

1. Basic Information

- 1.1 Publication reference number: EuropeAid/ 137-907/DH/ACT/ME
- 1.2 Programme: IPA 2014 Country Action Programme for Montenegro 2014 - (Objective 1 - part2)
(Financing decision No. is 2014 / 037-803)
- 1.3 Twinning Number: MN 14 IPA JH 01 16
- 1.4 Title: Support the implementation of integrity measures
- 1.5 Sector: Judiciary and Home Affairs
- 1.6 Beneficiary country: Montenegro

2. Objectives

- 2.1 Overall Objective(s):

To support Montenegro to prevent and counter corruption in line with EU best practices

- 2.2 Project purpose:

The purpose of the project is to support the implementation of integrity measures in all concerned institutions and to support the Agency for the Prevention of Corruption (APC) as far as the integrity measure coordination, monitoring, and reporting functions are concerned.

- 2.3 Contribution to National Development Plan/Cooperation agreement/Association Agreement/Action Plan

The European Partnership highlights the importance of anti-corruption policy in the public sector and the need for upgrading the capacity in the area of anti-corruption policy. It also defines priorities that are the basis for formulation of this project. As regards anti-corruption policy, the EP's medium-term priorities in the area of the political criteria are as follows:

Continue with determination the prevention and fight against corruption at all levels and provide increased means for prevention and suppression of corruption. Ensure full compliance with the UN Convention on the fight against corruption and with the relevant Council of Europe Conventions.

Establish effective procedures for the detection, treatment and follow-up of cases of suspected fraud and other irregularities affecting national and international, including EU, funds.

The defined measures correspond to overall principles of the **Stabilisation and Association Agreement (SAA)**. According to article 80 of the SAA (Reinforcement of institutions and rule of law), in their cooperation on justice, freedom and security, the Parties shall attach particular importance to the consolidation of the rule of law, and the reinforcement of institutions at all levels in the areas of administration in general and law enforcement and the administration of justice in particular. Cooperation shall notably aim at strengthening the independence of the judiciary and improving its efficiency, improving the functioning of the police and other law enforcement bodies, providing adequate training and fighting corruption and organised crime. In addition, according to article 86 (Preventing and combating organised crime and other illegal activities) the Parties shall cooperate on combating and preventing criminal and illegal activities, organised or otherwise, both in the private and public sector, in particular linked to non-transparent administrative practices.

Resolution (97)24 of the Committee of Ministers of the Council of Europe on the Twenty Guiding Principles for the Fight Against Corruption underlines that it is necessary: " to ensure that those in charge of the prevention, investigation, prosecution and adjudication of corruption offences enjoy the independence and autonomy appropriate to their functions, are free from improper influence and have effective means for gathering evidence, protecting the persons who help the authorities in combating corruption and preserving the confidentiality of investigations."

Council of Europe Criminal Law Convention on Corruption requires the following: "Each Party shall adopt such measures as may be necessary to ensure that persons or entities are specialised in the fight against corruption. They shall have the necessary independence in accordance with the fundamental principles of the legal system of the Party, in order for them to be able to carry out their functions effectively and free from any undue pressure. The Party shall ensure that the staff of such entities has adequate training and financial resources for their tasks."

European Anti-Corruption Policy has been characterized for almost a decade by intensive activities of *the European Partners against Corruption (EPAC)*. The document "Anti-Corruption Authority Standards" (November 2011) describes the guiding principles and parameters for the independence of anti-corruption bodies that anti-corruption authority should meet according to the international conventions, legal instruments and the best practice.

This Project directly responds to priorities in *Country Strategy Paper* (Sector 2: Justice, Home Affairs and Fundamental Rights): "As regards fight against corruption, Montenegro needs to further improve and strengthen its legal and institutional framework for the prevention and suppression of corruption and enhance its overall capacity to effectively implement and monitor all measures foreseen in the pertinent strategic documents and action plans. It needs to step up anti-corruption measures at the local level and in particularly sensitive areas such as public procurement. Reforms should aim at strengthening the institutional framework and putting in place effective systems for preventing conflict of interest as well as for controlling asset declarations of public officials and political party financing. Montenegro also needs to effectively implement free access to information rules and strengthen the protection of whistle-blowers. Also, the project will serve the support to implementation of the Action plan for Chapter 23 in the area of corruption prevention.

3. Description

3.1 Background and justification:

Combating corruption is a long-term process that includes both the preventive and repressive efforts. The inception of anti-corruption measures in Montenegro dates back to 2001 when the Government of

Montenegro established many anticorruption bodies such as the Directorate for Anti-corruption Initiative, Commission for the Prevention of the Conflict of Interests, Commission for the Control of Public Procurement procedure, Public Procurement Directorate, Directorate for Prevention of Money Laundering and Terrorism Financing, etc. In the area of prevention of corruption, the analyses on the efficiency of the existing anti-corruption framework in Montenegro have shown that in spite of the serious improvements made particularly in the recent years, the existing decentralized anti-corruption institutional framework showed its deficiencies and constraints. This was recognized in the intensive EU integration processes, where Montenegro clearly stated its wish to establish a unique independent anti-corruption body based on the Law – Agency for Prevention of Corruption (APC), which will start working on 1 January 2016.

In line with the Action Plan for Chapter 23, the Parliament of Montenegro adopted the Law on Prevention of Corruption in December 2014 that will become effective as of 1 January 2016.

APC will merge the competencies of the Commission for Prevention of Conflict of Interest, Directorate for Anti-Corruption Initiative and part of the competencies of the State Electoral Commission. In order to provide full and effective implementation of its competences prescribed by the Law, the Parliament adopted the Budget in the amount of 0.2% of the total Budget of Montenegro (around Euro 1,5 million). Also, the GoM provided new premises for the Agency. Funds for initial development and adjustment of the software application for analysing and processing data in the APC (initial software) were provided through the Norwegian project (100.000 €).

IPA 2014 “Strengthening Integrity in the Public Sector through Effective Implementation of Preventive Anti-Corruption Institutes” is intended to support public sector in the implementation of the new legislation relating to the prevention of corruption, with special focus on integrity measures, lobbying, whistleblower protection and cooperation with other institutions in terms of regaining public trust in national institutions to fight against corruption.

Moreover, the mechanisms must be recognized primarily in the integrity plans as a preventive anti-corruption document whose adoption became obligatory as of 2013, and was significantly expanded by the Law on Prevention of Corruption that will become effective as of January 2016, and will be applied to public sector entities (authorities: state authority, state administration body, judicial authority, local self-government body, local government body, independent body, regulatory body, public institution, public company or other business or legal person exercising public authority, i.e. activities of a public interest or state-owned).

Therefore, consistent application of preventive anti-corruption measures must be the priority in the development and implementation of integrity plans. In this regard, it is necessary to organize workshops and seminars for beneficiaries that are subject to application of the new institutes set forth by the anti-corruption law, which are to be included in their respective integrity plans.

IPA 2014 should complement to the efforts of the national authorities to effectively implement the Law on Prevention of Corruption. This requires further upgrade of APC’s IT system for better and faster data processing (direct access to the databases of the relevant institutions, etc.). Also, it is essential to enhance internal capacities of APC and support internal management process, with a view to establishing a smooth workflow, i.e. vertical and horizontal management, especially in the area of exchange of information among different organizational units. Last but not least, professional trainings of the staff on APC competences will be crucial for the proper implementation of the provisions of the Law. This will require exchange of knowledge and experiences with different national and international organisations, through attendance to different seminars and workshops, conferences, study visits, expert support, and other forms of enhancing administrative capacities.

3.2 Linked activities (*other international and national initiatives*):

IPA Assistance

- IPA 2007 MN-07/IB/JLS-02 “Fight against corruption and organized crime”, with the overall objective to “fight against organized crime and corruption by improving performance and cooperation of different law enforcement agencies”. The purpose of the project was to provide advisory and material assistance with the aim of strengthening strategic, institutional and operative capacities of the Criminal police Department, Agency for Money Laundering and Terrorism Financing and Directorate for Anti-Corruption Initiative. February 2009 – May 2010; Budget: EUR 1,2 million;
- IPA 2010 project MN 10 IB JH 03 „Support the implementation of the Anticorruption Strategy and Action Plan“– This project relates to strengthening and introduction of the new anti-corruption preventive mechanisms aimed at increased level of ethics and integrity in public administration bodies. September 2012 – April 2014, Budget 737.000 €, EU contribution 700.000€.

Other donor’s activities:

- Project “Enhancing Strategic Operational Capability of DACI through Capacity Building”; Improvement of DACI’s strategic management and related capacities in a comprehensive, sustained, and sustainable manner; July 2010 – July 2012; Budget EUR 304,000, implemented by UNDP, financed by the Government of the Kingdom of Norway.
- Integrity and capacity assessment of public administration in Montenegro, December 2010, UNDP
- Project “Support for the implementation of international anticorruption standards and instruments”; Survey “Analysis of corruption and barriers to business in the interaction of private and public sector in Montenegro”; High-level trainings on the implementation of the Law on Liability of Legal Entities for Criminal Offences, and legal provisions concerning detection, seizure and confiscation of proceeds from crime; Drafting DACI’s first development strategy; 2009 – 2010, implemented by International Management Group (IMG), financed by the Government of the Kingdom of Norway.
- Project “Strengthening Strategic Operational Capability of DACI”. Design, procurement and installation and launch of specialised software for processing reports on the implementation of national anticorruption strategy and action plan, as well as compiling and analysing data on corruption complaints. Training of trainers (DACI) for software usage, training of other stakeholders, i.e. reporting bodies. 2010 – 2011, implemented by International Management Group (IMG), financed by the Government of the Kingdom of Norway.
- In 2008 the Commission for the Prevention of Conflict of Interests, in cooperation with the NGO CEMI, conducted a cycle of 11 training seminars for public officials, media and NGOs. The Commission has established its website. A survey on the topic “Public in relation to the Law on the Conflict of Interest” was conducted in November 2008, including a sample of 1000 respondents in the central, southern and northern region of Montenegro.
- “Integrity and capacity assessment of judiciary in Montenegro”, 2008, UNDP.
- “Integrity and capacity assessment of local governments in Montenegro”, 2010, UNDP.
- Anti-Corruption Practitioners’ Network - UNDP CO and Bratislava Regional Centre, 2008-2010. DACI Capacity Assessment Study.
- “Strengthening the Capacities of the Ministry of Justice for EU Accession Negotiations on Chapter 23”. Grant, Norwegian Ministry of Foreign Affairs (MFA). Objective of the project is to strengthen capacities of the Ministry of Justice and relevant state authorities for EU Accession Negotiations on Chapter 23. Project duration: July 2014- July 2016.

3.3 Results:

Result 1

Integrity managers from public sector entities trained on integrity plans and their effective implementation;

Indicators:

- Integrity managers from 70% of public administration bodies according to the Law on State Administration and 50% of local self-governments, public companies and other legal entities attended at least one training on development and enforcement of integrity measures, including other obligations arising from the Law on Prevention of Corruption;
- Integrity plans successfully developed and submitted annual report on implementation in 70% public administration bodies according to the Law on State Administration and 50% of local self-governments, public companies and other legal entities. ;
- Integrity plans successfully developed and implemented in five pilot institutions with at least 80% of successfully implemented measures, according to the report on implementation.

The Agency for Prevention of Corruption, with the support of the twinning project, will prepare a report assessing the state of implementation of the integrity plans.

Result 2

Enhanced institutional and administrative capacities of the Agency for Prevention of Corruption to ensure effective implementation of whistleblower protection provisions.

Indicators:

- 100 % of relevant APC staff trained to implement whistleblower protection provisions, in line with best European practices and standards;
- Number of reports on threats to the public interest that indicate the existence of corruption increased by 10 % in comparison to the baseline for 2016;
- Number of citizens that are informed how and where to report threats to the public interest that indicate the existence of corruption increased by at least 10% in comparison to the baseline for 2016.
- Increased number of issued opinions stating threatening of the public interest in relation to the number of received reports
- Increase of the number of opinions where reports on threatening of the public interest assessed as well-grounded.
- Number of cases where on the basis of signals from whistle-blowers who addressed the Agency, criminal investigations have started.
- Gap – needs analysis on the implementation of provisions of the Law for Prevention of Corruption produced, in terms of procedures for receiving complaints and protection of whistleblowers, with recommendations for improvement;

Result 3

Enhanced institutional and administrative capacities of the Agency for Prevention of Corruption to coordinate and control the implementation of lobbying provisions.

Indicators:

- 100 % of relevant APC staff trained to implement provisions on lobbying, in line with best European practices and standards;
- Number of breaches of Law on Lobbying and follow up given/sanctions.

Result 4

Performance of the APC is assessed and improved, based on the recommendations from the gap-needs assessments;

Indicators:

- At least 70 % of recommendations from gap needs analysis on the implementation of the anti-corruption provisions implemented;
- At least 70 % of recommendations from gap needs analysis on improving working conditions of the APC implemented;

3.4 **Activities:**

Member State(s) may propose activities in line with the methodology elaborated in its proposal.

Result 1

1.1 Carry out a problem analysis of adopted integrity plans with recommendations for their improvement.

1.2. Improve integrity plans of five pilot institutions particularly vulnerable to corruption that will serve as example for other institutions to further upgrade their respective integrity plans.

1.3. Organize at least six trainings on development and enforcement of integrity measures in local self-governments, public companies and other legal entities and two trainings for public administration bodies institutions to be grouped together on the basis of their profile/similar corruption risks);

1.4 Organize two workshops on exchange of experiences and practices with agencies from the region in this area;

Result 2

2.1 Coaching the APC staff on procedures for receiving and following up complaints and protection of whistleblowers, including concerned ministries., once a month, 7 days in a month, during project's lifetime;

2.2 Organize at least one study visit for relevant APC employees on procedures for receiving and following up complaints and protection of whistleblowers to get acquainted with best European practices in this area;

2.3 Support to producing and distribution of brochure with practical information on procedures for reporting threats to the public interest that indicate the existence of corruption, including information on protection of persons who report it.

2.4 Organize three roundtables on reporting corruption by employees for public entities, interested publicity and citizens (in the northern, central and southern part of Montenegro).

2.5 Produce gap – needs analysis on the implementation of provisions of the Law for Prevention of Corruption, in terms of procedures for receiving and following up complaints and protection of whistleblowers, with recommendations for improvement

Result 3

3.1 Coaching the APC staff on proper implementation of lobbying-related provision.,

3.2 Organize at least 1 study visits for relevant APC employees on lobbying to get acquainted with best European practices in this area;

3.3 Support to producing and distribution of brochure with practical information on procedures for carrying out lobbying activities. The awareness raising on the new legislative framework (points 3.3. and 3.4) will target both lobbyists and public officials.

Result 4

4.1 Develop gap - needs analysis on the functional review and internal workflow procedures of the APC with recommendations for its improvement;

4.2 Develop gap - needs analysis on implementation of the Law on Prevention of Corruption with recommendations for its improvement in the area of conflict of interest and financing of political subjects and electoral campaigns.

3.5 Means/ Input from the MS Partner Administration:

3.5.1 Profile and tasks of the Project Leader

Profile of the Project Leader

Qualifications and skills

- University degree or equivalent work experience (of at least 5 years) in the anti-corruption field.
- Knowledge and understanding of anti-corruption policies and reform;
- Good analytical and drafting capacity.
- Computer literacy (MS Office applications, Excel, e-mail, internet).

General Professional Experience

- At least 10 years relevant experience in the area relevant to the assignment, notably anti-corruption.
- Very good organisational, coordination, reporting and communication skills

Specific Professional Experience

- Proven ability to coordinate relevant technical cooperation projects.
- Previous work experience with Twinning Projects and knowledge of EU Project Cycle Management tools will be an asset.
- Previous relevant experience in Montenegro or the Region will be an asset.

Language skills

- Excellent command of English, both spoken and written

Project Leader's task will be to:

- assure the overall supervision of the project co-ordination as well as the political support for the project within the MS and guarantee the provision of all required EU expertise
- be responsible for signing official documents
- co-ordinate the project and to attend the regular meetings of the Steering Committee and the planning meetings
- Work in close co-operation with the EU-Delegation, the Montenegrin Project Leader, the RTA, RTA-counterpart and representatives of involved Montenegrin authorities.
- Co-ordinate and co-chair the Project Steering Committee (PSC), which will meet every quarter.

3.5.2 Profile and tasks of the RTA

Profile of the RTA:

Qualifications and skills

- University degree with a proven track record in the area of anti-corruption/integrity, preferably with a legal background.
- Knowledge and understanding of anti-corruption policies and reform and in particular of European standards and good practice in the sub-areas covered by the project;
- Good analytical, appraisal and planning skills.
- Computer literacy (MS Office applications, Excel, e-mail, internet).

General Professional Experience

- At least 5 years experience at managerial level including in an anti-corruption area.
- Familiarity with strategic planning, project development and management,
- Knowledge and understanding of anti-corruption policies and reform;
- Very good organisational, coordination, reporting and communication skills

Specific Professional Experience

- A proven track record of at least 5 years in the field of anti-corruption gained with EU Member States institutions and/or with International Organisations.
- Practical experience with implementation of anti-corruption rules in at least one of the sub-areas covered by the project (integrity plans, whistle-blower protection, conflict of interest, political party financing) and preferably integrity plans or whistle-blower protection.
- Excellent knowledge and practical experience on the management of institutional and capacity building/training programmes regarding anti-corruption.
- Proven ability to organize, coordinate and manage large and complex projects.
- Previous work significant experience in Montenegro or the Region will be an asset.
- Previous work experience with Twinning Projects and knowledge of EU Project Cycle Management tools will be an asset.

Language skills

- Excellent command of English, both spoken and written

RTA will be seconded in Montenegro for 18 months to support APC. He/she will provide advisory services in all project fields mentioned in the Project proposal, especially in preparation and implementation of integrity plans and will be responsible for advising of the APC staff and director on integrity-related issues.

RTA's duties will include:

- Ensuring, together with the Project Leader that each activity is fulfilled and that the benchmarks and mandatory results are achieved;
- Provide expert services – trainings, analyses and other activities which relate to integrity and that are set forth in the project matrix
- Facilitate communication between the BC Project Leader, BC RTA and the MS Project Leader as well as other MS and BC representatives involved in the project process
- Coordinate activities with other EU projects and their RTAs which are related to the Twinning project
- Managing and coordination of short-term expert missions / act as focal point for the preparation of seminars, workshops and visits by STE's
- Carry out on-the-spot evaluation of activities undertaken
- Advise on all technical and administrative and organisational issues relevant for the project success;
- Support in preparing the meetings of the Project Steering Committee (PSC);

3.5.3 Profile and tasks of the short-term experts

In addition to the RTA, the Member State Partner (MSP) must have quick and flexible access to a pool of short-term experts from the EU MS. These experts will work as advisors and trainers; produce specific studies or analyses within the scope of the twinning project, which shall be specifically defined in the Twinning contract to this project. Experts engaged in the project will have previous experience in the capacity building programs, and will have thorough understanding of the issues pertinent to the overall anti-corruption policy in Montenegro, including legal and institutional set up. Moreover, experts will have extensive knowledge of the applicable international conventions in this regard. Knowledge of one of the languages from the region will be an asset.

Qualifications and skills

- University degree or equivalent work experience in the area of rule of law.
- Knowledge and understanding of anti-corruption policies and reform and of European standards and good practice in the sub-areas covered by the project.
- Good analytical, appraisal and planning skills.
- Computer literacy (MS Office applications, Excel, e-mail, internet).

Professional Experience

- At least 10 years experience in area relevant to the assignment.
- Very good organisational, coordination, reporting and communication skills;
- Ability to produce analyses and recommendations for enhancing institutional and legal framework in Montenegro

Language skills

- Excellent command of English, both spoken and written

- Knowledge of local language will be considered as an asset

4. Institutional Framework

Direct beneficiary of this project will be Agency for the Prevention of Corruption, and other concerned ministries and legal entities in Montenegro.

The MS RTA and experts will be based at the premises of the APC which will provide the necessary logistical support such as office space and desktop computers with internet connection for experts, venue for holding seminars and workshops, and to ensure the necessary local staff/experts inputs.

Project Steering Committee

A Project Steering Committee (PSC) will be established for the supervision and coordination of project activities and for ensuring that an effective coordination takes place between the different components of the project. PSC will meet quarterly, and ad hoc as required, and will be chaired by the APC. The Steering Committee members shall include APC, the EU MS Twinning Partner, the Ministry of Justice and the EU Delegation. PSC composition will be detailed during the drafting of the work plan.

5. Budget

The indicative budget of the project will amount € 600.000.

6. Implementation Arrangements

- 6.1 Implementing Agency responsible for tendering, contracting and accounting (AO/CFCU/PAO/Commission), *including contact person and full contact details.*

Delegation of the European Union in Montenegro

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- 6.2 Main counterpart in the BC, *including contact person and contact details. Also include RTA counterpart and the BC Project leader*

Project leader counterpart:

Mr Sreten Radonjić

Director of the Agency for Prevention of Corruption
Kralja Nikole 51/V, 81000 Podgorica, Montenegro

RTA counterpart:

Ms Aleksandra Vojinović
Senior Advisor in the Agency for Prevention of Corruption
Kralja Nikole 51/V, 81000 Podgorica, Montenegro

6.3 Contracts

7. Implementation Schedule (indicative)

7.1 Launching of the call for proposals: Q1 2016

7.2 Start of project activities (Date): Q3 2016

7.3 Project completion (Date): Q1 2018

7.4 Duration of the execution period (number of months): 18 months

8. Sustainability

Sustainability is ensured through the adoption of legal framework and establishment of the institutional capacity on national and local level and organizational mechanisms for the implementation of the reforms. One of main results of the present project is the transfer of the project results to all the main stakeholders involved in this area. This project strongly relies on development of sound regulatory framework, outlines efforts to implement it, and relies on strengthening capacities of Montenegrin authorities and ordinary citizens to be able to add to the long-term efforts of Montenegrin sustainable development of the society. Coordinated action in this project will contribute to fulfilment of the part of the criteria for successful closure of the Chapter 23 and accession of the Montenegro to the EU.

9. Crosscutting issues (*equal opportunity, environment, etc...*)

9.1 Equal Opportunity

Equal opportunities for men and women will be guaranteed as an integral part of the implementation of this project. Training will be equally available to men and women working for the entities covered by the scope of the laws. The project will ensure an equal gender representation related to the necessary competencies and abilities in developing the actions programmed within the project. A fair selection of all participants in all project fields will be ensured.

9.2 Environment

This project is harmonised with national environmental regulations and standards. It will not have any negative impact on the environment nor jeopardise environment, health and security in the future.

9.3 Minorities

Minorities as the employees in the public administration and as a part of the community will benefit from this project in the same way as the others defined as the project target groups. All personnel selection activities are to be developed under the European non-discriminatory principles.

10. Conditionality and sequencing

ANNEXES TO PROJECT FICHE

1. Logical framework matrix in standard format (compulsory)
2. Detailed implementation chart (optional)
3. Contracting and disbursement schedule by quarter for full duration of programme (including disbursement period) (optional)
4. Reference to feasibility /pre-feasibility studies. For all investment projects, the executive summary of the economic and financial appraisals, and the environmental impact assessment should be attached (optional)
5. List of relevant Laws and Regulations (optional)
6. Reference to relevant Government Strategic plans and studies (may include Institution Development Plan, Business plans, Sector studies etc) (optional)

ANNEX 1: Logical framework matrix in standard format

LOGFRAME PLANNING MATRIX FOR Project Fiche		Programme name and number	
		Support the implementation of integrity measures	
		Contracting period expires: two years from the signing the Financing Agreement	Disbursement period expires one year after the final date for execution of the contract
		Total budget : 600.000 euro	IPA budget: 600,000 Euro
Overall objective	Objectively verifiable indicators	Sources of Verification	
To support Montenegro to prevent and counter corruption in line with EU best practices	<p>GRECO recommendations within IV Evaluation Round fully implemented</p> <p>Higher level of public confidence in the work of the public administration at central level, measured by an annual public opinion poll</p> <p>Recognized progress as regards to the performance of the public administration bodies within the EC</p>	<p>European Commission Progress reports for 2016 and 2017</p> <p>SAA JHA Subcommittee meeting 2017</p> <p>Single semi-annual reports to the EU on implementation of the measures from the AP 23 and related track record tables;</p>	

	<p>monitoring mechanism.</p> <p>Better ranking of Montenegro in corruption perception index of TI for 2017.</p> <p>Evolution of track records in the area of prevention of corruption.</p>	<p>Peer review missions reports;</p> <p>CPI Transparency International report;</p> <p>Annual reports of the Agency for Prevention of Corruption</p> <p>Transparency International Reports</p> <p>Public opinion poll, commissioned by a national body (Agency for Prevention of Corruption)</p> <p>GRECO Compliance Report (IV Evaluation Round)</p>	
<p>Project purpose</p> <p>The purpose of the project is to support the implementation of integrity measures in all concerned institutions and to support the ACP as far as the integrity measure coordination; monitoring, reporting functions are concerned.</p>	<p>Objectively verifiable indicators</p> <p>Adoption and proper implementation of the integrity plans by 70% of public sector authorities and 50% of local self-governments, public companies and other legal entities by the end of the project lifetime.</p> <p>At least 70% public officials regularly fulfilled and submitted reports of incomes and property</p> <p>Increase of ex officio and other decisions</p>	<p>Sources of Verification</p> <p>Reports on the Action plan Chapter 23</p> <p>Integrity and Capacity Assessment of Public Administration</p> <p>Statistical information and Annual reports of the Agency for Prevention of Corruption</p> <p>APC report on the state of implementation of the integrity plans;</p>	<p>Assumptions</p> <p>Anti-corruption continue to be a priority for the Government of Montenegro</p> <p>Efficient detection, prosecution and sanctioning of criminal</p>

	<p>that resulted from a follow up on the basis of signals received from the outside decisions of the Agency or for breaching the Law on Prevention of the Corruption, in all areas included in the mandate of the agency</p> <p>Increase of 20% of reported offences of corruption, which involve a public and private sector employee in comparison to the previous year, reported by a whistle-blower;</p> <p>Increase in number of decisions of the Agency for Prevention of Corruption in all areas included in the laws that are defining the competencies of the Agency.</p> <p>Increase in number of Initiations of misdemeanor proceedings by the Agency for Prevention of Corruption</p>		<p>offences of corruption</p> <p>Acting upon the proposals of the Agency for Prevention of Corruption for dismissal of public officials by body that appointed him/her</p>
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Mandatory Results	Objectively verifiable indicators	Sources of Verification	Assumptions
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<p>Component 1) Integrity managers from public sector entities trained on integrity plans and their effective implementation</p>	<p><u>Result 1:</u></p> <ul style="list-style-type: none"> • Integrity managers from 70% of public administration bodies according to the Law on State Administration and 50% of local self-governments, public companies and other legal entities attended at least one training on development and enforcement of integrity measures, including other obligations arising from the Law on Prevention of Corruption; • Integrity plans successfully developed and submitted annual report on implementation in 70% public administration bodies according to the Law on State Administration and 50% of local self-governments, public companies and other legal entities. ; • Integrity plans successfully developed and implemented in five pilot institutions with at least 80% of successfully implemented measures, according to the report on implementation. 	<p>Reports of the each state authority responsible for the implementation of the integrity plans on their implementation</p> <p>APC report on the state of implementation of the integrity plans;</p> <p>Reports on implementation of the Action Plan for Chapter 23</p> <p>Reports from International Organisations (Transparency International, OECD, Council of Europe, UNODC), and from EU Institutions confirm that the perception of corruption is reduced</p> <p>Reports of RTA and STEs</p> <p>Annual report of the Agency for Prevention of Corruption</p> <p>Quarterly reports of the Twinning project</p> <p>Monitoring reports</p>	<p>Anti-corruption continue to be a priority for the Government of Montenegro</p> <p>Montenegro provides the necessary human, material and financial resources.</p> <p>Good interagency coordination</p> <p>Good coordination with the twinning partner</p>
<p>Component 2) Enhanced institutional and administrative capacities of the Agency for Prevention</p>	<p><u>Result 2:</u></p>		

<p>of Corruption to ensure effective implementation of whistle-blower <i>protection</i> provisions.</p>	<ul style="list-style-type: none"> •100 % of relevant APC staff trained to implement whistle-blower protection provisions, in line with best European practices and standards; •Number of reports on threats to the public interest that indicate the existence of corruption increased by 10 % in comparison to the baseline for 2016; •Number of citizens that are informed how and where to report threats to the public interest that indicate the existence of corruption increased by at least 10% in comparison to the baseline for 2016. •Increased number of issued opinions stating threatening of the public interest in relation to the number of received reports •Increase of the number of opinions where reports on threatening of the public interest assessed as well-grounded. •Number of cases where on the basis of signals from whistle-blowers who 		
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<p>Component 3) Enhanced institutional and administrative capacities of the Agency for Prevention of Corruption to coordinate and control the implementation of lobbying provisions;</p> <p>Component 4) Performance of the APC is assessed and improved, based on the recommendations from the gap-needs assessments</p>	<p>addressed the Agency, criminal investigations have started.</p> <ul style="list-style-type: none"> •Gap – needs analysis on the implementation of provisions of the Law for Prevention of Corruption produced, in terms of procedures for receiving complaints and protection of whistle-blowers, with recommendations for improvement; <p><u>Result 3:</u></p> <ul style="list-style-type: none"> •100 % of relevant APC staff trained to implement provisions on lobbying, in line with best European practices and standards; •Number of breaches of Law on Lobbying and follow up given/sanctions. <p><u>Result 4:</u></p> <ul style="list-style-type: none"> •At least 70 % of recommendations from gap needs analysis on the implementation of the anti-corruption provisions implemented; •At least 70 % of recommendations from gap needs analysis on improving working conditions of the APC 		
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	implemented;		
<p>Activities</p> <p>Member State(s) may propose activities in line with the methodology elaborated in its proposal.</p> <p><i>Result 1</i></p> <p>1.1 Carry out a problem analysis of adopted integrity plans with recommendations for their improvement.</p> <p>1.2. Improve integrity plans of five pilot institutions particularly vulnerable to corruption that will serve as example for other institutions to further upgrade their respective integrity plans.</p> <p>1.3. Organize at least six trainings on development and enforcement of integrity measures in local self-governments, public companies and other legal entities and two trainings for public administration bodies institutions to be grouped together on the basis of their profile/similar corruption risks);</p> <p>1.4 Organize two workshops on exchange of experiences and practices with agencies from the region in this area;</p> <p><i>Result 2</i></p>	<p>Means</p> <p>Twinning contract</p>	<p>Costs</p> <p>600,000 EUR</p>	

<p>2.1 Coaching the APC staff on procedures for receiving and following up complaints and protection of whistle-blowers, including concerned ministries., once a month, 7 days in a month, during project's lifetime;</p> <p>2.2 Organize at least one study visit for relevant APC employees on procedures for receiving and following up complaints and protection of whistle-blowers to get acquainted with best European practices in this area;</p> <p>2.3 Support to producing and distribution of brochure with practical information on procedures for reporting threats to the public interest that indicate the existence of corruption, including information on protection of persons who report it.</p> <p>2.4 Organize three roundtables on reporting corruption by employees for public entities, interested publicity and citizens (in the northern, central and southern part of Montenegro).</p> <p>2.5 Produce gap – needs analysis on the implementation of provisions of the Law for Prevention of Corruption, in terms of procedures for receiving and following up complaints and protection of whistle-blowers, with recommendations for improvement</p> <p><i>Result 3</i></p> <p>3.1 Coaching the APC staff on proper implementation of lobbying-related provision.,</p> <p>3.2 Organize at least 1 study visits for relevant APC employees on lobbying to get acquainted with best European practices in this area;</p>			
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<p>3.3 Support to producing and distribution of brochure with practical information on procedures for carrying out lobbying activities. The awareness raising on the new legislative framework (points 3.3. and 3.4) will target both lobbyists and public officials.</p> <p><i>Result 4</i></p> <p>4.1 Develop gap - needs analysis on the functional review and internal workflow procedures of the APC with recommendations for its improvement;</p> <p>4.2 Develop gap - needs analysis on implementation of the Law on Prevention of Corruption with recommendations for its improvement in the area of conflict of interest and financing of political subjects and electoral campaigns.</p>			
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