

Partnership for Good Governance

Yaxşı İdarəçilik üçün Tərəfdaşlıq



FINAL NARRATIVE REPORT

1 PROJECT DATA

Project title: 2015/DGI/IP/3255

Strengthening Capacities to Fight and Prevent Corruption in Azerbaijan (2015-2017)

Strengthening Anti-Money Laundering in Azerbaijan (2018)

Project type: Bilateral

Target country: Azerbaijan

Project duration: 1 January 2015 – 31 December 2018

Final beneficiaries and/or target groups:

Commission on Combatting Corruption, State Examination Centre, Anti-Corruption Directorate under the Office of the Prosecutor General, State Agency for Public Service and Social Innovations/ASAN, Financial Monitoring Service under the Financial Market Supervisory Authority, Ministry of Justice, Ministry of Internal Affairs, Ministry of Taxes, Ministry of Education, Academy of Justice, State Customs Committee, Central Election Commission, Chamber of Auditors, Professional Associations (Banks; Lawyers,)representatives of law enforcement agencies, higher education institutions and civil society organisations.

Project Team	
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2 OVERALL ASSESSMENT

The Project on “Strengthening capacities to fight and prevent corruption in Azerbaijan” (PGG-AZ) was one of the four National Components of the CoE/EU Partnership for Good Governance (PGG) Programme “Fight against corruption and fostering good governance/ Fight against money-laundering”, specifically tailored to respond to the needs of Azerbaijan in the area of fight against corruption and money-laundering. The Project assisted Azerbaijani prevention and repression entities with building up their internal capacities and supported the Azerbaijani Government in setting future priorities in the field.

The PGG-AZ provided support to strengthening the training capacities of the Commission on Combating Corruption and the State Examination Centre and specialised operational capacities of the Anti-Corruption Directorate under the General Prosecutor and other judicial, investigative and financial intelligence bodies, including the Financial Monitoring Service. Furthermore, it served as the main facilitator of expert and public dialogue regarding the draft National Action Plan on Promotion of Open Government 2016-2018.

The project implementation during 2018 mainly focused on anti-money laundering, following the request of assistance from authorities in view of their upcoming Moneyval evaluation in 2019 and its relevant obligations.

Considering the nature of the project and the timeline it is too early to discuss any impact of the project, however the initial outcomes provide a good indication of potential impact in the future.

Overall, the project interventions contributed to the legislative processes and institutional capacities in the following areas:

- i) As a direct follow-up to the pilot trainings delivered under the project the Commission on Combatting Corruption developed a comprehensive training and awareness raising Action Plan for 2018. The Commission is actively using the training materials and the pool of certified trainers on Anti-Corruption and Ethics to deliver trainings to civil servants. During 2018, the Commission in cooperation with the Anti-Corruption Academy organised 60 trainings for 800 civil servants. The trainings were delivered by the pool of experts established under the Project and were based on the materials provided by the Project;
- ii) The National Action Plan on Promotion of Open Government (2016-2018), drafted with the assistance of the project, has been implemented at 89 % of planned activities by December 2018;
- iii) The indicators and the e-platform developed under the project which facilitates the drafting and delivery reports to the Commission on Combatting Corruption on the

implementation of activities under the National Action Plan on Promotion of Open Government (2016-2018) is actively used by 61 state agencies

- iv) There is an upward trend of activities in the field of investigation and confiscation by the Anti-Corruption Directorate, following trainings delivered by the project. According to the annual results¹ reported to the press by the Anti-corruption Directorate under the General Prosecutor's Office, in 2018, the authorities had completed the investigation of 278 corruption-related criminal cases against 431 individuals, following the investigation the cases were referred to the relevant courts;
- v) The law "On the rules of conduct of the deputies of the Milli Mejlis of the Republic of Azerbaijan" adopted in August 2017 takes into account some of the recommendations provided through the technical advise of the project. Later on, the amended version of law adopted in December 2018, takes into account the recommendations contained in a 2nd legal opinion delivered by the Project during 2018, most importantly, those dealing with conflict of interest where MPs should refrain from voting or participation in case of conflict of interests.
- vi) Four Academic institutions (universities and professional development establishment) have included in their curricula the training methodology and teaching materials on anti-corruption and ethics developed within the project.
- vii) The project provided training on most relevant economic crime offences and techniques used in investigating corporate criminal activities for 123 trainee judges.
- viii) Recommendations provided in the legal review on the application of "Fit and Proper" standards under the AML/CFT law have been introduced into the October 2018 amendments. Most notably, the "fit and proper" requirements were extended to those who are "associates" to criminals, in relation to entities which are subject to financial monitoring (persons obligated to implement AML/CFT measures stipulated under the Law).
- ix) The capacities of supervisory authorities, financial and non-financial sector has been increased to apply the risk-based approach through the methodology, guidelines and capacity-building activities provided by the Project
- x) Guidance on Conflict of Interest for Members of Parliament is used by Disciplinary Commission of the Parliament as a reference list for MPs when regulating conflict of interest situations.

The project delivered the following key outputs in 2015-2018:

¹ <https://azertag.az/xeber/1233634>

- i) Delivery of a training curricula and handbooks on Anti-Corruption, Ethics in Public Service and Performance Appraisals in Civil Service;
- ii) Delivery of training-of trainers on Anti-Corruption, Ethics in Public Service and Performance Appraisals in Civil Service and support to follow-up Pilot Training courses;
- iii) Development of training curricula and materials on whistle-blower protection, money laundering investigations, plea bargaining and cooperation agreements, criminal liability of legal persons and mutual legal assistance in asset recovery. Furthermore, the project provided trainings on these topics for law enforcement agencies, judiciary and financial analysts;
- iv) Comprehensive Review of the draft National Action Plan on anti-corruption and recommendations for future priorities;
- v) Development of an on-line monitoring tool; and a methodology for evaluating the implementation of National Action Plan on Promoting Open Government (2016-2018);
- vi) Development of a training methodology, and teaching materials on Anti-Corruption and Ethics for six academic institutions (universities/professional development establishments);
- vii) Development of a training toolkit and delivery of trainings on for investigative bodies and judiciary on investigating, processing and adjudicating money laundering and terrorism financing cases;
- viii) Delivery of an expert opinion on Application of “Fit and Proper” Standards in Azerbaijani Legislation in line with Moneyval and FATF recommendations;
- ix) Delivery of an expert opinion on the 2nd Draft Law on Regulations of Ethical Conduct of Members of the Parliament of the Republic of in line with relevant GRECO recommendations; Delivery of a training course on terrorism financing and proliferation of Weapons of Mass Destruction (WMDs) for financial and non-financial institutions;
- x) Development of a risk assessment methodology and sector-specific guidelines on effectively applying the risk-based procedures for the financial sector.
- xi) Development of Guidelines on the Prevention of Conflict of Interest for the Members of Parliament.

During the three-year implementation period, the PGG Azerbaijan project carried out 47 activities, thereby completing 84% of the planned project interventions for a four year period. In connection with the above the project produced 19 technical papers and organised 25 capacity-building workshops, seminars and conferences with 1044 participants in total, of which 78% were men while 22% were women.

3 ASSESSMENT OF PROJECT RESULTS

3.1 Achievements of project outcomes and expected results for the Project on Strengthening Anti-Money Laundering in Azerbaijan (2018)

On 31 May 2017, Azerbaijan's Parliament ratified the CoE Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No.198).

While Azerbaijan has made progress on certain technical elements of AML/CFT, the 2014 MONEYVAL mutual evaluation questioned the effectiveness of many aspects of the AML/CFT regime. Although authorities have made efforts to address a number of technical deficiencies, the indications suggested that both the preventive and enforcement regimes continue to lack effectiveness.

Consistent with the recommendations of the 2014 MONEYVAL mutual evaluation, a clear need was identified to enhance the level of compliance of financial institutions; effective risk-based supervision and inspections by the relevant supervisors could help to achieve this result.

The follow-up to the 2015-2017 phase of the Project therefore identified new priorities to be achieved in 2018, as a preparation phase for a new 3-year project cycle expected to start in 2019 until 2021. As result in 2018 the project focused on achieving the following:

- Improved institutional capacities to fight and prevent economic crime;
- Improved strategic and operational capacities of the Financial Monitoring Service (FMS);
- Strengthened capacities of judges and prosecutors on money-laundering/terrorist financing (ML/TF) proceedings and investigative techniques;
- Supported implementation of AML/CFT measures as a follow up to MONEYVAL recommendations;
- Increased risk-based approach to supervision and inspections capacities of supervisory authorities.

ER1. - Improved strategic and operational capacities of the Financial Monitoring Service under the new structure aimed at independence and autonomous FIU methodology

An initial assessment done in 2017 identified the need for further training of the personnel and enhancement of the independence of the Financial Monitoring Service (FMS). In terms of training there is a clear need for analysts to keep themselves up-to-date with effective methods, techniques and information sources in use in other countries. As noted in the 2014 Moneyval mutual evaluation report, lack of effectiveness in some aspects of investigating

and prosecuting ML/TF cases (particularly in addressing issues with autonomous money laundering cases) needed to be addressed.

Furthermore, special attention needed to be given towards the capacities and follow up that Azerbaijan will be giving toward the implementation of the FATF's recommendation concerning the new methodology on effectiveness of AML/CFT systems (operationally and autonomous conditions for an independent FIU) . As such, project outputs were conceived to address initially the capacity building needs and provide support to the new FMS (FIU) structure.

Expected result 1: Improved strategic and operational capacities of the Financial Monitoring Service under the new structure aimed at independence and autonomous FIU methodology

Status (*fully achieved, partly achieved, not achieved*) – *Partly achieved*

Description (*based on evidence/feedback/evaluation sources*)

Financial Monitoring Service (FMS) was established as an autonomous public legal entity in May 2018. It had been identified as the main beneficiary for the second phase of the project in late 2017. The institution had been undergoing significant restructuring throughout 2018 with staff appointments on-going. The Project has been informed by the FMS that this may affect the implementation and timing of activities, which are solely designed for FMS staff. The restructuring of the FMS had also strongly impacted on the appointment of the new Director of the FMS, which was only finalised in September 2018. Until the appointment of the leadership of the organisation, existing FMS staff did not have the authority to decide on any cooperation activities specifically conceived for the FMS, but they took part, whenever possible, in other multi-agency trainings.

This situation had been put forward by the FMS as a potential risk for implementation at the very beginning of the Project phase. After the 1st Steering committee took place on 5 February 2018, the FMS made a request to the Project team to move all activities aimed at capacity-building of the FMS (i.e. all activities under ER1) to the very last quarter of 2018, as delays were anticipated. The Workplan was amended accordingly.

The Project continued to monitor the situation and was checking on progress regularly. This was also reported in bi-monthly reports, as well as in meetings with the EU delegation, as the main donor. Several attempts were also made to exert soft pressure on the Azerbaijani authorities to speed up the process of appointing FMS management, but as the decision was solely at the discretion of the Presidential Administration, these attempts were unsuccessful.

Outcome indicator(s) under ER1:

- Increased quality of FIU analytical reports;
- Increased capacities to carry out freely and independently its functions as an FIU of the country;
- Available resources to freely carry out their functions;
- FMS is able to operate independently with other counterpart domestic and independent authorities;
- Number of statistical forms is increased;
- Improved knowledge on ML/TF typologies for financial and non-financial institutions.

Status : Partly achieved

Description (based on evidence/feedback/evaluation sources)

In terms of increased capacities to carry out freely and independently its functions as an FIU of the country, FMS is officially an independent and autonomous body since May 2018. In addition, at the end of 2018, new FMS Director was appointed, and the body was assigned its own annual budget. Therefore, it now has available resources to freely carry out its functions and the recruitment of new staff is on-going. FMS is, therefore, able to operate independently with other domestic and independent authorities.

Despite the obstacles encountered in delivering specialised capacity-building trainings for FMS staff, the Project ensured that FMS staff took part in other capacity building exercises designed for law enforcement and judicial bodies. FMS staff took an active part in the following activities delivered under other ERs:

- Development of Expert Opinion on Application of “Fit and Proper” Standards in Azerbaijani Legislation;
- Training on Investigative Techniques in Money Laundering;
- Training on Terrorism Financing: Concepts and Challenges;
- Training on Processing and Adjudicating Money Laundering Cases for prosecutors and judges;
- Development of a Risk-Assessment Methodology and Sectoral Guidelines for Banks;
- Workshop on Risk Assessment Methodology and Sector-Specific Guidelines for Banking Sector;
- Training on Terrorism Financing and Proliferation of Weapons of Mass Destruction for Banks.

Therefore, in terms of raising operational capacities of the FMS, ER 1 was partly achieved.

ER2. - Strengthened capacities of judges and prosecutors on ML/TF proceedings and investigative techniques

Within ER2 the project sought to strengthen capacities of law enforcement and judiciary in investigating and processing money-laundering in line with national legislation and the Criminal Procedure Code. The capacity-building measures targeted all investigative bodies, aiming to enhance their capability to address money laundering and terrorism financing

from the substantial, procedural and investigative aspects. This was achieved through the following actions:

- Providing a training toolkit on money laundering and terrorist financing investigative techniques;
- Delivering a training on investigative techniques in ML for law enforcement;
- Delivering a training on processing and adjudicating ML cases for judges and prosecutors;
- Delivering a training on terrorism financing for judges and prosecutors.

Expected result 2: Strengthened capacities of judges and prosecutors on ML/TF proceedings and investigative techniques

Status (*fully achieved, partly achieved, not achieved*) – *Not achieved*

Description (*based on evidence/feedback/evaluation sources*)

During 2018, the Project contributed to further specialisation of prosecutors of the Anti-Corruption Directorate under the Office of the Prosecutor General, law enforcement agencies, and the judiciary on anti-money laundering and terrorism financing issues. Pursuant to project interventions, authorities have acquired skills and knowledge on use of investigative techniques in money laundering and terrorist financing cases. Capacity of specialised prosecution and investigation bodies and judges was enhanced to prosecute and adjudicate money laundering cases.

Moreover, the authorities were provided a training toolkit on money laundering and terrorist financing investigative techniques, which was made available in the local language to facilitate its use by the authorities in future trainings.

In a series of trainings organised within the project, the trainees have learned specific aspects of investigation, prosecution and adjudication of money laundering and terrorism financing cases.

In cooperation with the Anti-Corruption Directorate, Ministry of Justice and National Security Services, around 100 trainee judges, prosecutors, and investigators obtained knowledge on most relevant money laundering and terrorism financing investigative techniques. Trainings were complemented with group works on fictional cases with an aim to equip the trainees with knowledge on strategies and mechanisms to better tackle money laundering and terrorism financing offences.

Outcome indicator(s) under ER2:

- Level and frequency of use of practical knowledge and tools by law enforcement agencies when dealing with anti-money laundering and terrorism financing;
- Number of judges with improved knowledge to adjudicate ML/TF offences;
- Number of ML/TF investigations;
- Number of investigative tools available.

Status: Fully achieved

Description (based on evidence/feedback/evaluation sources)

Judges, prosecutors and investigators have acquired specialised and advanced knowledge on key issues such as investigating money laundering cases. Capacity on processing and adjudicating money laundering cases of specialised prosecution, investigative bodies and judges was also enhanced. Accompanying training materials were developed and provided to trainees.

Moreover, specialised prosecution and investigation bodies have been introduced to the concepts and challenges concerning terrorism financing cases, based on good international practices. Accompanying training curricula and materials were developed on these topics and distributed to the relevant authorities for their reference in their future work.

In terms of figures, 40 representatives of specialised prosecution and law enforcement bodies, as well as judges, were trained on investigative techniques in anti-money laundering. 30 representatives of specialised prosecution, law enforcement bodies and judges were trained on handling terrorism financing cases, based on case studies. Finally, 29 prosecutors and judges, as well as representatives of respective state bodies were provided with a practical understanding on prosecuting and adjudicating money laundering cases, reflecting international best practices.

The training toolkit on investigating, processing and adjudicating money laundering and terrorist financing cases has been developed and translated into Azerbaijani language for future continuous training purposes.

ER3. - Supported implementation of AML/CFT measures as a follow up to MONEYVAL recommendations

Within ER3, the Project focused on providing necessary support to the Azerbaijani authorities in achieving specific objectives as identified through MONEYVAL Recommendations. This was also complemented by the priorities specified in the National Action Plan on Combating Legalisation of Criminally Obtained Funds or Other Property and Financing of Terrorism for 2017-2019.

- Develop training materials and training course on terrorism financing and proliferation of Weapons of Mass Destruction (WMDs) for financial institutions and non-financial institutions.
- Legal review on Application of "Fit and Proper" Standards in Azerbaijani Legislation in line with Moneyval and FATF recommendations was delivered;

- A legal opinion on the new Draft Law on Regulations of Ethical Conduct of Members of the Parliament of the Republic of Azerbaijan was delivered in order to ensure that the law is in line with relevant GRECO recommendations;
- In addition, a guidance document for MPs was drafted to provide practical advice on situations involving the acceptance of gifts, conflicts of interest and contact with third parties.

Expected result 3: Supported implementation of AML/CFT measures as a follow up to MONEYVAL recommendations

Status: *Fully achieved*

Description *(based on evidence/feedback/evaluation sources)*

During 2018, the Project carried out two legal reviews within ER3. First review was to assess the compliance of the national legislation with international standards in view of implementing outstanding MONEYVAL recommendations in relation to “fit and proper” standards. The legislation under review included the Law on Banks, Law on Non-Bank Credit Institutions, Law on Insurance Activity, Law on Securities Market, and Law on Investment Funds. The review aimed to assist the Financial Monitoring Service in identifying potential changes to the country’s AML/CFT regime, including amendments to laws, regulations and other measures.

The second legal review was carried out following an ad-hoc request by the Commission on Combatting Corruption concerning the Draft law on Regulations of Ethical Conduct of Members of the Parliament of the Republic of Azerbaijan.

The Project delivered an Expert Opinion on the previous draft of the Law in February 2017. However, very few of the recommendations were included in the adopted version of the Law. In view of the above and for the purpose of addressing all outstanding GRECO recommendations, the Azerbaijani authorities requested further assistance. In addition to the opinion, the expert will also develop a guidance paper on the prevention of conflict of interest for Members of Parliament including practical examples of acceptance of gifts, post-employment rules and contact with third parties. The legal review and the guidance paper were presented during a workshop attended by MPs and parliamentary staff.

Finally, as a separate effort to enhance the capacities of the financial and non-financial sector, the Project developed a training programme on terrorism financing and proliferation of WMDs. The trainees were presented with financial crime risk assessment tools, which included identification of risk factors, assessment of control effectiveness and calculation of residual risk levels. To better manage terrorist financing and proliferation risks, the importance of risk measurement in order to apply a risk-based approach for AML/CFT prevention was highlighted.

Outcome indicator(s) under ER3:

- Increased capacities to identify Terrorism Financing by financial and non-financial institutions;
- Adopted legislation amended reflecting outstanding MONEYVAL recommendations.

Status: Fully achieved**Description (based on evidence/feedback/evaluation sources)**

Recommendations of both legal reviews were taken into account by Azerbaijani authorities. Concerning the legal review on “Fit and Proper” standards, the FMS has amended the AML/CFT Law accordingly on 12 October 2018. Most importantly, the “fit and proper” requirements were extended to those who are “associates” to criminals, in relation to entities which are subject to financial monitoring (persons obligated to implement AML/CFT measures stipulated under the Law).

Concerning ethical conduct of MPs, the authorities have reviewed the Draft Law on Regulations of Ethical Conduct of Members of the Parliament for the second, this time taking into account most of the recommendations made both from the legal reviews provided in 2017 and 2018. The new version of the law was adopted on 18 December 2018. The amended version of law adopted takes into account the recommendations delivered by the 2nd legal opinion delivered by the Project in 2018, most importantly, the recommendation in relation to conflict of interest was addressed. The adopted version removed the prohibition on voting or participating in parliamentary proceedings in situations of conflict of interest and replaced it with a non-binding recommendation that an MP should refrain from voting or participation.

Furthermore, the examples of conflict of interest situations presented in the guidance paper and workshop on Conflict of Interest for MPs” were taken onboard by the Parliament . In addition, the Disciplinary Commission of the Parliament agreed that it will be useful to scrutinise all the examples provided in the paper, make appropriate modifications/additions and deploy it as a reference list for MPs to check for relevant solutions to potential conflict of interest situations.

Banks and other reporting institutions have enhanced their capacities on how to carry out a robust risk assessment of money laundering and terrorism financing risks. Through the capacity-building activity facilitated by the Project, they have strengthened their knowledge and skills to better identify higher risk entities or individuals and obtain a better understanding of TF and WMD proliferation risks.

ER 4. - Increased risk-based approach to supervision and inspections capacities of supervisory authorities

The aim of ER4 was to develop an AML/CFT risk assessment methodology and sector-specific guidelines for banking sector in order to ensure Azerbaijan's compliance with international recommendations regarding the application of the risk-based approach and proposing actions to mitigate risks effectively, both for supervisory and reporting entities.

Expected result 4: Increased risk-based approach to supervision and inspections capacities of supervisory authorities
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Status (<i>fully achieved, partly achieved, not achieved</i>) – Fully achieved

Description (based on evidence/feedback/evaluation sources)
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<p>In 2018, Financial Markets Supervisory Authority (FIMSA), with participation of the FMS, conducted a series of onsite AML/CFT inspections across all banks using survey forms with a set of typical control questions. However, it was noticed that supervisory bodies need to ensure a more standardised methodology for implementing risk assessments not only across financial institutions, but also non-financial institutions. In that regard, a "Risk assessment methodology for supervisory authorities" was produced under the project in order to help relevant supervisory authorities to tailor it according to their needs and to be better positioned to carry out an effective AML/CFT supervision.</p>

<p>Similarly, banks lacked the know-how on the practical implementation of their own internal risk assessments and its compliance with the national legislation and international standards, as well as the requirements of supervisory institutions. Taking this into consideration the Project produced and delivered "Guidelines for effective implementation of risk-based Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) procedures in the financial sector".</p>

<p>During the scoping process, the Project team worked separately and jointly with the regulatory authorities (FIMSA and FMS), as well as with commercial banks, in order to be able to tailor both documents to their specific needs. This goal was achieved successfully.</p>

<p>Both technical papers were presented during the "Workshop on Risk Assessment Methodology and Sector-Specific Guidelines" for representatives of financial institutions, including banks. The risk assessment methodology provided a model for a data-base, which will assist the Azerbaijani authorities to assess the money laundering and terrorism financing risks impacting on the financial sector. The workshop also served as an open platform for both supervisory and reporting entities to jointly discuss the necessary steps needed to understand the extent of the exposure of the financial system to ML/TF risks and to implement relevant risk mitigation measures.</p>
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Outcome indicator(s) under ER4:

- Improved methodology for carrying out risk-assessments;
- Increase of risk-based approach by supervisory authorities.

Status: Fully achieved**Description (based on evidence/feedback/evaluation sources)**

A methodology for carrying out a risk assessment in the banking sector was developed, following an extensive scoping exercise with main financial supervision authorities and commercial banks, due to which Azerbaijani authorities and reporting institutions are now better equipped to carry out their own risk-assessments independently.

In addition, sector-specific guidelines for financial institutions in order to effectively apply risk-based procedures have been developed, which has further enhanced the risk-based approach capacities of supervisory and reporting entities.

Workshop was held on the methodology and guidelines for financial institutions, where 33 participants from the supervisory authorities and banks had the opportunity to prepare for the upcoming MONEYVAL mutual evaluation scheduled for late 2019.

3.2 Achievements of project outcomes and expected results for the Project on Strengthening Capacities to Fight and Prevent Corruption in Azerbaijan (2015-2017)

3.2.1 ER1 – Strengthened training capacities of the Commission on Combatting Corruption and the State Examination Centre

PGG-AZ took first actions in 2015 with a view toward strengthening training capacities of the Commission on Combatting Corruption (CCC) and the State Examination Centre (SEC).

PGG-AZ made good progress toward strengthening training capacities of the CCC by producing a tailor-made training curriculum and handbook on anti-corruption concepts, standards, and practices. Similarly, the State Examination Centre (SEC) has been provided with a curriculum and handbook on “Ethics in Public Service”, which was used as a basis for development of a continuing ethics training program for the public administration in Azerbaijan.

Furthermore, the PGG Project supported the Commission on Combatting Corruption (CCC) and State Examination Centre (SEC) through tailor-made training-of-trainer courses on ethics, performance evaluations and anti-corruption in public service.

Expected result 1: Strengthened training capacities of the Commission on Combatting Corruption and the State Examination Centre.

Status (<i>fully achieved, partly achieved, not achieved</i>) – Fully achieved
<p>Description (<i>based on evidence/feedback/evaluation sources</i>)</p> <p>Over a three-year implementation period, the Project took series of actions with a view toward strengthening training capacities of the Commission on Combatting Corruption (CCC) and the State Examination Centre (SEC)². The project produced a tailor-made training curriculum and handbook on anti-corruption concepts, standards, and practices for the CCC with input on Azerbaijani context. Similarly, the SEC has been provided with curricula and handbooks on “Ethics in Public Service” and “Performance Evaluations in Public Service”, with particular focus on the local context.</p> <p>A pool of 27 national trainers was established through two Training-of-Trainers courses on Ethics and Anti-corruption in Public Service with an aim to increase the capacities of the CCC and SEC to independently organise future trainings on these subjects in the public sector for the civil service, education sector and civil society (April and July 2017). In addition, a training-of-trainers course on Performance Evaluations was provided for 24 civil servants dealing with human resources issues (April 2017).</p> <p>As a follow-up action to the Training-of-Trainers courses, three regional pilot trainings were delivered on ethics and anti-corruption by four national trainers certified by the Project and selected by the Commission on Combatting Corruption and State Examination Centre (June and October 2017, Guba and Ganja).</p> <p>A pilot training on Performance Evaluations training took place in Guba region in June 2017, delivered by two certified national trainers.</p> <p>The positive assessment of these pilot trainings attests to the sustainability of the training programme for the Azerbaijani authorities, specifically the CCC and SEC.</p>
<p>Outcome indicator(s) under ER1:</p> <ul style="list-style-type: none"> - Inclusion of standardised (certified) Training Curricula for the civil service continuous education on: a) anti-corruption; b) ethics; and c) performance appraisals training; - Number, level and frequency of trained civil servants that promote integrity in public administration through provision of anti-corruption, ethics and performance appraisals as daily standards
Status (<i>fully achieved, partly achieved, not achieved</i>): Fully achieved
<p>Description (<i>based on evidence/feedback/evaluation sources</i>)</p> <p>The State Examination Centre and the Commission on Combatting Corruption have been provided by the Project with standardised anti-corruption and ethics curricula and handbooks, which are adaptable to the specific needs of different civil service institutions and feature specific local content legislation, regulations and policy. Similarly, the Project</p>

² The State Examination Centre was established in 2016 as a result of the merger of the State Examination Centre and the State Commission for the Admission of Students.

developed and delivered Performance Evaluations handbook for the SEC.

Eighty-five (85) ethics, performance evaluations and anti-corruption trainers have been trained through Training-of-Trainers courses to deliver trainings to cover the entire civil service in Azerbaijan and are conducting trainings using the new curricula in institutions at central and local levels. The project also used selected trainers to deliver pilot trainings in the regions for the representatives of public service institutions, higher education institutions and civil society organisations covering the same subjects.

3.2.2 ER2 – Reinforced law enforcement capacities of the Anti-Corruption Directorate of the General Prosecutor’s Office

Within ER2 the project took a multifaceted approach by:

- a) Providing training for prosecutors and investigators of the Anti-Corruption Directorate under the General Prosecutor’s Office;
- b) Enhancing skills and knowledge on use of plea bargaining and non-prosecution agreements, investigation of money laundering, and use of informal and formal mutual legal assistance tools in case investigations and prosecutions;
- c) Enhancing the capacities of the judiciary to tackle corporate criminal liability cases and implement recently adopted legislation on whistle-blower protection.
- d) Contributing to training of trainee judges on most relevant economic crime offences and techniques used in investigating corporate criminal activities.

Expected result 2: Reinforced law enforcement capacities of the Anti-Corruption Directorate under the Office of the Prosecutor General

Status (*fully achieved, partly achieved, not achieved*) – **Fully achieved**

Description (*based on evidence/feedback/evaluation sources*)

The Project contributed to further specialisation of prosecutors of the Anti-Corruption Directorate under the Office of the Prosecutor General, law enforcement agencies, and the judiciary on complex economic crime issues. Pursuant to project interventions, authorities have acquired skills and knowledge on use of plea bargaining and non-prosecution agreements, investigation of money laundering and requesting mutual legal assistance in asset recovery cases. Capacity of specialised prosecution and investigation bodies and judges was enhanced to tackle corporate criminal liability and whistle-blower protection.

The authorities have moreover been provided expert recommendations on legislative framework and good operational practices through training curricula on “Liability of the Legal Person (Entity)”, “Plea Bargaining, Immunity and “Restricted Use” Agreements, Witness Protection and Deferred Prosecution Agreements” and “Mutual Legal Assistance in Asset Recovery”.

In a series of trainings organised within the project the trainees have learned on specific

aspects of investigation and prosecution of corporations, tools to be used and approaches to be taken for successful completion of such cases, and channels for close inter-agency cooperation. The intervention has contributed to the readiness of law enforcement and justice sector authorities for applying the new provisions of the Criminal Procedure Code on criminal liability of legal entities, adopted in November 2016.

In cooperation with the Academy of Justice, **123 trainee judges** obtained knowledge on most relevant economic crime offences and techniques used in investigating corporate criminal activities.

Outcome indicator(s) under ER2:

- Level and frequency of use of practical knowledge and tools by law enforcement agencies when dealing with: witness/whistle-blower protection, criminal liability of legal persons, anti-money laundering

Status (*fully achieved, partly achieved, not achieved*): Fully achieved

Description (based on evidence/feedback/evaluation sources)

All prosecutors and investigators in Anti-Corruption Directorate under the Office of the Prosecutor General (ACDOPG) have acquired specialised and advanced knowledge on key issues (such as corporate criminal liability of legal persons; asset recovery) and skills to investigate and prosecute corruption and other forms of economic crime; relevant training curricula are developed in cooperation with the ACDOPG's training department for future continuous training purposes.

Moreover, specialised prosecution and investigation bodies have been introduced to the basic concepts of criminal liability of legal persons, plea bargaining and cooperation agreements, and mutual legal assistance in asset recovery and whistle-blower protection. Accompanying training curricula and materials were developed on these topics and distributed to the relevant authorities for their reference in their future work.

3.2.3 ER3 – Support the preparation of an expected new National Anti-Corruption Action Plan

The PGG-AZ facilitated a large scale public and expert discussion in support of the efforts of the Commission on Combatting Corruption (CCC) to obtain extensive public input on the draft National Anti-corruption and Open Government Action Plans.

PGG-AZ strengthened the awareness raising and training capacities of the Central Election Commission of Azerbaijan through training for political party representatives on financial reporting.

The E-platform developed by the project in 2016 to monitor and report on the implementation of the National Action Plan, was successfully launched in 2017.

Expected result 3: Support the preparation of an expected new National Anti-Corruption Action Plan (NACAP)

Status (*fully achieved, partly achieved, not achieved*) – **Fully achieved**

Description (*based on evidence/feedback/evaluation sources*)

The Project facilitated a large scale public and expert discussion in support of the efforts of the Commission on Combatting Corruption (CCC) to obtain extensive public input on the draft National Anti-corruption and Open Government Action Plans. Furthermore, the CCC was provided with detailed expert advice on ways to improve the draft strategic documents through a Technical Paper on the Draft National Anti-corruption and Open Government Action Plans.

Upon the adoption of the “National Action Plan on Promotion of Open Government 2016-2018”, PGG-AZ provided to the CCC a tailor-made electronic platform³ for collecting information on the implementation of the Action Plan and assessment of the rate of implementation, which will also be accessible to the civil society.

As a continuation on the e-platform produced by the project in 2016 and launched in 2017, a methodology for evaluating the implementation level of the “National Action Plan on Promotion of Open Government 2016-2018”, including guidelines for evaluation and specific indicators, were developed. This methodology will serve as guidance for the Commission on Combatting Corruption in carrying out accurate measuring of the implementation rate of the activities contained within the Action Plan and reported in the e-platform.

Two additional activities were delivered within this Expected Result. In an effort to further boost implementation of outstanding international anticorruption recommendations in Azerbaijan, the project provided assistance in awareness-raising by the Central Election Commission of Azerbaijan through a training for political party representatives on financial reporting. As a result, representatives of the majority of political parties in Azerbaijan have been acquainted with international standards, good practices, and national rules regarding political party financial reports.

Furthermore, a **legal opinion** was provided to Azerbaijani authorities **on the draft “Law on Regulations of Ethical Conduct of Members of the Milli Majlis (Parliament) of the Republic of Azerbaijan”** in order to ensure that the law is in line with relevant GRECO recommendations in early 2017. The law **was adopted in August 2017 with several CoE**

³ An *E-platform* for the CCC was developed within PGG-AZ

expert recommendations incorporated.

Outcome indicator(s) under ER3:

- Level of monitoring and evaluation reports and findings on implementation of National Action Plan on Promoting Open Government (2016-2018) through the application of the new evaluation methodology; and the on-line monitoring tool

Status (*fully achieved, partly achieved, not achieved*): **Fully achieved**

Description (*based on evidence/feedback/evaluation sources*)

Support was provided to the national authorities in drafting the new National Anti-Corruption Action Plan (NACAP) by organising a public discussion on the draft Action Plan, with participation of representatives of state agencies and civil society organisations, taking into account the evaluation of the 2012-2015 Anti-Corruption Action Plan and providing an expert review of the draft Action Plan. It incorporated measures to implement outstanding recommendations from the second, third, and fourth GRECO evaluation rounds and other monitoring bodies (e.g. MONEYVAL).

To increase the capacities of relevant state institutions to monitor and report on the implementation of the National Action Plan on Promotion of Open Government 2016 - 2018, an electronic platform was developed and launched in 2017. The project has also produced a methodology for the CCC for evaluating the level of implementation of the NACAP which provides comprehensive evaluation guidelines, including specific indicators allowing the authorities to carry out objective and accurate measuring of the implementation rate of the activities contained within the Action Plan.

Pursuant to request from the authorities, support was provided to the Central Election Commission to ensure financial transparency of political parties through expert input and in line with GRECO recommendations

3.2.4 ER4 – Anti-Corruption Training is introduced into the public service and the education sector

In 2016, PGG-AZ established contacts with the Ministry of Education, as well as several higher education institutions such as the Law Faculty at Baku State University and Public Administration Academy, to set ground for the activities under this ER planned for 2017.

Significant progress was made in 2017 toward assisting higher education institutions in Azerbaijan to incorporate and /or enhance anti-corruption and ethics modules within their higher education institutions.

Expected result 4: Anti-Corruption training is introduced into the public service and the education sector

Status (fully achieved, partly achieved, not achieved) – Partly achieved

Description (based on evidence/feedback/evaluation sources)

In order to assist higher education institutions in Azerbaijan to introduce and/or improve their anti-corruption and ethics courses, a teaching methodology and curriculum outline was developed for academic staff which provided some suggested teaching approaches, optional group activities and case studies. In addition to the methodology, three student readers with comprehensive anti-corruption and ethics content were developed based on the handbooks already produced by the Project.

In 2017 the **teaching methodology and accompanying teaching materials** were presented to the members of the academic community from **six higher education institutions**⁴, as well as the representatives of the Ministry of Education and the Commission on Combatting Corruption. The academic staff of selected higher education institutions gained an insight into anti-corruption and ethics issues, with a special focus on the Azerbaijani policy context. They were provided with practical tools on how to introduce/enhance anti-corruption and ethics trainings in their institutions, thus raising awareness faculty members on good practices in anti-corruption/ethics education.

Moreover, **some of the participating institutions** provided the project with their **strategy on applying the teaching methodology, including the details of the institution's level of engagement**, while also indicating a short plan of action and timeframe, as identified by their respective department/faculty. The institutions are likely to start the implementation in 2018/2019 academic year.

Due to the delayed implementation of ER4 by one year, the final activity (Assessment of the efficiency and the impact of new ethics and anti-corruption training modules) could not be carried out within the suggested timeframe as most institutions involved were unable to introduce the anti-corruption/ethics module within the given timeframe.

In any case, a viable assessment of efficiency and impact would only be possible after two or three years of the introduction of the course. Therefore, the introduction of such an activity during project design stage was unrealistic from the outset during a three-year project cycle.

Outcome indicator under ER4:

- Number of public and private education institutions that have integrated anti-corruption and ethics in their training curricula (including level and volume of course

⁴ Baku State University, Public Administration Academy under the President of the Republic of Azerbaijan, Azerbaijan State Pedagogical University, ADA University (private institution), Academy of Justice, Azerbaijan State University of Economics.

materials)
Status (<i>fully achieved, partly achieved, not achieved</i>): Fully achieved
<p>Description (<i>based on evidence/feedback/evaluation sources</i>)</p> <p>Awareness regarding continuing education on anti-corruption and ethics issues was raised among representatives of higher education institutions.</p> <p>Six higher education institutions were selected in cooperation with the Commission on Combatting Corruption and Ministry of Education to pilot the teaching methodology and materials on anti-corruption and ethics produced under the Project. During the selection process, particular attention was paid to select institutions with highest outreach potential, as well as selecting faculties which are more likely to educate future civil servants. Therefore, a good balance was achieved between public, private and professional training institutions.</p> <p>The project held bilateral meetings with academic staff of the institutions, to discuss the level of their involvement in including anti-corruption and ethics modules into their curriculum and secure teaching staff for the modules. Moreover, a workshop was delivered to provide the institutions with initiative and advice on the need to institutionalise anti-corruption and ethics trainings in the higher education sector, thus raising awareness of faculty members on the importance of anti-corruption and ethics education for students, especially those who may enter public service careers.</p> <p>Pursuant to the request of the project, the participating institutions have expressed their support and commitment to continue the imitative and start introducing the teaching materials as part of their existing courses in the coming academic year of 2018-2019.</p>

3.3 Mainstreaming and cross-cutting issues

The project made specific efforts to address cross-cutting issues throughout the whole implementation period. In view of potential challenges in relation to certain aspects like the traditional dominance of men in senior and middle-level public service positions, less active role of civil society actors in the country, the original goals can be assessed as essentially achieved.

The project sought to promote gender-balanced participation in all capacity building activities. An average 22% representation of women was achieved during the events organized by the Project.

Furthermore, under ER1, the Project delivered regional pilot trainings using the certified local trainers by creating an equal opportunity for women trainers. The balanced pairing of trainers helped to better address and grasp gender-sensitive issues under ethics and anti-corruption topics during the pilot trainings.

The Project encouraged active involvement of civil society to demonstrate the significant role of NGOs in strengthening public trust in government and its efforts in combating corruption. At the beginning of the first year of implementation, the Commission on Combatting Corruption (CCC) transmitted to the project the interest from the NGO Coalition against Corruption in being more involved in the Project and providing their input to the NACAP drafting process. On 14 March 2016, the project held a public discussion on the draft Action Plan for around 75 representatives of state agencies, civil society organisations and professional associations.

The three consequent PGG Annual Co-ordination Platform Meetings took place with the participation of the civil society which created an open venue for NGOs to address their questions and provide recommendations in regard to the project specific activities.

The Project managed to invite civil society organizations for most of the trainings to ensure adequate participation of all related parties - public administration, civil society and higher education institutions. Even the regional activities included NGO representatives whereas regions significantly lack civil society organizations. The pool of local trainers certified by the Project also includes members of civil society organizations.

During the initial phase of the Project (2015-2017), under ER4, the Project successfully targeted the youth by assisting higher education institutions in Azerbaijan to introduce and/or improve anti-corruption and ethics education for students, especially those who may enter public service careers. This joint exercise with the selected higher education institutions, the Ministry of Education, and the Commission on Combatting Corruption will positively inspire and motivate the youth - university students in bringing a new culture of integrity to all levels of the society.

4 PROJECT GOVERNANCE AND CO-ORDINATION

4.1 Complementarity and co-operation

The PGG-AZ has been very well received by relevant Azerbaijani counterparts. Main project beneficiary institutions, the Commission on Combatting Corruption, State Examination Centre, and the Anti-Corruption Directorate with the Prosecutor General, showed willingness and support to actively engage in all project activities and provide the PGG Project Team with necessary information and input. Other project constituencies (e.g. Justice Academy, Chamber of Auditors, and the Financial Monitoring Service), as well as counterparts with whom activities began later on in the project (namely the Ministry of Education and universities) were open for discussion regarding plans for involvement and future steps.

PGG-AZ developed excellent working relations with key project partners, such as the Commission on Combatting Corruption, who have taken clear ownership over project outputs from the very beginning. Good cooperation with other project partners, such as the

State Examination Centre and the Anti-Corruption Directorate under the Office of the Prosecutor General provided for smooth and efficient implementation of project activities.

In addition, the project also had very good cooperation with the Financial Monitoring Service and Chamber of Auditors in relation to anti-money laundering activities and with the Central Election Commission with regard to political financing. Furthermore, the Project established successful cooperation with the Academy of Justice in organizing two seminars for trainee judges on Corporate Criminal Liability. The Project's initiative to introduce anti-corruption and ethics modules into higher education sector was highly supported through successful cooperation with the Ministry of Education and selected higher education institutions.

The PGG Project Team regularly liaised with international organisations, working on the same and similar issues (e.g. EU, U.S.D.O.J, USAID, OECD, and GIZ) country specific projects, in order to ensure complementarity and avoid overlap. No major challenges regarding cooperation have been observed, but an overlap of project portfolios has been noted with the EU Technical Assistance Project to the Ministry of Justice in relation to training activities organised for the Anti-Corruption Directorate, especially concerning plea bargaining and corporate criminal liability.

In addition, UNDP and GIZ were providing assistance to strengthen the institutional capacities of State Examination Centre as part of Institutional Reform Plan 3 (IRP3) "Strengthening civil service training in Azerbaijan with a focus on EU affairs". The Project titled "Support to the State Examination Centre under the President of the Republic of Azerbaijan in implementation of the Institutional Reform Plan within the Comprehensive Institutional Building Program" was to end in 2016 and no overlap was observed as areas of assistance differed on specifics.

With regard to EUD, the Project maintained efficient co-ordination and regular communication on the project activities with them, as well as submitted written reports on a bi-monthly basis through the PGG platform and regularly extended invitations to the project events.

4.2 Communication and visibility

The Project followed the PGG Communications Strategy, agreed between the European Union and the Council of Europe, which is applicable to all programmatic outputs, including official communication, technical papers, activity agendas and presentations, news/media feeds, and project visibility kits (i.e. banners, folders, notepads, and pens). In 2018, visibility materials were redesigned and published to reflect the change in the name of the Project.

The Project paid particular attention to visibility of its interventions. Key Programme documents and information on programmatic events and deliverables (e.g. technical papers

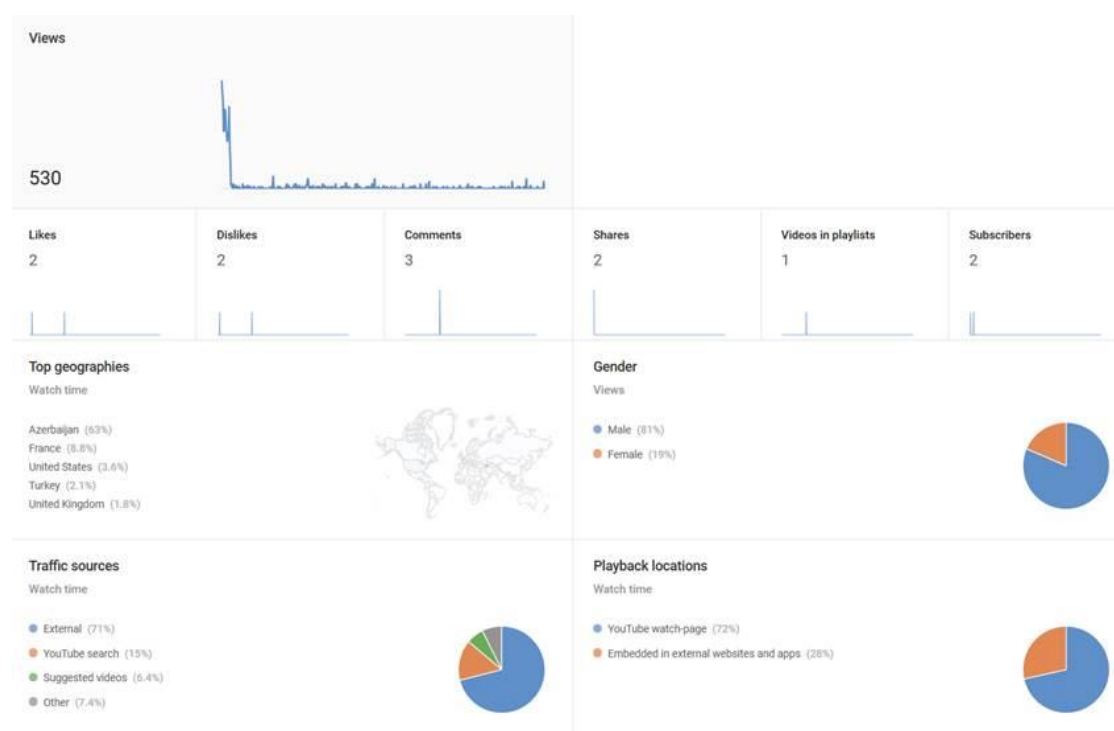
on reviewed legislation) can be found on the webpage of the [Council of Europe Economic Crime and Cooperation Division](#) and webpage section specifically dedicated to [PGG-Azerbaijan Programme components](#).

A [note for the press](#) with a general description of the project, as well as news updates were regularly published on the websites of the [Economic Crime and Corruption Division](#) and [CoE office in Baku](#).

Some of the project activities were highlighted in the press by local beneficiary institutions⁵. In addition, the first parts of the PGG Annual Co-ordination Platform Meetings were open to the press for the presentation of the mid-term results of the PGG projects in Azerbaijan.

A promotional clip⁶ on the PGG-Corruption Programme and its interventions in Azerbaijan was done in 2016, illustrating support provided to national counterparts through this initiative.

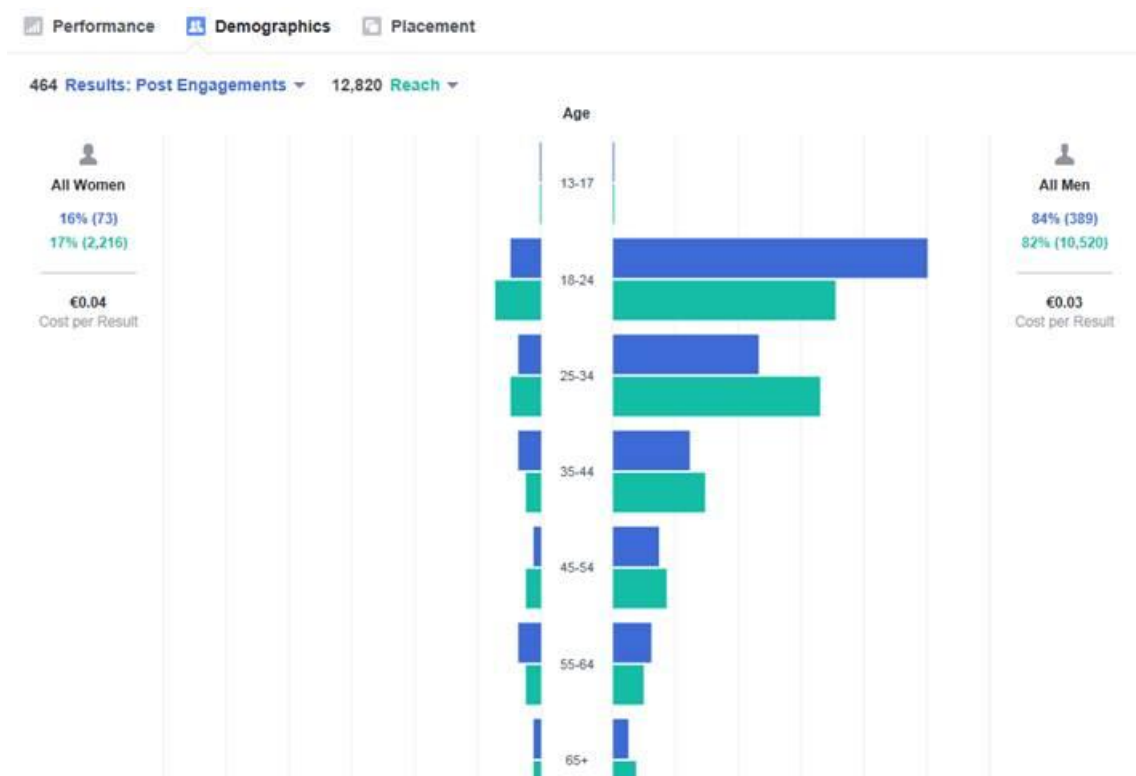
The YouTube analytics for the video clip are as follows:



The video clip was posted on Facebook. The figures below show the FB post analytics:

⁵ For more details visit: [Azertag Ganja News](#); [Genprosecutor.gov.az](#)

⁶ Promotional [Clip](#) of PGG Corruption Programme



4.3 Challenges, lessons learned and possible follow-up

4.3.1 Challenges:

Technical Assistance projects with substantive overlap

In 2016, the PGG Project Team had witnessed the emergence of a new EU funded TA projects which overlap, to some degree, with the PGG Programme. This development has created a duplication of activities for the same beneficiary institutions, especially where assistance provided was not planned in-sync. This opened the opportunity for local beneficiaries to pick and choose the modality of assistance they prefer for the same types of activities. The project management team took measures to adjust to such new situation, however it should be noted that this development resulted with a challenging environment for the project management of both CoE and EU led projects.

Passive approach at policy level

When it comes to implementation of project deliverables, individual government agencies were highly active in project activities, and the main beneficiary served as a highly efficient coordinator for the entire range of authorities. However, this steadfastness in participation in activities has only in several cases translated into actual policy steps, institutional or legislative reforms at the Government level. The project can thus boast a large number of deliverables covering all areas and levels of the anti-corruption system, with relatively few of these deliverables serving as the starting point in a continuous reform process.

Institutional changes

Another challenge encountered by PGG-AZ project was the institutional reform which took place in April 2016. The Civil Service Commission (CSC), as one of the main Project beneficiaries under ER 1, was dissolved, while its tasks were placed under the authority of a new body, State Examination Centre. In view of uncertainty concerning the key functions of the SEC that bear direct relevance to project implementation and the fact that the reforms were finalised only in November 2016, the project had to postpone all trainings until SEC had informed the project they could continue with planned activities during the first quarter of 2017. This also directly impacted the implementation of ER4, which also depended on completion of training handbooks and materials on order to be initiated.

Similar situation was encountered with the Financial Monitoring Service (FMS), as one of the main beneficiaries, during 2018. The ongoing institutional and structural changes meant that FMS staff was unable to fully benefit from the Project. All trainings concerning FMS were postponed and were finally cancelled as it was clear that FMS was unable to commit time and human resources to the completion of planned activities.

Ad-Hoc assistance requests

The PGG Project Team received several additional requests for assistance throughout the project, which is largely a reflection of emerging issues in the country. In 2016 and 2017, the PGG Programme has accommodated a number of such requests where the overall substantive framework, the time-line, and the budget permitted it, including the Seminar on Transparency in Political Party Financing, Legal Opinion on the Draft Law on Regulations of Ethical Conduct of Members of the Milli Majlis (Parliament) of the Republic of Azerbaijan, and the methodology for evaluating the implementation of the National Action Plan on Promotion of Open Government 2016-2018.

4.3.2 Lessons learned:

Monitoring of implementation

There is a need to institute a system to closely monitor and discuss the authorities' actions in implementing the various recommendations delivered by the project and measure their progress. While the Steering Committee is one of the existing mechanisms used to monitor and report on progress, in the case of this project and due to a rather limited access to information and internal processes, it was not always possible to fully ensure that there is follow-up to project activities. Future technical assistance projects may benefit from the development of an additional monitoring mechanism, to be agreed on with the authorities in advance.

Engaging local experts

It has been noted during the trainings-of-trainers that the best results were achieved when combining international experts with local ones. Given the challenging and sensitive nature of delivering effective trainings-of-trainers, especially when it comes to a multi-sector target group, it was noted that the audience responded very positively to a local expert acting as an interlocutor with international experts, thus complementing the trainings with local context and communication styles.

Pilot activities

The engagement of local experts was further asserted through Pilot trainings delivered by local experts, certified by the project. The effectiveness and impact of the pilot trainings delivered in the regions was very high thanks to the local experts who not only possessed excellent level of knowledge on subject matter, but they also possessed excellent presentation and training skills. The response of the audience was also very positive, especially realizing that the trainings were delivered on a fully voluntary basis. The piloting approach should be continued as a matter of good practice in similar CoE projects.

5 ANNEX

5.1 Major reports and documentation (e.g. publications, studies and surveys)

- 1) Technical Paper on: Liability of the Legal Person (Entity) (ECCU-PCF-AZ-1/2015)
- 2) Technical Paper on: Review of Draft National Anti-Corruption Action Plan for 2016-2019 and Draft Action Plan for 2016-2018 on Promotion of Open Government (ECCU-PCF-AZ-1/2016)
- 3) Technical Paper on: Plea Bargaining, Immunity and “Restricted Use” Agreements, Witness Protection and Deferred Prosecution Agreements (ECCU-PCF-AZ-2/2016)
- 4) Technical Paper on: Technical specification for an IT solution (“e-platform”) for monitoring and reporting on the implementation of the “National Action Plan on Promotion of Open Government 2016-2018” (ECCU-PCF-AZ-3/2016)
- 5) Anti-corruption Training Handbook (ECCD-PCF-AZ-4/2016)
- 6) Anti-corruption Training Curriculum (ECCD-PCF-AZ-5/2016)
- 7) Technical Paper on: Mutual Legal Assistance in Asset Recovery (ECCD-PCF-AZ-6/2016)
- 8) Ethics in Public Service Training Handbook (ECCD-PCF-AZ-7/2016)
- 9) Ethics in Public Service Training Curriculum (ECCD-PCF-AZ-8/2016)
- 10) Legal Opinion on: Draft Law on Regulations of Ethical Conduct of Members of the Parliament of the Republic of Azerbaijan (ECCD-PCF-AZ-1/2017)
- 11) Methodology and Guidelines for the Assessment of Implementation of National Action Plan on Promotion of Open Government (2016-2018) (ECCD-PCF-AZ-2/2017)
- 12) Handbook on Performance Evaluation System in Civil Service (ECCD-PCF-AZ-3/2017)
- 13) Teaching Methodology and Curriculum Outline on Anti-Corruption, Ethics and Integrity Education (ECCD-PCF-AZ-4/2017)
- 14) Expert Opinion on: Application of “Fit and Proper” Standards in Azerbaijani Legislation (ECCD-PGG-AZ - 1/2018)
- 15) Training Toolkit on: Money Laundering and Terrorist Financing Investigative Techniques (ECCD-PGG-AZ - 2/2018)
- 16) Expert Opinion on: Draft Law on Rules of Ethical Conduct of Deputy of the Milli Majlis (Parliament) of Azerbaijan Republic (ECCD-PGG-AZ - 3/2018)

- 17) Guidelines for the Prevention of Conflict of Interest for Deputies of the Milli Majlis (Parliament) of Azerbaijan Republic (ECCD-PGG-AZ - 4/2018)
- 18) Methodology for carrying out an Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) risk assessment in the banking sector (ECCD-PGG-AZ - 5/2018)
- 19) Guidelines for effective implementation of risk-based Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) procedures in the financial sector (ECCD-PGG-AZ - 6/2018)

5.2 List of activities (title of the activity, dates and location)

- 1) **Development of training curricula on Liability of Legal Entities**
29 October – 20 November 2015
- 2) **Training on Investigation and Prosecution of Legal Entities and Asset Recovery**
19 - 20 November 2015, Baku, Azerbaijan
Number of participants: 35; Female/Male participants: 2/33
- 3) **Training-of-Trainers Workshop on Ethics**
3-4 December 2015, Baku, Azerbaijan
Number of participants: 14; Female/Male participants: 6/8
- 4) **Review of the draft National Anti-Corruption Action Plan (2016-2019)**
1-31 March 2016
- 5) **Public Discussion of Draft Action Plans on Anti-Corruption and Open Government Partnership**
14 March 2016, Baku, Azerbaijan
Number of participants: 76; Female/Male participants: 18/58
- 6) **Workshop on Challenges and Best Practices in Anti-Money Laundering Investigations**
16 May 2016, Baku, Azerbaijan
Number of participants: 41; Female/Male participants: 2/39
- 7) **Development of a training curricula on Plea Bargaining and Cooperation agreements**
1 May 2017 – 1 September 2016
- 8) **Workshop on Plea Bargaining, Cooperation and Non-Prosecution Agreements**
17 May 2016, Baku, Azerbaijan
Number of participants: 43; Female/Male participants: 3/40

- 9) **Seminar on Transparency in Political Party Financing: Financial Reporting by Political Parties**
7 June 2016, Baku, Azerbaijan
Number of participants: 60; Female/Male participants: 10/50
- 10) **The 1st Meeting of the Steering Committee**
15 July 2016, Baku, Azerbaijan
Number of participants: 11; Female/Male participants: 3/8
- 11) **Development of training curricula on Mutual Legal Assistance in Asset Recovery**
31 October – 30 November 2016
- 12) **Workshop on Mutual Legal Assistance in Asset Recovery**
31 October – 1 November 2016, Baku, Azerbaijan
Number of participants: 35; Female/Male participants: 7/28
- 13) **Assessment of IT Capacities and Development of E-Platform for monitoring the implementation of the National Action Plan on Promotion of Open Government 2016-2018**
19 August – 1 November 2016
- 14) **Development of training curricula and training materials on Ethics in Public Service**
3 November - 2 December 2016
- 15) **Launch event of the E-Platform for monitoring the implementation of the National Action Plan on Promotion of Open Government 2016-2018**
23 January 2017, Baku, Azerbaijan
Number of participants: 87; Female/Male participants: 18/69
- 16) **Development of training curricula and materials on Anti-Corruption approaches**
1 February 2016 – 30 January 2017
- 17) **Provision of Legal Opinion on the Draft Law on Regulations of Ethical Conduct of Members of the Parliament of the Republic of Azerbaijan**
25 January – 17 February 2017
- 18) **Development of methodology and guidelines for evaluating the implementation status of National Action Plan on Promotion of open Government (2016-2018)**
2 February – 28 February 2017
- 19) **Development of training curricula and training workshop on Whistle-blower Protection**
27 February – 15 March 2017
- 20) **Workshop on Whistleblower Protection**

- 27-28 February 2017, Baku, Azerbaijan
Number of participants: 59; Female/Male participants: 9/50
- 21) **Training-of-trainers on Ethics in Public Service**
17-19 April 2017, Baku, Azerbaijan
Number of participants: 27; Female/Male participants: 7/20
- 22) **Development of Performance Evaluations training curricula and materials**
20 March – 21 April 2017
- 23) **Training-of-Trainers on Performance Evaluations in Public Service**
20-21 April 2017, Baku, Azerbaijan
Number of participants: 24; Female/Male participants: 12/12
- 24) **Pilot Training on Ethics in Public Service**
29 June 2017, Guba, Azerbaijan
Number of participants: 30; Female/Male participants: 4/26
- 25) **Pilot Training on Performance Evaluations in Public Service**
30 June 2017, Guba, Azerbaijan
Number of participants: 29; Female/Male participants: 4/25
- 26) **Training-of-Trainers Course on Anti-Corruption in Public Service**
11-13 July 2017, Baku, Azerbaijan
Number of participants: 20; Female/Male participants: 5/15
- 27) **Presentation of the methodology and guidelines for monitoring the implementation of the National Action Plan on Promotion of Open Government 2016-2018**
18 July 2017, Baku, Azerbaijan
Number of participants: 42; Female/Male participants: 14/28
- 28) **Seminars on Criminal Liability of Legal Persons for Trainee Judges**
28 and 29 September 2017, Baku, Azerbaijan
Number of participants: 123; Female/Male participants: 35/88
- 29) **Second Pilot Training on Ethics in Public Service**
9 October 2017, Ganja, Azerbaijan
Number of participants: 32; Female/Male participants: 13/19
- 30) **Pilot Training on Anti-Corruption in Public Service**
10 October 2017, Ganja, Azerbaijan
Number of participants: 37; Female/Male participants: 20/17
- 31) **Development of teaching methodology, training curricula and materials on anti-corruption and ethics concepts for universities**

17 October – 30 November 2017

- 32) **Workshop on introducing and delivering Anti-Corruption and Ethics courses in higher education**
24 November 2017, Baku, Azerbaijan
Number of participants: 18; Female/Male participants: 5/13

- 33) **The 1st Meeting of the Steering Committee**
05 February 2018, Baku, Azerbaijan
Number of participants: 15; Female/Male participants: 3/12

- 34) **Development of Expert Opinion on: Application of “Fit and Proper” Standards in Azerbaijani Legislation**
24 April – 31 May 2018

- 35) **Training on Investigative Techniques in Money Laundering**
24-25 May 2018, Baku, Azerbaijan
Number of participants: 42; Female/Male participants: 2/40

- 36) **Development of Methodology for carrying out an Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) risk assessment in the banking sector**
14 September – 11 December 2018

- 37) **Development of Guidelines for effective implementation of risk-based Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) procedures in the financial sector**
14 September – 31 December 2018

- 38) **Scoping Mission for Developing AML/CFT Risk Assessment Methodology and Sector-Specific Guidelines**
24-26 September 2018, Baku, Azerbaijan

- 39) **Training on Terrorism Financing Concepts and Challenges**
27 September 2018, Baku, Azerbaijan
Number of participants: 25; Female/Male participants: 1/24

- 40) **Development of Training Toolkit on Money Laundering and Terrorist Financing Investigative Techniques**
10 October – 25 October 2018

- 41) **Training on Processing and Adjudicating Money Laundering Cases**
22-23 October 2018, Baku, Azerbaijan

Number of participants: 29; Female/Male participants: 3/26

- 42) **Development of Expert Opinion on Draft Law on Rules of Ethical Conduct of Deputy of the Milli Majlis (Parliament) of Azerbaijan Republic**
25 October – 30 November 2018

- 43) **Development of Guidelines for the Prevention of Conflict of Interest for Deputies of the Milli Majlis (Parliament) of Azerbaijan Republic**
25 October – 30 November 2018

- 44) **Workshop on AML/CFT risk assessment methodology and sector-specific guidelines for the application of risk-based procedures**
2 November 2018, Baku, Azerbaijan
Number of participants: 33; Female/Male participants: 10/23

- 45) **Workshop on the Prevention of Conflict of Interest for Members of Parliament**
23 November 2018, Baku, Azerbaijan
Number of participants: 14; Female/Male participants: 1/13

- 46) **Development of training materials on Terrorism Financing and Proliferation of Weapons of Mass Destruction**
27 November – 6 December 2018

- 47) **Workshop on Terrorism Financing and Proliferation of Weapons of Mass Destruction**
10 December 2018, Baku, Azerbaijan
Number of participants: 45; Female/Male participants: 15/30