bodies. It also depends on open institutions, informed residents, independent oversight, responsible organisations and communities that expect decisions to be fair and explainable.

2.5 Warning signs

A **warning sign** or **red flag** is a circumstance that suggests a higher risk of wrongdoing and may justify further questions.

A red flag is **not proof of corruption**. It may have an innocent explanation, be the result of poor administration or reflect information that is not yet available to the observer. Several connected warning signs, repeated patterns and unexplained inconsistencies usually deserve more attention than one isolated irregularity.

Process-related warning signs

- Rules or criteria are changed after the process has begun.
- Deadlines are unusually short without a clear reason.
- A decision is made urgently even though the need was known long in advance.
- Required consultation or publication appears to have been avoided.
- Important decisions are made informally and confirmed only afterwards.
- Records, minutes, scores or explanations are missing.
- Different applicants receive different information.
- Normal procedures are repeatedly bypassed.
- Responsibilities are unclear, making it difficult to identify who made the decision.
- An unsuccessful applicant is denied a meaningful explanation.

Relationship and conflict-of-interest warning signs

- A decision-maker has family, business, political or close personal links to a beneficiary.
- The relationship is not disclosed.
- A person participates in deciding on their own exclusion from a process.
- Former officials quickly obtain employment from an organisation they previously regulated or selected.
- The same small circle repeatedly appears as applicants, evaluators, consultants and contractors.
- Officials defend a private operator's interests without explaining the public-interest basis.
- Invitations, travel, gifts or services are provided by a party awaiting a public decision.

Procurement and financial warning signs

- Only one bid is received repeatedly.
- Tender conditions are unusually narrow.
- Bids contain identical errors, wording or formatting.
- The winning bidder is consistently selected despite higher prices or poor performance.
- A contract is split into several smaller purchases.
- The final cost rises substantially without a clear change in scope.
- Invoices do not match actual work or delivered quantities.
- Payments are made before required outputs are completed.
- Subcontractors are connected to decision-makers or the main contractor.
- Publicly funded equipment cannot be located.
- The same expenditure appears under more than one project.
- Monitoring relies entirely on information supplied by the beneficiary.

Information and participation warning signs

- Documents are published only after the decision can no longer be influenced.

- Key attachments are missing.
- Reasons for confidentiality are vague or overly broad.
- Public meetings are announced too late for meaningful attendance.
- Questions are ignored or answered only in general terms.
- Information is available only through personal contacts.
- Residents of remote villages are excluded because meetings are inaccessible or no digital alternative is provided.
- Technical documentation is used to discourage rather than enable public understanding.

Environmental and land-use warning signs

- Environmental conditions are weakened without a documented technical reason.
- Inspections repeatedly find no problem despite visible or documented harm.
- Reports from residents are lost, delayed or transferred between institutions without resolution.
- A land-use change significantly increases the value of land linked to a decision-maker.
- Projects are divided into smaller parts to reduce environmental scrutiny.
- Public claims about sustainability are not supported by measurable commitments.
- Environmental compensation measures are promised but not monitored.
- Waste, extraction or construction activities begin before all necessary approvals are clear.
- A private operator receives exclusive access to a common natural resource without transparent conditions.
- Environmental monitoring data are unavailable, incomplete or produced only by the operator.

Workplace and accountability warning signs

- Staff are told not to record instructions in writing.
- Employees who raise concerns are excluded, transferred or threatened.
- Internal control findings are repeatedly ignored.
- The same problem continues after audits or official recommendations.
- Complaints are automatically sent to the person they concern.
- Reporting channels exist on paper but are not trusted or functional.
- People are pressured to approve documents they did not prepare or verify.
- Responsibility is shifted to junior staff while senior decision-makers remain unnamed.

How to respond to a warning sign

When participants notice a red flag, they should avoid immediately declaring that corruption has occurred. A safer and more credible approach is to:

1. Record the observable facts. Note dates, published documents, decisions and statements.
2. Separate fact from interpretation. "The contract was increased by 40%" is a fact if documented. "The mayor stole the money" is an allegation requiring proof.
3. Identify the applicable process. Determine which criteria, deadlines, conflict-of-interest rules or publication requirements applied.
4. Look for a reasonable explanation. Exceptional procedures may be justified by a genuine emergency, but the justification should be documented.
5. Compare similar cases. Check whether the same rules were applied consistently.
6. Request information lawfully. Use public documents, meetings, access-to-information procedures and official portals.

7. Protect privacy and safety. Do not publish personal data or expose a potential reporting person.
8. Use an appropriate channel. Depending on the issue, this may include the institution, an appeal body, inspectorate, Information Commissioner, Commission for the Prevention of Corruption, audit authority, police or another competent body.
9. Avoid public accusations without evidence. Criticise the process, identify unanswered questions and describe the evidence available.
10. Preserve original material. Do not alter documents, fabricate evidence or obtain information unlawfully.

Suggested activity: “Corruption, unfairness or poor practice?”

Purpose

Participants practise distinguishing corruption from conflicts of interest, favouritism, poor management, administrative error, lack of transparency and lawful but unpopular decisions.

Learning outcomes

By the end of the activity, participants should be able to:

- apply the three-element corruption test;
- recognise that a red flag is not proof;
- distinguish facts from assumptions;
- explain why more than one classification may apply;
- identify what additional information would be needed;
- discuss local integrity concerns without making unsupported personal accusations.

Duration

60–75 minutes.

Group size

8–15 participants.

Materials

- printed scenario cards;
- category cards or posters;
- markers and flipchart paper;
- optional copies of the diagnostic questions from Section 2.2.

Suggested categories

Place the following labels around the room:

1. Corruption or probable corruption
2. Conflict of interest
3. Favouritism, nepotism or clientelism

4. Poor administration or management
5. Lack of transparency or another integrity risk
6. Lawful but unpopular decision
7. Not enough information

Explain that groups may select more than one category.

Method

Step 1: Introduce the categories — 10 minutes

Briefly review the distinctions in Section 2.2. Emphasise:

- situations can fit more than one category;
- participants are analysing fictional cases, not determining criminal guilt;
- the quality of their reasoning is more important than finding one “correct” label.

Step 2: Small-group classification — 20 minutes

Divide participants into groups of three to five. Give each group three or four scenario cards.

For every scenario, ask them to answer:

- What facts are known?
- What is assumed?
- Who holds entrusted power?
- Is there an apparent private or political advantage?
- Is there a conflict of interest?
- Which category fits best?
- What additional information is needed?
- What would be an appropriate first response?

Step 3: Positioning exercise — 15 minutes

Read selected scenarios aloud. Participants move to the category they consider most appropriate.

Invite people standing in different parts of the room to explain their reasoning. Participants may change position after hearing other arguments.

Step 4: Reveal additional information — 10 minutes

For two or three scenarios, provide a second piece of information that changes the analysis.

Example:

- Initial information: “Only one company submitted a bid.”
- Additional information: “The tender was open for the legally required period, six companies downloaded the documents and an independent review found that the requirements were necessary.”

Discuss how conclusions should change when new evidence appears.

Step 5: Debrief — 15 minutes

Use the reflection questions at the end of the activity.

Scenario cards and facilitator guidance

Scenario 1: The road-maintenance tender

A municipality publishes a tender for winter road maintenance. Bidders have five days to apply, and the machinery specifications match the equipment owned by one local company. That company wins as the only bidder.

Likely classification: Lack of transparency or procurement-integrity risk; possible favouritism or corruption; not enough information.

Key issue: A single bid is not proof. Participants should ask why the deadline was short, whether the machinery requirements were objectively necessary and whether any relationship existed between the company and decision-makers.

Scenario 2: The mayor's relative

The mayor's cousin owns a company bidding for municipal landscaping work. The mayor reports the relationship in writing, takes no part in preparing the tender, leaves the meeting during the discussion and does not vote. The cousin's company wins after submitting the best-scoring bid.

Likely classification: Conflict of interest that appears to have been managed; not automatically corruption.

Key issue: A relationship creates a risk, but disclosure and withdrawal can protect the process. Participants may still ask whether the evaluation was genuinely independent.

Scenario 3: The missing youth-grant application

A youth organisation submits its municipal grant application on time. A municipal employee accidentally saves it in the wrong electronic folder, and the committee does not evaluate it. After the organisation complains, the municipality acknowledges the mistake and reopens the procedure.

Likely classification: Administrative error.

Key issue: The error is serious but appears unintentional and is corrected. If similar "mistakes" repeatedly affected organisations critical of the municipality, the classification might change.

Scenario 4: The cancelled bus route

Following a published budget review and two public meetings, the municipal council votes to cancel an underused evening bus route. Young people from three villages strongly oppose the decision because it limits their access to education and cultural events.

Likely classification: Lawful but unpopular decision, assuming the authority followed the applicable rules.

Key issue: Participants can criticise the decision as socially harmful or insufficiently youth-sensitive without calling it corrupt.

Scenario 5: The illegal dumping site

An environmental inspector discovers that a construction company has been dumping waste near a stream. The inspector takes no action. Several weeks later, the company renovates the inspector's private driveway free of charge.

Likely classification: Probable corruption or bribery; abuse of authority; environmental wrongdoing.

Key issue: There is a clear possible exchange between failure to perform a public duty and a private benefit.

Scenario 6: The community grant

A municipal councillor tells a grant-selection panel that funding should go to an association that mobilised supporters during the election campaign. The association receives the grant despite a lower score than two other applicants.

Likely classification: Clientelism, favouritism and possible corruption or abuse of authority.

Key issue: Public resources appear to be exchanged for political support. Participants should ask whether the councillor had decision-making influence and whether scores were altered.

Scenario 7: The green subsidy

A business receives EU funding for solar equipment. It also claims the full cost of the same equipment under a national programme. No evidence shows that a public official helped or knew about the duplicate claim.

Likely classification: Possible subsidy fraud or double funding, but not necessarily corruption.

Key issue: Fraud by an applicant is not automatically corruption. Corruption may arise if an official intentionally facilitates or conceals the false claim in exchange for an advantage.

Scenario 8: The village hall

The only municipal hall in a rural settlement is frequently given free of charge to organisations connected to the governing political group. Other associations are told that the hall is unavailable. No calendar, fee schedule or allocation criteria are published.

Likely classification: Lack of transparency; possible favouritism or clientelism.

Key issue: The pattern and absence of criteria are significant warning signs. Further information is needed about actual availability, decisions and relationships.

Scenario 9: The job advertisement

A public institution advertises a communications position requiring an unusual combination of qualifications and experience. Only one person applies: an adviser who previously worked on the director's election campaign.

Likely classification: Recruitment-integrity red flag; possible favouritism or clientelism; not enough information.

Key issue: Unusual criteria and a political connection raise questions but do not prove that the requirements were unjustified or that the candidate was unqualified.

Scenario 10: Emergency riverbank works

After severe flooding, a municipality awards an urgent contract for temporary riverbank stabilisation without an ordinary open procedure. The work begins the next day.

Likely classification: Not enough information; potentially lawful emergency procurement.

Key issue: Bypassing an ordinary procedure may be justified where immediate action is necessary. Participants should ask whether the emergency was genuine, the procedure legally permitted, the price reasonable, the conflict-of-interest rules respected and the decision documented.

Debrief questions

1. Which scenarios produced the greatest disagreement?
2. Did participants sometimes confuse an unfair result with corruption?

3. Which situations involved a conflict of interest but not necessarily corrupt conduct?
4. How did the availability of additional information affect the classification?
5. Which warning signs were strongest?
6. What information would citizens reasonably request?
7. How can young people raise concerns without making unsupported accusations?
8. Do personal relationships make impartial decisions more difficult in small communities?
9. Which safeguards are especially important in rural municipalities?
10. How can environmental harm make the consequences of corruption less visible at first but more serious over time?

Facilitator note

Do not invite participants to disclose identifiable ongoing cases. When participants refer to real situations, encourage them to anonymise the details and focus on the process. The facilitator's role is to support analysis and learning, not to investigate or decide whether a criminal offence occurred.

Chapter takeaways

- Corruption involves the misuse of entrusted power or resources for an undue private, financial or political advantage.
- Bribery is only one form of corruption.
- Conflict of interest is a risk that must be disclosed and managed; it is not automatically proof of corruption.
- Favouritism, nepotism and clientelism undermine equal treatment and can become corrupt when public authority is deliberately misused.
- Poor management, lack of transparency and administrative mistakes can cause serious harm even when no private advantage is present.
- Citizens can strongly oppose a lawful decision without describing it as corrupt.
- Transparency makes decisions visible; accountability requires explanations, review, correction and consequences.
- Red flags justify questions and closer examination, not automatic conclusions.
- Credible civic action begins by separating facts, interpretations and unanswered questions.
- Integrity is created through both ethical people and reliable systems.

Selected sources and further guidance

- [Commission for the Prevention of Corruption \(2020\). Integrity and Prevention of Corruption Act \(unofficial English translation\).](#)
- [Commission for the Prevention of Corruption \(n.d.\). Conflict of interest.](#)
- [Commission for the Prevention of Corruption \(2025\). Resolution on the Prevention of Corruption.](#)
- [Information Commissioner of the Republic of Slovenia \(n.d.\). Access to Public Information Act.](#)
- [European Commission \(n.d.\). Public procurement thematic factsheet.](#)
- [European Commission \(2021\). Guidance on avoiding and managing conflicts of interest under the Financial Regulation.](#)
- [OECD \(2020\). OECD Public Integrity Handbook.](#)
- [European Commission \(2026\). 2026 Rule of Law Report – Country Chapter on Slovenia.](#)

3. Corruption and everyday life in rural areas, smaller towns and regional communities

Where a young person lives shapes how they experience public institutions, services and opportunities. A remote settlement may depend on one bus connection; a small municipal centre may be physically close to local institutions but socially difficult to challenge; and a regional city may offer more services while still making major decisions on housing, procurement, transport or redevelopment in ways that are difficult to follow.

These places are diverse and interconnected. Rural settlements, smaller towns, municipal centres and regional cities depend on one another for employment, education, healthcare, transport, waste management, culture and administration. A decision taken in one municipality or regional centre can therefore affect communities far beyond its administrative boundary.

Slovenia has 212 municipalities, including 12 urban municipalities, and 12 development regions. The development regions support planning and coordination but are not self-governing regional authorities. Responsibility is therefore often divided among municipalities, intermunicipal bodies, public institutions, regional development agencies and national authorities.

Close community ties can strengthen solidarity, cooperation and local knowledge. The same ties can also make criticism more difficult, blur professional and personal relationships and reduce independent oversight. This does not mean that corruption is inherently more common in smaller communities. It means that integrity depends especially strongly on clear procedures, declared interests, accessible information and independent review.

Chapter 2 explains how to distinguish corruption from conflict of interest, favouritism, poor administration, lack of transparency and lawful but unpopular decisions. This chapter applies those distinctions to local and regional life rather than repeating them.

3.1 How local power and influence operate

Formal authority and informal influence

Formal authority comes from law, election, appointment or contract. At local level it may be exercised by the mayor, municipal council, municipal administration, supervisory committee, public companies, public institutes, grant or procurement committees, inspectorates, intermunicipal bodies and national authorities. Informal influence is the ability to shape a decision without holding final legal authority. It can arise through personal, family, political, professional or business relationships; control over expertise or information; long-standing institutional cooperation; or privileged access to decision-makers.

Informal influence is not automatically improper. Authorities need advice from residents, businesses, experts, youth organisations and community groups. The integrity question is whether access is transparent and reasonably open, interests are declared and the process serves the public rather than a private or political advantage.

Legitimate cooperation or improper influence?

Situation	Legitimate cooperation	Possible integrity risk	Example
Consulting a local business	Relevant stakeholders can participate and the advice is documented.	One company privately shapes tender requirements that only it can meet.	An inspector accepts free building work in return for ignoring illegal dumping.
Using a local expert	The expert's qualifications, role and interests are known.	A connected expert influences the outcome without disclosing the relationship.	A councillor is asked to vote on a contract involving a company owned by a close relative.
A relative applies for a job or grant	The relationship is declared and the official withdraws from the procedure.	The official helps set criteria, score applications or influence colleagues.	A municipal hall is repeatedly allocated to organisations connected to local officials.
The same contractor wins repeatedly	Competition is genuine and the award is supported by objective evidence.	Specifications, deadlines or contract changes repeatedly favour one supplier.	A manager appoints a relative to a public position without an open competition.
A local organisation receives public support	Funding follows published criteria and a documented assessment.	Support depends on loyalty, personal ties or silence about municipal decisions.	Access to seasonal municipal work is offered mainly to families expected to support the ruling group.

Repeated cooperation is not proof of corruption. Smaller markets may have few qualified suppliers or organisations. The relevant questions are whether alternatives were genuinely considered, relationships were disclosed, criteria were objective and the result can be independently reviewed. The OECD has identified limited competition as a continuing challenge in Slovenian public procurement, which makes these safeguards particularly important.

Concentrated power and long incumbency

Long political incumbency can provide continuity and experience, but risks increase when it is combined with weak competition, blurred institutional and party roles, dependence on municipal funding, recurring appointments of connected individuals, limited media scrutiny and weak supervisory bodies.

In some communities, the municipality, a public institution or one major employer controls a large share of jobs, premises, grants, sponsorships or services. A person may simultaneously be a councillor, employer, board member, contractor or sponsor. Such overlaps are not necessarily unlawful, but they make conflict-of-interest rules and transparent decision-making essential.

Questions for analysing local power

1. Who has formal authority to decide, and who prepared the proposal?
2. Who benefits directly or indirectly?
3. Which personal, political, professional or business relationships are relevant?
4. Were those relationships declared and managed?
5. Could other residents, organisations or businesses participate?

6. Is the reasoning documented and accessible?
7. Who can independently supervise, review or appeal the decision?

3.2 Challenges faced by young people outside major urban centres

Young people's decisions to remain, leave or return are shaped by practical opportunities. Transport, housing, education, employment, healthcare, digital access and youth infrastructure depend on public budgets, contracts, grants, permits and planning decisions. Opaque procedures in these areas can therefore have direct consequences for young people's everyday lives.

Mobility and access to services

A bus route can determine whether a young person can attend school, accept shift work, access healthcare, join an evening activity or participate in a public meeting. Service reductions may be financially justified, but the data, criteria, alternatives and expected effects should be visible before the decision is final.

Similar concerns apply when education, healthcare or administrative services are centralised. A lawful reorganisation may still create unequal burdens if travel time, transport costs, disability access, digital exclusion or the needs of remote settlements are not considered.

Key integrity questions: Who assessed the need? What evidence was used? Which alternatives were considered? Who was consulted? Who monitors the result?

Employment, internships and housing

Small labour markets often rely on personal recommendations and informal networks. These can help circulate opportunities, but public-sector jobs, publicly funded placements and municipal internships should still follow open, merit-based procedures.

Warning signs include vacancies shared only privately, requirements tailored to one candidate, repeated avoidance of open recruitment, or the belief that political loyalty is needed to obtain work.

Housing is equally important. Municipal and non-profit housing systems should publish eligibility criteria, priority rules, waiting-list procedures, reasons for allocation, safeguards for exceptional cases and routes for review. The same transparency should apply when municipalities sell or lease land, premises, village halls or unused public buildings.

Youth, cultural and community infrastructure

Youth centres, sports facilities, rehearsal rooms, community gardens and cultural programmes can strongly influence whether young people feel that a community includes them. Integrity risks arise when premises or grants repeatedly go to connected organisations, evaluators have undeclared interests, promised facilities are not completed, or young people are consulted only after key decisions have already been made.

Transparent funding protects both the municipality and successful organisations. It helps demonstrate that support was awarded fairly rather than as a personal or political favour.

Digital connectivity and participation

Reliable connectivity is needed for education, employment, remote work, healthcare information, banking

and public participation. Integrity risks may concern procurement of infrastructure, inaccurate coverage claims, unexplained prioritisation of settlements or subsidies without measurable results.

Online participation can improve access, but it should not replace in-person options where connectivity, digital skills or disability access remain uneven.

Local development and environmental decisions

Land-use changes, renewable-energy facilities, tourism projects, quarries, waste infrastructure, industrial zones and roads may create benefits and costs across several municipalities. Relevant information should include land ownership, public subsidies, planning documents, environmental assessments, permit conditions, expected public benefits, consultation comments and monitoring arrangements.

These decisions illustrate why local integrity cannot be understood only within municipal borders: traffic, water, air quality, employment and land values may be affected across an entire region.

The right to stay, leave and return

Young people should have a genuine choice to remain, commute, leave temporarily or return. The EU–Council of Europe Youth Partnership describes this as part of a broader “right to stay” agenda. That choice depends on services, housing, employment, mobility and meaningful participation.

When a bus route disappears without explanation, housing is allocated through connections, internships circulate privately or youth infrastructure is repeatedly postponed, young people receive a message that their future is not a public priority.

3.3 Why transparency may be weaker

Transparency means more than uploading a document. Information must be timely, complete, searchable, understandable and available before the public’s opportunity to influence the decision has passed.

Common barriers

- few independent local media outlets and limited capacity for investigative reporting;
- civil society organisations with little staff time and strong dependence on municipal grants;
- important information dispersed across agendas, minutes, budgets, procurement portals, planning systems and public-company reports;
- documents published only as scans, in technical language, without summaries or accessible formats;
- consultations held during school or working hours, in inaccessible places or after the proposal is effectively final;
- weak political competition or recurring contracts and grants that receive little independent scrutiny;
- reliance on informal communication instead of clear and equally accessible procedures.

These conditions do not automatically show deliberate concealment. Small municipalities may have genuine staffing and technical limitations. However, limited capacity does not remove the public’s right to information.

Capacity problem or deliberate opacity?

Possible capacity problem	Possible deliberate opacity
Delays occur across many unrelated areas.	Delays mainly concern controversial projects or particular beneficiaries.
Staff acknowledge gaps and provide information when asked.	Officials avoid questions, contradict one another or claim key documents do not exist.
Documents are poorly formatted but substantively complete.	Scores, annexes, contracts or reasons are repeatedly missing.
Procedures are inconsistent because responsibilities are unclear.	Different applicants are treated differently without explanation.
The municipality seeks training or shared administrative support.	The authority resists oversight and repeats the same practice after warnings.

In 2024, Slovenia's Information Commissioner recorded 217 complaints against municipalities, compared with 137 in 2023. Complaints do not prove corruption, but they show that municipal transparency and administrative responsiveness require continued attention.

Where information should be available

Depending on the issue, relevant information may be found on municipal websites and official gazettes, in council materials, budgets and final accounts, on the Public Procurement Portal and e-JN, in ERAR, in the Spatial Planning Information System, in public-company and public-institute reports or through a request under the Access to Public Information Act.

A short transparency check

- Was information available before the decision?
- Could it be found without insider knowledge?
- Were criteria, alternatives and conflicts of interest explained?
- Were public comments recorded and answered?
- Were the final decision, reasons and spending published?
- Can implementation be monitored?
- Is information accessible to young people and groups facing additional barriers?
- Is an appeal, complaint or supervisory route clear?

3.4 Why speaking up can be difficult

In a smaller community, the official, employer, contractor, teacher, landlord, coach or organisation involved may belong to the same social network as the person raising a concern. Young people may fear damage to employment, education or housing opportunities; pressure on family members; exclusion from organisations or services; political labelling; harassment; or dismissal because of their age.

These concerns should be treated as realistic assessments of power, not as a lack of courage. Anti-corruption education should not expect one young person to confront powerful actors alone.

Safer and more effective participation

- use collective requests for information or joint consultation submissions;
- work through a youth council, youth organisation, residents' initiative or trusted civil society organisation;
- attend meetings with others rather than alone;
- frame concerns as documented procedural questions;
- use the appropriate supervisory, information, equality, audit or anti-corruption body;
- seek specialist advice before using formal whistleblowing or reporting channels.

For example, instead of publicly claiming that a contract was awarded to a friend, a youth group can ask which criteria were used, how many bids were received, whether conflicts of interest were declared and where the award decision and contract are published.

Facts, questions and safety

Young people should separate verified facts, reasonable questions, interpretations, rumours and formal allegations. A warning sign justifies further examination; it does not justify a public declaration of guilt.

1. Record what is known and what remains uncertain.
2. Keep lawful copies of relevant documents and note their source.
3. Avoid collecting or sharing unnecessary personal data.
4. Do not alter documents or publish unsupported accusations on social media.
5. Consider digital, employment, social and emotional risks.
6. Seek advice from a trusted and competent body.
7. Choose a response proportionate to the evidence and risk.

Detailed reporting pathways, whistleblower protection and digital safety should be addressed in the later chapter on safe reporting rather than repeated here.

3.5 Rural areas, small towns and regional centres: different but connected

Type of area	Possible strengths	Typical barriers and integrity risks
Dispersed rural settlement	Strong local knowledge, neighbour support and community attachment.	Long distances, weak transport, few services, digital gaps and decisions made elsewhere.
Small municipal centre	Institutions are physically close and local procedures may be familiar.	Social closeness can discourage criticism; personal, professional and political roles may overlap.
Smaller town	More schools, employers, associations and public spaces.	Declining services, limited housing, concentrated property ownership and recurring beneficiaries.
Regional city	More institutions, media, universities, civil society and specialised services.	Larger procurement and redevelopment projects, complex public companies and unclear cross-municipal responsibility.

Slovenia's development regions and regional development agencies support strategy, coordination and funding, but they do not form an elected regional tier of government. A "regional" issue may therefore

involve several municipalities, a regional development agency, a public company, a national ministry, an infrastructure agency or an EU funding authority.

Illustrative example: a regional transport decision

A regional city reorganises its bus network. Urban routes become more frequent, but evening and weekend connections to surrounding municipalities are reduced. The city, neighbouring municipalities, the operator, national transport authorities, schools and employers may all influence or implement parts of the decision. The effects differ: one student gains a better city service, a young worker in a smaller town loses the last connection, a person in a remote village needs a car to reach the nearest stop and a disabled passenger finds the replacement stop inaccessible.

Meaningful transparency would require more than a new timetable. The public should be able to see demand data, funding responsibilities, route criteria, expected effects on different settlements, consultation results, contract arrangements and monitoring indicators.

3.6 Inclusion and unequal access to local decision-making

Geographical barriers often combine with poverty, discrimination, disability, weak digital access and dependence on others for transport. A process may be formally open while remaining practically inaccessible. Particular attention is needed for Roma youth, LGBTQ+ youth, migrant youth, NEETs, young people with disabilities, those without private transport, people from low-income households and young people living in remote settlements.

How barriers can combine

- A Roma student in a remote settlement may face transport barriers, discrimination and limited access to information at the same time.
- An LGBTQ+ young person may avoid a public meeting because participation could disclose personal information.
- A migrant young person may not understand technical documents or the division of institutional responsibilities.
- A NEET young person may not receive information distributed mainly through schools and universities.
- A person with a disability may face inaccessible transport, venues, documents or online platforms.
- A low-income participant may be unable to pay for travel, data, childcare or lost working time.

Practical inclusion measures

- plain-language and accessible information;
- interpretation and alternative formats where needed;
- anonymous questions and confidential registration;
- hybrid, telephone, written and mobile consultation options;
- meetings near public transport and coordinated with actual timetables;
- transport reimbursement, sufficient notice and no participation fees;
- outreach through youth work, employment services, libraries, sports organisations and trusted community groups;
- early involvement of affected communities rather than consultation after the proposal is final.

Inclusion test

1. Who received and understood the information?
2. Who could physically or digitally participate?
3. Who could speak without fear?
4. Whose costs were covered?
5. Who was missing?
6. Were affected groups involved before the main decisions were made?
7. Is there evidence that their input influenced the outcome?

3.7 Mapping local and regional decision-making

When responsibility is unclear, people may approach the wrong institution, miss a consultation deadline or assume that nobody is accountable. A power map helps young people follow a decision from formal authority through influence, implementation and supervision.

How to build the map

1. Define the issue precisely rather than describing a broad dissatisfaction.
2. Identify the settlements and municipalities affected.
3. Find the formal decision-maker and the legal or contractual basis of its authority.
4. Identify who prepares, finances and implements the decision.
5. Map relevant influence without assuming that influence is improper.
6. List the information that should be public.
7. Identify the supervisory, review or appeal bodies.
8. Find the earliest point at which young people can still participate.

Tool 3.1: Local and Regional Power Map

Field	Example	Your notes
Issue or decision	Reduction of an evening regional bus service	
Area affected	Regional city, two smaller towns and surrounding villages	
Who formally decides?	Relevant municipality or municipalities and the responsible transport authority	
Who may influence the decision?	Operator, schools, employers, passengers, neighbouring municipalities and experts	
What should be public?	Demand data, funding, contract, route criteria, consultation record and final reasons	-
Who supervises?	Municipal supervisory bodies, transport authority, procurement or audit bodies	-
How can young people participate?	Joint information request, youth survey, consultation submission, council question or public meeting	-

Complete the map using official documents rather than assumptions. List influence neutrally, mark missing information with a question mark and add an inclusion note identifying which young people are not represented.

Suggested activity: One Region, Different Realities

Objective

compare how one public issue affects a remote village, a small municipal centre, a smaller town and a regional city.

Suggested duration

60–75 minutes.

Group size

12–20 participants.

Choose one issue, such as public transport, waste management, youth spaces, affordable housing or renewable-energy development. Assign each group one of the four settings described in Section 3.5.

1. Identify how the issue affects young people in that setting, including possible benefits, costs and excluded groups.
2. Complete the Local and Regional Power Map.
3. Compare access to information and the ability to influence the decision.
4. Form mixed groups and agree on one transparency measure, one inclusion measure and one safeguard against improper influence.
5. Debrief by asking where formal authority was located, who had informal influence, which young people were least visible and what evidence would be needed before alleging corruption.

Use fictional or anonymised scenarios. Do not invite participants to name local individuals or make unsupported accusations. The purpose is to build analytical and civic skills, not to investigate a live case.

Chapter takeaways

- Rural areas, smaller towns and regional cities are different but closely connected.
- Close relationships can support cooperation while also making criticism and oversight more difficult.
- Informal influence is not automatically improper; integrity depends on openness, declared interests, equal access and review.
- Limited administrative capacity should be distinguished from deliberate opacity.
- Decisions on transport, housing, employment, youth infrastructure, connectivity and development directly shape young people's choices.
- Young people should not be expected to confront powerful actors alone.
- Participation is stronger when it is collective, evidence-based, inclusive and linked to the correct institution.
- A power map helps identify who decides, influences, implements, finances and supervises a local or regional issue.

Selected sources and further guidance

- [Government of Slovenia \(n.d.\). Municipalities in numbers.](#)
- [Government of Slovenia \(n.d.\). Local self-government and regional development.](#)
- [Government of Slovenia and OECD \(2025\). Building More Competitive Regions in Slovenia.](#)
- [OECD \(2025\). Maximising the Benefits of Effective Competition in Public Procurement in Slovenia.](#)
- [Institute of Macroeconomic Analysis and Development \(2026\). Development Report 2026: Key Messages.](#)
- [Commission for the Prevention of Corruption \(n.d.\). ERAR.](#)
- [European Commission \(n.d.\). Rural opportunities.](#)
- [European Commission \(2022\). Digital connectivity: essential for the EU's long-term vision for rural areas.](#)
- [EU–Council of Europe Youth Partnership \(n.d.\). Research on rural youth.](#)
- [European Union Agency for Fundamental Rights \(n.d.\). EU Charter, Article 21: Non-discrimination.](#)
- [European Union Agency for Fundamental Rights \(2025\). Roma Survey 2024.](#)

4. Green integrity: transparency for people, land and nature

Environmental decisions determine how land is used, which natural resources may be exploited, where infrastructure is built, who receives public funding and which environmental risks a community must accept. These decisions can support sustainable development, but they can also create opportunities for conflicts of interest, hidden influence, favouritism, misuse of public funds and weak enforcement.

This chapter applies the integrity framework from Chapter 2 to environmental governance. It does not assume that every controversial construction project, spatial plan, subsidy or environmental permit involves corruption. Disagreement, poor planning, insufficient expertise and corruption must remain clearly distinguished, as explained in Section 2.2. The focus here is practical: how young people can examine environmental decisions, test sustainability claims, follow public money and identify questions that deserve a clear answer.

Local power relations and the particular challenges of monitoring decisions in rural areas, smaller towns and regional communities are addressed in Chapter 3. When these factors affect an environmental project, readers should refer especially to Sections 3.1, 3.3 and 3.7.

4.1 What is green integrity?

Green integrity means that decisions affecting land, nature, climate and natural resources are made and implemented in the public interest, using credible evidence, fair procedures and accountable use of money and authority.

It connects three responsibilities:

Responsibility	What it requires in practice
Environmental responsibility	Decisions take account of effects on water, air, soil, biodiversity, climate and human health.
Public integrity	Personal, political or commercial interests do not improperly determine public decisions.
Social fairness	Environmental benefits and burdens are not distributed unfairly between places, groups or generations.

Green integrity is therefore more than compliance with a minimum environmental standard. A project can have a legal permit and still raise legitimate integrity questions about how the site was selected, who influenced the decision, whether alternatives were seriously considered, who received the contract or whether promised environmental results were achieved.

At European level, environmental democracy is supported by the Aarhus Convention. It establishes three connected public rights: access to environmental information, participation in environmental decision-making and access to review or justice. EU environmental assessment rules also require certain plans, programmes

and projects to be assessed before they are approved, with public participation forming an important part of the process. (European Commission, Aarhus Convention and environmental assessments.)

The green integrity chain

A credible green project should leave a traceable chain from the original need to the final results:

Public need → alternatives → environmental evidence → decision → funding → procurement or subsidy → implementation → monitoring → correction

Weakness at one stage can affect the whole project. For example, a formally competitive procurement procedure cannot correct an earlier decision to select an unsuitable location without considering realistic alternatives.

The five-question green integrity test

Young people examining a project can begin with five questions:

1. Evidence: What environmental and social evidence supports the decision?
2. Interests: Who influenced the decision, and were relevant interests and relationships disclosed?
3. Alternatives: Were other locations, designs or non-construction options genuinely considered?
4. Money: Who receives public money, land, contracts, subsidies or other benefits?
5. Results: How will environmental promises be measured, published and enforced?

A clear answer to one question does not compensate for missing answers elsewhere. A project may have strong climate objectives but weak procurement. It may use fair procurement but rely on an incomplete environmental study. Green integrity requires the whole decision chain to withstand reasonable public scrutiny.

4.2 Environmental corruption and harmful influence

Corruption can enable environmental harm by weakening permits, inspections, controls or decisions concerning natural resources. Europol and UNODC identify corruption, document fraud and the bribery or co-optation of officials as recurring enablers of environmental offences, including illegal waste activities, forestry crime and unlawful exploitation of natural resources. (Europol and UNODC, environmental crime materials.)

Influence is not automatically corruption

Businesses, farmers, environmental organisations, landowners, residents and professional associations may all try to influence public policy. This is a normal part of democratic decision-making when positions are presented openly and public officials remain impartial.

The integrity concern begins when influence is hidden, privileged, misleading or connected to an improper benefit. Examples include:

- private access to decision-makers that is not available to other affected groups;
- undisclosed personal or financial relationships;
- technical requirements designed around one preferred provider;

- pressure on officials to ignore environmental conditions;
- studies shaped to produce a predetermined result;
- public consultation used only to legitimise a decision that has already been made.

Slovenian law regulates lobbying as non-public influence exercised on behalf of interest groups in relation to certain public decisions. The Commission for the Prevention of Corruption maintains information and reporting arrangements concerning lobbying activities. Lawful lobbying should therefore be distinguished from bribery, conflict of interest, secret favouritism or interference in procedures where improper influence is prohibited. (Commission for the Prevention of Corruption, Slovenia.)

Where environmental integrity risks can arise

Area	Possible integrity risk	Useful questions and documents
Land-use changes	A parcel is reclassified shortly after being acquired by a politically connected investor; a spatial-plan amendment benefits one identifiable project; alternative locations are not assessed.	Who owned the land before and after the planning process began? Who proposed the change? What reasons and alternatives appear in the planning documents?
Construction in sensitive areas	A large project is presented as several smaller interventions; environmental effects are considered separately even though the projects are connected; preparatory works begin before important decisions are final.	Are the interventions technically, financially or geographically connected? What cumulative impacts were assessed? Which permits and decisions were required?
Extraction and use of natural resources	Concessions or licences are awarded through unclear criteria; reported extraction volumes differ from visible activity; fees or restoration duties are weakly enforced.	What are the concession terms, permitted quantities, payments and rehabilitation obligations? Are inspection and monitoring results available?
Forestry and timber management	Harvesting exceeds approved volumes; timber origin or quality is incorrectly recorded; public timber is repeatedly sold to the same connected buyers.	Are cutting permits, transport documents, sale procedures and quantities consistent? Who measured and approved the timber?
Waste collection and illegal dumping	Collection contracts favour a limited group of providers; declared treatment differs from actual disposal; inspection findings do not lead to correction.	Where is the waste taken? Are weighing, transport and treatment records consistent? Were contract changes and additional payments explained?
Water management	Water abstraction, flood protection or river works benefit selected users while transferring risk downstream; permits or concessions are renewed without clear review.	Who benefits from the intervention? Who may face increased flood, drought or pollution risks? What monitoring data and permit conditions apply?
Renewable-energy projects	A project is labelled green, but site selection, land leasing, grid access or subsidy allocation favours connected actors; biodiversity and landscape effects are minimised.	Why was the site chosen? Who owns or leases the land? What public support is provided? What alternatives and cumulative effects were assessed?

Agricultural and rural-development subsidies	Selection criteria are vague or changed during the procedure; beneficiaries are connected to decision-makers; environmental obligations are checked only on paper.	Who applied and who received support? What were the scores and reasons? What environmental results were promised and verified?
Environmental permits and inspections	The same operator repeatedly breaches conditions without effective follow-up; inspection schedules or decisions are influenced; documentation is incomplete.	What conditions apply? What violations were found? Were deadlines, measures and sanctions consistent with comparable cases?

A practical distinction: project failure or integrity failure?

An unsuccessful environmental project is not necessarily corrupt. A tree-planting programme may fail because of drought, poor species selection or inadequate maintenance. Integrity concerns become stronger when the failure is connected to concealed interests, manipulated selection, false reporting or refusal to disclose how decisions and payments were made.

A useful sequence is:

1. Describe the observable result. Example: most of the planted trees died within one year.
2. Identify the decision or obligation. Example: the contractor was required to maintain the trees for three years.
3. Check implementation and payment. Example: the full contract value was paid despite missing maintenance records.
4. Look for an explanation. Example: extreme weather, administrative error, weak contract management or preferential treatment.
5. Classify what is known. Separate verified facts, plausible interpretations, unanswered questions and rumours, following the approach introduced in Chapter 2.

4.3 Greenwashing and misleading environmental claims

Greenwashing occurs when environmental language creates a more positive impression than the available evidence supports. It may involve an entirely false claim, an exaggerated benefit, selective presentation of results or the omission of an important environmental cost.

Not every inaccurate claim is deliberate. Sometimes a project uses unclear language because its indicators are weak or its staff lack expertise. The practical response is the same: request specific evidence rather than accepting or rejecting the claim based only on its wording.

Common greenwashing techniques

Vague language. Terms such as “eco-friendly”, “green”, “clean”, “natural” or “sustainable” are used without explaining what they mean or how they are measured.

Narrow evidence. A project highlights one improvement while ignoring more significant impacts. A new building may use energy-efficient lighting, for example, while requiring the destruction of valuable soil or creating high transport emissions.

Missing baseline. A claim of “50% lower emissions” does not state what year, technology or scenario is used for comparison.

- Future promises without a plan.** An authority or company announces climate neutrality, habitat restoration or zero waste without milestones, allocated resources or responsible persons.
- Reliance on compensation.** Continuing pollution or habitat loss is described as neutral because trees will be planted or offsets purchased elsewhere, without demonstrating the quality, permanence or additional value of those measures.
- Unverified labels.** A project presents a logo, award or self-created certificate as if it were independent confirmation.
- Activity presented as impact.** The number of workshops, trees planted or recycling bins distributed is reported, but there is no information on behavioural change, tree survival or actual waste reduction.

The evidence test

Claim	Evidence that should be requested
“Carbon neutral”	Emissions included and excluded, calculation method, baseline, actual reductions, use of offsets, verification and target date.
“Biodiversity positive”	Ecological baseline, affected species and habitats, predicted loss, restoration measures, indicators, monitoring period and responsible body.
“Zero waste”	Definition of waste, material-flow data, treatment destinations, excluded waste streams and independent records.
“Green jobs”	Number of jobs, duration, working conditions, skills required, recruitment process and access for local residents.
“Community energy”	Ownership structure, decision-making rights, distribution of income, energy access and community benefit arrangements.
“Nature-based solution”	The environmental problem addressed, alternatives considered, ecological design, long-term maintenance and possible negative impacts.
“Sustainable mobility”	Expected change in travel behaviour, access for people without cars, links with public transport and monitoring of actual use.

EU consumer-protection rules have been strengthened through Directive (EU) 2024/825, which addresses misleading environmental claims and sustainability labels. Member States were required to transpose the Directive by March 2026, and its rules are due to apply from 27 September 2026. These consumer rules do not automatically govern every statement made about a municipal project, but the underlying principle is useful in all settings: broad environmental claims should be specific, evidence-based and capable of verification. (Directive (EU) 2024/825.)

From slogan to verifiable statement

A vague claim:

“The project will transform the municipality into a green regional leader.”

A more accountable statement:

“By December 2029, the project aims to reduce annual electricity consumption in the three participating municipal buildings by 30% compared with the verified 2024 baseline. Consumption data and the calculation method will be published annually.”

The second version identifies the subject, indicator, baseline, deadline and reporting commitment. It can later be tested.

A seven-part claim check

Before repeating an environmental claim, ask:

1. What exactly is being claimed?
2. What part of the project or organisation does it cover?
3. What baseline is used?
4. Which indicator measures progress?
5. Who produced and verified the evidence?
6. Over what period will results be monitored?
7. Which significant trade-offs or negative effects are not mentioned?

4.4 Public money for the green transition

The green transition is financed through combinations of municipal and national budgets, EU cohesion funding, agricultural and rural-development support, the Recovery and Resilience Facility, public environmental funds, loans and private investment. The presence of EU funding does not replace national planning, procurement, environmental or integrity obligations.

Public oversight is complicated because information may be spread across several systems. One portal may show the funding decision, another the procurement, another the payment and another the environmental procedure.

Follow the full funding chain

Young people do not need to audit every invoice. They can begin by reconstructing the main chain:

Stage	Questions
1. Programme	Which EU, national or municipal programme finances the project? What public objective does the programme set?
2. Call or selection	Was there an open call, direct selection or another procedure? What were the eligibility and award criteria?
3. Beneficiary	Who received the funding? Who owns or controls the beneficiary?
4. Project design	What activities, location, budget, indicators and environmental results were approved?
5. Land and permits	Who owns the land? Which spatial, construction, water, nature or environmental decisions apply?
6. Procurement	Which contracts were awarded, to whom, for how much and through which procedure?
7. Changes	Did the price, location, contractor, scope or deadline change after approval? Why?
8. Results	What was delivered? Were environmental and social results measured against the original commitments?

Practical sources for tracing public projects

In Slovenia, the Spatial Information System provides access to spatial-planning procedures, documents,

graphical information and opportunities to submit comments during public consultations. It also allows the public to follow relevant planning and construction procedures. (Spatial Information System of Slovenia.)

The Slovenian e-JN platform provides public access to current public procurements without requiring registration. ERAR, maintained as a transparency application of the Commission for the Prevention of Corruption, enables the monitoring of public-sector cash flows and related information. (e-JN and ERAR.)

At EU level:

- TED provides access to procurement notices and contract awards that must be published at European level;
- Kohesio contains information and results concerning regional-policy projects under shared management;
- the Financial Transparency System identifies recipients of funding managed directly or indirectly by the European Commission;
- EU countries publish information on beneficiaries of Common Agricultural Policy payments under CAP transparency rules.

Not every small contract or payment will appear in every system. Missing data from one portal should therefore lead to a search in other relevant sources, not an immediate conclusion that information has been deliberately concealed.

Public procurement and environmental quality

Green public procurement should use clear and verifiable environmental requirements rather than relying on general promises. Slovenia's green public procurement framework concerns goods, services and works with reduced environmental impacts across their life cycle. EU guidance similarly emphasises verifiable, justifiable criteria supported by a life-cycle approach and scientific evidence. (Government of Slovenia and European Commission green public procurement materials.)

Questions to ask include:

- Were environmental criteria included in the technical specifications or only in promotional materials?
- Were the criteria relevant to the main environmental effects of the contract?
- Could several qualified providers realistically meet them?
- Did the winning bidder provide evidence or merely sign a declaration?
- Does the contract include monitoring, penalties or correction if environmental obligations are not met?
- Were later contract changes used to remove or weaken the environmental requirements?

Subsidy integrity

A subsidy may be awarded through a lawful procedure and still deliver limited public value. Oversight should therefore cover both selection integrity and result integrity.

Selection integrity asks whether the criteria were clear, consistently applied and free from conflicts of interest.

Result integrity asks whether the recipient completed the activities, maintained the investment and achieved the environmental outcome for which support was provided.

For example, verifying that a farmer received support for an environmental measure is only the first step. Further questions concern what practice was required, how compliance was checked, whether the measure continued for the required period and what environmental result was recorded.

4.5 Who bears the environmental cost?

Environmental projects create benefits and burdens that are rarely distributed evenly. A renewable-energy facility may contribute to climate goals while placing noise, visual or land-use burdens on one village. Urban greening may improve an area while increasing property values and housing pressure. Energy-renovation subsidies may reduce costs for homeowners while remaining inaccessible to low-income tenants.

The European Environment Agency distinguishes several dimensions of justice in sustainability transitions:

- distributional justice, concerning who receives benefits and who carries costs;
- procedural justice, concerning who can meaningfully participate;
- recognitional justice, concerning whose needs, knowledge and ways of life are respected;
- restorative justice, concerning how past and present environmental harm is repaired.

This framework should be applied to the specific environmental decision rather than used to repeat the general inclusion principles addressed in Sections 3.4 and 3.6. (European Environment Agency, justice in sustainability transitions.)

Environmental cost and fairness questions

Issue	Questions
Health	Which groups are exposed to pollution, noise, heat, unsafe water or traffic? Do health assessments consider cumulative exposure and existing vulnerability?
Housing	Could the project increase rents, property prices, displacement or housing costs? Who can access renovation and energy subsidies?
Land	Who loses access to agricultural land, forests, allotments, common areas or traditional routes? Is compensation fair and transparent?
Energy	Who pays for the infrastructure and who receives cheaper or more secure energy? Are renters and low-income households included?
Employment	Are promised jobs local, accessible, safe and long-term, or mainly temporary construction work?
Public services	Does the investment improve services for the whole community or primarily support a commercial development?
Climate risk	Does flood, drought, fire or heat risk move from one location or group to another?
Future generations	Who will pay for maintenance, decommissioning, contaminated land or restoration after the project ends?

Environmental and health inequalities can overlap with income, housing, age, disability, geographical isolation and insecure access to services. Slovenian public-health materials also recognise that environmental risks and barriers do not affect all groups equally. (National Institute of Public Health, Slovenia.)

The benefit-and-burden map

For a specific project, draw four columns:

Direct benefits	Indirect benefits	Direct burdens	Long-term risks
Subsidies, contracts, energy, land value, jobs	Local services, tax income, reduced emissions	Noise, traffic, land loss, pollution, higher costs	Maintenance, climate exposure, decommissioning, debt, habitat decline

Add the actors or groups affected under each column. The map often reveals that “the community” is not a single interest. Different residents may experience the same project very differently.

The purpose is not to require unanimous support. It is to make distributional choices visible and to ask whether preventable burdens can be reduced, compensated or shared more fairly.

4.6 Green red flags

The following red flags are adapted to environmental and green-transition decisions. General corruption warning signs are already covered in Section 2.5.

Red flag	Why it deserves attention	What to check
A sudden change to a spatial plan benefits a specific project or parcel.	Planning authority may be responding to private rather than public need.	Chronology, land ownership, initiator, expert justification, alternatives and declared interests.
Contracts are repeatedly awarded to the same connected providers.	Competition may be restricted or relationships may affect selection.	Tender participation, ownership, evaluation records, contract history and conflicts of interest.
Subsidy recipients are selected through unclear criteria.	Discretion may allow favouritism or inconsistent treatment.	Published criteria, scores, reasons, decision-makers and appeal records.
Environmental studies are missing, incomplete or unavailable.	The public cannot test the evidence or understand the decision.	Whether a study was legally required, who prepared it, when it was completed and whether annexes and raw data are accessible.
Consultation begins after the essential decision is effectively final.	Participation may be symbolic rather than capable of influencing the result.	Date of the funding application, land agreement, political commitment, tender, consultation and final approval.
Procurement is divided into several small or separate contracts.	Fragmentation may reduce competition or scrutiny.	Whether the contracts concern one functional project, how their estimated values were calculated and why separate procedures were used.
A temporary intervention repeatedly remains in place.	Temporary status may avoid fuller planning or environmental review.	Original duration, extensions, legal basis, cumulative impact and restoration obligations.
Urgency is repeatedly used to avoid ordinary procedures.	Genuine emergencies require speed, but urgency can also reduce oversight.	When the need became known, who caused any delay and which safeguards remained in place.

The environmental claim changes when evidence is requested.	The claim may be promotional rather than measurable.	Original communication, approved indicators, baseline and later revisions.
A project's positive impact is monitored, but its negative effects are not.	Selective monitoring can produce misleading reporting.	Full indicator set, complaints, inspection data, mitigation duties and cumulative impacts.
The contractor or beneficiary helps define the criteria used to select itself.	Advance access can create an unfair advantage.	Market consultation, communication records, technical specifications and participation of independent experts.
Works, land preparation or purchases begin before key decisions are final.	The authority may create pressure to approve a project because money has already been spent.	Dates of contracts, works, permits, funding decisions and environmental assessments.

Red flags are a starting point, not a verdict

A red flag should produce a precise question:

“Why was the consultation late, and which parts of the project could still be changed?”

This is more useful than a premature accusation:

“The consultation was corrupt.”

A credible review should record:

- what is confirmed;
- which document supports it;
- what remains unknown;
- which non-corrupt explanation may exist;
- what additional evidence would clarify the issue.

This approach protects the quality of public debate and makes it easier for institutions, journalists, civil society organisations and oversight bodies to respond to the actual concern.

Case activity: The Green Community Project

Purpose

Participants analyse a fictional municipal project involving EU funding, land-use change, procurement, environmental assessment, green claims and local consultation.

The activity develops the ability to:

- separate facts from assumptions;
- follow a project across several procedures;
- identify environmental and financial integrity questions;
- test sustainability claims;
- propose practical safeguards.

Recommended format

Element

Recommendation

Duration

90 minutes

Group size

12 to 30 participants

Group work

Teams of 4 to 6

Materials

Scenario, evidence cards, project-integrity worksheet and flipchart paper

Main output

A short integrity assessment and five recommended actions

Scenario

The Municipality of Maribor announces a Green Community and Energy Park with an estimated value of EUR 6.2 million. The municipality expects 70% of the cost to be financed through EU and national funds.

The project includes:

- a solar installation and battery system;
- an eco-innovation and events building;
- a cycling and electric-mobility point;
- new parking and access roads;
- a landscaped public area;
- educational activities for young people.

The proposed site is a seven-hectare area on the edge of the town. It is currently used partly as agricultural land and partly as a wet meadow that temporarily stores water after heavy rain.

Municipal promotional materials describe the project as “carbon neutral”, “biodiversity positive” and “created with the community”.

Evidence card 1: Land and planning

The current municipal spatial plan does not permit the full proposed development. An amendment is being prepared. Ten months before the project was publicly announced, a company called Zelenik Investments acquired two of the relevant parcels. One of its co-owners previously worked as an adviser to the mayor. No evidence has

been presented that the relationship influenced the decision.

A former industrial site was considered as an alternative. A short municipal note states that it would be more expensive because contaminated soil would require remediation. No comparative cost or environmental analysis has been published.

Evidence card 2: Funding

The municipality submitted an initial funding concept before the public presentation of the project. The concept identifies the current site and the main facilities.

The funding application promises 40 green jobs, a 35% reduction in municipal energy emissions, improved biodiversity and increased youth participation.

The application does not specify how many jobs will be permanent or how biodiversity improvement will be measured.

Evidence card 3: Procurement

A company called SunBuild presented an unsolicited technical concept to the municipality several months before the procurement began.

The tender for the solar system requires compatibility with a specialised control platform distributed in Slovenia by SunBuild. The municipality states that this is necessary for technical reliability.

Construction, solar equipment, landscaping, communication and access-road works are being procured separately. The municipality explains that different professional expertise is required.

Evidence card 4: Environmental information

A preliminary ecological report records common bird and plant species. It was based on one site visit conducted in February.

Residents provide photographs showing seasonal standing water and amphibians during spring. The consultant responds that these observations do not necessarily change the overall assessment.

The environmental screening decision concludes that a full environmental impact assessment is not required. The decision refers to mitigation measures, but one annex containing the detailed measures is not available on the project website.

Evidence card 5: Consultation

The municipality holds one public presentation after the initial funding concept has been submitted but before the spatial-plan amendment is adopted.

Participants can comment on landscaping, cycling facilities, educational content and opening hours. When asked whether the location can change, the project manager says that changing the site would probably endanger the funding timetable.

Residents of a nearby low-income settlement say they received information only through an online municipal notice. Small farmers using neighbouring land are concerned about drainage and access during construction.

Evidence card 6: Public communication

The municipality's website states: "The park will be completely carbon neutral and will create 40 permanent green jobs while increasing local biodiversity."

The funding application refers to 40 jobs but does not call all of them permanent. Its emissions estimate covers electricity used by municipal buildings but does not include construction emissions or additional traffic. The municipality has not yet adopted a biodiversity baseline or monitoring plan.

Group task

Each group should complete five steps.

Step 1: Sort the information

Confirmed fact	Possible integrity concern	Missing information	Possible public benefit
			-

Participants should not place an allegation in the confirmed-fact column unless the evidence card supports it.

Step 2: Apply the green integrity test

Assess evidence, interests, alternatives, public money and measurable results. Give each area one of three ratings: Adequate, unclear or serious concern.

Step 3: Follow the decision chain

Place the following in chronological order:

- private land purchase;
- unsolicited company proposal;
- funding concept;
- public announcement;
- environmental screening;
- consultation;
- spatial-plan amendment;
- procurement;
- construction;
- monitoring.

Identify where an early commitment may have limited later choices.

Step 4: Prepare five public-interest questions

Questions should be specific and answerable through documents or a reasoned institutional explanation. Examples:

- What ownership and interest checks were completed before selecting the site?
- What evidence supports rejection of the former industrial site?
- Why is the specialised control platform necessary, and can equivalent solutions compete?
- Where are the detailed environmental mitigation measures?
- Which parts of the project can still change as a result of consultation?
- How were the 40 jobs and carbon-neutrality claim calculated?
- How will drainage and flood-storage effects be monitored?

Step 5: Recommend safeguards

The group should propose five improvements before the project proceeds. Possible measures include:

- publishing the full project chronology and relevant ownership information;
- disclosing meetings and interests connected with site selection;
- commissioning an independent comparison of locations;
- making the missing environmental annex available;
- collecting ecological data during appropriate seasons;
- clarifying whether separate procurements form one functional project;
- allowing equivalent technical solutions in the tender;
- correcting unsupported public claims;
- reopening consultation while meaningful alternatives remain possible;
- adopting measurable environmental, employment and community-benefit indicators;
- publishing annual implementation and monitoring results.

Group presentation

Each group has three minutes to present:

1. its two strongest integrity concerns;
2. the most important missing document;
3. one credible non-corrupt explanation that should be considered;
4. the safeguard that would most improve the project.

Facilitator notes

The activity has no single correct verdict. Participants should not be asked to decide whether the fictional municipality is “corrupt”. The objective is to assess whether the project provides enough evidence, openness and procedural integrity to justify public confidence.

Strong analysis should recognise both sides:

- the project could deliver renewable energy, public facilities and mobility improvements;
- the chronology, location, procurement specifications, consultation timing and public claims create questions that require clearer answers.

The facilitator should reinforce the distinction between:

- a project that is environmentally beneficial;
- a project that is legally authorised;
- a project that is managed with integrity.

These categories can overlap, but they are not identical.

Tool 4.1: Green Project Integrity Worksheet

This template can be used for fictional exercises or publicly available project information.

Project name and location:

Responsible authority:

Funding source and value:

Main beneficiary or contractor:

Area	Information found	Document or source	Open question
Public need			
Site and land ownership			
Alternatives			
Environmental assessment			
Public participation			
Funding decision			
Procurement or subsidy			
Ownership and interests			
Environmental claims			
Social costs and benefits			
Monitoring and enforcement			

Three confirmed facts:

1. -----

2. -----

3. -----

Three unanswered questions:

1. -----

2. -----

3. -----

Most important environmental indicator:

Most important integrity safeguard:

Relevant earlier sections: Chapter 2 for classification and general warning signs; Chapter 3 for mapping local decision-makers, influence and unequal access.

Chapter takeaways

- Green integrity connects environmental responsibility with fair procedures, transparent influence and accountable use of public money and authority.
- A controversial environmental decision is not automatically corrupt. Poor planning, policy disagreement, administrative failure and integrity violations must be distinguished.
- Environmental projects should be followed across the complete chain: planning, permits, funding, procurement, implementation, monitoring and enforcement.
- Claims such as “green”, “sustainable” or “climate-friendly” should be supported by measurable commitments, credible evidence and publicly available results.
- Public consultation is most meaningful when communities receive understandable information before the main decisions have become final.
- Environmental benefits and burdens may be distributed unequally. Young people should examine who benefits, who bears the risks and how effects may change over time.
- Green-transition funding requires the same scrutiny as other public spending, including clear beneficiaries, selection procedures, contracts, indicators and monitoring.
- Relationships between officials, investors, consultants and beneficiaries should be disclosed and managed where they could affect impartial decision-making.
- Environmental red flags justify further questions and examination; they do not establish corruption by themselves.
- A credible green-integrity assessment combines verified facts, missing information, environmental indicators and practical safeguards.

Selected sources and further guidance

European and international sources

- [European Commission \(n.d.\). The Aarhus Convention and the EU.](#)
- [European Commission \(n.d.\). Environmental assessments.](#)
- [European Commission \(n.d.\). Sustainable consumption.](#)
- [European Union \(2024\). Directive \(EU\) 2024/825.](#)
- [European Environment Agency \(2024\). Delivering justice in sustainability transitions.](#)
- [European Commission \(n.d.\). EU budget transparency.](#)
- [European Commission \(n.d.\). Common Agricultural Policy beneficiaries.](#)
- [TED – Tenders Electronic Daily \(n.d.\).](#)
- [Europol \(2022\). Environmental Crime in the Age of Climate Change.](#)
- [UNODC \(n.d.\). Environment, climate and wildlife.](#)

Slovenian sources and portals

- [Spatial Information System of Slovenia \(n.d.\).](#)
- [Government of Slovenia \(n.d.\). Environmental assessment.](#)
- [e-JN – Slovenian Electronic Public Procurement \(n.d.\).](#)
- [Commission for the Prevention of Corruption \(n.d.\). ERAR.](#)
- [Commission for the Prevention of Corruption \(n.d.\). Lobbying.](#)
- [Government of Slovenia \(n.d.\). Green public procurement.](#)
- [National Institute of Public Health, Slovenia \(n.d.\).](#)

5. Following decisions, public money and public information

Local projects rarely exist in a single document. A new youth centre, road, sports facility, waste contract, cultural programme or environmental project may begin as a political proposal, appear later in a budget, move through procurement or a public grant, generate payments and finally produce - or fail to produce - a visible result.

proposal → decision → budget → procurement or grant → implementation → monitoring

This chapter explains how young people can reconstruct that chain using publicly available documents and simple tracking tools. It does not assume that every delay, change or missing document indicates corruption. The distinctions explained in Section 2.2 remain important: the purpose of tracking is first to establish what happened, who was responsible and what evidence exists. Warning signs should be interpreted using Section 2.5, while environmental and land-related effects should be assessed using Chapter 4.

The tools at the end of this chapter help users organise information before deciding whether further documentation, institutional dialogue or reporting is needed. More detailed guidance on documenting and reporting concerns is provided in Chapter 6, while Chapter 7 explains how verified findings can be turned into constructive youth action.

5.1 How local decisions and spending processes work

Following the decision-to-delivery chain

Public decisions often appear more complicated than they are because information is divided among meeting materials, budgets, procurement portals, payment records, contracts and project reports. The following six-stage model provides a practical starting point.

Stage	Main question	Documents that may exist	What the stage establishes
1. Proposal	What is being proposed, why and by whom?	Development programme, investment proposal, spatial plan, feasibility study, mayor's proposal, committee materials, consultation documents	The original purpose, expected cost, location, intended users and proposed timetable
2. Decision	Who formally authorised the proposal?	Municipal council resolution, ordinance, administrative decision, voting record, approved project document	Whether the project or measure received formal approval and under what conditions
3. Budget	Was money allocated, from which source and for which period?	Draft and adopted budget, budget explanation, development-programme plan, budget revision, annual financial statement	The planned financial framework and later changes to it

4. Procurement or grant	How was the contractor or beneficiary selected?	Tender notice, public call, specifications, selection criteria, evaluation record, award decision, contract or grant agreement	Who was selected, how the choice was made and what was promised
5. Implementation	What was delivered, paid or changed?	Invoices, payment records, interim reports, contract amendments, supervision reports, permits, acceptance certificates	What happened after the award and whether scope, price or deadlines changed
6. Monitoring	Did the project achieve its expected result?	Final report, annual financial statement, indicator report, audit, supervisory committee report, evaluation, inspection record	Whether the planned output and wider result were achieved

The sequence is a map rather than a rigid legal formula. Some projects combine several stages, while others use multiannual budgets, framework agreements, direct implementation by a municipal company or several funding sources. Nevertheless, each stage should leave some documentary trace.

In Slovenia, the municipal council adopts the municipal budget and annual financial statement, while the mayor has the exclusive competence to propose them. Municipalities also have a supervisory committee, separate from the mayor and municipal council, which performs municipal financial oversight. These distinctions help identify who proposed a measure, who approved it, who implemented it and who was expected to review it. (Government of Slovenia, n.d.)

A budget is a plan, not proof of expenditure

One of the most common mistakes in public-money monitoring is to treat all financial figures as if they meant the same thing. They do not.

Financial term	What it normally tells you
Estimated value	An early calculation of what a project may cost
Budget allocation	The maximum or planned amount available for a purpose
Award value	The amount accepted in a procurement or grant-selection procedure
Contract value	The financial commitment written into the signed contract
Amended contract value	The contract value after any additions, reductions or price adjustments
Paid amount	Money actually transferred by the public body
Final project cost	Total recognised cost after implementation and financial closure

A budget allocation does not prove that the money was spent. An award decision does not prove that a contract was signed. A signed contract does not prove that the entire amount was paid. A payment does not, by itself, prove that the work was completed correctly or that the project achieved its intended result.

For this reason, amounts should always be recorded with a label such as planned, awarded, contracted, amended, paid or reported as final.

Procurement and grants perform different functions

A public body normally uses procurement when it needs to purchase works, goods or services for its own responsibilities—for example, construction of a playground, preparation of a municipal study or waste collection.

A grant or subsidy is normally used when the public body supports an activity carried out by another organisation in pursuit of a public objective—for example, youth programmes, cultural events, environmental initiatives or support for local associations.

This practical difference determines which documents should be followed.

Procurement file	Grant file
Procurement notice or invitation	Public call or call for proposals
Technical specifications	Eligibility and award criteria
Questions and clarifications	Applicant guidance
Tender or bid	Project application
Evaluation and award decision	Assessment record and funding decision
Procurement contract	Grant agreement
Contract modifications	Approved project or budget changes
Acceptance, supervision and invoices	Narrative and financial reports

In both cases, the key issue is continuity: the selection criteria published at the beginning should be traceable to the evaluation, the award, the contract and the final result.

Track the adopted version, not only the first proposal

Projects commonly change during decision-making and implementation. A council may reduce the budget, move a project to a later year or attach conditions. A procurement procedure may be cancelled and repeated. A contract may be amended because of unforeseen works, inflation, a changed timetable or a revised technical solution. A grant beneficiary may receive approval to change activities or reallocate costs.

The monitoring file should therefore preserve both the original and later versions of important documents. At minimum, check for:

- budget revisions or reallocations;
- amended council resolutions;
- repeated or cancelled public calls;
- corrected procurement documents;
- contract annexes and modifications;
- extensions of deadlines;
- changes to deliverables, location or beneficiaries;
- final figures that differ from the original estimate.

The change itself is not evidence of misconduct. The practical question is whether it was authorised, explained, documented and consistent with the applicable procedure.

Example: tracking a fictional youth-space renovation

A municipality announces that an unused building will be renovated as a youth space.

1. The original proposal estimates a cost of EUR 240,000.
2. The adopted budget allocates EUR 180,000 in the first year and places an additional EUR 60,000 in the development plan for the following year.
3. The procurement contract is awarded for EUR 226,000.
4. A later contract amendment increases the value to EUR 239,000 and extends the deadline by three months.
5. Payment data show that EUR 160,000 has been transferred.
6. The municipality's project page still describes the project as "under implementation".

The correct conclusion is not that EUR 239,000 has already been spent or that the project is complete. The evidence shows that EUR 239,000 has been contractually committed after amendment, EUR 160,000 has so far been identified as paid, and completion still needs to be verified through later payments, an acceptance document, a final report or physical observation.

This discipline prevents both premature accusations and overly optimistic public claims.

5.2 What young people should look for

The purpose of tracking is to create a reliable project record. The following eight elements form a useful minimum evidence set.

1. Responsible institution

Identify the body with formal authority over the decision. This may be the municipality, municipal council, municipal administration, public institution, public company, ministry, managing authority or another body.

Also distinguish between different functions:

- decision-maker: formally approves the measure;
- budget holder: provides or controls the money;
- implementing body: carries out the project;
- contracting authority: conducts procurement;
- managing authority or intermediary: manages EU or national funding;
- oversight body: reviews legality, finances or performance.

The same institution may perform several functions, but this should not be assumed.

2. Beneficiary

Record who receives the immediate financial or material benefit. Depending on the case, this may be:

- a contractor paid to perform works or services;
- a company receiving a concession or use of municipal property;
- an association receiving a grant;
- a public institution receiving investment funding;
- residents or a target group receiving the final service.

It is useful to distinguish the financial recipient from the intended public beneficiary. A construction company may receive the payment, while young people are the intended users of the facility.

3. Selection criteria

Find the criteria that governed the choice. These may include price, technical quality, experience, environmental performance, accessibility, proposed programme, number of users or contribution to local objectives.

Record the criteria as published, not as later summarised in a press release. Then compare them with the evaluation or award decision:

- Were all published criteria applied?
- Were their weights or scoring rules changed?
- Is the winning score explained?
- Were unsuccessful applicants or bidders informed?
- Does the selected offer meet the stated requirements?

The purpose is not to re-evaluate a technical procedure without evidence, but to check whether the documented decision follows the rules announced in advance.

4. Contract or grant amount

Record all financial amounts together with their stage and date. Where several figures exist, do not select only the largest or smallest one.

Estimated value:	EUR 300,000
Budget allocation:	EUR 280,000
Initial contract:	EUR 257,500
Amended contract:	EUR 274,000
Payments identified by 30 June:	EUR 196,000

This makes the financial story visible without implying that the amounts should be identical.

5. Source of funding

A local project may combine:

- municipal own resources;
- national co-financing;
- EU cohesion funding;
- Recovery and Resilience Facility funding;
- a ministry grant;
- private contributions;
- donations or in-kind support;
- borrowing.

The source matters because each funding stream may have different objectives, reporting obligations, eligible costs and oversight arrangements.

Do not rely only on project logos. Check the grant decision, funding agreement, budget explanation or project database. Where funding is shared, record the approximate or contractual contribution of each source.

6. Expected result

Separate the activity, output and result.

Level	Example
Activity	Renovating a building
Output	One accessible youth centre equipped and opened
Result	More young people regularly accessing local programmes
Wider effect	Stronger youth participation and reduced geographic exclusion

A project can complete its activities and outputs without achieving the intended result. A building may be renovated but remain largely unused. A consultation may take place but have no influence on the adopted decision. Monitoring should therefore include both what was delivered and what changed because of it.

7. Environmental and social effects

Record the effects that were explicitly promised, assessed or required. Depending on the project, this might include accessibility, effects on neighbouring residents, land use, energy performance, tree removal, traffic, waste, noise, equal access or impacts on vulnerable groups.

Chapter 4 provides the appropriate framework for environmental and land-related review. At this stage, the task is to connect those commitments to the project file:

- Where was the effect assessed?
- Was a mitigation measure included in the contract or permit?
- Who was responsible for implementing it?
- Is there evidence that it was carried out?

8. Oversight and reporting

Identify how implementation was meant to be checked. Possible mechanisms include:

- technical supervision;
- financial controls by the funder;
- reports to the municipal council;
- municipal supervisory committee review;
- internal or external audit;
- inspection;
- evaluation of grant results;
- public reporting of indicators;
- a Court of Audit report.
-

The Slovenian Court of Audit publishes audit reports concerning public-funds users, including municipalities and local public bodies. These reports can clarify recurring problems in financial management, procurement, municipal property or project implementation. (Court of Audit of the Republic of Slovenia, n.d.)

Work with three categories: fact, gap and question

A useful discipline is to divide notes into three categories.

Category	Example
Verified fact	"The municipal council approved the project on 18 April."
Information gap	"The signed contract has not been found."
Question requiring clarification	"Was the contract concluded, and what is its final value?"

An information gap is not automatically evidence that a document does not exist or that a procedure was improper. It means only that the information has not yet been located.

Similarly, an interpretation should not be presented as a fact. Compare:

- Fact: Two bids were submitted.
- Interpretation: Competition may have been limited.
- Unverified allegation: The procedure was designed for one bidder.

The first statement is supported by a document. The second may justify further research. The third requires substantially stronger evidence.

Compare the stages, not isolated numbers

The most useful comparisons are:

- proposal versus adopted decision;
- draft budget versus adopted budget;
- adopted budget versus revised budget;
- budget versus annual financial statement;
- published criteria versus award decision;
- award decision versus signed contract;
- initial contract versus amendments;
- contract value versus payments;
- promised deliverables versus final report;
- final report versus visible conditions or user experience.
-

A mismatch should first become a clear question. For example:

The contract required completion by 30 September, but the final report states that the work continued until December. Was the deadline formally extended, and where is the relevant contract amendment?

This is more precise and constructive than claiming that "the project was late and therefore corrupt".

Build one project file

For each case, create one folder containing:

1. a short project summary;
2. a timeline;
3. downloaded documents;
4. a list of sources;
5. a table of amounts;
6. unanswered questions;
7. correspondence with institutions;

8. a record of updates.

File names should include the date and document type, for example:

- 2026-03-15_Municipal-council_resolution-42.pdf
- 2026-05-08_Procurement-award-decision.pdf
- 2026-06-30_ERAR-payment-check.pdf

This will make later verification, dialogue or reporting considerably easier. Guidance on responsible evidence handling is continued in Chapter 6.

5.3 Where to find information

Begin with information already published. A focused search often answers most basic questions without a formal request.

Municipal websites

The municipal website is normally the first place to look for:

- agendas and materials for municipal council meetings;
- minutes, voting records and adopted resolutions;
- municipal ordinances and other local regulations;
- draft and adopted budgets;
- budget revisions;
- development-programme plans;
- annual financial statements;
- public consultations;
- public calls and grant results;
- municipal property transactions;
- project pages and progress reports;
- reports of the municipal supervisory committee;
- contact details for the official responsible for public information.

Meeting materials can be more informative than the final minutes because they may contain financial explanations, maps, expert opinions, draft contracts or alternatives considered before the vote.

Search both the current website and any document archive. Municipalities may organise similar information under different headings, such as Municipal Council, Official Publications, Budget, Public Calls, Projects, Open Data or Public Information.

Public-information catalogues and register of liable bodies

Slovenian public bodies maintain catalogues describing the types of public information they hold and identifying the official responsible for providing access. The central government portal provides a search facility for public-information catalogues, while the register of bodies subject to the Public Information Access Act can help determine whether a particular organisation is covered. (Government of Slovenia, n.d.) The catalogue is particularly useful when the relevant department or contact person is unclear.

ERAR

ERAR, operated by the Commission for the Prevention of Corruption, provides insight into public-sector financial flows. It includes individual transactions, public-procurement information and other bases for payments, together with additional integrity-related data. (Commission for the Prevention of Corruption, n.d.)

A practical ERAR search can help answer:

- Has the institution paid the contractor or beneficiary?
- On what dates were payments made?
- Are there several payments connected with the same recipient?
- Which public bodies have transferred money to that recipient?
- Does the payment pattern correspond with the project timetable?

ERAR should be interpreted together with the contract and budget documents. A transaction may represent an advance, partial payment, reimbursement, transfer between public bodies or payment covering several activities. The transaction confirms a financial flow, but its precise purpose may require additional documentation.

Slovenian public-procurement sources

The Public Procurement Portal publishes notices, procurement documentation and other information that legislation requires to be made public, including publicly accessible contract information. The e-JN system supports electronic procurement procedures and provides a public view of current procurements without requiring registration. (Government of Slovenia, n.d.)

Search by:

- contracting authority;
- procurement title;
- notice or procedure number;
- contractor;
- type of works, service or goods;
- place of performance;
- publication date.

A complete procurement record may include an initial notice, corrections, questions and answers, an award notice, a cancellation notice, contract information and later modifications. Searching only the first notice may therefore produce an incomplete picture.

PISRS and official publications

The Legal Information System of the Republic of Slovenia, municipal official gazettes and other official publication systems can help verify:

- municipal ordinances;
- regulations;
- statutory responsibilities;
- adopted spatial acts;
- budget ordinances;
- amendments;

- legal bases cited in decisions.

An adopted regulation should be distinguished from a draft, consultation version or meeting proposal.

OPSI: Open Data Slovenia

The OPSI portal provides access to Slovenian public-sector datasets and tools for their reuse. It can be useful when monitoring requires comparison across several municipalities, years, funding recipients or categories of spending rather than examination of one document. (OPSI, n.d.)

Open data may support maps, charts or trend analysis, but users should first review the dataset description, date of update, units, coverage and any limitations.

Audit and oversight reports

Search the websites of:

- the municipal supervisory committee;
- the Court of Audit;
- competent inspectorates;
- the funding ministry or managing authority;
- the Commission for the Prevention of Corruption;
- the Information Commissioner, where access to documents has been disputed.

An audit report may concern an earlier period or only part of an institution's operations. Record its scope before applying its findings to the project being monitored.

EU-level sources

EU databases are especially useful when a local project is co-financed by the European Union.

Source	Best used for
TED – Tenders Electronic Daily	EU-wide procurement notices, contract awards and modifications published in the Supplement to the Official Journal
Kohesio	Projects and beneficiaries supported by EU cohesion policy
Financial Transparency System	Beneficiaries receiving funding managed directly by the European Commission
Funding & Tenders Portal	EU calls, programme documents, funded projects and procurement opportunities managed through the portal

TED provides free access to current and archived EU procurement notices, including contract-award notices and contract modifications for procedures subject to EU publication requirements. (ted.europa.eu)

Kohesio contains information about projects supported through EU cohesion policy in the 2014–2020 and 2021–2027 programming periods. (Kohesio, n.d.)

The Financial Transparency System identifies beneficiaries of funding paid directly by the European Commission. It does not replace national databases for funds managed by Member States. (European Commission, n.d.)

Quick source guide

Question	First source to check	Possible second source
Who approved the project?	Municipal council materials and resolution	Official gazette
Was money budgeted?	Municipal budget and development plan	Budget revision
Who received the contract?	Public Procurement Portal	TED for EU-level publication
Who received a grant?	Municipal or ministry public-call results	Funding decision or grant agreement
Was money paid?	ERAR	Annual financial statement or invoices
Was EU funding involved?	Project documents and funder's website	Kohesio or Financial Transparency System
Was the project completed?	Final report or acceptance document	Site observation and payment records
Was it audited?	Municipal supervisory committee	Court of Audit or managing authority
Where is a missing document?	Public-information catalogue	Formal information request

Search method

Use the exact project title first, followed by alternative terms. Search separately for the institution, contractor, beneficiary, location and identification number. Procurement and council documents frequently refer to earlier decisions by number; those references can lead to the next part of the chain.

Record the publication date and download the document. Online pages can later be updated, reorganised or removed. A source log should include the title, institution, date, web location and date on which it was accessed.

5.4 Requesting public information

When the necessary document is not already available, a public-information request can be used. The request should be treated as a method for obtaining existing documentation, not as a demand that an institution conduct a new investigation, prepare a new analysis or answer a broad political question.

Under the Slovenian Public Information Access Act, public information includes documentary material originating from the body's work and held in the form of a document, file, register, record or similar material. (Information Commissioner of the Republic of Slovenia, n.d.)

Step 1: Identify the institution

Send the request to the institution that is likely to hold the document. This is not always the institution mentioned most prominently in a project announcement.

For example:

- the municipality may hold the council decision;
- a municipal public institution may hold the implementation contract;

- a ministry may hold the grant agreement;
- a managing authority may hold EU funding reports;
- a public company may hold invoices and operational records.

Use the institution's public-information catalogue to identify the responsible official and contact address.

Step 2: Define the document or information

Describe the requested material as precisely as possible. Include:

- project, programme or procedure name;
- location;
- relevant dates;
- decision, contract or procurement number, where known;
- document type;
- preferred format.

A broad request such as:

Please provide all information about the sports hall.

may require clarification.

A more workable request would be:

Please provide an electronic copy of the contract concluded for the renovation of the municipal sports hall under procurement procedure JN-____, including all annexes signed up to 30 June 2026.

Request existing documents rather than explanations where possible.

Less precise	More precise
Why did the project become more expensive?	Please provide the contract amendments, decisions and explanatory documents concerning changes to the contract value.
Who decided to give the organisation money?	Please provide the funding decision, evaluation record and grant agreement for the 2026 public call.
Was the work supervised properly?	Please provide the supervision reports, acceptance record and identified-defects record.
How much did everything cost?	Please provide the final financial report and a list of payments under the specified contract.

Step 3: Submit a written request

A Slovenian request may be submitted by ordinary post or email, and an electronic request does not require a qualified digital signature. A written request is preferable because it provides a right of appeal if the body refuses access or fails to respond. (Information Commissioner of the Republic of Slovenia, n.d.)

The applicant should identify the body, provide their name or organisation and address, describe the requested information and state how they wish to receive it—for example, as an electronic copy. The applicant does not have to explain why the information is wanted or provide a legal justification for the request. (Information

Commissioner of the Republic of Slovenia, n.d.)

Use neutral language. There is no need to allege corruption or explain the wider campaign in the request.

Step 4: Keep a copy

Save:

- the request;
- attachments;
- the date and method of submission;
- proof of delivery, where available;
- any acknowledgement;
- later correspondence;
- documents received;
- the institution's decision.

Add the request to the Decision Tracking Sheet or a separate correspondence log.

Step 5: Follow up where necessary

A Slovenian body must decide on a complete request without delay and no later than 20 working days after receipt. In exceptional circumstances involving extensive documentation or preparation of partial access, it may extend the deadline by up to 30 working days and must issue an explained procedural order. Refusal, partial refusal or failure to respond can be challenged before the Information Commissioner. (Information Commissioner of the Republic of Slovenia, n.d.)

If only part of a document is protected, the body should consider partial access by removing the protected portion and providing the remainder. (Information Commissioner of the Republic of Slovenia, n.d.)

Access by consultation is generally free, while material costs may be charged for copies or electronic records in accordance with the applicable rules. Requesting existing electronic documents in electronic form is usually the simplest option. (Information Commissioner of the Republic of Slovenia, n.d.)

A refusal does not establish that the institution has acted improperly. Review the stated reason, the information actually requested and the available appeal guidance before deciding on the next step.

5.5 Practical tools

Tool 5.1: Follow the Money Worksheet

Purpose: To connect the initial allocation of public money with the recipient, payments, delivery and final result.

A. Basic project information

Field	Entry
Project, contract or grant title	
Location	
Short description	
Responsible institution	

Implementing body	
Contractor or grant beneficiary	
Intended public beneficiaries	
Start date	
Expected completion date	
Current status	

B. Funding sources

Funding source	Programme or budget line	Planned contribution	Confirmed contribution	Evidence
Municipality				
National funding				
EU funding				
Other public source				
Private or in-kind source				
Total				
Intended public beneficiaries				
Start date				
Expected completion date				
Current status				

C. Financial chain

Stage	Date	Document or source	Amount	Amount type	Responsible actor	Evidence saved?
Initial estimate				Estimated		☐
Adopted budget				Planned		☐
Revised budget				Planned/revised		☐
Award decision				Awarded		☐
Signed contract or grant agreement				Contracted		☐
Amendment 1				Amended		☐
Amendment 2				Amended		☐
Payment 1				Paid		☐

Payment 2				Paid		☐
Payment 3				Paid		☐
Final recognised cost				Final		☐

D. Delivery check

Contracted or promised item	Deadline	Evidence of delivery	Current finding	Amount type
			Delivered / partial / not verified	Estimated
			Delivered / partial / not verified	Planned
			Delivered / partial / not verified	Planned/revised
			Delivered / partial / not verified	Awarded

E. Findings

Verified facts

Information still missing

Questions for the responsible institution

Next source or action

Tool 5.2: Decision Tracking Sheet

Purpose: To reconstruct how a proposal became an adopted decision and how the decision was implemented.

A. Decision overview

Field	Entry
Issue or project	
Responsible institution	
Decision-making body	
Main responsible official or department	
People or area affected	
Related contract, grant or budget line	
Tracking period	

B. Decision timeline

Stage	Expected document or event	Responsible actor	Planned date	Actual date	Outcome or status	Source
Proposal introduced						
Committee review						
Public consultation						
Council or authority decision						
Budget allocation						
Procurement or public call						
Award or funding decision						
Contract or agreement signed						
Implementation begins						
Amendment or revision						
Completion						
Final report						
Audit or evaluation						

C. Decision details

Question	Finding	Evidence	Status
What problem was the decision intended to address?			Verified / incomplete
What alternatives were considered?			Verified / incomplete
Who proposed the decision?			Verified / incomplete
Who voted or formally approved it?			Verified / incomplete
What conditions were attached?			Verified / incomplete
Was funding available?			Verified / incomplete
Who was selected to implement it?			Verified / incomplete
What result was promised?			Verified / incomplete
What environmental or social commitments applied?			Verified / incomplete
Who was responsible for monitoring?			Verified / incomplete
What result was actually reported?	-		Verified / incomplete

D. Change log

Date	What changed?	Who authorised it?	Explanation provided	Supporting document

E. Current conclusion

Complete the following sentence:

*Based on the documents reviewed, we can verify that*_____.

*We cannot yet verify*_____.

*The next document or clarification needed is*_____.

Tool 5.3: Public-Information Request Template

Subject: Request for access to public information – [project, contract or decision]

To:

[Name of institution]

[Public-information official or department]

[Email or postal address]

Dear Sir or Madam,

I request access to the following public information held by your institution:

1. [Precise description of the first document, including project title, date, procedure number or relevant period.]
2. [Precise description of the second document.]
3. [Precise description of any annexes, amendments, evaluation records, reports or payment information.]

Where a requested document has been amended, please also provide the amendments or annexes valid up to [date].

I would like to receive the information in electronic form, by email to the address stated below. Where the information is already publicly available, please provide the exact location at which it can be accessed.

Where only part of a document cannot be disclosed, I request access to the remaining parts of the document.

Applicant:

Name or organisation: _____

Address: _____

Email: _____

Representative, where applicable:

Date: _____

Signature, where submitted by post: _____

Request log

Date submitted	Institution	Documents requested	Deadline being followed	Response received	Further action
					-
					-

From information to a verified account

Following public money is not simply a search for suspicious payments. It is a method for understanding whether public commitments were translated into fair selection, documented expenditure, completed work and meaningful results.

A strong monitoring account should allow another person to understand:

- what was proposed;
- who authorised it;
- how much money was planned;
- how the contractor or beneficiary was chosen;
- what was contractually promised;
- how much was paid;

- what changed during implementation;
- what was delivered;
- how the result was assessed;
- which questions remain unanswered.

Once this chain has been established, the next step depends on the findings. Missing documents may require a public-information request. Implementation problems may justify questions to the municipality or funder. Evidence of a possible violation may require careful documentation and an appropriate reporting pathway. Chapters 6 and 7 address those next stages without turning an initial information gap into an unsupported accusation.

Chapter takeaways

- Follow public decisions across the whole chain: proposal, decision, budget, selection procedure, implementation, payment and monitoring.
- A budget allocation is a plan; contracts, payment records, implementation reports and physical results show what happened afterwards.
- For each project, separate verified facts, missing information and questions that still require an answer.
- Use municipal websites, ERAR, public-procurement portals, OPSI, audit reports and EU databases together rather than relying on one source.
- A precise public-information request should identify the institution, the document or period and the preferred form of access.
- The purpose of following public money is to produce a fair and verifiable account, not to treat every unexplained payment as proof of wrongdoing.
-

Selected sources and further guidance

- [Government of Slovenia \(n.d.\). Local self-government.](#)
- [Court of Audit of the Republic of Slovenia \(n.d.\). Official website and audit reports.](#)
- [Information Commissioner of the Republic of Slovenia \(n.d.\). Access to Public Information Act.](#)
- [Information Commissioner of the Republic of Slovenia \(n.d.\). How to write an access-to-information request.](#)
- [Commission for the Prevention of Corruption \(n.d.\). ERAR.](#)
- [Public Procurement Portal of the Republic of Slovenia \(n.d.\).](#)
- [OPSI – Open Data Slovenia \(n.d.\).](#)
- [TED – Tenders Electronic Daily \(n.d.\).](#)
- [Kohesio \(n.d.\). About the EU cohesion-project database.](#)
- [European Commission \(n.d.\). Funding recipients.](#)

6. Documenting and reporting concerns safely

When something appears irregular, the first useful action is usually not to make an accusation or begin an investigation. It is to stop, record what is already known and decide what information is still missing.

This chapter provides a practical process for moving from an initial concern to an appropriate response. It builds on the warning signs discussed in Section 2.5 and the methods for following decisions, spending and public information presented in Chapter 5. The purpose is not to prove wrongdoing independently, but to organise information responsibly and place it before a person or institution able to clarify, review or investigate it.

record → check → assess risk → choose a route → submit or ask → preserve the record → follow up

6.1 Concern, suspicion, rumour and evidence

These terms should not be used interchangeably. The distinction affects what can responsibly be said and what action is appropriate.

Term	What it means in practice	Responsible response
Concern	Something appears unclear, inconsistent or unfair, but there may be an ordinary explanation.	Record the observation and ask for clarification or missing information.
Suspicion	Several facts or circumstances suggest that a rule may have been broken, but important information is still missing.	Identify the factual basis for the suspicion, mark uncertainties and consider advice or a competent reporting route.
Rumour	Information comes from an unidentified, indirect or unverified source.	Do not repeat it as fact. Record it only as an unverified lead if it may help identify a lawful source of information.
Evidence	A document, record, direct observation, verified statement or other item that supports or contradicts a specific claim.	Preserve the item, record its origin and explain precisely what it does - and does not - show.

Evidence does not need to prove an entire case. A municipal decision may establish that a contract was approved, for example, but not why a particular contractor was selected. A photograph may show that work was unfinished on a particular date, but not who was responsible for the delay. Responsible documentation avoids making the evidence carry more weight than it can support.

Young people should therefore use careful language:

- Confirmed: "The published decision names Company A as the selected contractor."
- Not yet confirmed: "The published documents do not explain how the competing offers were scored."
- Question requiring clarification: "What criteria were used and where is the evaluation report available?"
- Inappropriate conclusion without further information: "The contract was corruptly awarded."

6.2 Recording facts responsibly

A good record allows another person to understand what happened without relying on memory, assumptions or personal interpretation. It should be clear enough that a youth group, journalist, adviser or competent authority can distinguish the underlying facts from the person's conclusions.

6.2.1 Begin with a factual chronology

Start by creating a simple timeline. Record events in the order in which they occurred, even when the documents were discovered later.

For each event, note:

- the exact or approximate date;
- what happened;
- which person or institution acted;
- where the information came from;
- whether the event is confirmed;
- which supporting document or source is available.

Use exact dates where possible. If the date is uncertain, state this openly: "between 3 and 10 March", "before the council meeting of 15 April" or "date not yet confirmed". Do not replace missing information with an estimate that looks precise.

On 15 April, the municipal council approved the renovation project. The decision appears in the published minutes of the meeting. The minutes do not identify the contractor because the procurement procedure had not yet been completed.

This is more useful than: "The municipality had already arranged everything in advance." The second statement may express a genuine concern, but it does not show which part is observed, inferred or still unknown.

6.2.2 Separate the record into three parts

For each issue, maintain three clearly separated categories.

What is known contains facts supported by a document, direct observation or identifiable source.

What is indicated contains reasonable interpretations or patterns that may deserve further checking.

What remains uncertain contains missing documents, contradictory information, unanswered questions or facts that have not been independently verified.

What is known	What this may indicate	What remains uncertain
The grant notice required applicants to have at least two years of experience.	The eligibility requirement may not have been applied consistently.	Whether the selected organisation provided evidence of the required experience.
The municipality published the final selection decision.	The process has formally ended.	The individual evaluation sheets and scoring explanation are not published.
One applicant stated that it received no explanation.	Applicants may not have received sufficient feedback.	Whether a formal written explanation or appeal information was sent separately.

6.2.3 Record documents precisely

For every document, record its full title, issuing institution, date, reference number where available and the place where it was found. Documents relevant to local decisions may include:

- meeting agendas and minutes;
- municipal decisions;
- budgets and budget amendments;
- procurement notices and award decisions;
- calls for grants and published selection results;
- contracts and annexes;
- implementation reports;
- inspection findings;
- public registers;
- official correspondence;
- photographs or records of implementation.

Chapter 5 explains where these documents may be found and how different stages of a decision or spending process connect.

Download or save a lawful copy when possible. Webpages and online registers can change. Record the date on which the document was accessed and preserve the original file before adding highlights or annotations. Do not modify an original document. Create a separate working copy for highlighting, redaction or comments. Where authenticity may later matter, retain the complete file rather than only a cropped screenshot.

6.2.4 Record public statements accurately

Statements made during council meetings, public events, interviews or online broadcasts may provide important context. Record:

- who made the statement;
- their role at the time;
- the date and setting;
- the exact words, where a recording or transcript exists;
- whether the statement was later corrected or clarified;
- the source containing the statement.

Paraphrases should be labelled as paraphrases. Quotation marks should be used only when the wording can be checked.

A short extract should not be presented in a way that changes its meaning. Whenever possible, preserve the full recording, transcript or link reference together with the relevant timestamp.

6.2.5 Assess the quality of sources

Sources do not all carry the same weight. A practical source scale can help.

Source level	Examples	How to use it
Direct official source	Decision, contract, register entry, official recording or institutional response	Use as the main factual basis while checking whether the document is complete and current.

Direct personal source	A person describing something they directly saw, received or experienced	Record the circumstances and ask whether documents or other confirmation exist.
Independent secondary source	Credible media report, watchdog publication or research report	Use for context and leads; check the underlying documents where possible.
Indirect source	A statement about what another person allegedly said or experienced	Treat cautiously and seek the original source.
Unidentified source	Anonymous message, social-media claim or community rumour without supporting detail	Do not present as fact. Use only as a possible lead for lawful verification.

An anonymous source is not automatically unreliable, particularly where disclosure could expose someone to retaliation. However, the inability to assess how the source obtained the information must be recorded as a limitation.

6.2.6 Protect personal and sensitive information

Documentation should include only the personal information necessary to understand and report the concern. Avoid collecting identification documents, private addresses, health information, family details or unrelated correspondence merely because they are accessible.

Before sharing a record:

1. retain an unchanged original;
2. create a separate sharing copy;
3. remove unrelated personal information from the sharing copy;
4. check filenames, comments, tracked changes and screenshot notifications;
5. record what was removed and why.

Redaction protects individuals but should not be used to alter the meaning of a document. A competent authority may later need the complete version, which is why the original should be preserved securely.

6.2.7 Correct the record when new information appears

Documentation is a continuing process. If an institution provides a credible explanation or a source corrects an earlier statement, add the correction to the log. Do not silently delete the earlier entry.

Record:

- what changed;
- when the correction was received;
- who provided it;
- whether the concern is resolved, partly resolved or still open.

Correcting a record is not a sign that the original concern was irresponsible. It shows that the process is evidence-led rather than directed towards a predetermined conclusion.

6.3 Choosing an appropriate response

Not every concern should immediately become a formal report. The appropriate route depends on the information available, the seriousness of the issue, the desired outcome and the risks involved.

6.3.1 A practical decision tree

1. Is anyone in immediate danger, or is urgent intervention needed?

- Yes: contact the emergency services or police. Do not continue gathering information at the scene.
- No: continue to Step 2.

2. Is the main problem that a document, explanation or decision is missing?

- Yes: ask the responsible institution for the information. Where an existing public document is required, consider a written request for access to public information.
- No: continue to Step 3.

3. Could the issue reasonably be an error, delay or unclear administrative practice?

- Yes: contact the responsible official or institution with a precise factual question and request a written response.
- No, or the response does not resolve the concern: continue to Step 4.

4. Would raising the matter publicly create unnecessary risk or expose personal information?

- Yes or uncertain: seek confidential advice before taking further action.
- No: a carefully framed public question may be appropriate, provided it does not contain unverified accusations.

5. Was the information obtained through employment, volunteering, contracting, an internship or another work-related relationship?

- Yes: check whether an internal or external protected reporting channel applies.
- No: use an ordinary complaint, information request, police report or oversight route according to the subject matter.

6. Does the concern fall within the responsibility of a specialised authority?

- Possible corruption, conflict of interest or another integrity matter: Commission for the Prevention of Corruption.
- Possible criminal offence: police or prosecution service.
- Access to public information: the institution holding the document, followed where appropriate by the Information Commissioner.
- Sector-specific breach: the relevant inspectorate, regulator or oversight authority.
- Suspected fraud involving EU funds: the responsible national authority and, where appropriate, OLAF or the European Public Prosecutor's Office.

7. Is the available information sufficient for a useful submission?

- Yes: prepare a concise report containing the facts, sources, uncertainties and requested action.
- No: identify the minimum missing information that can be obtained lawfully. A person does not need to solve or prove the entire case before contacting a competent authority.

6.3.2 Ask for information

An information request is appropriate when the concern arises mainly from a gap in the public record. It can clarify:

- which institution made the decision;
- which criteria were used;
- who received public funds;
- what contract was signed;
- whether implementation was monitored;
- whether a report, evaluation or inspection record exists.

In Slovenia, a written request under the Access to Public Information Act should be sent to the institution believed to hold the requested document. A written request may be submitted by ordinary mail or email, without a digital certificate or electronic signature, and provides a basis for an appeal if access is refused or the institution does not respond (Information Commissioner of the Republic of Slovenia).

The request should describe an existing document or category of records as precisely as possible. Access-to-information procedures generally require an institution to provide records it holds; they do not normally require it to create a new analysis, answer broad political questions or explain a person's motives.

The Slovenian Information Commissioner deals with appeals against refusals and cases in which a public body does not respond within the applicable period. Its official guidance identifies 20 working days as the standard point at which a requester may seek assistance because of non-response.

6.3.3 Raise a public question

A public question may be useful where the facts are already public and the aim is to obtain an explanation, correct a process or place an issue on an institutional agenda.

It can be raised through:

- a municipal council question;
- a youth council or participatory body;
- a public consultation;
- a citizens' meeting;
- a formal written question to an institution;
- a moderated public event;
- responsible media engagement.

The question should identify the decision or document and ask for a verifiable response.

The published selection decision gives the final scores but not the scores under each criterion. Will the municipality publish the evaluation table and explain how the criteria were applied?

This wording creates an opportunity for clarification. It does not claim that the selection was unlawful.

6.3.4 Contact the responsible institution

Where a specific institution manages the process, contacting it directly may be the fastest proportionate response. A useful message includes:

1. the decision, project or procedure concerned;
2. the factual observation;
3. the relevant source or document;
4. the information that is missing or appears inconsistent;
5. the action requested;
6. a reasonable request for a written reply.

Retain the sent message, delivery confirmation and response. Where the matter is discussed by telephone or in person, make a dated note of the conversation and send a short written confirmation afterwards.

6.3.5 Seek advice

Advice should be sought before reporting when:

- the institution or competent authority is unclear;
- the documents include confidential or personal information;
- the person fears retaliation or social pressure;
- the concern involves an employer, supervisor or influential local actor;
- the reporter is under 18;
- public disclosure is being considered;
- the information may concern a criminal offence;
- the person is unsure whether the information was obtained lawfully.

Advice may come from a trusted youth worker, civil-society organisation, trade union, lawyer, journalist with appropriate expertise or competent public body. The adviser should first receive a short summary rather than an uncontrolled archive of personal or confidential material.

6.3.6 Use a protected reporting channel

Protected reporting channels apply only in particular circumstances. They should not be confused with every complaint made by a citizen.

Slovenia's Whistleblower Protection Act regulates reports concerning breaches learned about in a work-related environment and provides internal and external reporting routes together with measures against retaliation. The Slovenian framework implements Directive (EU) 2019/1937, whose protection also centres on information acquired through work-related activities (Commission for the Prevention of Corruption; EUR-Lex).

A work-related context may include employment, previous employment, recruitment, self-employment, contracting, volunteering, traineeships or work performed under the supervision of another organisation. Before using such a route, check the official conditions and instructions rather than assuming that protected status applies automatically.

An internal channel may be appropriate when it appears independent, confidential and capable of correcting the problem. An external channel may be more appropriate when:

- the internal route does not exist or cannot be trusted;
- the responsible person may be involved;
- there is a risk of retaliation;
- evidence could be concealed or destroyed;
- an earlier internal report was not addressed;
- the issue falls directly within the authority of an external regulator.

Slovenia designates specialised authorities for external reports under the Whistleblower Protection Act, including the Commission for the Prevention of Corruption, Information Commissioner, labour and environmental inspectorates, Financial Administration and other regulators. The receiving authority must protect the reporter's identity in accordance with the Act.

Public disclosure should not be treated as the automatic next step after an unsatisfactory response. Its legal conditions and personal consequences may differ from those of an internal or external report. Seek qualified advice before publishing confidential work-related information or identifying individuals.

6.3.7 Contact an oversight or investigative body

The authority should be selected according to its competence, not only according to how serious the concern appears.

Commission for the Prevention of Corruption

Any individual may submit information about conduct they believe shows signs of corruption or another irregularity within the Commission's competence. A useful submission should identify the people or bodies involved, explain the relevant public decision or resource and attach or reference the available documents.

Police

Possible criminal offences should be reported to the police rather than investigated privately. Slovenian police provide an anonymous electronic reporting route and the anonymous telephone number 080 1200. A person who wants investigators to contact them may voluntarily provide contact details. Immediate threats or emergencies should be reported through the emergency police number.

Sector inspectorates and regulators

Environmental, labour, data-protection, construction, market, public-sector and other specialised concerns may fall within the competence of an inspectorate or regulator. Describe the factual conduct and location rather than attempting to determine the exact legal offence.

EU funds and institutions

OLAF receives information concerning suspected fraud, corruption and other illegal activity affecting the EU's financial interests. Reports can be made anonymously through its Fraud Notification System, in any official EU language, and documents can be transmitted through the secure system. The European Public Prosecutor's Office investigates and prosecutes crimes affecting the EU's financial interests. Any person or legal entity may report a suspected offence within its mandate through its official form. Unlike OLAF's reporting system, a direct report to the EPPO cannot be anonymous. Supporting evidence should be provided when available, but the EPPO states that a report may still be submitted when such evidence is not available. The European Ombudsman deals with maladministration by EU institutions, bodies and agencies. It does not replace Slovenian municipal or national complaint bodies. A complainant must normally first attempt to resolve the issue with the EU institution concerned.

6.4 Personal and digital safety

This section contains only the practical checks directly connected with documenting and reporting. The broader principles of safe and inclusive participation introduced earlier in the toolkit continue to apply.

Before collecting or sharing information

Complete a brief risk assessment:

- Who might object to the information being reported?
- Does that person have authority over the reporter's employment, education, housing, benefits or community position?
- Could another person be identified through the documents?

- Is there a risk of confrontation, surveillance or pressure?
- Is a trusted adviser or support person available?
- Would a less exposed reporting route achieve the same purpose?

Where risk is uncertain, pause before contacting the subject of the concern.

Protect accounts and devices

Use a strong and unique password for the account holding the records and enable multi-factor authentication where available. Keep devices updated and protected by a screen lock.

Do not leave sensitive files in an openly shared folder, public computer or group-chat archive. Restrict access to the smallest necessary number of people.

Before sending screenshots or files, check for:

- visible email addresses or telephone numbers;
- notifications from other applications;
- usernames and profile photographs;
- location information;
- document comments and tracked changes;
- filenames revealing a source's identity;
- hidden spreadsheet columns or document metadata.

Preserve the original separately. Redact only the copy that will be shared.

Limit circulation

Do not send the entire evidence archive to every person consulted. Begin with a short summary and provide additional material only when it is necessary and the recipient's role is clear.

Avoid discussing sensitive reports in large messaging groups, informal meetings or public social-media threads. Every additional recipient increases the possibility of accidental disclosure, misunderstanding or pressure on the people involved.

Plan communication

Before submitting a report, decide:

- which contact details, if any, will be provided;
- which channel will be checked for responses;
- who will help assess follow-up messages;
- what information may be shared publicly;
- how unexpected contact from the institution or reported person will be handled.

Keep a record of every submission, acknowledgement, case number and follow-up communication.

Respond to pressure or retaliation

Do not answer threats or pressure impulsively. Preserve the messages, record dates and inform the reporting authority or adviser. Where the report was made under a protected reporting system, use the designated procedure for requesting protection against retaliation.

Where personal safety is threatened, contact the police. Do not arrange a private confrontation or meeting with the person concerned.

6.5 What young people should not do

Responsible action is defined as much by its limits as by the information collected.

Do not	Use this alternative
Unlawfully obtain information, enter restricted premises, access another person's account, secretly take protected files or misrepresent your identity.	Use public records, access-to-information procedures, lawful observations and competent reporting channels.
Publish unverified accusations or present suspicion as proof.	Publish or submit verified facts, identify uncertainties and frame unresolved points as questions.
Pressure another person to disclose information, documents or personal experiences.	Explain how the information may be used, allow the person to decide freely and refer them to an independent reporting route.
Investigate dangerous situations alone or confront a suspected person.	Record what is already known, withdraw from risk and contact a competent authority.
Promise confidentiality that cannot be guaranteed.	Explain who may receive the information, how it will be stored and what limits apply.
Create fake accounts, recordings or documents to test someone.	Ask lawful questions and allow investigators or regulators to conduct formal evidence-gathering.
Coordinate stories between witnesses.	Ask each person to record their own direct experience independently.
Delete inconvenient information.	Preserve corrections, contradictory records and responses that may weaken the original concern.
Use reporting as a threat or bargaining tool.	Submit the concern through an appropriate channel and allow the competent body to assess it.
Assume anonymity guarantees complete safety.	Review technical, social and procedural risks before submitting and seek advice where needed.

Young people are not expected to act as investigators, prosecutors or judges. Their role is to record responsibly, ask legitimate questions and provide competent institutions with information that may justify clarification, oversight or investigation.

6.6 Practical tools

Tool 6.1: Evidence and Source Log

Use one row for each document, observation, statement or communication. Do not combine several sources into a single entry.

ID	Key dates	Item or source	Origin and authenticity	What it confirms	What remains uncertain	Safety, storage and follow-up
01	15 / 17 April	Council minutes	Official website; reference recorded	Project and budget ceiling approved	Contractor and final value	Restricted folder; find the award decision
02	30 June	Site photograph	Public road; dated original retained	Works incomplete on that date	Reason for delay and responsibility	Avoid bystanders; compare with deadline
03	Unknown / 2 July	Community statement	Private source; not independently verified	Possible relationship lead	Accuracy, knowledge and relevance	Source anonymous; summary only; seek documents

For each entry, ask:

1. Is the source direct or indirect?
2. Can its date and origin be checked?
3. What exact statement does it support?
4. Could it have an innocent or alternative explanation?
5. Does it contain unnecessary personal information?
6. Has the original been preserved?
7. What is the next lawful verification step?

Tool 6.2: Safety Checklist for Handling Concerns

Before documenting

- ☐ I can describe the concern without naming people unnecessarily.
- ☐ I am using information that I obtained lawfully.
- ☐ I have separated direct facts from assumptions and rumours.
- ☐ I have considered whether anyone could face harm if identified.
- ☐ I know who can provide advice if the situation becomes more serious.
- ☐ I will not visit, enter or observe a dangerous location alone.

Before contacting a person or institution

- ☐ I have checked whether direct contact could expose the reporter or source.
- ☐ I have identified the minimum information needed for the first contact.
- ☐ I know whether I am making an information request, complaint, protected report or criminal report.
- ☐ I have checked the competence and instructions of the receiving body.
- ☐ I have decided whether to provide my identity and contact details.
- ☐ I have retained a secure copy of the submission.

Before sharing files

- ☐ The original files are preserved separately.
- ☐ The sharing copies contain only relevant information.
- ☐ Unnecessary personal data has been removed.

- ☐ Comments, tracked changes, metadata and filenames have been checked.
- ☐ The recipient and purpose are clear.
- ☐ The files are being sent through an appropriate channel.

After reporting

- ☐ I recorded the date, channel and content of the report.
- ☐ I saved the acknowledgement or case reference.
- ☐ I know when and how to follow up.
- ☐ I am recording any pressure, retaliation or unexpected contact.
- ☐ I will update the evidence log when new information is received.
- ☐ I will not publish the report merely because a response is delayed.

Tool 6.3: Reporting Options Map

A. Define the issue

Decision, project or process concerned:

Responsible institution:

What is confirmed:

What remains uncertain:

Public or personal interest affected:

Immediate safety risk: ☐ No ☐ Possible ☐ Yes

Was the information obtained in a work-related context? ☐ No ☐ Uncertain ☐ Yes

B. Define the desired result

- ☐ Obtain a document
- ☐ Obtain an explanation
- ☐ Correct an administrative error
- ☐ Stop or prevent harmful conduct
- ☐ Request institutional review
- ☐ Report suspected corruption or another integrity breach
- ☐ Report a possible criminal offence
- ☐ Request protection against retaliation
- ☐ Alert an authority responsible for EU funds
- ☐ Other: -----

C. Compare possible routes

Possible route	Appropriate when	Information needed	Identity or confidentiality considerations	Selected?
Informal clarification	A simple factual or administrative explanation may resolve the issue	Short description and precise question	Ordinary correspondence may become part of an institutional record	☐
Written public-information request	An existing public document is missing	Institution, document description and preferred form of access	Requester details are normally provided to process the request	☐
Public question	The issue is already public and an institutional explanation is needed	Verified facts and a neutral question	Avoid personal data and unverified allegations	☐
Institutional complaint	The institution may be able to correct its own procedure	Chronology, documents and requested remedy	Check complaint and privacy rules	☐
Confidential advice	Route, risk or legality is unclear	Short factual summary	Agree on the limits of confidentiality before sending files	☐
Internal protected report	A work-related breach can be addressed through a trusted internal channel	Facts, sources and relevant work context	Use the designated confidential channel	☐
External protected report	Internal reporting is unsafe, ineffective or inappropriate	Facts, sources, work context and risk information	Select the competent external authority	☐
Commission for the Prevention of Corruption	Facts may concern corruption, conflict of interest or another matter within its competence	People or bodies involved, conduct, documents and dates	Follow the Commission's reporting instructions	☐
Police or prosecution service	Facts may indicate a criminal offence or immediate risk	Clear factual account and available evidence	Anonymous police channels are available; contact details can assist follow-up	☐
Inspectorate or regulator	A specialised legal or regulatory breach may have occurred	Location, responsible body, conduct and supporting material	Check the sector authority's procedure	☐
OLAF	Suspected fraud or irregularity affects EU financial interests	Precise facts and available documents	Anonymous reports are possible	☐
European Public Prosecutor's Office	There are reasonable grounds to suspect a criminal offence affecting EU financial interests	Concise factual report; supporting evidence where available	Direct reports are not anonymous	☐
European Ombudsman	The concern is maladministration by an EU institution, body or agency	Prior correspondence and explanation of the administrative problem	The EU institution should normally be contacted first	☐

D. Final action plan

Selected route: _____

Reason for selecting it: _____

Information to submit: _____

Information not to submit at this stage: _____

Person providing advice or support: _____

Submission date: _____

Expected acknowledgement or response: _____

Follow-up date: _____

Steps if retaliation, pressure or danger occurs: _____

Chapter takeaways

- A responsible report begins with a factual record, not a conclusion.
- Record dates, decisions, documents, sources and uncertainties, and preserve only information obtained lawfully.
- Protect personal and sensitive information and limit circulation to people who need it.
- Use a response proportionate to the issue: request information, ask an institutional question, seek advice or use an appropriate reporting channel.
- Serious or unresolved concerns may require a protected channel, oversight body, police, OLAF or EPPO, depending on competence.
- Young people should not try to investigate everything independently; credible information should reach a competent and properly safeguarded institution.

Selected sources and further guidance

- [Commission for the Prevention of Corruption \(n.d.\). Reporting suspected corruption.](#)
- [Commission for the Prevention of Corruption \(n.d.\). Whistleblower protection and external reporting.](#)
- [Information Commissioner of the Republic of Slovenia \(n.d.\). How to submit an access-to-information request.](#)
- [Slovenian Police \(n.d.\). Anonymous electronic reporting.](#)
- [European Union \(2019\). Directive \(EU\) 2019/1937 on the protection of persons who report breaches of Union law.](#)
- [European Commission \(n.d.\). Protection for whistleblowers.](#)
- [European Anti-Fraud Office \(n.d.\). Report fraud.](#)
- [European Public Prosecutor's Office \(n.d.\). Reporting a crime to the EPPO.](#)
- [European Ombudsman \(n.d.\). Make a complaint.](#)

7. From evidence to youth action and institutional dialogue

Previous chapters explained how to follow decisions and public spending, obtain public information, document facts and choose an appropriate reporting route. This chapter focuses on the next step: turning verified information into a realistic youth-led initiative.

Not every concern requires a formal complaint or a public campaign. In many cases, the most useful response is a focused request for improvement: publication of missing information, clearer selection criteria, a consultation before a decision, better reporting on public spending or a regular way for young people to participate.

Effective youth action connects three elements:

reliable evidence → a specific requested change → engagement with the institution able to make that change

The purpose is not to prove personal guilt or publicly accuse individuals. It is to identify a concrete weakness in a decision-making process and propose a proportionate improvement. Concerns involving suspected wrongdoing or sensitive evidence should continue to be handled according to Chapter 6.

7.1 Choosing a manageable issue

A youth group may identify many problems: unclear municipal grants, inaccessible council documents, neglected public space, unexplained changes to a development project, limited youth representation or weak environmental consultation. Trying to address all of them at once usually produces a broad message but no clear institutional response.

A manageable issue is narrow enough to investigate, explain and connect to a responsible institution. The group should be able to describe it in two or three sentences without relying on assumptions about motives.

Criterion	Questions to ask
Local	Does it concern a particular municipality, village, neighbourhood, school, public institution or regional service?
Specific	Can we identify the decision, procedure, document, budget line, grant, project or consultation concerned?
Relevant to young people	How does it affect young people's opportunities, services, environment, public space or participation?
Supported by accessible information	Do we have public documents, official data, written responses, photographs, survey findings or other verifiable material?
Realistic to address	Is there an institution with authority to respond, and can we request a practical change within a reasonable period?

Broad concerns should be narrowed before action begins.

Too broad	More manageable
Municipal grants are unfair.	The municipality should publish the scoring and written explanation of results for its annual youth grant call.
Young people are ignored.	The municipality should include youth representatives in the working group preparing the next local youth strategy.
The new development will damage nature.	The municipality should publish the environmental documentation and hold a consultation before adopting the detailed spatial plan.
Nobody knows how public money is used.	The public institute should publish a short annual report showing how the youth programme budget was spent and what was delivered.

Before selecting the issue, complete a quick feasibility check:

- What do we know, and what remains uncertain?
- Which institution is responsible?
- What decision or practice could realistically change?
- Can the group complete a first action within one or two months?

When several issues meet these criteria, priority can be given to the one that combines a clear youth impact, strong evidence and a realistic opportunity for institutional engagement. A smaller initiative that secures a concrete improvement is usually more valuable than a highly visible campaign with no defined outcome.

7.2 Defining the desired change

Once an issue has been chosen, the group should define what success would look like. “More transparency”, “less corruption” or “greater youth participation” are useful principles, but they are not yet operational objectives.

A useful sentence structure is:

**We want [responsible institution] to [specific action] by [time or decision stage],
so that [public or youth benefit].**

Example: We want the municipal administration to publish the scoring criteria and final scores for the next youth grant call before contracts are signed, so applicants can understand how funding decisions were made. The group should distinguish between an output and a longer-term outcome. An output is something immediately produced, such as a published document, meeting, written response or amended procedure. An outcome is the wider improvement expected to follow, such as more consistent decisions, stronger confidence or fairer access.

Area	Possible requested change
Publication of information	Publish selection results, meeting minutes, project costs, implementation reports or environmental documents in an accessible location.
Grant procedures	Introduce clearer eligibility and scoring criteria and explain how applications are assessed.

Public consultation	Open a consultation before a plan, strategy, investment or local regulation is finalised.
Reporting	Publish a short annual implementation report with expenditure, activities, beneficiaries and results.
Youth representation	Reserve youth seats in a working group, advisory body or consultation process.
Decision-making process	Review who participates, how conflicts of interest are managed and how decisions are documented.

The desired change must fall within the powers of the institution being addressed. The group should also define its minimum acceptable result. The preferred result may be an immediate procedural change, while the minimum result could be a written explanation, access to the missing document or agreement to discuss the proposal.

7.3 Choosing an action

An action should be selected because it can move the group toward the desired change, not simply because it is visible or easy to organise. Several actions can be combined, but each should have a clear purpose.

Action	Best used when	Practical note
Information request	A key document or fact is missing.	Ask for a precise document or dataset rather than “all information”. See Chapter 5.
Community or youth survey	Institutional evidence exists, but the lived experience of young people is missing.	Keep it short, state the number and profile of respondents and acknowledge limitations.
Infographic or evidence summary	A budget, timeline or process is difficult to understand.	Make every figure traceable to a source and mark any unconfirmed information.
Public question	A formal meeting, consultation or council process allows questions.	Ask for an explanation, information or commitment rather than combining several accusations.
Youth recommendation	The group has enough evidence to propose a procedural or policy improvement.	Use the standard structure in Section 7.4.
Local meeting	Clarification, negotiation or agreement on next steps is needed.	Seek a concrete result: a document, written response, responsible contact or next meeting.
Dialogue event	Several stakeholders need to discuss one defined local issue.	Build the event around a clear question and record proposals and commitments.
Awareness campaign	Broader understanding or public support is necessary.	Communicate one central message and one realistic action; do not present suspicion as fact.
Police or prosecution service	Facts may indicate a criminal offence or immediate risk	Clear factual account and available evidence

A proportionate sequence may be:

obtain information → confirm the issue → prepare a recommendation → request a meeting → seek a written commitment → communicate the outcome

Public campaigning may become appropriate when the institution does not respond, wider support is necessary or a formal consultation is open. Escalation should be deliberate rather than automatic.

In Slovenia, draft regulations are normally published through the eDemokracija portal, where the public can submit comments and proposals. At EU level, the European Commission's Have Your Say portal provides consultations and other feedback opportunities on planned and existing initiatives.

7.4 Preparing recommendations

Use one standard structure throughout the initiative:

issue → evidence → impact → recommendation → responsible institution → requested next step

Issue: Describe the procedural or policy problem in neutral, precise language.

Evidence: Identify the documents, data, observations or consultation findings supporting the statement. Separate fact from interpretation, as explained in Chapter 6.

Impact: Explain the practical effect on young people or the community without exaggeration.

Recommendation: State the action that should be taken. A strong recommendation describes a concrete change, not only a principle.

Responsible institution: Name the body, department or decision-maker with authority to prepare, approve or implement the change.

Requested next step: Ask for a meeting, written response, review or decision and include a realistic deadline.

Before submitting the recommendation, check that:

- the issue is specific and every factual statement can be verified;
- the impact is explained without speculation;
- the recommendation falls within the institution's powers;
- the requested next step is clear and time-bound;
- the document can be understood without extensive additional explanation.

Recommendations should normally fit on one or two pages. Supporting evidence can be attached or linked separately, keeping the main request visible while allowing the facts to be checked.

7.5 Meeting public institutions

Institutional meetings are most productive when both sides understand the purpose, evidence and expected follow-up. Public officials may have limited time or may not control the entire process, so preparation should help them identify what can be done, by whom and at which stage.

Before the meeting

Send a **short written** request explaining who the group represents, the issue, the attached evidence or recommendation, why the institution is relevant and the result the group hopes to achieve. Ask who will attend and whether the person has responsibility for the issue.

Role	Main responsibility
Meeting lead	Opens the meeting, explains its purpose and keeps the discussion focused.
Evidence presenter	Summarises verified facts and answers questions about sources.
Youth perspective presenter	Explains the practical impact on young people.
Note-taker	Records responses, responsibilities, commitments and deadlines.
Timekeeper	Ensures enough time remains to agree on next steps.

During the meeting

Begin with the objective rather than a long history of the initiative. Present only the evidence needed to understand the recommendation. Ask the institution to clarify the current process, its competence and any legal, budgetary or technical constraints.

Useful questions include:

- Is our understanding of the current process correct?
- Which department or body can introduce the proposed change?
- At what point in the decision cycle could the change be made?
- What additional information would the institution need?
- What next step can be agreed today, and when will we receive a response?

Disagreement should be recorded accurately. An institution may accept the facts but reject the proposed solution, or identify constraints the group had not considered. The recommendation can be revised without abandoning the objective.

Ending and following up

Before leaving, summarise the agreed action, responsible person or department, deadline, additional material required and method of follow-up. Do not rely only on a general statement that the institution will “look into the matter”.

Send a short written summary within a few days and invite corrections. If the deadline passes without a response, send a polite reminder referring to the previous agreement. Keep meeting notes with the initiative records.

Slovenian local self-government legislation also provides formal participation routes, including citizens’ assemblies, referendums and popular initiatives. These are not necessary for every youth initiative, but may become relevant when the matter concerns a formal municipal decision and less formal engagement has not provided an adequate route.

7.6 Planning the initiative

A plan should fit on one page and remain usable during implementation. It is not a project application. Its purpose is to keep the group focused on the desired change, responsibilities and the next decision point.

Planning field	Group decision
Issue	What specific local problem are we addressing?
Evidence available	Which documents, data, observations or survey results support our position?
Information still needed	What must be confirmed before public action or institutional dialogue?
Desired change	What should the responsible institution do differently?
Responsible institution	Who has the power to make or approve the change?
Stakeholders	Who is affected, supportive, influential, undecided or potentially opposed?
Primary action	What first action is most likely to move the issue forward?
Roles and timeline	Who does what, and by when?
Indicator of progress	What would show that the initiative is moving forward?
Minimum result and review date	What is the smallest useful result, and when will progress be reviewed?

A simple initiative can follow five phases:

1. Confirm: verify the issue and obtain missing information.
2. Prepare: define the change, map stakeholders and write the recommendation.
3. Engage: contact the institution and undertake the selected action.
4. Follow up: record responses, fulfil agreed tasks and monitor deadlines.
5. Review: assess the result, communicate accurately and decide whether another step is justified.

Progress indicators should include more than online reach. Useful indicators may be information received, a meeting held, a written response, inclusion in a consultation, a document published, a procedure amended or implementation reported. The group should also record what did not change and why.

7.7 Practical tools

The following tools can be copied and completed by a youth group. They are designed to work together but can also be used independently.

Tool 7.1: Youth Advocacy Action Canvas

Element	Notes
Issue in one sentence	
Young people affected	
Verified evidence	
What remains uncertain	
Desired change	
Institution able to act	

Primary decision-maker or contact	
Main message	
First action	
Support needed	
Minimum acceptable result	
Review date	

Tool 7.2: Stakeholder Influence Map

Stakeholder	Interest	Influence	Role sought	Approach
Young people directly affected				
Responsible public institution				
Elected representatives				
Youth council or youth centre				
Community organisation				
Expert or professional body				
Local or regional media				
Other				

Tool 7.3: Youth Recommendation Brief

Title: A specific description of the proposed change.

Issue: What current practice, decision or omission needs attention?

Evidence: Which documents, data and verified observations support the statement?

Impact: What practical effect does the issue have on young people or the community?

Recommendation: What exactly should change?

Responsible institution: Which body has authority to act?

Requested next step: What response, meeting, review or decision is requested, and by when?

Contact and sources: Who coordinates follow-up, and which attachments verify the recommendation?

Tool 7.4: Institutional Meeting Checklist

Before:

- Objective and preferred result agreed.
- Recommendation brief and evidence prepared.
- Appropriate institution and participants confirmed.
- Group roles and confidentiality boundaries agreed.

During:

- Purpose stated at the beginning.

- Issue, evidence, impact and recommendation presented separately.
- Concrete next step requested.
- Responsible person and deadline recorded.

After:

- Written summary sent.
- Additional material provided.
- Commitments and deadlines entered in the initiative plan.
- Group debrief and follow-up reminder completed.

Tool 7.5: Local Initiative Plan

Task	Responsible	Deadline	Support	Expected output	Status
Confirm key facts					
Obtain missing information					
Consult affected young people					
Complete stakeholder map					
Draft recommendation					
Request institutional meeting					
Hold meeting or dialogue					
Follow up commitments					
Communicate results					
Evaluate initiative					

Chapter takeaways

Choose one issue. Define one change. Address the institution that can deliver it.

Request one clear next step. Follow up until the result is known.

- Choose a manageable issue that can be described neutrally and supported with verified information.
- Define a specific change that a clearly identified institution has the authority to make.
- Separate evidence, community impact and recommendation so that each can be assessed independently.
- Record meetings, commitments, responsible persons and deadlines, then follow up in writing.
- A modest, well-documented initiative is more credible than a broad campaign built on uncertain claims.

Selected sources and further guidance

- [European Union \(2018\). EU Youth Strategy 2019–2027.](#)
- [European Union \(n.d.\). EU Youth Dialogue.](#)
- [Council of Europe \(2025\). European Charter on the Participation of Young People in Local and Regional Life.](#)

- [OECD \(2022\). Guidelines for Citizen Participation Processes.](#)
- [Government of Slovenia \(n.d.\). eDemokracija – public consultation on draft regulations.](#)
- [European Commission \(n.d.\). Have Your Say portal.](#)
- [Republic of Slovenia \(n.d.\). Local Self-Government Act.](#)

8. Practical activity bank

This activity bank translates the toolkit's main concepts and methods into six practical learning activities. The activities can be used separately or combined into a sequence that moves from recognising integrity problems to understanding decisions, following public money, choosing a safe response and engaging institutions.

Each activity assumes that participants have access to the relevant earlier chapter or receive a short summary from the facilitator. The purpose is to apply knowledge rather than repeat theory. Where an activity touches on a real concern, facilitators should follow the evidence-handling and safety guidance in Chapter 6. Fictional, anonymised or already public cases should be used whenever discussion of a live case could expose a participant or another person.

8.1 Corruption, error or unfairness?

Purpose

To help participants distinguish between possible corruption, conflicts of interest, administrative mistakes, poor management, lack of transparency and lawful decisions that may still appear unfair or unpopular.

Toolkit link

Use after Chapter 2, particularly Sections 2.2 and 2.3. Section 6.1 provides the distinction between a concern, suspicion, rumour and evidence.

Duration

60–75 minutes

Group size

8–30 participants

Materials

Five category signs, printed case cards, paper, markers and one classification worksheet per group.

Suggested category signs:

1. Possible corruption or abuse of entrusted power
2. Possible conflict of interest or other integrity risk
3. Poor administration, error or weak management
4. Lawful but unpopular or disputed decision
5. Insufficient information to classify

Steps

1. Introduce the task

Place the five category signs in different parts of the room. Explain that participants are not acting as investigators or courts. Their task is to identify the interpretation best supported by the available facts and to recognise what remains uncertain.

2. Use a simple classification test

Before distributing the cases, present five questions:

- What exactly happened?
- Which public duty, rule or procedure may be relevant?
- Is there an apparent private, family, business or political advantage?
- What information supports the concern?
- What additional information would be needed before reaching a conclusion?

3. First individual decision

Read the first case aloud. Ask participants to stand beside the category that best matches their initial assessment. Participants who are uncertain should use the fifth category rather than guessing.

Invite two or three people from different positions to explain their reasoning. They should refer only to the information contained in the case.

4. Small-group analysis

Divide participants into groups and give each group two or three case cards. Ask them to complete the following classification worksheet.

Question	Group assessment
What facts are provided?	
What claims or assumptions are being made?	
Is a private or political advantage indicated?	
What rule, duty or procedure may be relevant?	
What important information is missing?	
Best-supported classification	
Appropriate next step	

5. Compare interpretations

Each group presents one case. Other participants may challenge the classification, but they must identify the fact or missing information on which their alternative interpretation depends.

Emphasise that some cases can involve more than one problem. A process may be poorly managed and contain a conflict of interest. A decision may be lawful but inadequately explained. A warning sign may justify further questions without proving corruption.

6. Reclassify after new information

Give each group an additional fact about one of its cases. Ask whether the new information changes the classification.

This final step demonstrates why careful documentation and verification matter. An initial impression may become stronger, weaker or fundamentally different when additional information is obtained.

Suggested case cards

Case 1: The delayed permit

A young farmer submits a complete application for a municipal permit. The responsible employee is absent for three weeks, and no replacement has been assigned. The application remains unanswered beyond the expected processing time. There is no indication that another applicant received preferential treatment.

Additional fact: Several applications were delayed during the same period because the department was understaffed.

Likely discussion: Administrative delay or poor management rather than evidence of corruption.

Case 2: The youth grant

A municipality awards a youth-event grant to an organisation managed by the sibling of a municipal councillor. The councillor participated in the committee that approved the grant. The organisation met the published conditions, but the conflict was not declared in the publicly available record.

Additional fact: The organisation received the highest score, but the councillor participated in setting one criterion that strongly favoured its previous activities.

Likely discussion: Conflict of interest and a possible integrity problem; further information would be needed before alleging corruption.

Case 3: The cancelled bus route

The municipality discontinues a poorly used evening bus route following a public budget debate. Young people oppose the decision because it limits access to education and cultural activities. The decision and voting record were published.

Additional fact: The municipality considered three alternatives but rejected them because of cost.

Likely discussion: A lawful but disputed policy decision, although participants may still advocate for a different solution.

Case 4: The land-use change

A municipal councillor votes in favour of changing the permitted use of agricultural land. A company owned by the councillor's partner purchased nearby land shortly before the proposal was announced. The councillor did not publicly declare the relationship.

Additional fact: The land-use change would substantially increase the value of the company's property.

Likely discussion: A serious potential conflict of interest and possible abuse requiring verification by an appropriate authority.

Case 5: The single bid

Only one company submits an offer for renovation of a municipal sports hall. The price is higher than residents expected. Social-media posts claim that the tender was “obviously fixed”, but they provide no documents or information about the tender conditions.

Additional fact: The procurement documentation was publicly available, and two other companies requested information but decided not to submit offers.

Likely discussion: A single bid may justify closer examination, but it does not by itself prove manipulation.

Reflection questions

- Which cases produced the greatest disagreement, and why?
- What made participants move from one category to another?
- When does unfairness become an integrity concern?
- Why is “insufficient information” sometimes the most responsible conclusion?
- What harm can result from treating every poor decision as corruption?
- What harm can result from dismissing a serious warning sign as a simple mistake?
- Which information source would be most useful in each case?
-

Adaptation for rural areas and smaller towns

Use examples involving shared municipal services, local transport, village infrastructure, agricultural land, small grants, community facilities or inter-municipal projects. Avoid using names or details that enable participants to identify local individuals.

In a small community, participants may know people who resemble the characters in a case. State clearly that the exercise concerns the fictional facts provided, not speculation about real neighbours or officials. Anonymous written voting can replace physical movement where participants may feel uncomfortable expressing a position publicly.

Close personal relationships are common in small communities and do not automatically indicate wrongdoing. The key questions are whether a relevant interest was disclosed, whether the person withdrew where required, whether the process was impartial and whether the decision can be explained and reviewed.

8.2 Who decides in our community?

Purpose

To help participants understand which institutions and actors are responsible for a local issue, how authority is divided and where young people can obtain information or influence a decision.

Toolkit link

Use with Section 5.1 on local decision and spending processes and Sections 7.1–7.3 on selecting an issue, defining change and choosing an action.

Duration

75–90 minutes

Group size

6-25 participants

Materials

Large sheets of paper, sticky notes, markers, actor cards and copies of the community decision map.

Steps

1. Select a concrete local issue

Participants choose one manageable issue that affects young people or the wider community. Suitable examples include:

- renovation of a youth centre;
- an unsafe pedestrian crossing;
- closure of a local bus connection;
- management of a riverbank or woodland;
- allocation of municipal cultural spaces;
- a new sports facility;
- access to affordable housing;
- location of waste containers;
- use of an abandoned public building.

The issue should be specific enough to map. "Improve life for young people" is too broad, while "establish an evening bus connection between two named settlements twice a week" can be analysed.

2. Identify the decision stages

Write the following process chain across a large sheet:

problem or proposal → preparation → formal decision → budget or funding → procurement, grant or implementation → monitoring

Participants add any stages relevant to their issue, such as a permit, environmental assessment, public consultation or decision by another level of government.

3. Map the formal actors

Give participants actor cards or ask them to create their own. Possible actors include:

- mayor;
- municipal council;
- municipal administration;
- municipal committee;
- public utility or public institution;
- school, youth centre or cultural institution;
- inter-municipal administration;
- regional development agency;
- ministry or national authority;
- contractor or grant beneficiary;

- inspectorate;
- landowner;
- residents, youth organisations and civil society groups.

Place each actor beside the stage where it has a formal responsibility. More than one actor may be involved at each stage.

4. Separate decision-makers from influencers

For each actor, ask:

- Can this actor make or approve the decision?
- Does it prepare information or recommendations?
- Does it control the budget?
- Does it implement the decision?
- Can it inspect or review the process?
- Can it influence the debate without having formal authority?
- Can it provide information that the group needs?

This distinction prevents participants from directing requests to an institution that does not have the power to act.

5. Complete the community decision map

Stage	Responsible institution or actor	Key document or information	Opportunity for youth participation	Question still to answer
Proposal				
Preparation				
Formal decision				
Budget or funding				
Implementation				
Monitoring				

6. Find the entry points

Ask groups to mark each realistic participation opportunity with a symbol. Entry points might include:

- submitting a proposal;
- attending a council or committee meeting;
- responding to a consultation;
- requesting a document;
- contacting the responsible department;
- presenting evidence to a youth council;
- proposing a pilot activity;
- monitoring implementation;
- requesting an explanation after a decision.

Participants should identify the earliest useful entry point, not only the final decision meeting. Many decisions become difficult to change once a budget, plan or tender has already been approved.

7. Test the map

One participant takes the role of a young resident seeking change. Other participants represent institutions on the map. The young resident must find the correct route through the system by asking each actor:

- Are you responsible for this part of the issue?
- What decision can you make?
- Which document should we examine?
- Who acts before or after you?
- When can the public contribute?

8. Produce a practical output

The group converts its map into a one-page action sheet containing:

- the issue;
- the responsible institution;
- the next relevant decision or deadline;
- the first information needed;
- the most realistic participation point;
- the person responsible for follow-up.

Reflection questions

- Was the actor with the highest public visibility also the actor with the greatest formal authority?
- Which parts of the process were initially unclear?
- Where can young people participate before the final decision?
- Which actor controls information, and which actor controls implementation?
- What happens when responsibility is divided between municipal, regional and national bodies?
- Which questions could be answered from public documents?
- Where might informal influence be important, even though it does not replace formal authority?

Adaptation for rural areas and smaller towns

Include inter-municipal administrations, public utilities serving several municipalities, regional development agencies and national bodies that manage services locally. A municipality may be the most visible institution without being responsible for public transport, healthcare, water management, a regional road or a protected natural area.

Where digital access is limited, use printed municipal organograms, meeting agendas, budget extracts and service maps. Participants can also interview a municipal employee, councillor, youth worker or community representative before the session.

The activity may be carried out as a physical community map. Participants place institutions, settlements, services and transport links on the floor or on a large local map. This makes visible how distance and transport affect participation, even where a formal participation route exists.

8.3 The Green Community Project

Purpose

To practise designing a local environmental project in a way that combines environmental responsibility, transparent decision-making, fair participation and safeguards against conflicts of interest.

Toolkit link

Use with Chapter 4 on green integrity, Chapter 5 on decisions and public resources, and Chapter 7 on preparing realistic recommendations.

Duration

90–120 minutes

Group size

10–30 participants

Materials

Project scenario, stakeholder cards, large paper, markers, green integrity planning sheet and optional maps of a fictional community.

The activity reflects the approach of the Aarhus Convention, which connects environmental governance with access to information and public participation in environmental decision-making (UNECE, Aarhus Convention).

Scenario

The fictional Municipality of Dolina has received EUR 200,000 for one local green project. The municipality must select and prepare one of the following options:

- restoration of a riverbank and public path;
- conversion of an abandoned site into a community park;
- construction of a cycling connection between two settlements;
- installation of solar canopies and shade at public facilities;
- restoration of a wetland or small community forest;
- creation of a shared repair, reuse and composting centre.

The project must be environmentally useful, accessible to different groups and implementable within two years. Several residents own land near possible locations, local companies may compete for the work and different settlements want the investment.

Steps

1. Choose the project and define the public benefit

Divide participants into planning teams. Each team chooses one project and completes three sentences:

- The environmental problem we want to address is ...

- The community benefit should be ...
- We will know the project is useful when ...

Encourage concrete outcomes. “Raise environmental awareness” is less measurable than “restore 500 metres of riverbank, improve flood resilience and create an accessible walking route.”

2. Map affected groups

Teams identify people who may benefit, carry costs or hold relevant knowledge. Stakeholders might include:

- young residents;
- people living near the site;
- farmers and forest owners;
- landowners;
- older residents;
- persons with disabilities;
- environmental organisations;
- local businesses;
- schools and youth organisations;
- conservation, water or spatial-planning authorities;
- municipal departments;
- potential contractors.

Participants distinguish between consultation and shared decision-making. Not every actor decides the final outcome, but affected groups should have an appropriate opportunity to receive information and express their views.

3. Identify integrity risks

Each team receives three complication cards. Examples include:

- The preferred site is partly owned by a relative of a decision-maker.
- A company offers to prepare the technical specification free of charge and later intends to bid for the work.
- One settlement receives most municipal investments, while more remote villages rarely benefit.
- The consultation is announced only online and remains open for five days.
- The project description uses environmental language but includes no measurable environmental outcome.
- The cheapest option would damage a habitat that was not assessed in the initial proposal.
- A local association strongly supports the project but would also receive a paid management role.
- The municipality publishes the total budget but not the selection criteria or implementation timetable.

Teams should not attempt to determine criminal liability. They identify where transparency, impartiality, participation or monitoring needs to be strengthened.

4. Prepare a green integrity plan

Tool 8.1: Green Integrity Planning Sheet

Decision point	Information that should be available	Who should participate	Integrity safeguard	Evidence of successful implementation
Selecting the project				
Choosing the location				
Approving the budget				
Selecting a contractor or beneficiary				
Changing the project				
Monitoring construction or delivery				
Evaluating environmental and community results				

Possible safeguards include published criteria, declarations of interests, independent technical input, documented reasons for the selected option, accessible consultation, clear contract changes, public progress information and community monitoring.

5. Hold a community hearing

Assign participants stakeholder roles. Each planning team presents its proposal in five minutes. Stakeholders may ask questions about:

- environmental evidence;
- site selection;
- who benefits and who carries costs;
- accessibility;
- land ownership;
- selection of contractors;
- project changes;
- long-term maintenance;
- opportunities for public monitoring.

The presenting team should record unanswered questions rather than improvising unsupported answers.

6. Conduct an integrity stress test

Another team acts as a “red team” and tests the proposal:

- Could the criteria be written to favour a predetermined option?
- Is any decision-maker connected to a beneficiary, landowner or bidder?
- Could consultation exclude a settlement or social group?
- Could the project appear green without delivering measurable environmental value?

- Is responsibility for maintenance clear?
- Would the public be able to compare the promised and delivered results?

7. Revise and approve

Teams revise their green integrity plans and identify three non-negotiable safeguards. The whole group then selects a project using criteria agreed before voting.

Reflection questions

- Did the environmentally strongest proposal also have the strongest decision-making process?
- Which integrity risks could undermine an otherwise useful green project?
- How did land ownership and local economic interests affect the discussion?
- When should participation take place for it to influence the outcome?
- What information would residents need to make a meaningful contribution?
- How can a municipality show that a project is genuinely green rather than only described as green?
- Who should monitor the project after the contract is awarded?

Adaptation for rural areas and smaller towns

Select projects connected to agricultural land, forests, watercourses, flood protection, village centres, abandoned buildings, transport between settlements or management of shared natural resources.

Consultation should not depend only on a meeting in the municipal centre or an online form. Teams can propose village meetings, mobile consultations, telephone input, printed notices, school-based activities and cooperation with local associations. Timing should consider farming seasons, shift work and limited evening transport.

A small number of local contractors does not by itself mean that competition is improper. The activity should focus on whether requirements are proportionate, criteria are published, interests are declared and decisions are documented.

8.4 Follow the Public Euro

Purpose

To practise tracing a public project from its initial decision and funding source to procurement, payments, implementation and results.

Toolkit link

Use with Sections 5.1-5.5. Participants should already understand the difference between a budget, procurement notice, contract, payment and completed result.

Duration

90-120 minutes

Group size

6-24 participants

Materials

Internet-connected devices or a printed research pack, public euro tracing sheet, calculator, markers and a preselected public project.

For a first session, the facilitator should select an ordinary public project rather than a suspected scandal. Suitable examples include renovation of a playground, purchase of a municipal vehicle, construction of a cycling path, a youth grant, restoration of a cultural building or an environmental project.

In Slovenia, ERAR provides information on public-money flows, including transactions and information connected with public procurement. The Public Procurement Portal publishes procurement notices and related information, while OPSI is the national open-data portal. At EU level, TED is the official portal for procurement notices published in the Supplement to the Official Journal of the European Union, and Cohesion Open Data provides programme and financial data on EU-funded investments (Commission for the Prevention of Corruption, ERAR; Slovenian Public Procurement Portal; OPSI; TED; European Commission Cohesion Open Data).

Steps

1. Define a narrow research question

Examples include:

- Who approved and financed the renovation?
- How was the contractor selected?
- Did the final payment correspond to the announced contract value?
- Was an EU-funded project delivered within the published period?
- What was promised, and what evidence shows what was delivered?

Avoid beginning with a conclusion such as “prove that the project was corrupt”.

2. Create a project identity card

Participants record:

- official project title;
- contracting or funding institution;
- location;
- responsible department;
- funding source;
- beneficiary or contractor;
- announced value;
- relevant dates;
- identification number of the procurement, grant or project where available.

Small differences in project names can lead to unrelated search results. Participants should note exact names, reference numbers and legal entities.

3. Follow the document chain

Groups divide the research into stages:

decision or budget → funding → procurement or grant → contract or award → payment → implementation → monitoring or evaluation

Each group searches one or more stages and records the source of every item.

4. Use the public euro tracing sheet

Tool 8.2: Public Euro Tracing Sheet

Stage	Question	Information found	Source and date	Status
Decision	Who approved the project?			Verified / inferred / unknown
Funding	Which budget or fund paid for it?			
Selection	How was the contractor or beneficiary selected?			
Contract	What was agreed, for what amount and by when?			
Payments	What payments are visible?			
Changes	Were the value, deadline or scope changed?			
Delivery	What evidence shows what was completed?			
Monitoring	Who checked the result?			

5. Compare numbers carefully

Participants list every figure with its meaning. For example:

- estimated procurement value;
- offered price;
- contract value;
- value including or excluding VAT;
- total project budget;
- municipal co-financing;
- EU contribution;
- individual payments;
- final cost after amendments.

They should not add or compare amounts until they understand what each figure represents. A payment may cover only one phase, while a project budget may include design, land, supervision and construction.

6. Triangulate

No conclusion should depend on a single screenshot or social-media post. Participants try to confirm important information through two independent public records or through one official record and direct observation.

Examples include:

- a council decision and a budget document;
- a procurement award and ERAR transactions;
- an EU project description and a municipal implementation report;
- a contract deadline and photographs or a site visit;
- a grant decision and the beneficiary's public activity report.

7. Separate findings from questions

Verified

Information directly supported by a document or reliable observation.

Inferred

A reasonable interpretation that has not yet been directly confirmed.

Unknown

Information that could not be found or requires clarification.

8. Produce a public money map

Each group creates a one-page visual showing:

institution → funding source → selection process → contractor or beneficiary → payments → result

The map ends with no more than five factual questions. For example:

- Was the contract deadline formally extended?
- Does the payment total include VAT?
- Where is the final implementation report?
- Which institution is responsible for maintenance?
- Was the planned accessibility feature included in the completed work?

9. Present without accusation

Groups present what the documents show, what remains uncertain and which institution could clarify the issue. They should not label an unexplained difference as corruption. Chapter 6 should be used before participants publish findings or act on a real concern.

Reflection questions

- Which stage of the spending process was easiest to trace?
- Where did the document chain break?
- Which figures initially appeared contradictory?
- What is the difference between money allocated, contracted and paid?
- What can transaction data show, and what can it not show?
- Which missing information would justify a public-information request?
- Did the completed result correspond to the project description?
- How could this research be communicated accurately and accessibly?

Adaptation for rural areas and smaller towns

Choose a small, visible project that participants can observe directly. Examples include a village road, bus shelter, playground, water project, local festival grant, community centre or purchase by a public utility.

Where internet access or digital skills are limited, the facilitator can prepare a printed file containing a council decision, budget extract, procurement notice, award decision, payment record and implementation photograph. Participants then reconstruct the process offline.

Include projects implemented jointly by several municipalities or through a regional development agency. Participants should identify which institution made each decision rather than assuming that the municipality controlled the entire process.

8.5 From concern to safe action

Purpose

To help participants choose a proportionate and realistic response to a concern by considering what is known, what result is sought, which institution is responsible and what support may be needed.

Toolkit link

Use with Chapter 6 and Sections 7.1–7.3. The activity applies earlier guidance; it does not replace specialist legal advice or a case-specific risk assessment.

Duration

75–90 minutes

Group size

8–24 participants

Materials

Fictional concern cards, action-option cards, decision worksheet, paper and markers.

Suggested action-option cards:

- Clarify the facts
- Check a public document
- Request public information
- Ask the responsible institution for an explanation
- Monitor the next decision or implementation stage
- Raise the issue collectively
- Propose a corrective measure
- Use an administrative complaint or review procedure
- Seek advice from a competent institution or specialist organisation
- Make a formal report
- Take no external action yet and improve documentation

Steps

1. Work only with the provided case

Divide participants into groups and distribute one concern card to each group. Remind them not to introduce names or details from real cases.

2. Separate the information

Groups divide the case into four columns:

Known fact	Source	Claim or interpretation	Missing information

A statement such as “everyone knows the tender was fixed” belongs under claims unless the case provides supporting information.

3. Define the public-interest issue

The group completes the sentence:

“The concern matters because it may affect ...”

Possible answers include fair access to a service, public money, environmental protection, equal treatment, an impartial selection process or implementation of an approved decision.

This step helps distinguish a public-integrity issue from a personal disagreement.

4. Define the desired result

Groups choose a result that an institution could realistically deliver. Examples include:

- publish the missing selection scores;
- correct an administrative error;
- repeat an assessment without a conflicted member;
- inspect illegal dumping;
- explain a contract change;
- provide an accessible consultation;
- prevent further harm;
- review whether a procedure was followed.

“Expose everyone involved” is not a sufficiently precise institutional objective.

5. Complete the response decision worksheet

Tool 8.3: Concern-to-Action Planner

Decision question	Group answer
What is verified?	
What remains uncertain?	
Is there an urgent risk to people, evidence or the environment?	
Which institution has the authority to respond?	
What result is sought?	

What is the least escalatory action likely to produce that result?	
What could make the action ineffective or unsafe?	
What support or specialist advice may be needed?	
What should be recorded before acting?	
When should the decision be reviewed?	

6. Rank the action options

Groups arrange the action-option cards from the most appropriate first step to the least appropriate response. They may place two options together where they should happen in parallel.

Participants should explain why an apparently strong action may not be the best first action. A public accusation may reduce the chance of obtaining information. A general enquiry may be inadequate where there is immediate danger or a serious risk of evidence being destroyed.

7. Prepare a short action note

Each group drafts:

- a two-sentence description of the concern;
- the facts on which it relies;
- the desired result;
- the first action;
- the institution or person to contact;
- the information that should not be disclosed publicly;
- the point at which the approach will be reviewed.

8. Conduct a peer stress test

Another group tests the plan:

- Does the proposed action match the available evidence?
- Is the institution competent for the issue?
- Is the requested result clear?
- Could the wording create an unsupported accusation?
- Has the group relied on information it is not entitled to collect or share?
- Is there a safer or more effective route?
- What will happen if the institution does not respond?

9. Revise the plan

Groups make one final change based on the peer review and explain why the revised response is more proportionate.

Suggested concern cards

Concern 1: Unpublished grant scores

A municipality publishes the names of youth-grant recipients and the amounts awarded but not the scores or reasons for selection. One unsuccessful group believes the decision was unfair. It has the published criteria

and its own application but no evidence that a personal connection influenced the result.

Concern 2: Repeated illegal dumping

Young people document waste repeatedly appearing beside a forest road. They have dated photographs taken from a public path. They do not know who deposited the waste. A local resident claims that a nearby business is responsible but offers no evidence.

Concern 3: The changed playground

A municipal plan promised an accessible playground. The completed facility has no equipment suitable for children with reduced mobility. The public project description remains online, but participants have not seen the final contract or any approved project change.

Concern 4: The bribery rumour

A social-media account claims that a municipal employee accepted money for a permit. The post names the employee but provides no document, witness or other verifiable information.

Reflection questions

- Which action options were most often selected as the first step?
- How did the desired result affect the chosen response?
- When is asking for information more useful than making a complaint?
- When might delay cause additional harm?
- What is the difference between collective advocacy and a formal report?
- Why should an action plan include a review point?
- How can groups remain persistent without overstating what they know?
- Which cases required specialist support rather than independent youth action?

Adaptation for rural areas and smaller towns

Use concern cards involving inter-municipal services, local grants, environmental damage, land-use decisions, village facilities or public transport. Avoid situations so similar to a live local dispute that participants may identify the people involved.

Where direct contact could expose an individual, groups may consider collective questions, an intermediary organisation, a regional institution or a request focused on documents rather than personal allegations. The detailed assessment of confidentiality, reporting channels and protection remains in Chapter 6.

In communities with limited institutional capacity, the first response may involve clarifying which authority is competent. A municipality should not be asked to remedy an issue controlled by a ministry, inspectorate, public utility or neighbouring municipality.

8.6 Youth - Municipality Dialogue Lab

Purpose

To practise preparing and conducting a structured meeting between young people and public institutions that moves from evidence and concerns to recommendations, commitments and follow-up.

Toolkit link

Use with Sections 7.2-7.5 on defining change, choosing an action, preparing recommendations and meeting public institutions.

Duration

120 minutes, or two sessions of 60-75 minutes

Group size

12-30 participants

Materials

Issue briefing, role cards, dialogue agenda, recommendation template, observer checklist and dialogue outcome record.

The activity reflects the Council of Europe approach that youth participation requires practical opportunities, means and support for young people to influence decisions. The European Charter on the Participation of Young People in Local and Regional Life was renewed by the Congress in 2025 and subsequently supported through Committee of Ministers Recommendation CM/Rec(2026)3 (Council of Europe).

Suggested roles

Youth delegation

Three to six participants who present the issue, evidence and recommendations.

Municipal decision-makers

The mayor, deputy mayor, councillors or committee members who can make or influence a formal decision.

Municipal administration

Employees responsible for finance, environment, youth, transport, public services or another relevant field.

External or implementing actor

A public institution, public utility, regional development agency, school, contractor or service provider.

Moderator

A neutral person responsible for the agenda and balanced participation.

Recorder

A person responsible for documenting agreements, unresolved questions and deadlines.

Observers

Participants who assess the quality of the dialogue rather than the political strength of either side.

Steps

1. Select the issue

Use a fictional issue or a real, non-sensitive community question that participants have already researched. Suitable examples include:

- introducing an evening transport pilot;

- improving access to municipal youth spaces;
- publishing clearer grant-selection information;
- restoring a neglected public area;
- establishing a youth consultation mechanism;
- adding accessible features to a public facility;
- improving monitoring of a green project.

The issue should fall within, or at least partly within, the authority of the institutions represented in the simulation.

2. Prepare the youth delegation

The youth group prepares a one-page briefing with:

- the problem;
- who is affected;
- verified evidence;
- what remains uncertain;
- the desired change;
- one primary recommendation;
- up to two alternative options;
- questions for the institution;
- a suggested next step and timeframe.

Tool 8.4: Youth Recommendation Template

Element	Content
Issue	
Evidence	
People or places affected	
Desired change	
Primary recommendation	
Alternative or pilot option	
Responsible institution	
Resources or cooperation needed	
Proposed deadline or next step	
How progress could be monitored	

Recommendations should describe an action, not only a value. “The municipality should listen to young people” becomes more usable when expressed as “The municipality should hold two youth consultations before adopting the next local youth programme and publish a response to the proposals.”

3. Prepare the institutional group

The institutional group receives information about:

- its legal or organisational competence;
- relevant budget constraints;
- an upcoming decision deadline;
- existing plans or commitments;
- information that is available;
- information that requires further checking;
- actions that can and cannot be promised during the meeting.

The group must avoid inventing unlimited authority. Its task is to respond seriously while explaining genuine constraints and responsibilities.

4. Agree on the dialogue structure

Suggested 45-minute meeting agenda:

Time	Agenda item
5 minutes	Introductions, purpose and expected outcome
7 minutes	Youth presentation
8 minutes	Clarifying questions
10 minutes	Institutional response
10 minutes	Discussion of options
5 minutes	Agreements, responsibilities and follow-up

The moderator reminds participants that the aim is not to win a debate. It is to clarify the issue, test recommendations and identify what can happen next.

5. Conduct the meeting

The youth delegation opens with a concise presentation. The institutional group first asks questions and summarises what it understood before responding.

During the discussion, participants should distinguish among:

- facts accepted by both sides;
- facts requiring verification;
- policy disagreements;
- matters outside the institution's competence;
- actions that can be agreed immediately;
- actions requiring a later formal decision.

6. Use an observer checklist

Observers record whether:

- the problem was clearly defined;

- evidence was distinguished from interpretation;
- young people proposed a specific change;
- institutional representatives explained their competence;
- both groups asked genuine questions;
- constraints were explained rather than used as a general refusal;
- alternatives were considered;
- responsibilities and deadlines were recorded;
- disagreement was documented accurately;
- a follow-up method was agreed.

7. Complete the dialogue outcome record

Tool 8.5: Dialogue Outcome Record

Issue:

Date and participants:

Facts accepted by the participants:

Information still to be checked:

Agreed action	Responsible person or institution	Deadline

Recommendation requiring a formal decision:

Matter referred to another institution:

Unresolved disagreement:

Date and format of follow-up:

Information that will be made public:

8. Debrief in role

Participants first reflect from their assigned roles:

- What helped you participate?
- What made you defensive or uncertain?
- Which request was easiest to answer?
- Which constraint was difficult to explain?
- What made a recommendation appear credible?

9. Debrief out of role

Participants leave their roles and discuss the quality of the process. Observers present patterns rather than judging individual performance.

10. Repeat the difficult moment

Select one part of the meeting that became vague, adversarial or unproductive. Run it again using a clearer question, more specific evidence or a revised recommendation. This demonstrates that dialogue is a skill that can be improved through preparation.

Reflection questions

- Did the meeting produce a concrete next step?
- Was the requested change within the institution's authority?
- Which evidence had the greatest influence?
- Did either side confuse lack of agreement with lack of understanding?
- How were budget or legal constraints explained?
- Did alternative or pilot solutions improve the discussion?
- Were young participants treated as partners, petitioners or an audience?
- Which commitments were specific enough to monitor?
- How should the youth group follow up if the agreed deadline passes without action?
- What information from the meeting should be communicated to the wider community?

Adaptation for rural areas and smaller towns

Include representatives of inter-municipal administrations, regional agencies, public utilities or national bodies where responsibility is shared. A dialogue with only municipal representatives can create false expectations when the municipality does not control the service.

The simulation may be held in a village hall, school, youth centre or online rather than only in the municipal headquarters. For a real dialogue, timing should account for public transport, school schedules, seasonal work and caregiving responsibilities.

Where young people from remote settlements are rarely represented, allocate delegation places by settlement or use a rotating meeting location. Participants can also submit written or recorded contributions before the meeting.

Municipal representatives in small administrations may cover several policy areas and have limited staff support. The activity should still require clear answers and follow-up, but recommendations may include cooperation between municipalities, a pilot action or referral to another level of government rather than assuming that every solution can be delivered locally.

Chapter takeaways

The six activities develop a connected set of practical competences:

- distinguishing an integrity concern from an error, weak administration or disputed policy decision;
- identifying who has formal authority and where participation is possible;
- combining environmental action with transparent and inclusive decision-making;
- tracing public money from approval to implementation;
- selecting a response that matches the evidence, objective and institutional context;
- turning research into structured recommendations, dialogue and follow-up.

Activities should end with a usable output: a classification, decision map, integrity plan, public-money record, action note or dialogue agreement. Reflection is important, but the purpose of the activity bank is to help participants practise methods that they can later use responsibly in their own communities.

Selected sources and further guidance

- [Commission for the Prevention of Corruption \(n.d.\). ERAR.](#)
- [Information Commissioner of the Republic of Slovenia \(n.d.\). Access to Public Information Act.](#)
- [OPSI – Open Data Slovenia \(n.d.\).](#)
- [Public Procurement Portal of the Republic of Slovenia \(n.d.\).](#)
- [e-JN – Slovenian Electronic Public Procurement \(n.d.\).](#)
- [TED – Tenders Electronic Daily \(n.d.\).](#)
- [European Commission \(n.d.\). Cohesion Open Data Platform.](#)
- [UNECE \(n.d.\). Aarhus Convention public-participation resources.](#)
- [Council of Europe \(2025\). European Charter on the Participation of Young People in Local and Regional Life.](#)
- [Council of Europe \(2025\). Recommendation CM/Rec\(2025\)3 on rural youth.](#)

9. Facilitator notes, evaluation and resources

Chapters 1–7 provide the conceptual and practical sequence from understanding integrity risks to developing evidence-based youth action, while Chapter 8 offers activities that can be selected and adapted for different groups. This final chapter supports the person facilitating that process. It does not introduce new definitions or reporting procedures. Instead, it sets clear boundaries for educational work, provides three compact evaluation tools and brings together the main Slovenian and EU-level resources used throughout the toolkit. Facilitators should select only the material needed for the group and the available time. A short, well-prepared session that leaves participants with one usable skill is preferable to a dense session that creates confusion or pressure.

9.1 Essential facilitator principles

Anti-corruption learning can involve disagreement, strong emotions and situations that participants recognise from their own lives. The facilitator's main responsibility is to keep the activity educational, voluntary and proportionate. Detailed guidance on inclusion is provided in Chapter 3, while the distinction between facts, suspicions and evidence and the routes for safe action are addressed in Chapter 6.

Principle	What it means in practice
Voluntary participation	Explain the purpose and method in advance. Participants may pass on a question, observe instead of speak, leave an exercise or use an anonymous written contribution without having to justify the choice.
No pressure to disclose real experiences	Begin with fictional or publicly documented cases. Never ask participants to name people, organisations or situations from their own lives. Do not treat silence as lack of engagement.
Careful use of local examples	Local examples make learning relevant, but they should be based on public, verifiable information and described in neutral language. Remove unnecessary personal details and avoid using an unresolved allegation as a workshop case.
Education is not investigation	The group may analyse procedures, documents and public data, but the facilitator should not collect testimony, determine guilt, search private devices, contact alleged wrongdoers or encourage participants to obtain information unlawfully.
Inclusion and accessibility	Adapt language, pace, print size, room layout, digital tools and participation methods. Provide more than one way to contribute. Consider transport, language support, disability access and the practical barriers discussed in Chapter 3.
Proportionate challenge	Critical thinking does not require confrontation. Ask participants to test assumptions, distinguish evidence from interpretation and consider alternative explanations before proposing action.
Referral when a real case emerges	Pause the educational discussion and avoid examining the case in front of the group. Explain the limits of the facilitator's role and direct the participant to an appropriate confidential or specialist channel. Use the directory in Section 9.3 and the decision process in Chapter 6.

A short opening statement

At the beginning of the session, the facilitator can set the boundary in simple language:

“This is an educational space. Nobody is expected to share a personal experience or name a real person. We will work with procedures, public information and fictional or verified examples. You may pass on any activity. If a real concern arises, we can identify where independent advice may be available, but this workshop will not investigate the case.”

Before the session

A brief preparation check is usually sufficient:

- Choose the learning objective and no more than one main activity from Chapter 8.
- Review the example for accuracy, sensitivity and relevance to the participants.
- Prepare an alternative way to participate and identify any accessibility support needed.
- Decide how anonymous notes, photographs or digital outputs will be handled and deleted or stored.
- Have current referral information available without presenting reporting as the expected outcome of the session.

When a participant raises a real concern

The facilitator should not ask for the full story in the group. A proportionate response is to acknowledge the concern, ask whether there is any immediate danger, explain confidentiality limits, and offer a private follow-up only if the participant requests it. The next step may be a public-information request, independent advice or a formal reporting channel; it should be chosen by reference to Chapter 6 rather than improvised during the workshop. If a child or another person may be in immediate danger, the organisation’s safeguarding procedures and applicable legal duties take priority.

9.2 Evaluation

Evaluation should help participants and facilitators understand what was learned, what was useful and what should change. It should not test whether participants can identify “the correct offender”, collect allegations or require disclosure of personal experiences. The three tools below are sufficient for most Y-ACT activities. Printable versions are included in Annex 10 where relevant.

Tool 9.1: Participant Reflection Card

Use during the final five minutes of a session. Participants may write privately, discuss in pairs or contribute one point to a closing circle. They do not have to submit their answers.

- One idea or distinction that is clearer to me now is ...
- One source, document or tool I could use is ...
- One question I still have is ...
- One action that would be responsible and realistic in a local situation is ...
- One boundary or precaution I would keep in mind is ...

Tool 9.2: Workshop Feedback Form

Use anonymously after a workshop or short learning sequence. A five-point scale keeps the form brief and comparable.

Statement	Strongly disagree → Strongly agree
The purpose of the session was clear.	1 2 3 4 5
The examples and activities were relevant.	1 2 3 4 5
I had a meaningful way to participate.	1 2 3 4 5
The facilitator respected choice and different viewpoints.	1 2 3 4 5
I know where to find the next tool or source I need.	1 2 3 4 5
The pace and level of detail were appropriate.	1 2 3 4 5

Two optional open questions: What should be kept? What should be changed?

Tool 9.3: Local-Action Review

Complete after a youth group has requested information, met an institution, submitted a recommendation or completed another local action. The purpose is to review both the result and the quality of the process.

Review area	Question
Objective	What specific change or response did we seek?
Action completed	What did we actually do, and when?
Institutional response	What answer, commitment, decision or non-response did we receive?
Result	What changed immediately? What has not changed?
Quality of our work	Were our facts verified, roles clear, communication respectful and records complete?
Participation	Who contributed, who was missing and what barriers affected involvement?
Learning	What would we keep, stop or change next time?
Next step	Close the initiative, follow up, revise the recommendation or refer the issue elsewhere?

A local action can be valuable even when the requested change is not accepted. A documented reply, clearer understanding of responsibility, improved group skills or a new participation route may be meaningful results. The group should, however, describe outcomes accurately and avoid presenting contact or visibility alone as institutional change.

9.3 Resources and contacts

The following directory brings together the main institutions and portals relevant to the toolkit. Institutional names, functions and starting links were checked in July 2026. Responsibilities and contact arrangements may change, so users should verify the current competence and submission instructions before sending a real request or report. For reporting decisions, use Chapter 6 rather than selecting a channel only because it appears in this list.

Slovenia

Institution or portal	Use it for	Starting point
Commission for the Prevention of Corruption (KPK)	Suspected corruption, conflicts of interest, lobbying, integrity matters; guidance on protection of reporting persons and the list of external reporting bodies. General contact: anti.korupcija@kpk-rs.si; +386 1 400 57 10.	Reporting and guidance
Information Commissioner	Guidance on access to public information and appeals when access is refused, delayed or incomplete; also the national data-protection authority. Contact: gp.ip@ip-rs.si; +386 1 230 97 30.	ip-rs.si
Slovenian Police	Suspected criminal offences and urgent safety matters. Emergency number 113; anonymous information line 080 1200. Use official channels rather than social media.	policija.si
e-JN and the Public Procurement Portal	Current procurement procedures, notices, tender documentation, award decisions, contracts and amendments, depending on the procedure and publication duty.	e-JN / Public Procurement Portal
ERAR	Public-sector payment flows, procurement-linked information and other transparency data maintained by KPK. Use it as a starting point and verify figures against the underlying document.	ERAR
TZIJZ / Public Payments Administration	Public information on transactions of bodies subject to access-to-information rules and the register of budget users.	TZIJZ service
Slovenian Environment Agency (ARSO)	Official environmental monitoring, indicators, maps and data on air, water, weather, emissions and other environmental conditions.	arso.gov.si
Environment and Spatial Planning Inspectorate	Notifications concerning matters within environmental, spatial-planning, construction and related inspection competences. Check the service description before submitting.	GOV.SI inspectorate
Ministry responsible for youth; MOVIT	National youth policy and support; Erasmus+ Youth and European Solidarity Corps information, training and project support through the Slovenian national agency.	MOVIT
CNVOS	Legal, organisational, advocacy, funding and project support for Slovenian civil-society organisations and local initiatives.	cnvos.si

European Union level

Institution or portal	Use it for	Starting point
European Commission – access to documents	Search Commission documents and submit an access request when a document cannot be found publicly.	Access Commission documents
European Anti-Fraud Office (OLAF)	Administrative reports concerning fraud, corruption or serious irregularities affecting the EU budget or EU institutions. Reports can be submitted in any EU official language and may be anonymous.	Report fraud to OLAF

European Public Prosecutor's Office (EPPO)	Suspected criminal offences affecting the EU's financial interests, including certain fraud, corruption, money-laundering and misappropriation offences.	Report a crime to EPPO
European Ombudsman	Complaints about maladministration by EU institutions, bodies and agencies after first trying to resolve the matter with the institution concerned. It does not investigate national or municipal authorities.	Make a complaint
TED – Tenders Electronic Daily	EU and EEA procurement notices published in the Supplement to the Official Journal, with search by place, authority, sector and procedure.	ted.europa.eu
Financial Transparency System	Beneficiaries of funding managed directly by the European Commission, including amount, purpose, location and responsible department.	EU funding recipients
Cohesion Open Data	Financial and implementation data for EU cohesion-policy programmes, funds, countries and themes.	cohesiondata.ec.europa.eu
European Environment Agency	European environmental data, indicators, maps and assessments. For alleged failure by a Member State to apply EU environmental law, consult the Commission's environmental legal-enforcement guidance.	EEA data and knowledge
European Youth Portal and Eurodesk	EU-level youth information, participation, mobility, volunteering, learning opportunities and local information points.	European Youth Portal

Chapter takeaways

- Participation must remain voluntary, and no one should be pressured to disclose a personal experience.
- Facilitators provide education and support; they do not investigate cases, promise confidentiality they cannot guarantee or give legal advice beyond their competence.
- Fictional and publicly documented examples should be used before local cases, with careful attention to privacy, power relations and possible retaliation.
- Evaluation should measure learning, safety, confidence and the quality of follow-up, not only participant satisfaction.
- Facilitators should prepare referral information and know when to pause an activity and seek specialist support.

Selected sources and further guidance

- [Commission for the Prevention of Corruption \(n.d.\). Reporting suspected corruption.](#)
- [Commission for the Prevention of Corruption \(n.d.\). Whistleblower protection and external reporting.](#)
- [Information Commissioner of the Republic of Slovenia \(n.d.\). Access to public information and appeal guidance.](#)
- [European Commission \(n.d.\). Access to Commission documents.](#)
- [European Anti-Fraud Office \(n.d.\). Report fraud.](#)
- [European Public Prosecutor's Office \(n.d.\). Reporting a crime to the EPPO.](#)
- [European Ombudsman \(n.d.\). Make a complaint.](#)
- [European Youth Portal \(n.d.\).](#)

Annexes

These ten tools are designed for printing or direct completion. They may be used independently, but they work best as a sequence: map the issue and decision-makers, identify integrity risks, follow information and money, document sources, assess safety, plan action, prepare recommendations and review the result. Complete only the fields relevant to the initiative. Do not record unnecessary personal data or unverified allegations.

Each annex begins on a new page so that it can be copied or printed separately.

Annex 1. Local Power and Accountability Map

Use this sheet to identify who decides, who implements, who oversees and where young people can obtain information or participate.

Issue or decision	Place / institution	Date completed	Group

Decision chain

Stage	Responsible body or person	Public document or information source	Participation / accountability point
Proposal or agenda setting			
Formal decision			
Budget or funding			
Procurement / grant / permit			
Implementation			
Monitoring and review			

Accountability map

Area	Guiding question	Names / notes
Decision-makers	Who can approve, reject or amend the decision?	
Implementers	Who manages the contract, service, grant or project?	
Oversight bodies	Who audits, inspects, hears appeals or monitors compliance?	
Affected groups	Who benefits, who bears costs or risks, and who is underrepresented?	
Independent sources	Which media, experts, civil-society groups or public datasets can help verify information?	
Monitoring and review		

Most important information gap	First realistic accountability step	Person responsible	Deadline

Annex 2. Green Integrity Red-Flag Checklist

A red flag justifies further questions; it does not prove corruption. Mark Y, N or ? and note the document or observation that supports the answer.

Area	Question or observation	Y / N / ?	Source or note
Planning and need	The public need, alternatives and long-term environmental effects are not clearly explained.		
Planning and need	Key information appeared only after the main decision had effectively been made.		
Participation	Affected communities had little time, inaccessible information or no realistic way to comment.		
Influence	Relevant relationships, lobbying contacts or conflicts of interest are unclear or unmanaged.		
Permits and assessment	Environmental studies, permits or expert opinions are missing, unusually narrow or inconsistent.		
Public money	The funding source, beneficiary, selection criteria or expected environmental results are unclear.		
Procurement	Requirements appear tailored, competition is weak or the same supplier repeatedly succeeds without clear explanation.		
Contract changes	Price, scope, deadlines or environmental commitments changed substantially after selection.		
Implementation	Works or services differ from the approved plan, contract or published environmental conditions.		
Monitoring	Indicators, inspection findings, emissions data or corrective measures are not published or followed up.		
Distribution	Benefits and environmental burdens fall unevenly on neighbourhoods, rural settlements or vulnerable groups.		
Claims	Terms such as "green", "sustainable" or "circular" are not linked to measurable commitments and results.		
Strongest verified concern	Most important missing information	Next step and responsible person	

Annex 3. Follow the Money Worksheet

Trace one project, grant, purchase or service from the stated public need to payment, delivery and monitoring. Record the source for each entry.

Project / programme		Responsible institution	Location	Period
Stage		Question	Finding	Source / document
1. Public need		What problem or service is the spending meant to address?		
2. Decision		Who approved it, under which decision and on what date?		
3. Funding		Budget line, national / municipal / EU source and total planned value.		
4. Selection route		Procurement, grant, subsidy, concession, direct award or other route.		
5. Beneficiary / supplier		Who receives the money and under which criteria or contract?		
6. Contract or award		Initial amount, main obligations, indicators, deadlines and publication link.		
7. Changes		Amendments to amount, scope, supplier, deadline or conditions.		
8. Payments		Amounts and dates paid; compare ERAR, TZIJZ or other official records.		
9. Delivery		What was actually delivered, built, funded or provided?		
10. Monitoring		Who checked quality, results and compliance, and what was published?		
Planned total	Paid to date	Difference explained?	Main unanswered question	Next check

Annex 4. Public-Information Request Template

Adapt the wording to the institution and request existing documents or recorded information as precisely as possible. See Chapter 5 for the full guidance.

[Name of public body]

[Address or official e-mail / online channel]

Subject: Request for access to public information

Dear Sir or Madam,

Under the Slovenian Public Information Access Act, I request access to the following existing information or documents:

1. _____
2. _____
3. _____

The request concerns: _____

Relevant time period / decision / project: _____

Preferred form of access: [] electronic copy by e-mail [] inspection [] copy in another available format

Where a document contains information that cannot lawfully be disclosed, please provide partial access to the remaining information. If the requested information is not held by your institution, please inform me or transfer the request where the applicable rules require this.

Please send the response to:

Name / group: _____ E-mail / address: _____

Date: _____ Signature, where required: _____

Before sending

- Ask for existing records rather than an explanation that has not been recorded.
- Name the institution, document, period and subject as precisely as possible.
- Do not include motives, accusations or unnecessary personal data.
- Keep the request, confirmation of submission and response together.

Annex 5. Evidence and Source Log

Use this log to separate verified material, interpretation and remaining questions. Record only information obtained and stored lawfully.

Issue		Log coordinator	Storage location / access		Review date
ID	Date obtained	Source / document	What it directly confirms	Reliability / verification	Privacy or use restriction
1					
2					
3					
4					
5					
6					
7					
8					

Current assessment

Verified facts	Reasonable interpretation	Unknown or disputed	Document still needed
Who checked the log?	Date	Correction or update made	Version / file name

Annex 6. Safety and Reporting Checklist

Complete before publishing, contacting an institution or submitting a report. This checklist supports — but does not replace — the decision process in Chapter 6 or specialist advice.

Area	Check	Yes / No / unsure	Action needed
Purpose	Can we describe the concern and intended result without accusing a person?		
Facts	Have we separated verified facts, interpretation, suspicion and rumour?		
Lawful source	Was each document, image or recording obtained and stored lawfully?		
Personal data	Have we removed names, contact details and other personal data that are not necessary?		
Immediate risk	Could anyone face violence, serious retaliation, job loss, housing loss or another urgent harm?		
Digital risk	Are accounts, devices, files and sharing permissions appropriate for the sensitivity of the material?		
Group consent	Does each participant understand the action, visibility and use of their contribution?		
Role boundaries	Are we staying within education, public monitoring and advocacy rather than conducting an investigation?		
Channel	Is the receiving institution competent for this issue, and have we checked its current instructions?		
Support	Does the person most exposed have access to independent advice or a trusted support person?		
Record	Will we keep a dated copy of what was sent, to whom and through which channel?		
Communication	Can every public statement be supported by the source log and expressed without exaggeration?		

Stop and seek specialist advice before proceeding when there is immediate danger, a serious retaliation risk, uncertainty about confidential or unlawfully obtained material, a child-protection concern, or pressure to publish names or allegations that cannot be verified.

Decision	Options
	☐ Proceed ☐ Revise the action ☐ Seek advice ☐ Use another channel ☐ Do not proceed

Annex 7. Stakeholder Influence Map

Map people and organisations according to their influence over the decision and their interest in the issue. Base the map on roles and evidence, not assumptions about motives.

Issue / objective	Decision or change sought	Date	Team
	Lower influence		Higher influence
Higher interest			
Lower interest			

Engagement plan

Stakeholder	Role / interest	What we need from them	Approach and message	Owner / date
Who is missing from the map?		How will young people and affected groups participate?		

Annex 8. Youth Advocacy Action Canvas

Plan one manageable initiative. Keep the requested change specific and within the authority of the institution addressed.

Issue and youth / community impact		Desired change and minimum acceptable result	
Verified evidence and main information gap		Responsible institution and decision stage	
Primary audience, allies and affected groups		Core message: issue → evidence → impact → recommendation	
Action sequence and timetable		Roles, skills and resources	
Risks, boundaries and safeguards		Indicators of progress and result	
Follow-up date and escalation conditions		Communication and record-keeping	
First action	Responsible person	Deadline	Review point

Annex 9. Youth Recommendation Brief

Keep the main brief to one page. Attach or link the evidence log and supporting documents separately.

Title of requested change			
To: institution / department	From: group / organisation	Date	Contact
1. Issue		<i>Describe the current procedure, decision or omission in neutral and precise language.</i>	
2. Evidence		<i>List the strongest verified documents, data or observations. Distinguish what is known from what remains uncertain.</i>	
3. Impact		<i>Explain the practical effect on young people, the community, public resources or the environment.</i>	
4. Recommendation		<i>State exactly what should change. Identify the standard, procedure, document, participation route or safeguard requested.</i>	
5. Responsible authority		<i>Explain why the recipient has the power or role to act.</i>	
6. Requested next step		<i>Request a written response, meeting, review, publication or decision and give a realistic date.</i>	
Attachments / links	Follow-up coordinator		Response deadline

Annex 10. Local Initiative and Evaluation Sheet

Use the upper part to plan the initiative and the lower part to review it after the agreed follow-up date.

Plan

Issue	Specific objective	Responsible institution	Review date
Step	Action	Owner	Deadline / status
1			
2			
3			
4			
Indicators of progress	Evidence or record to keep	Risks / support needed	

Review

Review question	Notes
Action completed	
Institutional response or non-response	
Immediate result	
What did not change?	
Participant learning and participation barriers	
What to keep / stop / change	
Next step and deadline	
Overall status	Status options
	☐ Completed ☐ Follow-up required ☐ Revised action ☐ Referred elsewhere ☐ Closed