



REGIONAL ANTI-CORRUPTION INITIATIVE

**EVALUATION REPORT
on Work Plan implementation
for 2014 - 2015**

Regional Anti-corruption Initiative



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List of Acronyms

ADA	Austrian Development Agency
CEI	Central European Initiative
CSO	Civil Society Organization
EU	European Union
ICJ	International Court of Justice
MLA	Mutual Legal Assistance
MoU	Memorandum of Understanding
NGO	Non Governmental Organization
OECD	Organization for Economic Co-operation and Development
OSCE	Organization for Security and Co-operation in Europe
RACVIAC	Regional Arms Control Verification and Implementation Assistance Centre
RAI	Regional Anti-Corruption Initiative
RCC	Regional Cooperation Council
SEE	South Eastern Europe
SEECF	South East Europe Cooperation Process
SELDI	Southeast European Leadership for Development and Integrity
SOE	State-Owned Enterprise
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
UNSC	United Nations Security Council



I. Overview

Since its establishment, the Regional Anti-corruption Initiative (RAI) acts as a regional platform through which governments of the region combine their efforts to help curb corruption in South Eastern Europe (SEE). It intends to give an impetus to the fight against corruption in South Eastern Europe by building upon existing actions through better co-ordination of all efforts and by relying on high-level political commitment.

This report is the result of the RAI Work Plan 2014 – 2015 evaluation process. The purpose of this report is to inform involved actors on progress made, and also to analyze data on activities implementation so as to assess the strengths and weaknesses of the organization, which should be taken into account for the next planning cycle. Its findings shall serve for outlining the RAI priorities during the next two years (2016 – 2017), which will be included in the next Work Plan.

During the past two years, RAI has aimed its efforts and activities at the priorities as set down in the RAI Work Plan for 2014 – 2015¹. The Work Plan was developed in accordance with the Memorandum of Understanding concerning Cooperation in Fighting against Corruption through the South Eastern European Anti-corruption Initiative (MoU)² and duly approved as prescribed by the RAI Strategic Document³.

The Work Plan for 2014 – 2015 sought to converge and integrate strategic needs identified by the high level forum Regional Anti-corruption Cooperation in South-Eastern Europe: The Way Ahead (held on July 11, 2013 in Zagreb), by the Regional Anti-corruption Conference to commemorate the 10th anniversary of the adoption and opening for signature of the UN Convention against Corruption (held in Sarajevo, December 2013), as well as by conducting a research on anti-corruption state of affairs in member countries and maintaining consultations with relevant national stakeholders. The document was adopted by the Steering Group at its 18th Meeting in Munich on February 14, 2014⁴.

The adopted Work Plan for 2014 – 2015 foresees two groups of targets: South East Europe 2020 Strategy's Anti-corruption Targets and RAI Specific Targets. The delimitation of the targets was determined by the need of an efficient coordination of the overall activities. The targets set in SEE 2020 Strategy are by its nature cross-cutting and also involve more stakeholders, whereas RAI

¹http://rai-see.org/wp-content/uploads/2015/05/RAI_Work_Plan_2014-2015.pdf

²http://rai-see.org/wp-content/uploads/2015/05/MEMORANDUM_OF_UNDERSTANDING-UPDATED.pdf

³http://rai-see.org/wp-content/uploads/2015/05/Strategic_document_and_Annex_1_Updated_February_2014.pdf

⁴http://rai-see.org/wp-content/uploads/2015/07/Conclusions_and_decisions_of_18th_RAI_SG_Meeting-February_14_2014-Munich_Germany.pdf



specific targets are more tangible. The decision to group the targets was also impelled by the difference in execution bodies, financial sources for activities' implementation, timeframes, risks as well as monitoring mechanisms for measures implementation.

The South East Europe 2020 Strategy's Anti-corruption Targets are important to RAI and form a comprising part of the Work Plan for 2014 – 2015 as RAI took the responsibility of the Dimension Coordinator for Anti-corruption in South East Europe 2020 Strategy⁵ (SEE 2020 Strategy). Simultaneously, RAI identified additional issues that need to be addressed regionally therefore, RAI decided to formulate and address three more targets, defined as RAI Specific Targets.

II. RAI's Targets: Measuring Progress

South East Europe 2020 Strategy's Anti-corruption Targets

The action proposed under Governance for Growth Pillar of the SEE 2020 Strategy should assist national governments improve the capacity of public administration in the region to deliver governmental services more efficiently; increase transparency and public awareness of the rules governing access to services, and increase capacity and cooperation across the judicial system in the region⁶.

The overall achievements in SEE 2020 Strategy implementation, as well as the challenges facing the region across the different policy dimensions, including Good Governance and Anti-corruption, as they strive to reach the Strategy's headline targets, are outlined in the Southeast Europe 2020 Baseline Report⁷, produced by the Regional Cooperation Council with the inputs from all Dimension Coordinators, including RAI.

The SEE 2020 Strategy anti-corruption key instruments are:

1. **transparent rules:** move away from discretion to rule-based political and administrative decision making by conducting risk assessment, by adopting public, simple and enduring rules;
2. **competitive procedures:** make as mandatory as possible for all government procurement to be competitive with as few barriers to participation as possible (given the nature of the tender) by unifying standards;
3. **revision and control:** introduce regular audits by independent agencies and require ex-ante and ex-post evaluations;

⁵<http://rcc.int/files/user/docs/reports/SEE2020-Strategy.pdf>

⁶Southeast Europe 2020 Baseline Report, RCC, 2014, p.15

⁷<http://www.rcc.int/files/user/docs/reports/SEE2020-Baseline-Report.pdf>



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4. **public awareness:** researches, whistleblowers, media and other agencies should be actively supported and their findings considered and given ample publicity;
5. **building capacity of law enforcement (anti-corruption) agencies and judiciary** and improve their regional cooperation and data exchange (including mutual legal assistance in corruption cases).

As stated above, these key instruments were converted into actionable items in the RAI Work Plan for 2014 – 2015. As the Work Plan comprised only two years from the Strategy's implementation period, most of the activities were oriented towards establishing the base for further actions. The continuation of measures implementation to achieve the targets shall be reflected in the forthcoming RAI Work Plans upon an evaluation of the conducted activities' results.

The Work Plan foresaw some of the risks at regional level that could have occurred and slow down the Strategy's implementation and targets' achievement. Firstly, it is about the limited timeframe provided by the SEE 2020 Strategy; secondly – the delay and/or insufficiency of the resources allocated for Strategy implementation at regional level. Both of the stipulated risks turned to be realistic. For instance the target *O.2 Competitive procedures* had to be achieved by 2015. Making mandatory for all government's procurement to be competitive with a few barriers to participation by unifying standards, within the proposed timeframe, turned to be too ambitious.

RAI Secretariat established early on that the key challenge with the implementation of set targets will be the lack of funding or very limited funding available. Therefore, the Secretariat timely started with mitigation measures to deflect the impact of the risk as much as possible. Secretariat team was strengthened with the new position of Program and Outreach Officer whose job is devoted to pursuing avenues for implementation of RAI projects. In the reporting period several steps were made towards improving the position of Secretariat in relation to the donor community and towards other stakeholders. There are four different pillars that were pursued in this respect.

1) Secretariat has improved its internal processes in articulating and devising activities. This will be a continuous process in the future period as well. With the new programming capacity in the Secretariat, the team has improved on devising projects and project cycle. Team introduced new methods of planning projects such as process mapping, logical frameworks etc.

2) Secretariat diversified its outreach by communicating to number of new potential donors with sound program and project proposals.

Since March 2015, the Secretariat has been building a relationship with Austrian Development Agency (ADA). Together with another international organization, Secretariat is currently negotiating a Program that was originally adopted by the Steering Group members.



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In May 2015, Secretariat presented the Regional Program – Building Capacities of Anti-Corruption Entities in South East Europe and Strengthening their Cooperation – to the RAI Steering Group. Also in May, Secretariat applied to Central European Initiative CEI with the project proposal titled: Central European Initiative CEI: Summer School for Junior Anti-Corruption Professionals from South East Europe – Moldova 2016.

In June 2015 SELDI applied to Central European Initiative (CEI) with project “Good Governance and Anti-Corruption Civil Society Initiative: Capacity Building for Monitoring SOE Governance in the Energy Sector”. RAI Secretariat is an Associated Partner in the Project.

In July 2015 Instituti Riinvest Kosovo and SELDI Network applied with the European Commission with the Project proposal titled: Establishing a Public-Private Platform for Rule of Law Dialogue in Southeast Europe (EuropeAid/150147/DH/ACT/PRAREG). RAI Secretariat is an Associated Partner in the Project.

Also in July Secretariat applied to open call by the Regional Cooperation Council (RCC) titled Support of the promotion and enhancement of the SEE 2020 Strategy with the project: Establishing Coalition of Whistleblower Advocates in South East Europe.

3) Secretariat invested itself in establishing new partnerships and strengthening existing ones with relevant organizations. RAI has actively pursued peer organizations in the region and partnered with them to organize events, conferences, projects etc. There are several key organizations that the partnership progressed the furthest – SELDI, Blueprint for Free Speech and UNODC. Besides, the Secretariat concluded two Memorandums of Understanding: with RACVIAC Center for Security Cooperation and with UNDP Kosovo, which strengthen the regional partnership of the organisation and led to joint activities on the ground. Along the same lines, the Steering Group welcomed an observer to RAI – the Central Anti-corruption Bureau of Poland, which is a more strategic relation for the organization.

4) Secretariat focused on increasing its visibility. Increase in visibility is seen as an important element in positioning RAI as a mature stakeholder in the region. In this regard, Secretariat engaged in organizing and co-organizing number of regional and international events with different organizations such as UNDP, OECD, RCC etc. where RAI had a key role in implementation, bringing the organisation more in the spot light of peers and other stakeholders.

The efforts conducted by the Secretariat listed above are not related to the SEE 2020 Strategy only, but for implementation of RAI Specific Targets too.

RAI Secretariat carried out activities under SEE 2020 Strategy using financial contributions provided by the member States. The Regional Cooperation Council has also supported certain activities



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undertaken for Strategy's implementation that will be described below. It is to be mentioned that RAI involved all its member States as well as Kosovo* when carrying out measures towards SEE 2020 Strategy implementation, although the Strategy was designed for Western Balkans countries only.

As stipulated in Article 2 of MoU Concerning Cooperation in Fighting Corruption through the SEE Anti-Corruption Initiative, in addition to the annual contributions by member countries, RAI shall seek donor support for specific programmatic activities within its program. In 2014-2015, RAI Secretariat has strengthened its cooperation with other partnering organizations and therefore has managed to have a large portion of costs for programmatic activities being financed by those organizations.

In addition to own funds originating from the annual contributions by member countries, RAI Secretariat has implemented a number of activities and projects in 2014-2015 through cooperation with other donor and partner organizations whose total financial value is approximately €360,000. Added to funds utilized from RAI's budget, a sum of approximately €535,000 has been utilized for implementation of programmatic activities in the 2014-2015 period.

A comprehensive description of the measures undertaken at regional level to achieve SEE 2020 Strategy targets will follow.

1. Transparent Rules

In accordance with the Work Plan for 2014-2015, in order to assist countries to move away from discretion to rule-based political and administrative decision making, RAI Secretariat focused its efforts towards promoting two corruption preventive measures: anti-corruption assessment of laws (corruption proofing) and corruption risk assessment in public administration.

Studies on current experience of the states in the region, conclusions and recommendations endorsed at regional events, developed and translated methodologies, as well as trainings delivered on these matters represent indicators of achievement for implemented activities under the Transparent Rules objective.

With the support of the Regional Cooperation Council, two consultants were hired in order to review the current situation and experience existing in RAI member states and Kosovo*. As a result, two regional researches were produced in close cooperation with relevant national institutions. The studies revealed existing good practice in the region, which could be explored and shared with

* This designation is without prejudice to positions on status, and is in line with UNSC 1244 and the ICJ Opinion on the Kosovo Declaration of Independence



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the interested countries. Relevant best practices in the field of corruption proofing and corruption risk assessment were identified in the EU countries, creating a potential for collaboration in the future should RAI decide to assist countries in undertaking anti-corruption assessment of laws and corruption risk assessment in public institutions.

Furthermore, based on the researches, regional methodologies for conducting corruption proofing and corruption risk assessment were developed. First drafts of the documents were presented and amply discussed at two Regional Workshops organized by RAI and RCC in cooperation with the Montenegrin Directorate for Anti-corruption Initiative in Becici, on September 9-10, 2014⁸. Inputs and feedback from the Workshops served for further improvements of the Regional Methodologies.

The Regional Methodology on Anti-corruption Assessment of Laws⁹ was endorsed by a forum of government officials, anti-corruption experts and representatives of civil society at the Regional Conference *Preventing Corruption by Assessing its Risks*, organized by RAI, RCC and the Ministry of State on Local Issues of Albania under Albanian Chairmanship-in-office in SEECF (Tirana Conference, 14 November 2014)¹⁰. The Conference also resulted in a series of recommendations¹¹ to the RAI member States with the aim of making corruption prevention more efficient by conducting corruption proofing in accordance with the RAI/RCC Methodology.

In this context, RAI/RCC Methodology on Anti-corruption Assessment of Laws became the first international instrument to assist in conducting corruption proofing of legislation. Moreover, the Tirana Conference adopted the 10 Principles of Effective Corruption Proofing¹². The Principles were formulated based on the developed Methodology with the aim of reducing discretion in political and administrative decision making process.

At the same event, participants discussed the draft Regional Methodology on Corruption Risk Assessment in Public Institutions and provided inputs for its further improvement. It was finally endorsed by practitioners coming from the region at the Regional Conference *Corruption Risk*

⁸http://rai-see.org/events_tip/becici_2014_workshops/

⁹http://rai-see.org/wp-content/uploads/2015/06/Comparative_Study-Methodology_on_Anti-corruption_Assessment_of_Laws.pdf

¹⁰http://rai-see.org/events_tip/regional-conference-on-good-governance-and-anti-corruption-policy-challenges-november-13-14-2014-tirana-albania/

¹¹http://rai-see.org/wp-content/uploads/2015/07/Recommendations_of_the_Regional_Conference_Preventing_Corruption_by_Assessing_Its_Risks.pdf

¹²http://rai-see.org/wp-content/uploads/2015/05/10_Principles_on_Effective_Corruption_Proofing.pdf



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Assessment, Public Procurement and Open Contracting in South East Europe, organized by RAI, RCC and UNDP in Istanbul on May 26-27, 2015¹³.

At this point, RAI member States have an instrument and a guide to conduct corruption risk assessment in their public sectors in order to reduce discretion and make public services more transparent and accessible. For the same purpose, the Conference in Istanbul adopted The 10 Principles on Effective Corruption Risk Assessment in Public Administration¹⁴.

RAI recognized that the actions and outcomes delivered need to be strengthened further especially at the national level. To that end, Secretariat underwent an outreaching campaign towards potential donors and partners. Different regional donors and potential partners were contacted with the project proposal outlining the work that need to be implemented in the forthcoming period to ensure transparent rules are introduced and used at the national level. During the reporting period both a donor and a partner were identified. Secretariat is currently in negotiations stage for the three-year project with UNODC as a partner and ADA as a donor.

That being said, it is concluded that the goal set up by the Transparent Rules objective was achieved. In order to proceed with next tangible results on the ground at national level, further action is required. Developed Methodologies will be translated by the end of 2015 and technical assistance to countries interested in having in place these preventive measures has to be delivered by RAI.

2. Competitive Procedures

The Strategy's objective related to Competitive Procedures was to acquaint current practices on public procurement procedures in all member countries, identifying weak points and best practices, as well as assessment of the possibility of introducing unified practices for public procurement in the region. Indicators of achievement foreseen by the Work Plan included a comparative study on public procurement, as well as conclusions of a regional event on cooperation in the area of public procurement.

As RAI had less expertise in this area, the Work Plan for 2014-2015 also envisaged identification of potential partners with a prominent expertise in the field of public procurement. First exchanges of views in this regard were conducted with the Southeast European Leadership for Development and Integrity (SELDI) since SELDI has extensive experience and expertise in public procurement field.

¹³http://rai-see.org/events_tip/corruption-risk-assessment-public-procurement-and-open-contracting-in-south-eastern-europe-regional-conference-may-26-27-2015-istanbul-turkey/

¹⁴http://rai-see.org/wp-content/uploads/2015/07/10_Principles_Effective_CRA_in_Public_Administration_final.pdf



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RAI Secretariat developed a draft Project Concept in consultations with SELDI Coordinator, which was presented to the Steering Group at its 19th Meeting in Skopje.

In attempt to reach other stakeholders and potential partners RAI engaged in another efficient collaboration with the UNDP (Regional Hub in Istanbul). This partnership led to the organization of the Regional Conference on Corruption Risk Assessment, Public Procurement and Open Contracting¹⁵. The participants of the event, state representatives as well as NGOs, national UNDP representatives, Council of Europe, UNODC and Transparency International, tried to identify best practices and measures on public procurement addressing specific issues related to the competitiveness of public procurement in individual countries.

In addition, this event served to the Secretariat as an opportunity to identify potential regional partners as well as current regional issues. It also served as an opportunity to discuss the further cooperation between RAI and UNDP, cooperation that should have in focus specific needs of countries in Southeast Europe on public procurement.

As elaborated above, during the reporting period, Secretariat was invested in building the relationships and laying the ground for the future activities. Secretariat is and will actively build partnerships in this field and will ensure that expertise is made available for the identified projects.

In evaluation of the achievements against this objective, it is concluded that the objective was achieved to a greater extend and further inputs will have to take place in the next reporting period to capitalize the efforts from current reporting period.

3. Revision and Control

The SEE 2020 Strategy, in its 3rd anti-corruption key instrument, aims at introducing regular audits by independent agencies and requiring ex-ante and ex-post evaluations. RAI intended to ascertain current practices in all member States on revision and control procedures, identifying weak and strong points in existing practices. Based on the conducted research, the short term targets for accomplishing the main objective should be established.

RAI Secretariat conducted a thematic study on Links between Anti-corruption and Revision and Control¹⁶. The Study further elaborates on the different models of Supreme Audit Institutions and what the different advantages and disadvantages of those models are. Revision and control show to be very essential anti-corruption mechanisms.

¹⁵http://rai-see.org/events_tip/corruption-risk-assessment-public-procurement-and-open-contracting-in-south-eastern-europe-regional-conference-may-26-27-2015-istanbul-turkey/

¹⁶<http://rai-see.org/wp-content/uploads/2015/05/Thematic-Study-Links-between-Anti-Corruption-and-REVISION-AND-CONTROL.pdf>



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The introduction of regular audits by independent agencies and requiring ex-ante and ex-post evaluations can be an important component of preventing and detecting corruption and fraud. But the study showed that it is more complex than that. Different conditions on different levels need to be established so as the control mechanisms like audits function as anti-corruption measures. The study suggests a series of recommendations in regards of Supreme Audit Institutions, parliaments, audit reports, cooperation of anti-corruption bodies and other institutions, as well as ethical principles. These recommendations form a basis to be taken into account when planning the next short- and middle-term targets in regard of Revision and Control.

Secretariat recognizes that interventions in revision and control national mechanisms are complex in terms of multiple institutions and functions that need to be addressed. This is why the approach to development of interventions must be carefully planned and developed. Therefore, Secretariat will continue a consultation process with the member countries on identification of best approaches. Further on, Secretariat will continue to actively build partnerships in this field and will ensure that expertise is made available for the identified activities.

In evaluation of the achievements against this objective it is concluded that the objective was partly achieved and further inputs will have to take place in the next reporting period to capitalize on the work conducted so far.

4. Public Awareness

The SEE 2020 Strategy prescribed that the researchers, whistleblowers, media and other agencies should be actively supported and their findings considered and given ample publicity. For that reason, RAI had to promote public – private partnership in raising awareness on corruption and anti-corruption. RAI Secretariat has made significant progress in the field of Public Awareness. Recognizing the importance of awareness, this particular target is and will continue to be Secretariat's leading cross cutting subject.

In this respect, RAI Secretariat ensured that events organized in the last two years had a sound representation of non-governmental sector in order to enhance and foster cooperation between public sector and civil society, specifically during the following events:

- Regional Conference on Good Governance and Anti-corruption Policy Challenges, Tirana, Albania, November 13 – 14, 2014;
- Regional Conference on Trends and Challenges in Implementing Anti-corruption Strategies, Skopje, Macedonia, November 25, 2014;



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- International Meeting on Effectiveness of Corruption Prevention Measures, Zagreb, Croatia, May 18 – 19, 2015;
- Regional Conference on Corruption Risk Assessment, Public Procurement, and Open Contracting, Istanbul, Turkey, May 26 – 27, 2015;
- International Whistleblowing Research Network Conference, Sarajevo, Bosnia and Herzegovina, June 18 – 19, 2015.

In addition to above listed events, RAI was represented in 8 different international and regional events where Secretariat team members took part as presenters, facilitators or attendees.

Further to achieving the target, RAI Secretariat engaged in constructive dialogue and partnership building with relevant stakeholders. The partnership established with the Southeast European Leadership for Development and Integrity (SELDI) proved to be very productive in terms of established goals. SELDI is an anti-corruption and good governance coalition created in November 2012 by 17 likeminded CSOs in Southeast Europe, involving partners from nine countries (Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Kosovo, Republic of Macedonia, Montenegro, Serbia and Turkey). The Network is operating on the basis of joint strategy and agreed action agenda. The objective of SELDI is to contribute to a dynamic civil society in the region, capable of participating in public debate and influencing policy and decision-making process in the area of anti-corruption and good governance.

RAI Secretariat participated as an associated partner in SELDI network and has supported the network and its events throughout the period of 2014 – 2015. It has actively participated at all SELDI's Steering Committee meetings and events, providing consulting and substance support when needed. At the same time, RAI delivered presentations on SELDI's events promoting the organizations' values, goals and network. Moreover, RAI Secretariat actively involved SELDI's Secretariat in its own events, receiving support especially in its endeavors to enhance cooperation between public sector and civil society in monitoring the implementation of anti-corruption policies (see, for instance, information related to Regional Conference on Trends and Challenges in Implementing Anti-corruption Strategies¹⁷ and the activity on Monitoring the Implementation of Anti-corruption Strategies¹⁸).

A product of such cooperation was the Regional Conference on Good Governance and Anti-corruption Policy Challenges¹⁹, organized jointly by RAI, RCC, Albanian Ministry of State on Local

¹⁷http://rai-see.org/events_tip/regional-conference-on-trends-and-challenges-in-implementing-anti-corruption-strategies-november-25-2014-skopje-republic-of-macedonia/

¹⁸<http://rai-see.org/monitoring-of-ac-strategies/#>

¹⁹http://rai-see.org/events_tip/regional-conference-on-good-governance-and-anti-corruption-policy-challenges-november-13-14-2014-tirana-albania/



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Issues and SELDI. The two-day forum, aimed at fostering civil society – state dialogue in identifying effective measures to prevent corruption, reflected one of the main priorities of regional cooperation in SEE - joining efforts and actions against corruption, in a wider and transnational contest. It brought together relevant anti-corruption experts, governmental officials and civil society organizations from the region.

Particular focus was given to improving the awareness of the issues surrounding the whistleblowers. RAI Secretariat together with NGO Blueprint for Free Speech prepared the first baseline on whistleblowers legislation and practice in the member countries titled Whistleblower protection in South East Europe: an overview of laws, practice and recent initiatives²⁰. The base line report was presented at the International Whistleblowing Research Network Conference, co-organized by the International Whistleblowing Research Network, Middlesex University UK, Regional Anti-Corruption Initiative and Blueprint for Free Speech, took place in June, 2015 in Sarajevo, Bosnia and Herzegovina. This was a unique opportunity where internationally renowned researches, scholars and practitioners met with government representatives and civil sector to debate whistleblowing agenda.

RAI Secretariat, together with Blueprint for Free Speech, has also launched discussions on founding the Southeast Whistleblower Anti-corruption Coalition, a network of civil society organizations which would work on strengthening legal rights and protections for whistleblowers, monitoring the implementation of whistleblower laws and practices, providing resources to policy-makers, NGOs, researchers and whistleblowers, as well as on raising awareness on the role of whistleblowing in exposing and combating corruption. RAI Secretariat is committed to supporting the process of establishing the Coalition of whistleblowers advocates in the SEE recognizing that fragmented efforts on improving the legal and social status of whistleblowers needs to be streamlined and expertise needs to be exchanged at the regional level. To this end Secretariat has applied to Regional Cooperation Council with a project proposal to kick start the process of establishing the coalition by bringing all the organizations to one place to define the founding documents and identify the next steps.

5. Building Capacity of Anti-corruption Agencies and Judiciary

Entire RAI Work Plan for 2014 – 2015 is dedicated to building capacities of anti-corruption agencies in the region. Afore mentioned activities assigned to different individual targets all contribute the capacity growth of the respective stakeholders. There were eight events organized by RAI in partnership with other organizations which aimed at, *inter alia*, building capacities of anti-corruption agencies:

²⁰http://rai-see.org/wp-content/uploads/2015/07/Whistleblower_Protection_in_SEE.pdf



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- 9th Summer School for Junior Anti-corruption Practitioners from SEE, organized in Sibiu, Romania, June 01 – 07, 2014;
- Regional Meeting on Anti-corruption Assessment of Laws and Corruption Risk Assessment, Becici, Montenegro, September 9 – 10, 2014;
- Regional Conference on Good Governance and Anti-corruption Policy Challenges, Tirana, Albania, November 13 – 14, 2014;
- Regional Conference on Trends and Challenges in Implementing Anti-corruption Strategies, Skopje, Macedonia, November 25, 2014;
- International Meeting on Effectiveness of Corruption Prevention Measures, Zagreb, Croatia, May 18 – 19, 2015;
- Regional Conference on Corruption Risk Assessment, Public Procurement, and Open Contracting, Istanbul, Turkey, May 26 – 27, 2015;
- 10th Summer School for Junior Anti-corruption Practitioners from SEE, Varna, Bulgaria, June 01 – 05, 2015;
- International Whistleblowing Research Network Conference, Sarajevo, Bosnia and Herzegovina, June 18 – 19, 2015.

In addition to above listed events, RAI was represented in 3 different international and regional events where Secretariat team members took part as presenters, facilitators or attendees.

The events built the capacities of both preventive and law enforcement bodies. They put into focus general topics such as efficiency of preventive measures or implementation of anti-corruption strategies, but also aimed at discussing detailed information on anti-corruption policies, such as conducting risk assessment in public administration, carrying out corruption proofing of legislation or running financial investigations and recovering crime related proceeds. All of the events have an added value of strengthening regional cooperation between anti-corruption professionals and sharing of expertise and experience from the region.

In order to foster mutual cooperation among anti-corruption bodies, but also to provide with an online resource center for anybody interested in anti-corruption institutional framework in SEE, RAI Secretariat mapped all existing organizations in SEE dealing with anti-corruption. The mapping contains information related to preventive and law enforcement agencies, and it provides data on contacts, relevant legislation, competencies and level of independence. The mapping will be constantly updated by the RAI Secretariat with the help of its interns.



RAI Specific Targets

For the reasons elaborated in the Overview chapter of the Report, RAI decided to develop three additional targets that would be more focused and therefore tangible and measurable.

Besides the targets stated above, there were three more targets that RAI focused its activities on:

Target 1: recovery of crime related proceeds,

Target 2: asset disclosure and conflict of interest, and

Target 3: effective monitoring mechanism for implementation of the national anti-corruption strategies and action plans.

In order to strengthen the capacities of Secretariat, a myriad of amendments to Secretariat's internal rules were adopted by the Steering Group at its 18th Meeting in Munich. The amendments were to improve the institutional mechanism and discipline within the Secretariat, as well as the working conditions of the staff. Strict enforcement of existing rules led to an increased efficiency of the Secretariat, acknowledged by the Steering Group at its Meeting in Skopje.

The limited financial resources and RAI Secretariat's capacities were among the risks RAI foreseen in regard of implementation of related activities. In order to mitigate the risks, there were a series of activities undertaken by RAI Secretariat.

First, the position of Fundraising and Outreach Assistant within the Secretariat was upgraded and a competent and skilled incumbent was recruited in the new position. That brought to development of a number of project concepts.

Also, the internship programme was re-launched and in the course of 2014 – 2015 four interns benefitted from it. All of them have significantly contributed to the Secretariat's activities in implementing the Work Plan.

6. Recovery of Crime Related Proceeds

RAI Secretariat continued its successfully established annual project "Summer School for Junior Anti-corruption Practitioners from South East Europe". It is an intensive five-day programme designed for familiarizing participants with contemporary insight in selected areas of corruption theory and anti-corruption practice. By attending and completing the courses of the Summer School, junior practitioners from the South Eastern European countries set the basis for enhanced knowledge on international anti-corruption standards and their implementation in practice.



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Summer School editions for 2014 and 2015 were both dedicated to Financial Investigations and Asset Recovery. In total 41 practitioners coming from anti-corruption law enforcement institutions and judiciary from RAI member countries and Kosovo* were trained. The Summer School helped to create an informal network among junior anti-corruption practitioners able to further consolidate the cooperation at bilateral and regional levels.

The participants were provided with in-depth knowledge and training on topics like national and international instruments for recovering criminal assets, pre-MLA and mutual legal assistance cooperation for the purposes of seizing and confiscating, management of seized assets, use of open sources in financial investigations, international money movements, understanding offshore jurisdictions and investigating offshore money laundering.

7. Asset Disclosure and Conflict of Interest

When dealing with Asset Disclosure and Conflict of Interest, RAI Secretariat had to take into account other efforts and initiatives happening in the region in order to avoid overlapping or duplication. As there was another Network operating on the same issues in the region, RAI Secretariat revisited the decision to organize another meeting of RAI integrity experts network. However, Asset Disclosure and Conflict of Interest was addressed in the Regional Program – Building Capacities of Anti-Corruption Entities in South East Europe and Strengthening their Cooperation, as a standalone component of the Program. In May 2015 Secretariat presented the Program to the RAI Steering Group where it was duly adopted. Following the decision of the Steering Group, Secretariat engaged in outreach activities to ensure partners as well as resources for implementation of set out activities. Outreach activities were fruitful and Secretariat partnered with UNODC on a joint application to Austrian Development Agency. The negotiations are underway with the donor and anticipated start of the activities is January 2016.

8. Effective Monitoring Mechanism for Implementation of the National Anti-corruption Strategies and Action Plans

The Regional Anti-corruption Initiative Secretariat launched its Project at the Regional Conference on Trends and Challenges in Implementing Anti-corruption Strategies²¹, held in Skopje on November 25, 2014. The event was organized to identify the priorities and needs of the South-East European countries in terms of efficient implementation of the Anti-corruption Strategies and

²¹http://rai-see.org/events_tip/regional-conference-on-trends-and-challenges-in-implementing-anti-corruption-strategies-november-25-2014-skopje-republic-of-macedonia/



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Action Plans, with an emphasis on the monitoring mechanism. It brought together relevant experts, representatives of ministries of justice and anti-corruption bodies from Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Kosovo*, Republic of Macedonia, Republic of Moldova, Montenegro, Romania, Serbia and Turkey, in order to identify successful stories and lessons learned for putting in place efficient anti-corruption policy documents. Amongst other recommendations of the forum²², a tool to help counties make their monitoring and evaluation mechanisms more efficient was suggested.

As a result, the Methodology on Monitoring and Evaluation of the Implementation²³ of national Anti-corruption Strategies and Action Plans was developed by RAI. It was presented and endorsed at the International Meeting on Effectiveness of Corruption Prevention Measures²⁴, organized on May 18-19, 2015 by RAI, OECD and RACVIAC and hosted by the Ministry of Justice of Croatia. The forum also adopted the Ten Principles of Effective Monitoring and Evaluation²⁵.

²²http://rai.mostar360.ba/wp-content/uploads/2015/07/Skopje_Conference_Conclusions.pdf

²³http://rai.mostar360.ba/wp-content/uploads/2015/05/Methodology_on_Monitoring_2015.pdf

²⁴http://rai-see.org/events_tip/international-meeting-on-effectiveness-of-corruption-prevention-measures-may-18-19-2015-zagreb-croatia-2/

²⁵http://rai.mostar360.ba/wp-content/uploads/2015/05/Ten_Principles_of_Effective_Monitoring_and_Evaluation.pdf



III. Lessons Learned and Recommendations for the Next Work Plan

This report will be used as basis for preparation of the subsequent Work Plan for 2016 – 2017 as well as to inform the stakeholders on the progress made against set targets. Therefore, it is essential to objectively reflect on the reporting period and draw conclusions that can be fed into the planning process for the next Work Plan.

In the evaluation process Secretariat also reflected on the organization itself. This led to identifying number of points that derived from this process. The conclusions and general recommendations for the future are presented in the subsequent paragraphs.

Reflecting on the last two years of performance led to overarching conclusion that this period was particularly important for RAI Secretariat because the organization had to act not only as a regional platform, but as a SEE 2020 Strategy Dimension Coordinator as well. With the new role, Secretariat extended its influence and visibility. This is seen as an important gain and RAI will continue to work on promoting the organization and its values in the new role as well. But the role of Dimension Coordinator did not come without its toll. Secretariat struggled in the beginning with setting ground rules and establishing sustainable working relationship with Regional Cooperation Council – the Coordinator for the entire SEE 2020 Strategy. In the last two years both parties invested energy into building sound relations and balance is strike in the long term partnership between the two organizations.

Communication is another important element that Secretariat looked at more closely. Its key line of communication is with its member countries. The formal communication process, the meetings of the Steering Group that are complemented with bilateral formal and informal communications has proven to be adequate so far, but with the growing number of activities the situation will have to be monitored more closely to preempt possible issues. Also, with the new role, RAI is working and communicating with growing number of stakeholders. Those are peers and partners, different donors and various NGOs. In the next reporting period Secretariat will devise a communication strategy to better manage the relationships and to maximize its impact with available resources.

Secretariat also evaluated the ownership and sustainability factors in the organization itself as well as with implemented activities. It is apparent that the life expectancy of achieved results heavily rests on ensuring that beneficiaries own the results. Therefore, Secretariat now regularly looks at ownership and sustainability when planning all of its activities. Factors to be considered as crucial are: continuous consultation process with beneficiaries, networking with other stakeholders to avoid overlapping and to ensure results achieved through other projects are complemented, listening to the needs in the field more closely and regularly, also ensuring that beneficiaries lead the process and see the benefits for their organizations.



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Further on, during the evaluation another aspect surfaced which was not considered before by the Secretariat - gender equality. In dealing with donor community it became obvious that RAI should examine gender equality in its activities. Since Secretariat does not have expertise in this field nor adequate policy on gender to rely on, it will have to review best practices and possibly propose for adoption gender equality principles that are most relevant to RAI.

Finally, in the process of preparing the Evaluation Report and devising the next Work Plan Secretariat had to reflect on its planning process from two years ago. It became apparent that identified risk factors became an obstacle to implementation. Secretariat has since learned more about all the potential risks as well as opportunities and will continue to mitigate the risks as much as possible. In reviewing the results of the last two years it also became clear that Secretariat has over planned the two year period in respect to its resources, expertise and timeframes at hand. This is a lesson learned that will be taken in consideration when consolidating the new Work Plan.

In regards to the Work Plan objectives, Secretariat identified following lessons and reached following conclusions:

- 1. Transparent rules:** Secretariat successfully partnered and consulted in the process of devising methodologies for Corruption Risk Assessment and Corruption Proofing of Legislation. Following the formal acceptance of regional guidelines by national stakeholders as well as regional entities, RAI needs to proceed with next tangible results at national level. Secretariat will assist interested countries in introducing corruption risk assessment as a corruption preventive measure and carry it out in sectors, institutions or projects. Developed Methodologies need to be translated by the end of 2015 and technical assistance to countries interested in having in place these preventive measures will be delivered by RAI. RAI is actively working with partners on obtaining funding for implementation of next steps. Bearing in mind the accomplishment of the Methodology on Anti-corruption Assessment of Laws and the interest of certain countries to implement it on the field, RAI will keep corruption proofing as a regional priority. It is concluded that the goal set up by the Transparent Rules objective was achieved.
- 2. Competitive procedures:** Public Procurement was an area where serious risks for the Work Plan implementation were identified early on. Risks included lack of expertise and low capacity of the Secretariat, plus no resources for outsourcing activities. Secretariat tried to mitigate the risks by partnering with organizations that are more experienced in the procurement field. Progress was made in identifying the partners and also familiarizing with the current state of affairs in the countries both in the government sector and civil society. Secretariat will continue to pursue the objective in the next Work Plan with intention to devise and start with the relevant project.



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3. **Revision and control:** Secretariat recognizes that interventions in revision and control of national mechanisms are complex in terms of multiple institutions and functions that need to be addressed. Secretariat will continue a consultation process with the member countries on identification of best approaches. As with the Competitive procedures target, lack of expertise and low capacity of the Secretariat resulted in underachieving on this Target. Secretariat will continue to analyze possibilities where it can get involved as well as build its own capacities in this field.
4. **Public awareness:** Secretariat has made significant steps against this target. Five major events were organized or co-organized by the Secretariat and it also took part in significant number of events. All of them served as opportunities for enhancing cooperation at the regional level and promoting partnerships. As one of the target activities, first regional research on whistleblowing was produced. The long-term goals of the Secretariat are to assist in better capitalizing on whistleblower disclosures to stop wrongdoing that damages the public interest, and to work toward developing policy reforms and corrective actions to deter further wrongdoing.
5. **Building capacity of law enforcement (anti-corruption) agencies and judiciary:** In evaluating the objective, RAI determined that key milestones were achieved. The evaluation also concluded that capacity building and fostering mutual cooperation among anti-corruption bodies and stakeholders is at the core of RAI's Mission. The work in this field is in fact ongoing for RAI and should therefore not be treated as an Objective but as part of the RAI's Mission. Thus, Secretariat will not have this specific objective in the next Work Plan.
6. **Recovery of Crime Related Proceeds:** Apart from the Summer School for Junior Anti-corruption Practitioners from South East Europe, Secretariat did not succeed to produce tangible results against this objective. In the evaluation process it was determined that the key factors were lack of capacity both in terms of funds and staff. It was also determined that the situation regarding identified obstacles will not change significantly during the next two year period. Secretariat came to the conclusion that this objective needs to be parked aside for the next Work Plan. It will be revisited during the next evaluation cycle to determine if adequate preconditions are met to engage in activities in this field.
7. **Asset Disclosure and Conflict of Interest:** This objective was not achieved fully against the set indicators in the Work Plan 2014-2015. In the evaluation process RAI determined that the indicators were ambitious for the given time frame. Nevertheless, Secretariat has reached some



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significant milestones in the field of asset disclosure and conflict of interest. The Project on data exchange and asset disclosure that is part of the three year Program was devised and RAI is negotiating its implementation with our partner and donor. This has shown that its networking efforts in this field have been fruitful and Secretariat will continue to pursue this objective in the next two years. Bearing in mind the ambitious indicators set in the previous Work Plan, attention will be paid to ensuring that SMART indicators are devised so that realistic assessment can be preformed.

- 8. Effective Monitoring Mechanism for Implementation of the National Anti-corruption:** It is evaluated that Secretariat has achieved this objective as per set indicators in the Work Plan 2014-2015. Developing and adopting *Ten Principles of Effective Monitoring and Evaluation* at a regional level took time and effort as well as strong collaboration with partner organizations. Nevertheless, it is recognized that the results reached to date must be taken forward in order to ensure sustained impact at national level. In the next Work Plan RAI will not set and objective in this field but it will continue to monitor the implementation of effective monitoring and evaluation at the national level.