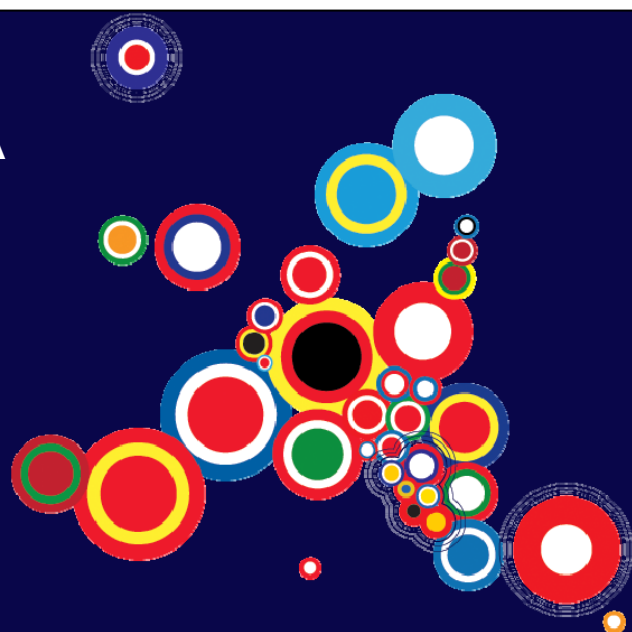




INSTRUMENT FOR PRE-ACCESSION ASSISTANCE (IPA II) 2014-2020

BOSNIA AND HERZEGOVINA

Support to implementing
anti-corruption strategies



Action summary

Bosnia and Herzegovina has committed itself to respect and implement internationally agreed and accepted principles for the fight against corruption and to embed those conventions and principles in its own legal framework.

The country has started to implement the anti-corruption strategies at the different levels of government in order to effectively prevent and combat corruption in Bosnia and Herzegovina.

In this context, the specific objective of this Action is to further enhance the capacities of the anti-corruption institutions in Bosnia and Herzegovina to effectively coordinate and monitor the implementation of anticorruption strategies. The activities focus on coordinating and harmonising the anti-corruption strategies, preventing corruption in the public service and addressing needs for training, communication and awareness raising in the context of fighting corruption.

Action Identification	
Action Programme Title	Country Action Programme for Bosnia and Herzegovina for the year 2014
Action Title	Support to implementing anti-corruption strategies
Action Reference	IPA 2014/ 037-662.4/Bosnia and Herzegovina/ Support to implementing anti-corruption strategies
Sector Information	
IPA II Sector(s)	Rule of Law and Fundamental Rights
DAC Sector	15113 - Anti-corruption organisations and institutions
Budget	
Total cost	EUR 0.75 million
EU contribution	EUR 0.75 million
Management and Implementation	
Method of implementation	Direct management
	Delegation of the European Union to Bosnia and Herzegovina
Location	
Zone benefiting from the action	Bosnia and Herzegovina
Timeline	
Deadline for conclusion of the Financing Agreement	at the latest by 31 December 2015
Contracting deadline	3 years following the date of conclusion of the Financing Agreement, with the exception of the cases listed under Article 189(2) Financial Regulation
End of operational implementation period	6 years following the date of conclusion of the Financing Agreement.

1. RATIONALE

PROBLEM AND STAKEHOLDER ANALYSIS

Anti-corruption legal framework: the Law on the Agency for the Prevention of Corruption and Coordination of the Fight against Corruption adopted in 2009 establishes the Anti-corruption Agency¹ (ACA) mandate and governs the concept of corruption and the method and forms of corruption prevention. The adoption of the Law on Conflict of Interest signals that there is some political will to fight corruption. Access to information laws, asset declaration, transparency and budget oversight in political party financing and public procurement are just examples of regulations that need to be streamlined and improved. In line with the EU 2013 Progress report on Bosnia and Herzegovina, anti-corruption legislation should continuously be enhanced to eliminate loopholes in the whole legal framework. The current Action will support alignment of the legislative framework with international standards².

Sustainability of the fight against corruption also requires that **enforcement of the law** is achieved. Police and/or prosecutors are responsible for criminal prosecution within the different competences at all levels of government. The ACA has no authority to define and implement repressive measures. No steps have been taken to harmonise the legislative provisions at the state and entity levels in order to ensure a uniform application of the law.

Coordination, harmonisation and monitoring of the anti-corruption strategies and policies: the institutional settings regarding the fight against corruption are still evolving as described in the respective anti-corruption strategies. Up to 2014, weakness of internal mechanisms in monitoring, and a lack of a clear chain of responsibility in the implementation of the Anti-corruption strategy have demonstrated inabilities to monitor the implementation of the Anti-corruption strategy at all levels. Cooperation between the entity/cantonal-based structures and the ACA needs to be enhanced in order to consolidate the co-operation framework and co-ordinate the implementation of the anti-corruption strategies and action plans³.

Prevention in public sector down to local governments and municipalities: integrity plans are to be adopted and implemented by the respective ministries and public institutions at any level of the Government in order to prevent corruption and also open channels of communication to allow the civil servants and the clients of the public administration to report on potential and/or actual corruption cases. The ACA⁴ has created a methodology for implementation of integrity plans so that institutions assess risk for corruption. Rules for ethics for civil servants have also been designed. By 2014, at least 14 institutions have developed a plan for preventing and fighting corruption. It is expected that the anti-corruption strategies after 2014 include measures to address issues such as: the integrity of public service, accountability and good governance, requesting concrete data or track record in implementation of the integrity plans, codes of conduct, ethical codes. The development of integrity systems shall be designed to also reduce corruption in local governments and municipalities.

Fighting corruption in sectors: education, health and public / private interface: corruption in health care and education impair the quality of health services and education services⁵ which in turn

¹ http://www.apik.ba/acms_documents%5Czakon%20o%20agenciji-%20engleska%20verzija.pdf: Law establishing the Agency for the Prevention of Corruption and Coordination in the Fight against Corruption. Art 6 : the agency is an independent and autonomous administrative organisation reporting to the Bosnia and Herzegovina Parliament. Art. 10: ACA has been established as a body responsible for coordinating the work of institutions having public authorities in combating corruption.

² Groupe d'Etats contre la Corruption (GRECO), Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL), Financial Action Task Force (FATF), Organisation for Security and Co-operation in Europe (OSCE)/Office for Democratic Institutions and Human Rights (ODIHR), United Nations Convention Against Corruption (UNCAC)

³ Art. 10 of the Law establishing the ACA: ACA's mandate includes responsibilities for coordinating the work of the institutions with public authorities in combating corruption. Art 23: structures shall closely cooperate with the ACA in order to ensure a timely and efficient implementation of coordinated anti-corruption policies

⁴ The ACA's mandate includes responsibilities re. enhancing the integrity by developing a uniform methodology. Law establishing the ACA Art.10 q) Prescribe a uniform methodology and guidelines for making integrity plans and providing assistance to all public institutions in their implementation;

⁵ Centre for Civil Initiatives - Report on the progress of anti-corruption measures taken by the government institution (2014)

affect the most vulnerable groups of the society. Corruption in the private sector and business sector/public private interface has a direct detrimental effect on the ability of the country to attract investors and has a significant social and reputational cost. The public officials with the highest risk of bribery in interactions with businesses are health authorities, police officers, customs officers and judges/prosecutors⁶. Corruption also takes the form of irregularities in public procurement, influence of private investors on legal regulation, unequal access to information or other forms such as 'fictive firms', tax evasion, etc. Company internal compliance mechanisms are still not systematically adopted both in public companies and private companies, especially small enterprises which constitute the largest share of all businesses.

Needs for training, communication and awareness raising: training for the ACA and bodies mandated to fight corruption must be developed and the staff concerned enrolled in the training measures. Educational programmes on corruption prevention and the fight against corruption for public institutions, the private sector, educational institutions and the media must also be developed and implemented. Information sharing about anti-corruption achievements shall be enhanced to change the perception of corruption, build confidence and strengthen institutions that should give the most important contribution in the fight against corruption. The ACA and other bodies mandated to fight corruption must inform the public about all aspects of corruption and publish reports and analyses. A website is being developed for the ACA. Still there is a need for a communication strategy which would specify the modalities of inter-bodies cooperation and public communication.

In view of this state of play and these needs, this Action intends to (i) reinforce the capacities of the authorities involved in fighting corruption, (ii) support as relevant the evolution and improvement and of the legal framework in the context of the fight anti-corruption and (iii) support the implementation of anti-corruption strategic documents in order to ensure that a coherent and coordinated policy of prevention, deterrence and repression of corruption is applied and backed by educational and communication measures. The Action will complement the Multi-country Action "Measuring and assessing organised crime in the Western Balkans: supporting evidence-based policy making" by supporting the implementation of measures anticipated in the anti-corruption strategies to develop proper statistics and reports on corruption.

RELEVANCE WITH THE IPA II STRATEGY PAPER AND OTHER KEY REFERENCES

The 2002 Council of Europe (CoE) Criminal Law Convention on Corruption requires its parties to create **specialised authorities in fighting corruption**. The 2003 EC Communication on 10 Guiding Principles for EU Comprehensive Policy against Corruption re-emphasises that EU accession conditionality is articulated into four areas: i) Legislation, ii) Implementation, iii) Strong, Efficient and Independent Law Enforcement; iv) Judicial Systems and **Prevention of Corruption**. The 2005 negotiating framework for Croatia and Turkey introduced a Chapter 23 covering rule of law issues, including judicial reform and the fight against corruption. "Member States must fight corruption effectively, as it represents a threat to the stability of democratic institutions and the rule of law. A solid legal framework and reliable institutions are required to underpin a coherent policy of prevention and deterrence of corruption⁷."

In accordance with the Country Strategy Paper for Bosnia and Herzegovina, IPA II assistance will focus on the implementation of principles of good governance, improving the public sector / public financial management as well as the fight against corruption.

SECTOR APPROACH ASSESSMENT

⁶ United Nations of Drugs and Crimes - Business, corruption and crime in Bosnia and Herzegovina: the impact of bribery and other crime on private enterprise (2013) prepared with support of the EU: Business representatives in Bosnia and Herzegovina rank corruption as the sixth most significant obstacle to doing business, after high taxes, complicated tax laws, political instability, labour regulations and limited access to financing.

⁷ http://ec.europa.eu/enlargement/policy/conditions-membership/chapters-of-the-acquis/index_en.htm

Bosnia and Herzegovina is not yet prepared for the adoption of a sector approach regarding rule of law and fundamental rights which would require well-defined countrywide sector policies/ strategies; the institutional setting, leadership and capacity for implementation of the sector strategy; sector and donor coordination; mid-term budgetary perspectives for sector policy implementation based on sector budget analysis and realistic sector allocations in Mid-Term Expenditure Frameworks (MTEFs) and monitoring of sector policy implementation and in particular the development of Performance Assessment Frameworks (PAFs). Some elements are however in place.

Anti-corruption strategies exist at Entities and State level but they are not harmonised to provide for a countrywide implementation. The current Action under the heading “Rule of law and fundamental rights” will contribute to create the capacities for preparation for sector support by strengthening anticorruption policy co-ordination by the respective governments.

As of 2013, the EUD has taken the lead in establishing a donor co-ordination system with regard to anti-corruption initiatives. Meetings co-chaired by the ACA have been organised to become an “**Anti-corruption donor and policy coordination forum**” where views are exchanged to co-ordinate a strategic approach towards fighting corruption. Information on donor supported projects in connection with the Anti-corruption Strategy and Action Plan (e.g. respective measures supported by the respective donors, status of implementation, remaining gaps) and priorities and anti-corruption policy agenda are discussed as well as other topics (e.g. Public Procurement, involvement of civil society).

LESSONS LEARNED AND LINK TO PREVIOUS FINANCIAL ASSISTANCE

The implementation of the anti-corruption Action Plan 2009 -2014 and related reforms have faced delays. The most recent evaluation⁸ of the implementation of the strategy reports that over the 81 measures in the Action Plan only 2 have been implemented in full. 40% of the measures have been implemented in part and 58% have not been implemented at all. The majority of the measures listed in the 2009 – 2014 Action Plan had been assigned to the ACA. But without the minimum human and financial resources needed to implement the strategy and make the ACA operational, delays have been unavoidable.

Regarding IPA 2007-2011, three projects provided support to Civil Society Organisations (CSOs) and then to the ACA. The IPA 2009 assistance allocated to support the establishment of the ACA and the implementation of a detailed anti-corruption action plan had to be postponed and the project ultimately redesigned because the conditions related to staffing and funding the ACA could not be complied with. The evaluation of IPA support to the Rule of Law⁹ in Bosnia and Herzegovina has not been in a position to provide much on results achieved by EU funding for fighting corruption because the performance of the ACA so far had been extremely limited and only CSOs had been providing reports available to the public. As underlined during a monitoring mission¹⁰ of May 2013, the effectiveness and impact of the IPA assistance has been limited by a lack of cooperation and links between the bodies/stakeholders responsible for anticorruption, especially at the level of the Federation of Bosnia and Herzegovina.

⁸ Evaluation of the implementation of the Strategy for the fight against corruption of Bosnia and Herzegovina for the period 2009 – 2014 and the accompanying Action Plan – May 2014 – Project: Strengthening anti-corruption capacities and CSO networks in the area implemented since January 2014

⁹ Thematic Evaluation of Rule of Law, Judicial Reform and Fight against Corruption and Organised Crime in the Western Balkans – Lot 3 - Final Main Report - http://ec.europa.eu/enlargement/pdf/financial_assistance/phare/evaluation/2013_final_main_report_lot_3.pdf

¹⁰ Monitoring report MR-145694.01 - May 2013

2. INTERVENTION LOGIC

LOGICAL FRAMEWORK MATRIX

OVERALL OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS (OVI)	SOURCES OF VERIFICATION	
To strengthen the capacity of Bosnia and Herzegovina institutions in continuing to implement the anti-corruption strategies at the different levels of government in order to effectively prevent and combat corruption in Bosnia and Herzegovina.	- Global Integrity Indicator	- National Integrity Assessments / Transparency International reports - Global Integrity Report / Global integrity overall score published -	
SPECIFIC OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS (OVI)	SOURCES OF VERIFICATION	ASSUMPTIONS
To further enhance the capacities of the relevant institutions in Bosnia and Herzegovina to effectively coordinate and monitor the implementation of anticorruption strategies within a harmonised approach	- Control of corruption score - Corruption Perception Index (CPI)	- Global Corruption Barometer Survey - GRECO assessments - Transparency International: http://www.transparency.org/country#BIH_DataRsearch	- Anti-corruption strategies and action plans adopted at the respective levels of the Government - Respective levels of the Government accept to adopt a coordinated and harmonised approach
RESULTS	OBJECTIVELY VERIFIABLE INDICATORS (OVI)	SOURCES OF VERIFICATION	ASSUMPTIONS
Result 1: The Bosnia and Herzegovina Anti-Corruption Strategy 2014 – 2019 and Action plan and anti-corruption strategies and action plans at all levels of Bosnia and Herzegovina are implemented and monitored	% of the measures foreseen in the anti-corruption strategies and actions plans supported by the Action	- Reports on implementation of anti-corruption strategies produced by other sources than the TA - TA reports - External monitoring reports - DG Enlargement Progress reports	- Anti-corruption strategic documents ready upon start of the action - Measures anticipated in the anti-corruption strategies are realistic and implementable - Implementation of measures in line with the Action Plans deadlines
Result 2: Prevention of anti-corruption is strengthened in public service including in the interaction with the private sector.	% of public institutions and companies that have a code of conduct/integrity plan and monitor its implementation.	- Publication and reports on public administration and business environment	- Coordination between the anti-corruption policies and public administration reforms - Coordination between the anti-corruption policies and sectoral reforms and strategies at all level of Bosnia and Herzegovina
Result 3: Needs for training communication and awareness raising in the context of fighting corruption are addressed	% of staff / audience targeted by the training programmes / Training schemes actually benefiting of training measures	- Training lists / Training reports - Reports on implementation of anti-corruption strategies	- Target audience of training available - Trained trainers able to implement training actions - Communication strategies adopted and allocated means and resources for their implementation
ACTIVITIES	MEANS	OVERALL COST	ASSUMPTIONS
Activities related to Result 1: 1.1. Confirm the conditions of that prevail re. anti-corruption strategies in Bosnia and Herzegovina 1.2. Enhance the legal framework 1.3. Monitor the implementation of anti-corruption strategies and action plans Activities related to Result 2: 2.1 Strengthen integrity in public administration in public service 2.2 Strengthen business sector integrity 2.3 Strengthen anti-corruption mechanisms in public procurement procedures Activities related to Result 3: 3.1 Ensure that training processes are developed and mainstreamed in the human resources development mechanisms applicable in Bosnia and Herzegovina 3.2 Develop and implement communication strategies re. fight anti-corruption	1 technical assistance support	EUR 0.75 million	- Technical Assistance accepted at all levels as a partner in the implementation of the anti-corruption strategies

ADDITIONAL DESCRIPTION

Detailed activities per results

Result 1: The Bosnia and Herzegovina Anti-Corruption Strategy 2014 – 2019 and Action plan and anti-corruption strategies and action plans at all levels of Bosnia and Herzegovina are implemented and monitored

1.1. Confirm the conditions of that prevail regarding anti-corruption strategies in Bosnia and Herzegovina

- 1.1.1. Update the status of implementation, coordination, monitoring and evaluation of the respective anti-corruption strategies and Action plans
- 1.1.2. Identify the bodies in charge of anti-corruption at all levels of the government down to the cantonal level, local governments and municipalities. Document the chain of interactions and responsibilities re. the anti-corruption strategies implementation, coordination, monitoring and evaluation and update the assessment of the institutional capacity at the different levels of government
- 1.1.3. Review the status of anti-corruption measures and strategies at sectoral level (e.g. education, health, etc...), taking into account any sectoral risk assessment performed and recommendations expressed

1.2. Enhance the legal framework

- 1.2.1. Update the review of the legislative framework and recommendations regarding inconsistencies that need to be addressed (legal loopholes), regulations that need to be updated and/or further improved
- 1.2.2. Support the development of the legal amendments as relevant
- 1.2.3. Propose measures to be taken to support a coordinated approach to key legislation in order to enhance the impact of the laws on anti-corruption and related matters
- 1.2.4. Follow-up and provide legal and advisory services

1.3. Monitor the implementation of anti-corruption strategies and action plans

- 1.3.1. Develop systems of exchange of information between the institutions involved in implementing the anti-corruption strategies and support the comprehensive monitoring of the anti-corruption policy implementation
- 1.3.2. Prepare and/or update guidelines on conducting stakeholders consultations
- 1.3.3. Support meetings, consultations and follow-up of implementation of decisions made
- 1.3.4. For the respective measures anticipated in the anti-corruption strategies support customs and indirect taxation (working integrity system), support to local development (integrity systems to reduce corruption in local governments and municipalities), development of SME (business integrity), law enforcement framework (to address corruption), public administration reform, sectoral strategies (education, health, private sector development) and identify ad-hoc synergies
- 1.3.5. Coordinate activities with support to CSO / NGOs in connection with the fight anti-corruption and identify ad-hoc synergies
- 1.3.6. Carry out stakeholders consultations for the assessment and formulation of amendments to the strategies and actions plans as need may be.

Result 2: Prevention of anti-corruption is strengthened in public service including in the interaction with the private sector

2.1 Strengthen integrity in public administration in public service

- 2.1.1. Perform a review and issue recommendations on the application of the disciplinary procedures, management and leadership issues in the public service; on training in the public service; on the Freedom of information and open government legislation and practices; Conflicts of Interest management policies at political and administrative level; the interface between political level and administration; integrity of the Election campaign and political parties funding in the political process;
- 2.1.2. Formulate in cooperation with the stakeholders specific proposals and assist in undertaking actions for the improvement of the public service ethics infrastructure (fitted to the Anti-corruption strategy / Action Plan)
- 2.1.3. Support on a continuous basis selected institutions in implementing the recommendations formulated as a result of the assessment of the ethics infrastructure
- 2.1.4. Support in drafting a code of conduct, free hotline and establishing an Ethics Board to establish a closer cooperation between the ACA and other agencies at the central level of government, and in particular with the Public Administration Reform Coordinators Office of Bosnia and Herzegovina (PARCO), due to increased focus on the anti-corruption issues in the reform of public administration.
- 2.1.5. Support the development of integrity plans in public companies

2.2 Strengthen business sector integrity

- 2.2.1. Identify the relevant stakeholder organisations (business associations); establish contact and work together to identify the integrity issues that may be subject to regulation (self-regulation)
- 2.2.2. Develop codes of good (responsible) conduct (business practices) and involve the business associations in the fight against corruption at all levels
- 2.2.3. Develop Integrity standards for the way business is done in the country
- 2.2.4. Organise a process of advocacy for adoption of the codes of conduct

2.3 Strengthen anti-corruption mechanisms in public procurement procedures

- 3.3.1. Review the public procurement legislation and suggest measures to reduce corruption.
- 3.3.2. Strengthen the business development and integrity –promoting compliance programmes or introduce anti-corruption councils at the local/ regional level

Result 3: Needs for training communication and awareness raising in the context of fighting corruption are addressed

3.1 Ensure that training processes are developed and mainstreamed in the human resources development mechanisms applicable in Bosnia and Herzegovina

- 3.1.1. Assess training needs re. integrity and anti-corruption within the ACA, the bodies involved in implementing the anti-corruption strategies and more widely in the public service
- 3.1.2. Analyse training practices and existing public servants' training programmes / training schemes

- 3.1.3. Propose and develop anti-corruption / integrity training programmes to be implemented by technical assistance and/or the ACA and training programmes to be included in the public agencies in charge of training at the respective levels of Bosnia and Herzegovina. Include the development of a “Train trainers” component
- 3.1.4. Develop curricula, training materials and pedagogical tools to deliver training on selected issues together with the public agencies in charge of training at the respective levels of Bosnia and Herzegovina
- 3.1.5. Organise advocacy for the mandatory inclusion of these training programmes in training schemes applicable throughout the public sector
- 3.1.6. Implement the training programmes and evaluate the training impact
- 3.1.7. Provide support to the development of the e-learning platform; ensure that the training is available also in web based format

3.2 Develop and implement communication strategies regarding the fight against corruption

- 3.2.1 Assist in developing and implementing communication strategies in order to educate the public at large on the dangers of corruption and the means to combat it, remove acceptance of corruption, enhance the public pressure to change and raise awareness on the individual responsibilities and rights of every citizen
- 3.2.2 Enhance the communication capacities of the ACA and other bodies concerned at all levels of the government and raise the awareness of the public sector on the importance of ethics
- 3.2.3 Support regular proactive information of the public by both the ACA and other institutions responsible for its implementation (including though relevant sections of web sites and press conferences at least once every six months) on the state of corruption and implementation of the anti-corruption strategies
- 3.3.4 Stimulate public demand for information and capacity of the civil service to provide information to the public.

3. IMPLEMENTATION ARRANGEMENTS

ROLES AND RESPONSIBILITIES

The institutional stakeholders involved in the management and implementation of anti-corruption processes are numerous and their mandates are still being refined. The bodies established and involved in the fight against corruption include:

1. ACA
2. Council of Ministers¹¹
3. Parliamentary Commission
4. Central Election Commission
5. Ministry of Justice Bosnia and Herzegovina
6. Ministry of Security Bosnia and Herzegovina
7. Ministry of Finance and Treasury Bosnia and Herzegovina
8. High Judicial & Prosecution Council of Bosnia and Herzegovina
9. Prosecutors Office Bosnia and Herzegovina

¹¹ In the 2009-2014 Action Plan, measures assigned to the Council of Ministers (i.e. streamlining of public administration, protection of whistleblowers, staff training, improving procedures for confiscation of illegally acquired assets, improving investigations with the aim of more efficient processing of corruption, etc.) have also not been fully implemented. The CoM of Bosnia and Herzegovina needs to be more strongly involved in policy development and co-ordination.

10. Court of Bosnia and Herzegovina
11. State Investigation and Protection Agency (SIPA) of Bosnia and Herzegovina
12. Public Administration Reform Coordinators Office of Bosnia and Herzegovina
13. Audit office of the institutions of Bosnia and Herzegovina
15. Team for monitoring of implementation of Action Plan in Federation of Bosnia and Herzegovina
18. Federal Ministry of Internal Affairs
19. Federal Ministry of Justice
14. Commission¹² for monitoring implementation of Anti-corruption strategy & Action Plan Republika Srpska
16. Ministry of Internal Affairs Republika Srpska
17. Ministry of Justice Republika Srpska
20. Team for monitoring of implementation of Action Plan in Brčko District
21. Criminal Police of Brčko District

Other bodies at cantonal level are also concerned. The Federation Government General Secretariat has been encouraging the cantonal governments to develop their anti-corruption action plans and set their anti-corruption structures. Three cantons have developed an action plan, others are still due to do so. None has appointed a monitoring body. New bodies are emerging at different levels of Bosnia and Herzegovina structure. For example, on May 8, 2014 changes to the legal frame were made in the Federation of Bosnia and Herzegovina to create specialised anti-crime and anti-corruption units. The mandates and detailed responsibilities of these units are being developed.

Anti-corruption co-ordination mechanisms are considered at the different levels of the country structure

- **Federation of Bosnia and Herzegovina:** a monitoring board for the implementation of the anti-corruption plan is in place, consisting of ministry representatives and chaired by the Government Secretary. The Government has no competence over anti-corruption measures at the cantonal level. A coherent approach would be beneficial.
- **Republika Srpska:** in summer 2012, following a Government decree, the co-ordination of the implementation of the Anticorruption strategy and action plan was transferred from the Ministry of Interior (MoI) to the Ministry of Justice (MoJ). The new anti-corruption strategy of Republika Srpska anticipates an *ad hoc* team for monitoring its implementation composed of officials from ministries/public institutions.
- **Brčko District:** the Police is the main co-ordinator in the implementation of the anti-corruption plan. The District Government intends to establish a new body within the Mayor's office to co-ordinate the work, preparation of documents and implementation of the action plan¹³.

The direct counterpart of the Contracting Authority will be Agency for the Prevention of Corruption and Coordination in the Fight against Corruption. A Senior Programme Officer will be appointed and a Steering Committee established.

¹² The Commission consists of high level officials of the Government, parliamentary bodies, judiciary, police, but also representatives of non-governmental organisations, academic community, students' union, trade association. The Commission is supported by the Professional Anticorruption Team established within the Ministry of Justice of Republika Srpska.

¹³ Status as of March 2014

IMPLEMENTATION METHOD(S) AND TYPE(S) OF FINANCING

The Action will be implemented by a service contract for technical assistance procured by the EUD to Bosnia and Herzegovina.

4. PERFORMANCE MEASUREMENT

The performance measurement of the action will be performed in parallel with the performance measurement of the anti-corruption strategies and related indicators.

METHODOLOGY FOR MONITORING (AND EVALUATION)

Monitoring: a Senior Programme Officer will be appointed in line with the practice in Bosnia and Herzegovina for IPA projects. A Steering Committee including representatives of the ACA and bodies mandated to fight corruption at entity and district level will be established to monitor the implementation of the Action. The composition of the Steering Committee and its rules of procedures will be determined in the Terms of reference of the technical assistance contract.

The National IPA Coordinator services (NIPAC services in the Directorate for European Integration – DEI) has set-up a sub-unit in charge of Monitoring and Evaluation. In accordance with the current practice, this sub-unit ensures with inputs from the Senior Programme Officer the preparation of reports and analysis required for monitoring EU funded projects and programmes by the IPA Monitoring Committee (IPA MC). The NIPAC services organises the IPA MC meetings. It also interacts with the Council of Ministers and the Parliament to address questions on the implementation of the EU funded projects.

In line with the Framework agreement to be signed between Bosnia and Herzegovina and the EC¹⁴, an IPA MC and relevant Sectoral Monitoring Committees (SMC) will be set and will adopt their respective rules of procedures. The IPA MC will meet at least once a year and the SMC at least twice a year. The NIPAC services will implement the procedures applicable for the preparation of implementation reports covering the technical and financial execution of the Action and to be examined by the SMC and IPA MC. The implementation reports will allow the SMC to measure progress in relation to achieving the objectives of the Action and expected outputs, results and impact by means of the indicators related to the baseline situation. The IPA MC will review “the overall effectiveness, efficiency, quality, coherence, coordination and compliance of the implementation of all actions towards meeting the objectives set out in the Financing Agreements and the country strategy papers” and will base itself on the information to be provided by the SMC.

In addition, the Action may be subject to Result orientated Monitoring (ROM). The NIPAC Services ensures that ROM reports are transmitted to the Senior Programme Officer(s) and other relevant stakeholders and follow-up the implementation of the related recommendations, including – when relevant - at the level of the IPA MC.

Evaluation: the Action will be subject to interim and ex-post evaluation in line with the General principles of evaluation of IPA II Assistance. The results of evaluations will be taken into account by the IPA MC and SMC under the aegis of the NIPAC Services.

¹⁴ Framework agreement between Bosnia and Herzegovina and the EC on the arrangements for implementation of union financial assistance to Bosnia and Herzegovina under the instrument for pre-accession assistance (IPA II)

INDICATOR MEASUREMENT

Indicator	Description	Baseline	Last available	Milestone 2017	Target 2020	Source of information
Overall objective	CSP indicator(s) (outcome/impact)					
Global Integrity Indicator	Assesses the existence and effectiveness of mechanisms that prevent abuses of power and promote public integrity, as well as the access that citizens have to their government. Range: Very Strong (90-100) - Strong (90-90) - Moderate (70-80) - Weak (60-70) - Very Weak (Below 60).	Year :2010 Score: N/A	Year :2011 Score: 61	Score: to be determined in line with the anti-corruption strategies	Score: to be determined in line with the anti-corruption strategies	- Global Integrity Report: https://www.globalintegrity.org
Specific objective	Outcome indicator(s)					
Control of corruption	Percentile Rank: World Bank indicator that reflects perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as “capture” of the state by elites and private interests. Range: a low percentile ranks (1=Worst) indicates that a country is relatively corrupt while a high percentile rank indicates that a country is relatively clean (100 = Best).	Year: 2010 Score: 48%	Year: 2012 Score: 49%	Score: to be determined in line with the anti-corruption strategies	Score: to be determined in line with the anti-corruption strategies	World Bank : Country Data Report for Bosnia and Herzegovina
Corruption Perception Index (CPI)	The Corruption Perception Index (CPI) ranks countries and territories based on how corrupt their public	Year: 2010 Score: 32 /100 Rank: 91/178	Year: 2013 Score: 42 /100 Rank: 72 /177	Score: to be determined Rank: to be	Score: to be determined Rank: to be	Transparency International: http://www.transparenc

Indicator	Description	Baseline	Last available	Milestone 2017	Target 2020	Source of information
	sector is perceived to be. It is a composite index – a combination of polls – drawing on corruption-related data collected by a variety of reputable institutions Range: 0 (Worst) – 100 (Best)			determined in line with the anti-corruption strategies	determined in line with the anti-corruption strategies	y.org/country#BIH_DataResearch
Result 1	Immediate results indicator					
% of measures foreseen in the anti-corruption strategies and actions plans supported by the Action	The action will support coordinating and monitoring the respective anti-corruption strategic documents. All measures anticipated in actions plans shall be monitored on a regular basis. Some measures may not involve the technical assistance. The indicator will measure the comparison between the number of measure planned and the number of measures actually implemented with the involvement of the Technical assistance.	Not applicable	Not applicable	100% of measures planned by 2017 in the Anti-corruption strategies and Action Plans	100% of measures planned by 2020 in the Anti-corruption strategies and Action Plans	- Reports on implementation of anti-corruption strategies produced by other sources than the TA - TA reports - External monitoring reports - DG Enlargement Progress reports
Result 2	Immediate results indicator					
% of public institutions and companies that have a code of conduct/integrity plan and monitor its implementation.	Percentage of public institutions and companies supported by this Action that develop a code of conduct/integrity plan and monitor its implementation	Not applicable	Not applicable	50%	100%	- TA reports - Public institutions' and companies reports/websites
Result 3	Immediate results indicator					
% of staff / audience targeted by the	Based on training needs assessed re. integrity and anti-corruption within	Not applicable	Not applicable	50% of targeted	100% of targeted	- Training lists / Training reports

Indicator	Description	Baseline	Last available	Milestone 2017	Target 2020	Source of information
training programmes / Training schemes actually benefiting of training measures	the ACA, the bodies involved in implementing the anti-corruption strategies and more widely in the public service, a number of bodies and staff will be targeted in the training programmes / training schemes.			bodies / staff	bodies / staff	

5. CROSS-CUTTING ISSUES

ENVIRONMENT AND CLIMATE CHANGE (AND IF RELEVANT DISASTER RESILIENCE)

N/A

ENGAGEMENT WITH CIVIL SOCIETY (AND IF RELEVANT OTHER NON-STATE STAKEHOLDERS)

NGOs have played an important role in the preparation and implementation of the anti-corruption strategies in Bosnia and Herzegovina. In addition, they have a watchdog role. Synergies will be sought between the NGO actions and the present action as much as feasible.

EQUAL OPPORTUNITIES AND GENDER MAINSTREAMING

Equal opportunities for men and women will be guaranteed as an integral part of the implementation of this Action. It is expected that gender equity will be fully observed in the recruitment of staff in anti-corruption bodies so all capacity building activities will be available equally to men and women. Training will be equally available to men and women.

All research and analyses will be conducted using gender-sensitive methodologies, and gender will be mainstreamed in all activities related to the implementation of the Anti-Corruption Strategies and Action Plans.

MINORITIES AND VULNERABLE GROUPS

Minorities and vulnerable groups are always the first to suffer from corruption and poverty. A reduction of corruption is expected to lead to a general improvement in the socio-economic environment of Bosnia and Herzegovina, which will be particularly beneficial for such groups.

Good governance will be strengthened through the implementation of the anti-corruption measures. Public awareness campaigns will help to empower minorities and vulnerable groups to participate in and contribute to anti-corruption efforts. This will in turn enhance civic responsibility among these groups which are often marginalised and socially excluded.

During the activities anticipated in the Action, full respect of minorities and vulnerable groups will be ensured. Thus, during the implementation of the Action, there shall be no direct or indirect discrimination against any person based on gender, age, marital status, language, mental or physical disability, sexual orientation, political affiliation or conviction, ethnic origin, nationality, religion, race, social origin or any other status.

6. SUSTAINABILITY

The sustainability of results will be achieved through ensuring that the implementation of anti-corruption strategies designed by authorities of Bosnia and Herzegovina themselves are implemented by their own bodies, with technical assistance providing advisory and hands on support, but without substituting the public administrations.

The high involvement of stakeholders in anti-corruption strategies design and implementation will create ownership and long-term links and commitment among partners. The harmonisation, coordination and monitoring over the respective levels of the Bosnia and Herzegovina structure will continue to function as the main instrument for discussing needs and creating consensus around fighting corruption. Moreover, successful measures will serve as an example, encouraging the adoption and adaption of good practice, tested methods and solutions to different contexts. In this

respect, the ACA should take up the role of coordinator and initiator of methodologies and new initiatives for fighting corruption.

7. COMMUNICATION AND VISIBILITY

Communication strategy within the anti-corruption strategies: communication (both internal – in the organisation and external – with stakeholders) is an important element of the anti-corruption bodies' capacities that need to be strengthened. The development and implementation of the communication strategy of these bodies has to be part of the anti-corruption strategies and action plans. Within the current Action, the respective communication strategies will be supported in the same way as other measures of the anti-corruption strategies and action plans.

Communication and visibility of the Action: communication and visibility will be given high importance during the implementation of the Action. The implementation of the communication activities shall be the responsibility of the IPA II beneficiary, and shall be funded from the amounts allocated to the Action. The Action will put particular emphasis on the dissemination of best-practices and exchange of information in order to increase the impact of results and bring a multiplier effect. The IPA II beneficiary will develop communication messages and tools adapted to the targeted audience, i.e.: public sector, business sector, general public, media, etc. All necessary measures will be taken to publicise the fact that the Action has received funding from the EU in line with the Communication and Visibility Manual for EU External actions.

Visibility and communication actions shall demonstrate how the intervention contributes to the agreed programme objectives and the accession process. Actions shall be aimed at strengthening general public awareness and support of interventions financed and the objectives pursued. The actions shall aim at highlighting to the relevant target audiences the added value and impact of the EU's interventions. Visibility actions should also promote transparency and accountability on the use of funds.

It is the responsibility of the IPA II beneficiary to keep the EU Delegation fully informed of the planning and implementation of the specific visibility and communication activities.

The IPA II beneficiary shall report on its visibility and communication actions in the report submitted to the IPA Monitoring Committee and the Sectoral Monitoring Committees.