1 BASIC INFORMATION

1.1 CRIS Number (Year 1):
1.2 Title: Ethics for the Prevention of Corruption in Turkey
1.3 Sector:                  
1.4 Location: Turkey  
1.5 Duration: 24 months (implementation)/36 months (disbursement)

2 OBJECTIVES

2.1 Overall Objective(s)

To contribute to the prevention of corruption in Turkey in accordance with European and other international standards.

2.2 Project purpose

To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials.

2.3 Accession Partnership (AP) and NPAA priority

The Turkish National Programme for the Adoption of the Acquis (NPAA) – under chapter 4.25.5 – points at several needs, including:

- Enhanced co-operation between competent ministries and other institutions.
- Accession to relevant international conventions, such as the Criminal Law Convention on Corruption (ETS 173), the Civil Law Convention on Corruption (ETS 174), and the Convention on Laundering, Search, Seizure and Confiscation of Proceeds from Crime (ETS 141) of the Council of Europe.
- Reform, adoption or implementation of national legislation, including Criminal Code, Criminal Procedure Code, Act on Public Procurement, Act on Declaration of Property, and others.

2.4 Contribution to National Development Plan

Not applicable

2.5 Cross Border Impact

Not applicable
3 DESCRIPTION

3.1 Background and justification

Surveys and reports confirm the adverse effects of corruption and point at the urgency to address it. The 2001 economic collapse (and subsequent devaluation) has – among other things – been attributed to corruption, and the results of the 2002 elections have been interpreted as an expression of the desire of the population for political reform and firm action against corruption. In Transparency International's corruption perception index for 2005, Turkey ranks 65th out of 158 countries with a score of 3.5. Following higher perceptions of corruption between 2002 and 2004, a slight improvement was noted in 2005.

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<tbody>
<tr>
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<td>4.1</td>
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<td>3.8</td>
<td>3.6</td>
<td>3.2</td>
<td>3.1</td>
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<td>3.5</td>
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In nationally-focused surveys conducted by the Turkish Economic and Social Studies Foundation (TESEV), respondents indicated that corruption was perceived to be widespread. Among the sectors addressed by the questionnaire, particularly noteworthy were media (69% of respondents thought corruption was “high”), government (70%), construction (52%), municipal government (42%) and health (40%). Moreover, 80% of businessmen believe that corruption is the main obstacle preventing foreign investments. Furthermore, it has been noted that corruption weakens trust in the political system and poses a threat to national security.

Other surveys show that the level of undue influence exercised by the business sector on politics and the public administration is very high in Turkey when compared to other European countries. Only 31.5% of businesses are not believed to resort to illegal forms of influence, and only 19.5% of businesses refrain from using legal but undue forms of influence. Indicators on ethics and integrity in the public sector are also relatively low.

On 12 January 2002, the Council of Ministers adopted – in the form of a decree – the "Action plan on increasing transparency and enhancing good governance in the public sector". The Action Plan has been elaborated by a Steering Committee composed of the Prime Ministry Inspection Board, the Undersecretariat of Treasury, Ministry of Justice, Ministry of Interior and the Financial Crime Investigation Board of the Ministry of Finance (MASAK) with the support of a Working Group. The Action Plan foresaw the establishment of an Interministerial Commission to ensure effective and co-ordinated implementation of these measures and a Steering Committee to support the Commission. Yet, the effectiveness of the Commission and the Steering Committee appear to have been limited.

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1 Source: www.transparency.org
2 From 158 countries included in the 2005 CPI.
In January 2003, the 58th Government announced an Emergency Action Plan which contains a section on corruption with important additional elements, such as the ratification of the Criminal and Civil Law Conventions on Corruption of the Council of Europe, increasing sanctions for corruption offences in the criminal law, enhanced transparency in the financing of political parties, enhancing access to information by reviewing secrecy provisions, and enhanced dialogue between Government, public administration and civil society.

Furthermore, in January 2003 a Parliamentary Investigation Committee was instituted which carried out a comprehensive analysis of the causes of corruption in Turkey and which, in its report of July 2003, made a number of important recommendations.

Within the broad directions defined by the Action Plan and the Emergency Action Plan, the Government of Turkey is engaged in a number of activities with far-ranging impact on anti-corruption work in the country:

- A Law on the Right to Information (Law 4982) was adopted by Parliament in 9 October 2003. The law greatly increases the ability of non-governmental actors to exercise oversight over the government.
- The Turkish National Programme for the Adoption of the Acquis also covers areas such as freedom of association, liberation of the economy, harmonisation of statistics, acquis provisions related to corruption, judicial cooperation.
- Amendments to the banking law have been adopted in 12 December 2003 (Law 5020), including provisions on embezzlement in banking sector.
- Public Administration reform Law is before the parliament including provisions on delegation powers of local authorities and auditing system.
- The Law on the Establishment of the Public Servant’s Ethics Council was adopted in 2004, which led to the creation of an Ethics Council. A Code of Ethics for the staff of the public administration was adopted in 2005.
- A number of other measures are in force to prevent corruption in the public administration, including conflicts of interest and revolving doors.
- Efforts have been made to enhance the independence of the judiciary.
- A new Criminal Code, Criminal Procedure Code and a Code of Misdemeanours were adopted in 2005, and various forms of bribery have thus been criminalised.
- Turkey is a party to the OECD convention on bribery in international business transactions, a member of the Financial Action Task Force and has signed (but not yet ratified) the United Nations Convention against Corruption.
- Turkey ratified ETS 141, ETS 173 (January 2004) and ETS 174 (April 2003) and on 1 January 2004 became a member of the Group of States against Corruption – GRECO – which monitors compliance with European anti-corruption standards. The first evaluation report on Turkey was adopted by GRECO in March 2006.

The fight against corruption is an important issue with regard to progress towards accession to the European Union. In this connection, the Turkish National Programme for the Adoption of the Acquis (NPAA) – under chapter 4.25.5 – points at several needs, including:
Enhanced co-operation between competent ministries and other institutions.

Accession to relevant international conventions, such as the Criminal Law Convention on Corruption (ETS 173), the Civil Law Convention on Corruption (ETS 174), and the Convention on Laundering, Search, Seizure and Confiscation of Proceeds from Crime (ETS 141) of the Council of Europe.

Reform, adoption or implementation of national legislation, including Criminal Code, Criminal Procedure Code, Act on Public Procurement, Act on Declaration of Property, and others.

Turkey has made some progress in these areas by ratifying relevant Council of Europe conventions and joining GRECO.

In the 2005 Progress Report on Turkey (9 November 2005) the European Commission noted the progress made in the adoption of anti-corruption measures (criminal legislation, parliamentary investigations, access to information, establishment of the Ethical Board for Public Servants and adoption of code of conduct) but also raised a number of concerns, namely:

- The scope of parliamentary immunity
- Lack of transparency in the financing of political parties
- The weak efficiency and effectiveness of governmental, parliamentary and other bodies established to combat corruption
- The weak consistency of anti-corruption policies and the degree of coordination and cooperation
- The need for an overhaul of the inspection system
- The need for strengthening of the dialogue between government, public administration and civil society
- The need to raise awareness of corruption
- The need for continuous support at the highest political level.

The Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey provides for three short-term priorities with regard to the anti-corruption policy:

- Fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.
- Ensure implementation of the Regulation on Principles of Ethical Behaviour for Civil Servants and extend its provisions to elected officials, judiciary, academics and military personnel
- Limit the scope of parliamentary immunity in line with European practice.

The present project will build upon the progress made. It will help Turkey implement the GRECO recommendations and make progress towards accession to the European Union.

3.2 Sectoral Rationale

The present project will focus on the following problems and needs:

1. Implementation of the Code of Ethics across the public administration
Formal rules for officials of the public administration of Turkey have been in force since the mid-1960s. However, the establishment of the Ethics Council of Public Officials\(^4\) and the subsequent adoption of a code of ethics\(^5\) now offer an opportunity to create a culture of ethics in the public administration in line with the requirements of good governance. The Council and the Code of Ethics also have the potential to become building blocks of a strategy for the prevention of corruption in Turkey.

The Ethics Council consists of eleven members elected by the Council of Ministers for a period of four years and includes former and retired persons of a certain seniority and with the following backgrounds: a minister, a provincial governor, three senior members of the public administration, three senior members of the judiciary, two directors or deans of university and a senior manager of a public agency.

The Ethics Council is established within the structure of the Prime Ministry that provides logistical and administrative support, including 1 experts and 2 assistants, as well as office space for the meetings of the Council (four times per month).

The tasks of the Council are:

- to determine whether public officials adhere to the Code of Ethics while performing their duties
- to investigate claims that the principles of the Code have been violated by a senior public official with a minimum rank of general manager or equivalent\(^6\)
- to inform the relevant authorities on the results of such investigations
- to carry out or to commission studies and research which help establish a culture of ethics throughout the public administration.

In addition, the Code of Ethics (Article 25) provides the Council with the task to prepare, coordinate and execute training programmes for public officials or to cooperate with relevant ministries, other public institutions, universities, local administrations and non-governmental organisations in their fields in this matter. The Ethics Council should thus support a wide range of institutions to make sure that they abide to the Code of Ethics and that they incorporate principles of ethics in their inservice training programmes.

Institutions and organisations of the public administration are furthermore required to establish their own ethics commissions consisting of at least three people and being responsible for the promotion of a culture of ethics in their respective institutions (Article 29). These ethics commissions are the counterparts of the Ethics Council.

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\(^6\) See the list in Appendix 2 of the Code of Ethics. Complaints on other categories of officials received by the Ethic Council are forwarded to the disciplinary authority of the respective institution without further investigation by the Council.
The Ethics Council and the Code of Ethics thus provide a suitable legislative, normative and institutional framework for the promotion of a culture of ethics and the prevention of corruption in the public administration.

The Ethics Council became operational in April 2005 when the Code of Ethics was published. After one year of operations a number of needs have been identified that would need to be addressed to enhance their effectiveness. Some of these can be addressed with the support of the project:

- Training: the Council and the ethics commissions in different institutions require support in the implementation of a wide range of training measures to build a culture of ethics and against corruption across the administration, not only at central but also at provincial levels.
- Training materials will need to be developed and tested or translated and adapted that can be used by different institutions and ethics commissions throughout Turkey.
- Trainers: a critical number of trainers need to be trained in order to meet training needs and ensure sustainability beyond the duration of the project.
- Research and studies need to be commissioned in order to identify risks and opportunities related to ethics issues. The involvement of academic institutions through such studies will also help incorporate ethics issues in curricula of universities.
- Outreach: the Ethic Council needs to reach out to a large number of public institutions not only at central level but also to the 81 provinces (governors, assistant governors and ethics commissions).

Some other issues cannot be resolved by the project but will need to be addressed by the Government:

- Budget and staff: it appears that many of the needs cannot be met because of budgetary limitations and in particular the shortage of staff in the secretariat of the Council.
- Independence: currently, the staff and budget of the Council are part of the budget of the Prime Ministry. Given the mandate of the Council to investigate alleged violations of the Code of Ethics by senior officials, the Council should be provided with its own budget and staff in order to enhance its independence from the Government.

2. Codes of ethics for other categories of officials

The provisions of the Code of Ethics and the mandate of the Ethics Council of Public Officials do not apply to the President, the members of the Parliament, members of the Council of Ministers, Turkish Armed Forces, members of the judiciary and universities.

The project will address this issue and support the development of codes of ethics for other categories of officials or holders of public office.

3. Need for monitoring the effectiveness of prevention and other anti-corruption measures
A wide range of anti-corruption measures have been undertaken by the authorities of Turkey in recent years. However, the impact of these measures has not yet been systematically evaluated.

The project will therefore seek support analyses of the effectiveness of key measures implemented in recent years, such as the reform of the criminal legislation, the Public Information Act and the Code of Ethics. Drawing on the results of these analyses, the project will support the development of proposals for further anti-corruption measures and reforms.

4. Need to ensure coordination of anti-corruption measures

The promotion of ethics is just one of many measures that need to be undertaken to prevent corruption. Prevention, in turn, is one of several components of a comprehensive anti-corruption strategy. Experience shows that anti-corruption strategies are more likely to be successful if they consist of political commitment and leadership, comprehensive anti-corruption legislation, the enforcement of legislation, corruption prevention programmes within public institutions, and public awareness and the involvement of civil society.

The need for a coordinated approach against corruption in Turkey and the need to entrust a body with the responsibility of coordinating and overseeing the implementation of the national anti-corruption strategy has been underlined by the Council of Europe and the European Commission on several occasions.

The project will seek close cooperation with the technical commission that assists the Interministerial Committee in the coordination of the Government’s anti-corruption measures. It will also help develop further proposals aimed at improving the management, coordination and monitoring of Turkey’s anti-corruption strategies.

This will allow Turkey to address an important provision of the United Nations Convention against Corruption, which has been signed by Turkey. This treaty requires countries to adopt comprehensive preventive policies (article 5). Furthermore, article 6 provides for the existence of a body or bodies capable of implementing preventive policies or overseeing and coordinating the implementation of such policies (if more than one body is responsible for prevention). This body or these bodies should also increase and disseminate knowledge about the prevention of corruption. Furthermore it/they should evaluate the effectiveness of anti-corruption policies and measures. This body or bodies should be granted the necessary resources and level of independence.

3.3 Results

A successful strategy against corruption requires measures in a wide range of areas. Given that a project addressing different sectors at the same time is currently not feasible in Turkey, the present project will focus on one particular area of corruption prevention, namely the implementation of the Code of Ethics adopted in April 2005. However, the project will also be used to evaluate the effectiveness of other anti-corruption measures, and proposals will be developed with regard to future anti-
corruption strategies and bodies. In this way, the present project is expected to prepare the ground for more comprehensive anti-corruption programmes in the future.

The overall objective is to contribute to the prevention of corruption in Turkey in accordance with European and other international standards.

The specific project is to ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials.

This is to be achieved through the following expected results (outputs):

1. The staff of the Ethics Council are trained and have the necessary working tools and procedures to better exercise their mandate
2. A training package is available to support the application of the code of ethics for public officials
3. At least 10 trainers have been trained and are able to deliver ethics training
4. The governors, assistant governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials
5. Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials
6. At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public
7. The development and implementation of codes of conduct for elected office holders and the judiciary will have been supported
8. The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available
9. Coordination of measures to promote ethics with other anti-corruption measures in Turkey will have been ensured

### 3.4 Activities (including Means)

<table>
<thead>
<tr>
<th>Intervention logic</th>
<th>Outputs and activities</th>
<th>Means</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>Start up activities, long-term advisers and overall management</td>
<td>Computer, fax, copy machine for project office Office running cost (office to be provided free of charge by the Government) 1 technical assistant for 24 work months 1 project assistant/translator Ankara for 24 work months 1 assistant project manager Strasbourg 24 work months 1 start up workshop</td>
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<tr>
<td></td>
<td>Establish and equip project office Recruit project personnel Prepare detailed work plan and inception report Carry out start up workshop</td>
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</table>
| Output 1: | The staff of the Ethics Council are trained and have the necessary working tools and procedures to better exercise their mandate | Long-term adviser  
Up to 40 work days of short-term consultants  
Cost for 2 study visits (up to 10 persons and up to 5 days each) |
|---|---|---|
| Activities: | Review the working procedures of the Ethics Council of Public Officials and its secretariat and make and implement proposals for improvement  
Train the staff of the secretariat in the management of complaints received  
Train members of the Council in the investigation of complaints  
Support 2 study visits of staff of the Ethics Council to study the experience of similar bodies in other European countries | --- |
| Output 2: | A training package is available to support the application of the code of ethics for public officials | Long-term adviser  
Up to 50 work days of short-term consultants  
Translation cost  
Cost for publication and production of CD |
| Activities: | Translate and review materials on ethics training available in other countries  
Develop a coherent training package/curriculum for ethics training based on the provisions of the Code of Ethics  
Following a testing of the training package (under outputs 4 and 5), finalise and the training package and make it available to different institutions for in-service training  
Produce and disseminate a training CD suitable for computer-based training | --- |
| Output 3: | At least 10 trainers have been trained and are able to deliver ethics training | Long-term adviser  
Up to 50 work days of short-term consultants  
Up to 4 train the trainer workshops |
| Activities: | Select 10 to 15 trainers from training institutions of the public administration  
Train these trainers in the application of the training package  
Support these trainers in the delivery of initial training activities (under outputs 4 and 5) | --- |
<p>| Output 4: | The governors, assistant governors and members of ethics commissions of the 81 provinces | --- |</p>
<table>
<thead>
<tr>
<th>Output 5:</th>
<th>Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials</th>
</tr>
</thead>
</table>
| Activities: | Organise up to 15 training events for members of ethics commissions and officials responsible for in-service training in different institutions of the public administration
Organise up to 4 training events for senior officials of central level institutions of the public administration (under secretary, general director, president, general secretary and deputy general secretary levels) |
| Long-term adviser | Up to 80 work days of short-term consultants
Cost for up to 19 training events |

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<tr>
<th>Output 6:</th>
<th>At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public</th>
</tr>
</thead>
</table>
| Activities: | Commission at least 10 research studies
Organise the publication of the results of these studies
Support the Ethics Council in the organisation of up to 5 public workshops on the results of these studies |
| Long-term adviser | Up to 20 work days of short-term consultants
Cost for 10 research studies
Up to 5 workshops |

<table>
<thead>
<tr>
<th>Output 7:</th>
<th>The development of codes of conduct for elected office holders and the judiciary will have been supported</th>
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<tbody>
<tr>
<td>Activities:</td>
<td>Organise workshops on codes of conduct for elected office holders and the judiciary to identify possibilities for the development of such codes</td>
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</table>
| Long-term adviser | Up to 35 work days of short-term consultants
Up to 6 workshops |
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<tr>
<th>Output 8:</th>
<th>The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available</th>
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<tbody>
<tr>
<td>Activities:</td>
<td>Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics. Based on these studies, make proposals with regard to future anti-corruption strategies. Organise up to 2 national conferences on the prevention of corruption in Turkey.</td>
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<tr>
<td>Long-term adviser</td>
<td>Up to 30 work days of short-term consultants</td>
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<td>Up to 5 studies</td>
<td>Cost for 2 national conferences</td>
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<th>Output 9:</th>
<th>Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured</th>
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<tr>
<td>Activities:</td>
<td>Support the organisation of regular meetings (once every six months) with the technical commission assisting the Interministerial Anti-corruption Commission. Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey.</td>
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<tr>
<td>Long-term adviser</td>
<td>Up to 40 work days of short-term consultants</td>
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3.5 Linked Activities

Within the framework of EU co-operation several activities are underway or planned which are of relevance to anti-corruption measures and with which co-operation should be sought. These include:

- Judicial Modernisation and Penal Reform Programme (Ministry of Justice – Council of Europe).
- TR0204.05 Strengthening the fight against organised crime (Turkish National Police and General Command of Gendarmerie-Twinning finished in November 2005).
- TR0204.04 Strengthening the fight against money laundering (Financial Crimes Investigation Board, MASAK – Twinning ongoing with Italy).
- TR0304.03 Strengthening the struggle against money laundering, financial sources of crime and the financing of terrorism (Turkish National Police – Twinning ongoing with Germany).

Other international donors are also contribution of action promoting good governance:

- UNDP workshops were organised with the Turkish Chamber of Business Chambers (TOBB) to consider the role of business in governance reform.
- The World Bank has conducted a number of activities including a workshop in 2001 looking at ways of reducing corruption. The Bank has also been involved in a Public Expenditure and Institutional Review (PEIR).
- The OECD – through the SIGMA programme – is helping strengthen the newly established Turkish Public Procurement Agency.
- The United Office for Drugs and Crime (UNODC) provides support to the TADOC (Turkish International Academy Against Drugs and Organised Crime).

3.6 Lessons learned

The fight against corruption is an important issue with regard to progress towards accession to the European Union. In this connection, the Turkish National Programme for the Adoption of the Acquis (NPAA) – under chapter 4.25.5 – points at several needs, including:

- Enhanced co-operation between competent ministries and other institutions.
- Accession to relevant international conventions, such as the Criminal Law Convention on Corruption (ETS 173), the Civil Law Convention on Corruption (ETS 174), and the Convention on Laundering, Search, Seizure and Confiscation of Proceeds from Crime (ETS 141) of the Council of Europe.
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- The scope of parliamentary immunity
- Lack of transparency in the financing of political parties
- The weak efficiency and effectiveness of governmental, parliamentary and other bodies established to combat corruption
- The weak consistency of anti-corruption policies and the degree of coordination and cooperation
- The need for an overhaul of the inspection system
- The need for strengthening of the dialogue between government, public administration and civil society
- The need to raise awareness of corruption
- The need for continuous support at the highest political level.

The Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey provides for three short-term priorities with regard to the anti-corruption policy:

- Fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.
- Ensure implementation of the Regulation on Principles of Ethical Behaviour for Civil Servants and extend its provisions to elected officials, judiciary, academics and military personnel
- Limit the scope of parliamentary immunity in line with European practice.

The present project will build upon the progress made. It will help Turkey implement the GRECO recommendations and make progress towards accession to the European Union.
4 INSTITUTIONAL FRAMEWORK

4.1 Role of the Ethics Council at the Prime Ministry

The Ethics Council of Public Officials Unit is the beneficiary responsible for project implementation on behalf of the Government of Turkey. The head of the Ethics Council of Public Officials will appoint a member or an expert of the Council as the Project Director. The responsibilities of the Project Director, in co-operation with the Technical Assistant, are:

- To contribute to the preparation of the work plan and to participate in the approval of the work plan.
- To monitor the proper implementation of activities of the project and report to the Steering Committee.
- To ensure that the implementation of activities is properly monitored and evaluated.

The Prime Ministry will also make office space available for project staff within the offices of the Ethics Council.

The Prime Ministry will allocate the staff to the secretariat of the Ethics Council necessary to ensure smooth implementation of the project.

4.2 Role of the Council of Europe

The Council of Europe will be responsible for the implementation of the project and the use of the funds under a contract with the European Commission. The Council of Europe is expected to ensure the achievement of the project outputs as listed above. In order to achieve these results the Council of Europe may propose alternative or complementary project activities to those identified in this section, where it can clearly justify them. Within the Council of Europe, the Department of Crime Problems of the Directorate General of Legal Affairs will be responsible for co-ordination and supervision of the programme.

The Council of Europe will recruit a long-term advisers/technical assistant, and local support staff which will be based in Ankara and work directly with the Ethics Council. This team will be responsible for project management on behalf of the Council of Europe. The Council of Europe will report to the CFCU.

4.3 Role of the European Commission

The European Commission will provide overall guidance to this project within the framework of the de-centralized implementation system (DIS).

4.4 The Steering Committee

The Steering Committee of this project will consist of the Ethics Council, Council of Europe, Delegation of the European Commission and CFCU. The steering committee meeting should also involve other relevant authorities which are the Prime Ministry
Inspection Board, Ministry of Justice, Ministry of Interior, National Police, Gendarmerie, Ministry of Finance (Financial Crimes Investigation Board- MASAK), State Security Courts, General Public Prosecutor’s Office. It will take strategic decisions and supervise the proper implementation of the project. It will address the major problems that the project might face. The Steering Committee shall be called to meet at the beginning of the project and every three months or when a serious problem arises. The responsibilities of the Steering Committee are the following:

- To make an assessment of emerging needs for a sound project implementation.
- To approve the overall work project and the annual work plans.
- Recommend strategies in the light of national anti-corruption priorities and Accession Partnership
- To make recommendations on the translation of newly developed strategies into policy.
- To conduct reviews of project reports and other documentation.
- To conduct a final review of the implementation.
- To recommend strategies for sustainability and follow up activities.

4.5 Reporting, monitoring and evaluation

The Council of Europe will submit the following reports:

- An inception report within two months of the beginning of the contract. The inception report will contain a detailed work plan and the names of possible consultants. In its elaboration, the Logical Framework Approach shall be followed linking the project objectives to expected results and the activities needed in order to achieve the results. The inception report outlines the management structure of the project clearly describing the responsibilities of the main players as well as the decision-making process and information flow between the project participants.

- Quarterly activity reports will be submitted every three months to the CFCU. These reports will list more in detail the activities undertaken and assess the progress toward achievement of project objectives. The update will stress particularly the achievement of results.

- A final report will be made by the end of the project period. The final report should follow the inception report format and include an in-depth assessment of project implementation results and the level of achievement of the objectives. The final report will be complemented by an evaluation of the impact of the project.

4.6 Submission & approval of reports

Reports should be submitted to:

- Central Finance and Contracts Unit
- European Commission Delegation
- The Steering Committee
- Ethics Council of Public Officials
4.7 Monitoring

The project will be monitored by the Head of Technical Cooperation of the Department of Crime Problems (Directorate General of Legal Affairs) of the Council of Europe in Strasbourg. He will ensure that reports are prepared and submitted as required, and provide all necessary support to the programme team in Ankara.

4.8 Evaluation

In conjunction with the final project report (to be prepared by the technical assistant and the programme director), two independent experts will prepare an evaluation report to determine the impact of the project towards the implementation of its overall objective.

5 DETAILED BUDGET

<table>
<thead>
<tr>
<th>Phare/Pre-Accession Instrument support</th>
<th>Co-financing</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>€</td>
<td>National Public Funds (*)</td>
<td>Other Sources (**)</td>
</tr>
<tr>
<td>Year 2006 Institution Building support</td>
<td>1.350.000</td>
<td>150.000</td>
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<tr>
<td>Direct Grant Contract</td>
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<td>IB support</td>
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</tr>
<tr>
<td>Total project 2006</td>
<td>1.350.000</td>
<td>150.000</td>
</tr>
</tbody>
</table>

(*) contributions form National, Regional, Local, Municipal authorities, FIs loans to public entities, funds from public enterprises
(**) co-financing by the Council of Europe.

6 IMPLEMENTATION ARRANGEMENTS
6.1 Implementing Agency

The Central Finance and Contracts Unit (CFCU) will be the Implementing Agency responsible for all the procedural aspects of the tendering process, contracting matters and financial management (including payments) of the project activities.

**Contact details in the CFCU:**

Mr. Muhsin ALTUN  
Programme Authorizing Officer  
Address: Eskişehir Yolu 4.Km. 2.Cad. (Halk Bankası kampüsü)  
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6.2 Twinning

Not applicable

6.3 Non-standard aspects

A direct grant agreement is to be signed with the Council of Europe for the implementation of the project.
Council of Europe is the “guardian of European values and principles”. Indeed, all European Union countries and Turkey are already member states of the Council of Europe. Joint projects therefore present a significant opportunity for Turkey to work together with the Council of Europe and the European Union closely to promote Turkish and European standards and consolidate democratic reforms.

Compliance with CoE commitments are a specific and important precondition for further progress in drawing closer to the EU.

More than a decade of effective co-operation between the EC and the CoE under the numerous joint programmes has proven that solid results in support of the rule of law, better protection of human rights, and stronger democratic institutions can be achieved when the two organisations combine their respective strengths.

With regard to corruption, the Council of Europe is well placed to support Turkey. The Council of Europe’s approach in this area consists of standard setting (conventions, recommendations), monitoring (through the Group of States against Corruption) and technical cooperation programmes. Turkey has ratified relevant conventions of the Council of Europe and is a member of GRECO. The present project will also ensure follow up to GRECO recommendations.

6.4 Contracts

A direct grant agreement of an amount of € 1.5 will be signed by Council of Europe.

7 IMPLEMENTATION SCHEDULE

7.1 Start of tendering/call for proposals

Description of action to be finalised by the Council of Europe by 1 November 2006. Direct grant agreement to be concluded by 1st quarter of 2007.

7.2 Start of project activity

Implementation phase will start in April 2007.

7.3 Project completion

Activities will end in April 2009.

8 EQUAL OPPORTUNITY

Equal opportunities for women and men is policy of the Council of Europe. Percentage of women participating in project activities will be one indicator.
9 ENVIRONMENT

Not applicable

10 RATES OF RETURN

Not applicable

11 INVESTMENT CRITERIA

Not applicable

12 CONDITIONALITY AND SEQUENCING

The three months prior to the start of specific project activities will constitute the inception phase during which a detailed work plan will be elaborated.

The project is based on the following assumptions (see also the logical framework in the appendix):

- Continued political commitment to implement the Code of Ethics
- Political commitment to undertake measures against corruption and to implement GRECO recommendations
- Important role of the Ethics Council recognised by line agencies, ministries and provincial administrations, and receiving high-level Government support
- Proposals for laws and regulations properly dealt with and processed by Government and Parliament
- The Prime Ministry will allocate the necessary staff to the Secretariat of the Ethics Council to facilitate project implementation.

Indicators of success include:

- Level of compliance with the Code of Ethics for Public officials in terms of:
  - Number of complaints received and investigated
  - Number of training activities carried out in different institutions
  - Activities carried out by Ethics Commissions
- Adoption of a Code of Ethics by the Judiciary
- Adoption of a Code of Ethics by the Parliament

(see logical framework for output-specific indicators)

**ANNEXES TO PROJECT FICHE**

1. Logframe
2. Detailed implementation chart
3. Contracting and disbursement schedule, by quarter, for full duration of project (including disbursement period)
4. Reference list of feasibility/pre-feasibility studies, in-depth ex ante evaluations or other forms of preparatory work.

5. Reference list of relevant laws and regulations

6. Reference list of relevant strategic plans and studies
### Annex 1: Logical framework

<table>
<thead>
<tr>
<th>Description</th>
<th>Indicators</th>
<th>Means of verification</th>
<th>Assumption</th>
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</thead>
</table>
| **Overall objective:** To contribute to the prevention of corruption in Turkey in accordance with European and other international standards | Level of compliance with the Code of Ethics for Public officials in terms of:  
- Number of complaints received and investigated  
- Number of training activities carried out in different institutions  
- Activities carried out by Ethics Commissions  
- Adoption of a Code of Ethics by the Judiciary  
- Adoption of a Code of Ethics by the Parliament | ▪ Studies on the effectiveness of anti-corruption measures  
▪ GRECO reports  
▪ EU/EC reports | |
| **Specific objective:** To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials | ▪ Number of complaints received and investigated  
▪ Number of training activities carried out in different institutions  
▪ Activities carried out by Ethics Commissions  
▪ Adoption of a Code of Ethics by the Judiciary  
▪ Adoption of a Code of Ethics by the Parliament | ▪ Study on the effectiveness of the Code of Ethics  
▪ GRECO reports  
▪ Project reports | |
| **Output 1:** The staff of the Ethics Council are trained and have the necessary working tools and procedures to better exercise their mandate | ▪ Number of meetings held by the Ethics Council  
▪ Number of complaints treated and investigations completed  
▪ Quality of work plan  
▪ Quality of reports prepared by the Ethics Council | ▪ Project reports  
▪ Study on the effectiveness of the Code of Ethics | The Ethics Council will have the necessary resources and commitment to translate its knowledge into action |
<table>
<thead>
<tr>
<th>Description</th>
<th>Indicators</th>
<th>Means of verification</th>
<th>Assumption</th>
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</table>
| Activities: | Review the working procedures of the Ethics Council of Public Officials and its secretariat and make and implement proposals for improvement  
- Train the staff of the secretariat in the management of complaints received and implementation of Ethics Principles in line with international standards  
- Train the staff of the Council in the investigation of complaints  
- Support 2 study visits of members and the staff of the Ethics Council to study the experience of similar bodies in other European countries | | | |
| Output 2: | A training package is available to support the application of the code of ethics for public officials | - The draft training package is available by month 6  
- The final package is available by month 10 and the training CD by month 12  
- Quality of the training package | Project reports | The training package is accepted by relevant institutions and used for training activities |
| Activities: | Translate and review materials on ethics training available in other countries  
- Develop a coherent training package/curriculum for ethics training based on the provisions of the Code of Ethics  
- Following a testing of the training package (under outputs 4 and 5), finalise | | |
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<tr>
<th>Description</th>
<th>Indicators</th>
<th>Means of verification</th>
<th>Assumption</th>
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<tbody>
<tr>
<td>and the training package and make it available to different institutions for in-service training</td>
<td>• Produce and disseminate a training CD suitable for computer-based training</td>
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<tr>
<td><strong>Output 3:</strong> At least 10 trainers have been trained and are able to deliver ethics training</td>
<td>• Quantity and quality of training activities carried out by trainers</td>
<td>• Project reports</td>
<td>Trainers will remain available for training activities</td>
</tr>
<tr>
<td><strong>Activities:</strong></td>
<td></td>
<td>• Study on the effectiveness of the Code of Ethics</td>
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<tr>
<td>• Select 10 to 15 trainers from training institutions of the public administration</td>
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<tr>
<td>• Train these trainers in the application of the training package</td>
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<tr>
<td>• Support these trainers in the delivery of initial training activities (under outputs 4 and 5)</td>
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<tr>
<td><strong>Output 4:</strong> The governors, assistant governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials</td>
<td>• Number of training activities carried out</td>
<td>• Project reports</td>
<td>Representatives of the provincial administrations make use of the skills acquired and follow up with ethics activities in their respective institutions</td>
</tr>
<tr>
<td><strong>Activities:</strong></td>
<td>• Follow up activities by provincial officials</td>
<td>• Study on the effectiveness of the Code of Ethics</td>
<td></td>
</tr>
<tr>
<td>• Organise up to 6 training events for governors and assistant governors</td>
<td>• Number of complaints received and investigated</td>
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<tr>
<td>• Organise up to 10 training events for</td>
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<tr>
<td>Description</td>
<td>Indicators</td>
<td>Means of verification</td>
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<tr>
<td>members of ethics commissions in provinces and municipalities</td>
<td>Number of training activities carried out</td>
<td>Project reports</td>
<td>Officials from different institutions make use of the skills acquired and follow up with ethics activities in their respective institutions</td>
</tr>
<tr>
<td>Output 5: Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials</td>
<td>Follow up activities by ethics commissions and senior managers</td>
<td>Study on the effectiveness of the Code of Ethics</td>
<td></td>
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<tr>
<td>Activities:</td>
<td>Number of complaints received and investigated</td>
<td></td>
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<tr>
<td>▪ Organise up to 15 training events for members of ethics commissions and officials responsible for in-service training in different institutions of the public administration</td>
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<tr>
<td>▪ Organise up to 4 training events for senior officials of central level institutions of the public administration (under secretary, general director, president, general secretary and deputy general secretary levels)</td>
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<tr>
<td>Output 6: At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public</td>
<td>Quantity and quality of research studies</td>
<td>Project reports</td>
<td>The relevant authorities contribute to the research studies and actively</td>
</tr>
<tr>
<td></td>
<td>Number of public workshops and feedback received</td>
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<tr>
<td>Description</td>
<td>Indicators</td>
<td>Means of verification</td>
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<tr>
<td>Activities:</td>
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<td>participate into workshops. The results of the research studies will be follow up and feed into improved corruption prevention measures</td>
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<tr>
<td>Output 7:</td>
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<td>Activities:</td>
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<td>Output 8:</td>
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<td>Description</td>
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<td>Means of verification</td>
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</table>
| other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available | ▪ Further studies available by month 22  
▪ Quality of studies and recommendations | | research studies will be followed up and feed into improved corruption prevention strategies |

**Activities:**
▪ Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics  
▪ Based on these studies, make proposals with regard to future anti-corruption strategies  
▪ Organise up to 2 national conferences on the prevention of corruption in Turkey

**Output 9:** Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured

| | Availability of proposals for improved coordination  
▪ Number and quality of meetings held with the technical commissions and other institutions responsible for anti-corruption measures in Turkey | ▪ Project reports  
▪ GRECO reports  
▪ EU/EC reports | Proposals for improved coordination will be followed up |

**Activities:**
▪ Support the organisation of regular meetings (once every six months) with the technical commission assisting the
<table>
<thead>
<tr>
<th>Description</th>
<th>Indicators</th>
<th>Means of verification</th>
<th>Assumption</th>
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</thead>
</table>
| Interministerial Anti-corruption Commission  
- Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey | | | |
# ANNEX-2: DETAILED IMPLEMENTATION CHART

<table>
<thead>
<tr>
<th>ANNEX - II IMPLEMENTATION CHART</th>
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<td>I - Twinning</td>
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<tr>
<td>II - Direct Grant Contract</td>
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<td>III - Supply</td>
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ANNEX-3: QUARTERLY CONTRACTING AND DISBURSEMENT SCHEDULE”

ANNEX – III Contracting and Disbursement Schedule (Quarterly – in Euro)

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<td>Direct Contract</td>
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<tr>
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Appendix 4: Preparatory work and feasibility studies

- Council of Europe/European Commission needs assessment mission and preparation of terms of reference for a programme against corruption (March/April 2003)
- Council of Europe technical mission on anti-corruption services (April 2004)
- Council of Europe needs assessment and preparatory mission (April 2006)
- GRECO evaluation report March 2006 (confidential until released by Turkish authorities)

Appendix 5: Reference list of relevant laws and regulations

- Law related to the establishment of ethics council of Public Officials (Law no. 5176, published in the Official Journal on 8 June 2004)

Appendix 6: Reference list of relevant strategic plans and studies

- "Action plan on increasing transparency and enhancing good governance in the public sector" (adopted by the Council of Ministers on 12 January 2002)
- Section on corruption in the Emergency Action Plan, the 58th Government January 2003