

## 3. Programme proposal CZ 10

### 3.1. Executive summary

This section shall provide a summary of the Programme proposal.

It is a known fact that corruption activities generally undermine the trust in the functioning state system; and that corruption in the state sector poses threat to public interest. Currently, independent sources point out to corruption with increasing intensity in the Czech Republic.

The submitted programme proposal is aimed at strengthening institutional capacity and human resources in public institutions whose aim is to take anti-corruption measures including pursuing corruption-generated proceeds.

Within the scope of the programme, one pre-defined project (PDP) in bilateral cooperation with the Council of Europe, with main **objective** ensure the implementation of recommendations made by GRECO is proposed.

PDP should help the designated target groups to combat this serious criminal activity. The target group will be composed of representatives of criminal law enforcement authorities (prosecutors, judges, members of Police of the Czech Republic) and selected employees of government administration (Financial Analytic Unit of the Ministry of Finance of the Czech Republic, the Office of the Government, the Ministry of Justice).

Based on the findings of GRECO evaluations, and taking into account existing challenges and needs of the Czech Republic, especially Government Strategy concerning the Fight against corruption for 2011 and 2012, the Project will aim to introduce legislative proposals and increase institutional capacities of government authorities of the Czech Republic in preventing and combating corruption, identifying and pursuing corruption-related proceeds. As a part of the project, exchange of experience and know-how among stakeholders on both national and international level concerning the uncovering, examination and investigation of corruption-related criminal activities and related financial crimes, especially money laundering, including obtaining new information on methods regarding the uncovering of these criminal activities from abroad, will take place.

An in-depth and comprehensive risk/threat assessment and gap analysis will be carried out as a first step of the Project in order to identify areas in legislation (and circumvention of the legislation) and enforcement practices particularly susceptible to corruption, as well as typologies related to the laundering of corruption-related proceeds. The findings will inform the drafting of legislative proposals and institutional capacity-building measures, particularly in the design of training curricula for competent authorities as envisaged by the Project, which will cover the following key areas:

- Criminal law and related enforcement measures, measures to ensure effective implementation of recently adopted legislation on the criminal liability of legal entities, measures to enhance the capabilities and capacities of law enforcement, prosecutorial and judicial authorities in the pursuit of corruption-related offences by ensuring proper structure/specialization of units and effective use of special investigative techniques, as well as enhancing the effectiveness of asset recovery mechanisms and practices;
- Financing of political parties and election campaigns, including through elaborating comparative study to ensure comparison with regard to international good practices;
- Assistance to the improvement of whistleblower protection.

As a separate component, the program will be aimed at enhancing the IT capacities of authorities involved in investigating corruption-related crime as well as tracing corruption-generated proceeds. Due to the fact that it follows from experience that at present information technologies largely contribute to examination or

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investigation of serious criminal activities, the improvement of technological capacities of Financial Analytical Unit of the Ministry of Finance of the Czech Republic and Unit for Uncovering Corruption and Financial Crime of the Police of the Czech Republic will help to improve the position of both units and their IT level in the areas of combating corruption and related financial crime.

### 3.2. Basic information

<b>Name of the Programme</b>	Capacity building and institutional cooperation between beneficiary state and Norwegian public institutions, local and regional authorities.
<b>Name of Programme area addressed (refer to the MoU)</b>	Capacity building and institutional cooperation between beneficiary state and Norwegian public institutions, local and regional authorities.
<b>Name of the Programme Operator</b>	National Focal Point – Ministry of Finance
<b>Name and country of origin of Programme partner(s) (if applicable)</b>	

### 3.3. Relevance of the Programme

Protection of economic and financial interest is one of the main priorities of individual EU member states. Corruption is one of the causes responsible for the decline in GDP generation and demoralization of the society as a whole. Corruption Perceptions Index (CPI) ranks states according to the intensity of perceived corruption among politicians and government officials and reflects opinions of representatives of business sphere and analysts from all over the world. In 2011, the Czech Republic dropped on the Corruption Perception Index from 57<sup>th</sup> to 59<sup>th</sup> place. According to Transparency International this trend is negative and the Czech Republic keeps dropping among the European states and developed countries to the very bottom.

Corruption poses a problem to a vast range of public and private institutions, and at the same time it demands a coordinated response at various levels of government. The overall objective of the Program (as stated in the MoU) *to ensure strengthened institutional capacity and human resource development in priority sectors* is therefore directly relevant to promoting successful anti-corruption measures in the Czech Republic.

The Czech Republic relies on the implementation of international instruments in the area of anti-corruption as a basis for its national anti-corruption strategy and other measures. The Czech Republic has signed and ratified both the Council of Europe Criminal Law Convention on Corruption (ETS 173) and Civil Law Convention on Corruption (ETS 174), in force in the country since 2002 and 2004, respectively. The Czech Republic has not signed the Additional Protocol to the Criminal Law Convention against Corruption (ETS 191). The United Nations Convention Against Corruption was signed in 2005 but is not yet ratified.

The Czech Republic is a member of several international anti-corruption monitoring mechanisms, and specifically the Council of Europe Group of States against Corruption (GRECO). It is subject to periodic assessments by GRECO and has undergone 3 evaluation rounds. The 1st and 2nd Evaluation Rounds of GRECO were completed, with the following outcomes:

- With the conclusion of the 1st Round Compliance Procedure in 2007, one recommendation remained only partially implemented;
- With the conclusion of the 2nd Round Evaluation in 2010, 5 out of 12 recommendations remained

partially fulfilled or unfulfilled, and the Addendum to the Compliance Report (the final assessment of fulfilment of the recommendations) expressed regret that the Czech authorities had not achieved more progress in implementation of recommendations, although it also noted that the implementation of some recommendations appeared to be underway.

The 3rd Round Evaluation took place in 2010 and the Evaluation Report was approved at the 50th GRECO Plenary from 28 March-1 April 2011. In total thirteen recommendations were made on the two Evaluations themes (Incriminations and Transparency of Political Party Financing).

In view of the above, the relevance of programme activities to assist the Czech Republic in the implementation of GRECO Recommendations remains high. The pre-defined project with the Council of Europe, will therefore contribute to the implementation of a select range of GRECO recommendations, specifically through assistance in legislative drafting in order to mitigate deficiencies in the implementation of international standards, and institutional capacity-building for key government authorities involved in measures to prevent and combat corruption and related offences, especially money laundering;

### 3.4. Programme motivation and justification

#### 3.4.1. Challenges and needs analysis

In January 2011 the Government of the Czech Republic approved a Strategy for the Fight against Corruption for 2011-2012. The Strategy follows two previous government anti-corruption strategies, one for the period 2006-2011 and a first strategy approved in 1999. The 2006 Strategy contained 32 objectives/measures, grouped under the headings of Prevention, Transparency and Repression. The 2011-2012 Strategy is a more detailed document, containing 58 objectives under the headings 'Public Administration', 'Public Contracts', Law Enforcement – Police, Law Enforcement – Prosecution and Courts, and 'The Legislature'.

The project is therefore also based on selected Strategy's targets. The Project will cover the following areas:

#### 1. **Risk and threat assessment in the areas of corruption and related offences (esp. money laundering)**

The lack of information and a systemic view on the volume, degree and nature of the corruption phenomenon in the Czech Republic, as well as the size of the threat in economic terms, typical patterns of corrupt conduct and subsequent activities to legalize corruption-generated proceeds, as well as legal loopholes pose a challenge to Czech authorities in terms of elaborating a proper enforcement response, or where required, appropriate policy measures.

A study of these phenomena is required in order to properly inform relevant authorities in designing policies and provide a basis for training anti-corruption and anti-money laundering specialists, as well as law enforcement, prosecutorial and other authorities. These professionals should also acquaint themselves with legislation regulating areas that help to conceal corruption practices (e.g. the topic of tax heavens, silent partners, anonymous shares, non-transparent shareholder structures of business, public procurement, financial and credit products and their abuse regarding the legitimisation of proceeds from criminal activities etc.).

Such a study could also attempt to obtain quantifiable estimates on the financial volume of funds that are intended for corruption activities and at the same time to point out to the amount of money that the state loses as a result of such activities, e.g. due to the decrease of tax yield or expenses on overpriced or ineffective public tenders.

## 2. Criminal law and enforcement measures

### 2.1 *Liability of legal entities*

In the Czech Republic, the issue of criminal liability of legal entities and its introduction into the Czech legal system has been a long-debated theme. The obligation to sanction legal entities for unlawful conduct and to allow international cooperation with regard to their sanctioning in cross-border cases is included in the European Community, or European Union regulations respectively, and in many international treaties that have not yet been ratified by the Czech Republic in spite of its membership in international organisations where these treaties were prepared (e.g. United Nations Convention against corruption).

Efforts to adopt sufficient legislative measures have long been fruitless in the Czech Republic. As early as in 2004, the government passed the draft on criminal liability of legal entities and proceedings against them; however the draft was rejected by the Chamber of Deputies. The absence of any form of liability of legal entities for unlawful conduct in the Czech Republic, in particular in the field of the most serious anti-social activities, was pointed out in MONEYVAL and GRECO evaluations.

Until recently, the Czech Republic was the last member state of the EU that had not implemented its obligations in this regard, which in the end led to the fact that Act No. 418/2011 Coll., on criminal liability of legal entities and proceedings against them, with effect from 1 January 2012 was adopted. By this act, criminal liability of legal entities was established.

However, currently it is necessary to analyse newly adopted legislation from the point of view of its application and effective implementation, which currently poses a challenge to the Czech Republic given the absence of prior experience. For this reason, it is important to obtain information and experience from abroad, especially from countries that have had similar legal regulations for a longer period of time.

While the purpose of the new legislation has been to establish functioning mechanisms for the punishment of legal entities for criminal conduct the challenge for authorities responsible for uncovering, investigating and imposing sanctions for such activities still remains, specifically in the area of effective implementation.  
*2.2 Investigations, prosecution and adjudication of corruption related cases and Seizure of assets from corruption*

The 2nd Round GRECO Evaluation report noted a ‘bleak picture’ painted by interlocutors (including from official institutions) over the effectiveness of the investigation, prosecution and adjudication of corruption cases in the Czech Republic. Specific concerns were expressed over the detection and conviction rate for corruption cases, insufficient investigative means following recent legal amendments restricting their use, alleged political interference, lack of specialisation and independence in the prosecution service and of continuity in various sections of the police. The 2011-2012 Strategy contains measures that address certain of these concerns, including:

- For the police: the submission of legal amendments to ensure that special investigative means can be used in suspected corruption cases; the submission of an analysis of the effectiveness of police investigations of corruption; strengthening the capacity of the Police Unit for Detection of Corruption and Financial Crime to improve seizure of the proceeds of crime; improving data collection and sharing within the police; improving police access to data from tax authorities and financial institutions; and establishment of permanent training of the police on fighting corruption and tracking and seizing proceeds of crime.
- For the prosecution offices and courts: increasing the independence of prosecutors; analysis of the possibilities of non-conviction based forfeiture via tax proceedings; establishment of specialised court senates and units within prosecution office especially for tackling corruption and serious economic crime; and the establishment of permanent training for judges and prosecutors on the fight against corruption and tracking/seizure of assets.

Assistance in institutional capacity-building for the proper authorities (e.g. police, prosecution, judges) is thus

needed. This also includes establishing a system of lifelong learning of judges and prosecutors and members of Police of the Czech Republic, explicitly in the area of fight against corruption and securing and seizing proceeds from criminal activities, as required by the Government Anti-Corruption Strategy for 2011-2012. However, the Judicial Academy intended for comprehensive training in all necessary areas of judges and prosecutors does not offer any course that would focus on the areas in question and at the same time, there is no obligation to attend any training activities. The aim of such training would be to increase potential awareness of corruption and unify the practice of criminal courts regarding corruption-related crimes.

The fight against money laundering and seizure of illegitimate proceeds (assets) is one of the top priorities of individual member states of the EU where such seizure could help to reduce not only economic and financial, but also organised crime and contribute to reduction of non-violent crimes, including corruption. These measures should include qualified and successful retrieval, seizure and consequent confiscation of proceeds from criminal or other activity that can be realised as part of criminal proceedings or using instruments outside criminal proceedings.

The issue of seizing the assets derived from illegitimate sources is highly relevant in the Czech Republic. In many criminal cases, the funds acquired through illegal activities can neither be secured nor seized, despite the fact that it is one of the priorities of the criminal proceedings. Not only is it important to make use of options offered by the criminal law, but also legal instruments outside criminal proceedings (e.g. tax). Among others, this measure is also prescribed by the Czech government in its Strategy for fight against corruption. The aim of this measure is to extend possibilities to seize proceeds from criminal activities using non-conviction based mechanisms. The Czech Republic has no experience in this regard and therefore it is necessary to analyse the legal environment, and consider legislative changes. As part of the study, a comprehensive look at the overall asset recovery framework of the Czech Republic, including the capacities of authorities to trace, as well as manage confiscated assets needs to be taken.

In practice it is quite common that it cannot be established that the assets acquired by parties to the criminal proceedings represent proceeds from criminal activity, even when their owner cannot give a plausible explanation as to their acquisition. Even, when complying with the presumption of innocence principle and elementary protection of property rights, in some states these assets may be sanctioned (e.g. through taxation), which shall also be covered by the analysis.

In the Czech Republic, the seizure of assets derived from illegitimate sources is currently partially regulated in Act No. 40/1964 Coll., Civil Code (the so called unjust enrichment – this provision is applicable to commercial-law relationships). In some cases, the Commercial Code specifically regulates the rendering of unjust enrichment. Many administrative regulations define sanction of forfeiture or seizure of a thing that can be in most cases imposed apart from penalty. The focus should also be aimed at the application of the above mentioned measures, which are currently utilized very rarely in practice.

The necessary training as mentioned and linked to the previous sub-topic should be organized and specifically focus on legislation regulating areas that help to conceal corruption proceeds and practices (e.g. *the issues of tax heavens, silent partners, anonymous shares, non-transparent shareholder structures of business, public procurement, financial and credit products and their abuse in order to legitimise the proceeds from criminal activities and so on*). This should also include training on legal and practical interpretation of possibilities how to obtain funds (of criminal procedure act and other legal norms) and the use of information technologies in practice, extracting publicly available information and so on to trace assets.

### **3. Financing of political parties and election campaigns**

The current legal framework regarding the financing of political parties is set up by the Act No. 424/1991 Coll., on association in political parties and political movements, and more specifically in the Economic

activities of parties and movements section of this act. Unfortunately, the current regulation offers many possibilities for abuse. Despite several changes to legislation over recent years, major provisions that would mitigate existing deficiencies have only taken the form of drafts over the last few years.

GRECO's 3rd Round Evaluation Report raised serious concerns over the transparency and oversight of political party/election campaign financing in the Czech Republic, and forwarded 9 recommendations. The 2011-2012 Government Anti-corruption Strategy includes measures to address the transparency of party financing, but only explicitly addresses three of the nine recommendations, and this in a general fashion, calling for the submission of an analysis and proposal for legislative steps to increase the transparency of political party financing, by 30 June 2011. The analysis and a concrete proposal were submitted by the Interior Ministry to the government prior to this date, but the government rejected the proposal on 8 June 2011. The government reservations included an explicit statement of the need to replace oversight of party financial reports by the Chamber of Deputies with oversight by an independent institution. Therefore further analysis of the Czech system for regulation of political party financing is required and subsequently the implementation of provisions and other actions enabling the fulfilment of GRECO recommendations and good practices more specifically.

Ministry of Interior of the Czech Republic is nowadays working on the report of the fulfilment of GRECO recommendations concerning the transparency of political party/election campaign financing in the Czech Republic, they are supposed to finish this report till the end of the year 2012.

#### **4. Assistance to the improvement of whistleblower protection to fulfill GRECO Recommendations**

GRECO concluded that there are no legal or other provisions to protect public interest disclosure in the Czech Republic (whistleblowing).

There is no whistleblowers' centre which provides legal service and support to whistleblowers who report suspicions of unlawful conduct in their employment/neighbourhood in the Czech Republic. This is the reason why it is necessary to prepare a project to establish such a whistleblowers' centre. Preparation needs participation of experts from abroad with an aim to learn know-how concerning the application of whistleblowing and whistleblowers' protection.

#### **5. Assistance in enhancing the IT capacities of authorities involved in investigating corruption-related crime as well as tracing corruption-generated proceeds**

In the framework of the Program it is proposed to improve the **technological capacities** of the Financial Analytical Unit of the Ministry of Finance of the Czech Republic and the Department for uncovering corruption and financial crimes of the Police of the Czech Republic, which are the key agencies involved in revealing, investigating (analysing) corruption, as well as tracing corruption-generated proceeds (Justification of including of the technological part - see 3.4.5.).

Most of the information sources currently utilized by the FIU contain unstructured (free text in different formats) information. In every source of information, information must be searched separately and using different logical algorithms. It appears that this is one of the major limitations for investigations and successful analysis of cases.

The aim of the System for automated mining of unstructured data is to make available, by integrated means, the above mentioned information sources for various in-house needs. This system is supposed to be an effective support tool to increase internal effectiveness of the FIU when processing information leading to the uncovering of financial crime and corruption practises. This activity can also be supported by automated monitoring of other sources, especially the Internet including the so called Deep Web (websites that are not

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available to general public).

For more detailed system requirements of this project please see Annex VII.

### 3.4.2 Public and private structures relevant to the Programme area

The existing **representatives of criminal law enforcement authorities** (i.e. judges, prosecutors, members of the Police of the Czech Republic) and relevant **representatives of selected government administration authorities** (Financial Analytical Unit of the Ministry of Finance of the Czech Republic, the Office of Government, and the Ministry of Justice) are target group of the project.

Given the number of all representatives of the target group, the focus should particularly be on those staff of state administration who will, as part of their working duties, share the acquired knowledge with other staff of the above mentioned groups (i.e. trainers, chief-investigators, head of relevant departments and so on).

However, in the above mentioned areas, the results of the project should concern all staff at every level of organisation structure of corresponding professions, departments and state offices.

A significant part of the project should be devoted to education of staff members, preparation of information materials, or publications, as the case may be, for further training, preparation of new technical solutions and training with regard to the utilisation of these new software solutions.

Within the projects, representatives of relevant professions, and Judiciary Academy, Police Academy and other educational institute of government administration will be contacted.

In order to participate (including active participation) at chosen seminars/conferences a representatives of private sector may also be contacted (representative of relevant association or professional chambers), or representatives of non-profit organisations concerned with the issues in question (e.g. Transparency International).

### 3.4.3 Legislation relevant to the Programme area

Legislation regulating corruption, related crimes and fight against corruption and related project themes:

- Act No. 40/2009 Coll., Criminal Code;
- Act No. 141/1961 Coll., Criminal Code;
- Act No. 253/2008 Coll., on certain measures against legitimisation of proceeds of crime and financing of terrorism;
- Act No. 424/1991 Coll., on association in political parties and political movements;
- Act No. 418/2011 Coll., on criminal liability of legal entities and proceedings against them;
- Act No. 40/1964 Coll., Civil Code;
- Act No. 500/2004 Coll., Administration Procedure Act;
- Act No. 280/2004 Coll., Tax Code;
- and related norms.

### 3.4.4 State aid and public procurement

Project that should be part of the proposed programme will be implemented by state organisational units – the Ministry of Finance, the Ministry of Interior, and the Police of the Czech Republic respectively, the Office of Government of the Czech Republic and the Ministry of Justice. Given the fact that criminal law enforcement authorities will be recipients of the grant (i.e. judges, prosecutors, members of the Police of the Czech Republic), the Ministry of Finance, the Office of Government, the Ministry of Justice that are state organisational units established by law and funded from the state budget, they **shall not constitute state aid**.

The public procurement within the project shall be governed by the Public Procurement act, as amended.

### 3.4.5 Justification for the Programme strategy

The proposed programme includes one pre-defined Project with outlined outcomes and outputs followed by number of relevant activities (see Annex II.), whose main objective is to ensure improved implementation of the recommendations made by the Council of Europe's Group of States against Corruption (GRECO) to the Czech Republic.

Even though there was an effort to involve all GRECO recommendations in the project, not all of them were finally included. This is the case of GRECO recommendations for reform of the Czech system of immunities of elected officials. The bill of immunities of elected officials has already been drafted and is currently in the Chamber of Deputies. From this perspective the Czech legal system does not need any legislative drafting assistance and has committed sufficient capacities to promote this issue in the legislature in recent years.

In addition, the technical assistance of mining unstructured and structured public sources is a part of the programme (according the recommendation of the Council of Europe as a project partner it is a separate pre-defined project). Inclusion of the technical part is directly linked to the drafted activities and is fully in line with the role of the Financial Analytical Unit of the Ministry of Finance of the Czech Republic and the Department for uncovering corruption and financial crimes of the Police of the Czech Republic. The proposed activities in the project represent the theoretical part of the fight against corruption and money laundering, technical assistance provides a tool to implement the anti-corruption and anti-money laundering measures. Combination of these activities will ensure the improvement of both repressive and preventive role of the Czech FIU and Police. In view of above mentioned information is clear that implementation of the project activities without technical assistance would be unreasonable.

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## 3.5. Programme objectives and indicators

### 3.5.1 Objective of Programme (expected impact)

**Provide the Programme area:**

Capacity building and institutional cooperation between Beneficiary state and Norwegian public institutions, local and regional authorities

**Provide the Programme objective:**

Strengthened institutional capacity and human resource development in public institutions, local and regional authorities in the beneficiary States within the agreed priority sectors through cooperation and transfer of knowledge with similar institutions and authorities in Norway.

### 3.5.2 Programme expected outcome

#	Outcome	Indicator for target	Description	Indicator value		Source of verification
				Baseline	Target	
1	Enhanced capacity and quality of the services provided by public institutions, local and regional authorities through enhanced institutional capacity and human resources development (2 503)	Number of institutions with strengthened capacity	Quality and expertise of the target group/state administration bodies improved (the number of relevant state officials not increased).	0	5	Report provided by the Financial Analytical Unit of the Ministry of Finance. Ex-post evaluations/questionnaires on the quality of delivered trainings. Evaluations of study visits to abroad (reports).
		Improved efficiency of investigation of serious criminal activities (securing financial resources acquired through illegal activities). Improved prevention against corruption.	Creation of functional technical (SW) and methodological background for efficient fight against serious crime (i.e. corruption and subsequent criminal offences, mainly money laundering) at target institutions.  Enhanced technological capacities of the Financial Analytical Unit of the Ministry of Finance and the Unit for	0	1	Results of the pilot phase of the new software.

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#	Outcome	Indicator for target	Description	Indicator value		Source of verification
			uncovering corruption and financial crimes of the Police of the Czech Republic allowing to combat corruption activities with an option to prepare own <i>ex ante</i> and <i>ex post</i> analysis in order to investigate serious criminal activities (purchased SW put in practice).			

### 3.5.3 Programme outputs

Outcome	Output	Output indicator	Indicator value		Description	Source of Verification
			Baseline	Target		
Enhanced capacity and quality of the services provided by public institutions, local and regional authorities through enhanced institutional capacity and human resources development (2503)	Studies/Comparative analyses	Approx. number of delivered studies or comparative analyses of legislative environment	0	3	Studies shall bring an analysis of foreign legislation and practical impact of relevant legislative measures in comparison with the Czech legislative framework. Studies and analyses are essential to define the main areas where corruption activities occur and proposal of anti-corruption measures, or subject-matter of amendments to relevant legislation.	Adoption of studies
	Increase the effectiveness and efficiency of Czech institutions in combating corruption via trainings, seminars,	Approx. number trained state officials, police officers, judges, state prosecutors, etc.	0	350	In line with results of analysis and studies performed within the project, all trainings, conferences, seminars and study visits are	Project documentation Lists of Presentation Interim Reports, Final

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Outcome	Output	Output indicator	Indicator value		Description	
	conferences and study visits (abroad) on various issues connected with the fight against corruption.				dedicated to the delivery of know-how in the field of legislation and areas where corruption activities occur and subsequent criminal offences (money laundering). Trainings will be dedicated mainly to representatives of individual target groups (judges, prosecutors, police officers, representative the Ministry of Finance, of the Office of Government and Ministry of Justice). The goal is to spread knowledge about application of relevant measures in foreign practise, about legislative requirements and best practises from foreign countries. Participants in the study visits will share the newly gained experience at conferences/seminars.	reports
	Increase the effectiveness and efficiency of Czech institutions in combating corruption.	Number of end users with strengthened technical capacity.	0	30	Enhancement of the technological capacity will enable more efficient fight against anticorruption activities through ex-ante and ex-post analysis.	List of trained users Number of users with certification
	Creation of software for data mining	1 complete SW programme delivered, technical background to run the new SW and relevant staff secured and trained	0	1	To strengthen technological capacity of the Financial Analytical Unit of the Ministry of Finance and the Unit for uncovering corruption and financial crimes of the Police of the Czech Republic requests changes of soft equipment (information technologies) of these units to be ready to more quickly and efficiently identify new trends in crime and deal with individual	
		number of cases with in-depth analysis	30%	60%		

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Outcome	Output	Output indicator	Indicator value		Description	
		The approximate time of the investigation of the case	2-3 months	1,5-2 months	cases. Enhancement of the technological capacity will enable more efficient fight against anticorruption activities through ex-ante and ex-post analysis, will increase the number of cases with in-depth analysis and will shorten the time of investigation)	
	PR/Publication/Methodology	Number of publications delivered, web presentations; outputs will be supplemented with PR activities to mediate results of the project to professional community/public.	0	8	Publications will summarize results of individual seminars, main achievements, best practices from abroad. They will include overview of relevant legislation and its interpretation. Publications shall inform members of the target institutions (participants in training activities but even beneficiaries who did not take part in the project but were involved in the issue). These materials will be available also online at website of the Ministry of Finance.  Activities of the project will be supplemented with information for public (press releases).	

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### 3.6 Target groups of the Programme

Project Target Group:

- Representatives of the law enforcement authorities – i.e. judges, prosecutors, members of the Police of the Czech Republic;
- Selected representatives of the public administration authorities – Financial Analytical Unit of the Ministry of Finance, representatives of the Office of the Government, the Ministry of Justice.

The representatives of private sector may also be involved in the project, particularly the representatives of professional chambers and associations and representatives of non-profit sector.

If this project is approved, the representatives of the target group will be addressed. The Financial Analytical Unit of the Ministry of Finance will address representatives of the target group directly. The Judicial Academy and the Police Academy, or other educational institutes of the public administration will also be addressed to conduct some activities (particularly trainings and seminars).

### 3.7 Risk and uncertainty

Out-come nr.	Outcome	Description of risk	Assessment		Risk mitigation plan
			Likelihood [low/medium/high]	Impact [low/medium/high]	
1	<b>All Project expected outcomes</b>	The risk that competent authorities do not fully participate in all planned activities and do not engage fully in ensuring proper implementation of the deliverables	medium	medium	The selection of experts will be carried out in close cooperation with experts of the Council of Europe and partner units of both departments (Financial Analytical Unit of the Ministry of Finance, Unit for Uncovering Corruption and Financial Crime of the Police of the Czech Republic).  If necessary contacts are not established, the agenda of each of the seminars and conferences will be adjusted, or experts from other institutions will be addressed.

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		<b>Changes in legislation and related procedures within the framework of comparative analyses of local and foreign legislation.</b>	medium	medium	Commissioning of a new analysis that will take into account and deal with the legislation changes. The elaborators of the analyses will, as part of their work, also apply the <i>de lege ferenda</i> aspect, i.e. the future changes of the laws and regulations in question and related legislation.
		<b>The risk of insufficient personal capacities of trainers and lecturers for seminars and trainings held.</b>	medium	medium	With regard to the trainings proposed, experts from the top level authorities representing the target groups, representatives of professional chambers (e.g. the Czech Banking Association), and renowned experts from private sector in the given field, representatives of some public authorities and so on will be addressed.  If contacts with sufficient number of trainers are not established, new selection of trainers and lecturers with modified selection criteria will be carried out; or the agenda of seminars and trainings will be adjusted accordingly.
		<b>Process risks when carrying out the TA</b>	medium	medium	The beneficiary will be responsible for the preparation of the high-quality tender documentation (conditions for realization). During the preparation, procedural time-limits of selection procedures must not be underestimated. The cooperation of the beneficiary and the supplier of software and related equipment is a precondition for successful implementation. Software will be developed independently on other project activities.

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		<b>Access to data resources required for overall solution of the TA.</b>	high	high	To utilize resources currently available to the department, to maintain the structure and format of these resources, and to ensure daily updates of these resources.
		<b>Failure to meet deadlines and quality of the TA.</b>	low	medium	To set the target functions and parameters of the technical solution unambiguously, to select expert supplier, to establish a steering committee of the TA.
		<b>Change of Government anti-corruption Strategy</b>	high	medium	Activities of individual outcomes will be modified according to the new government conception. Ongoing activities will not be cancelled; tender documentation will be possibly supplemented.

### **3.8. Bilateral relations**

As part of the programme, experts and partners from donor states will be sought (with participation of representatives of the Council of Europe, FMO Brussels and a representative of Norwegian Embassy in the Czech Republic who attended the kick-off meeting in December 2011) and partnership necessary to establish cooperation, exchange and share information, know-how and best practices, study visits and last but not least to attend seminars and conferences held as part of the project, between the project present and subjects in donor states will be established.

FAU is a member of the Moneyval. Czech Republic is evaluated according to the implementation of the FATF recommendations and this year the Report on Fourth Assessment Visit of the Czech Republic at the Plenary Meeting of Moneyval of the Council of Europe was adopted. At the same time FAU cooperates with the European Commission where is the permanent representative attending regular meetings of the Committee for the Prevention of Money Laundering and Terrorist Financing in Brussels. FAU also cooperates with countries belonging to the Egmont Group. The members of the Egmont Group can exchange information via the international net called Egmont Secure Web. The exchange of information at the international level among financial intelligence units from the entire world is critical to perform a quality and efficient investigation not only in the area of the fight against legalization of proceeds of crime and fight against terrorist financing.

#### **3.8.1. Donor programme partner(s)**

The Donor programme partner is the Council of Europe. The Council of Europe will also be the Project Partner for the pre-defined project envisaged under the Program and will be actively involved in, and effectively contributing to, the implementation of the project. The Council of Europe's role as Project Partner will be further detailed in a partnership agreement subsequent to this proposal and will include, but will not be limited to:

- Contributing to the implementation of the project through relevant knowledge experience, particularly in the field of anti-corruption and anti- money laundering and promoting/safeguarding transparency, ethics and human rights in this process;
- Contributing to the conceptual design and updating of the project workplan and specific activities through relevant experience in the implementation of technical cooperation and policy-oriented projects;
- Contributing to keeping the project implementation within the European standards framework through knowledge of the mandates, functioning, rules of the Council of Europe's monitoring mechanisms such as GRECO and MONEYVAL, and the case law of the European Court of Human Rights; and
- Contributing by providing legal and technical advice in particular as regards legislative and institutional related reforms and improvement processes, as well as project implementation tools;
- Using the Council of Europe networks of expert consultants to identify and encourage the participation of top professional level European and international experts in the relevant project activities. As appropriate, such experts will provide legal advice and technical expertise, keynote interventions in workshops and seminars, take part in assessment visits, drafting of manuals/guidelines, ensure expert intervention in training courses and other project activities.

Furthermore it should be noted that wherever the CoE is involved as a Project Partner in this project, its inputs will be provided through engagement of knowledge and skills of its own Secretariat member's bringing the experience, knowledge and quality control as required and needed for this project.

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<b>3.8.2 Donor partnership projects</b>
<i>NA</i>
<b>3.8.3 Donor state applicants</b>
<i>NA</i>
<b>3.9. Pre-defined projects</b>
The Program includes one pre-defined Project with the Council of Europe. A description of the pre-defined project is set out in Annex II to the current document.
<b>3.10. Small grant schemes</b>
<i>NA</i>
<b>3.11. Cross cutting issues</b>
<b>3.11.1 Good governance</b>
According to the European code, the principles of good governance include lawfulness, non-discrimination, proportionality, absence of abuse of power, impartiality and independence, objectivity, legitimate expectations, consistency and advice and fairness. All these principles will be adhered to during the preparation and implementation of the Programme. Only one pre-defined project will be implemented within the Programme. It will be implemented by the Ministry of Finance of the Czech Republic, which already adheres to the mechanisms of good governance. Standard procedures of good governance will also be transferred into the implementation of the pre-defined project.
<b>3.11.2 Environmental considerations</b>
Although the project does not expect other than common waste, it will support environmental friendly waste sorting and it will, at workplaces of the Implementation Team and in premises designated for training of target groups create such conditions that will allow to sort the municipal waste. The project will support behaviour consisting in e.g. economic double-sided copying and printing of documents, the use of recycled paper for internal needs; and electronic communication will be preferred. When carrying out the project, attention will be given to effective and economic consumption of energy and water so that the principles of sustainable development will be complied with. During the project implementation, the principles of environmental protection will be complied with.

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### 3.11.3 Economic sustainability

The project requires higher investment into the creation of new technological solution. The beneficiary of technical assistance claims that the economic sustainability of the technical solution will be ensured at least five years from the termination of the contractual relationship with the supplier.

The costs associated with maintaining the system of licenses and data base will be covered in a way that technical solutions could be used even after the basic warranty from the vendor, which is set to five years.

### 3.11.4. Social sustainability

N/A

### 3.11.5. Gender equality

When working with human resources, the relevant government administration authorities participating on the project will make sure that they enforce the policy of equal opportunities of women and men; comply with the measures resulting from Priorities and procedures of the government for implementation of equal opportunities of women and men. Each activity will record and report gender distribution in project activities.

## 3.12. Project monitoring by the Programme Operator

### 1) Pre-defined project monitoring

The regular monitoring shall be carried out via collecting information through the “formal monitoring” tools - interim project reports and final project report submitted by the Office of Government of the Czech Republic.

The interim reports shall describe:

- a) the project progress in comparison to the plan, fulfilment of project indicators on results level, information on tender procedures, project time schedule, project modifications and fulfilment of project condition (if relevant), risk management.
- b) financial progress of the project, including the list of claimed expenditures and request for payment, information from interim financial audit (if relevant). The financial supporting documents and payment claim are annexed to the report (see 14.5 financial management). Standard reporting period shall be 4 calendar months starting from the first date of eligibility of expenditures.

The last reporting period shall be max. 6 months.

The final report shall also be the final interim report. Thus, it will contain all aspects of interim report as well as the information on achievement of overall project objective and project purpose, summary information on project modifications, summary information on project relevant cross-cutting issues and project conditions, project sustainability and summary information on financial management including any findings from final financial audit.

Programme Operator (CFA 2 – responsibility for part a) and CFCU for part b)) will check the reports while using checklists. Both project managers cooperate while assessing the report. The payment shall be disbursed upon receipt of signed approved version of the report and its approval by the PO management (Head of CFCU and Head of CFA2).

### 2) On-site monitoring visits of the pre-defined project

On site monitoring visits (OSMs) shall verify, whether the project progress and financial status comply with the information declared in monitoring reports and whether the project management is efficient to meet

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declared objectives. OSMs are focused on the following aspects: checking project progress, efficiency and effectiveness of project expenditures - qualitative as well as quantitative assessment, adequacy of reporting on project modifications or discussion on proposals for project modifications, their efficiency, impact and added-value for the project, fulfilment of project specific conditions, transparency in management of the project, adequacy of risk management, publicity, sustainability potential, cooperation with partners etc.

The OSMs shall be carried out by the external technical experts in cooperation with the PO staff.

The OSM report shall formulate the findings and related recommendations and be consulted with Project Promoters. Findings shall be followed up by the PO and remedial actions of Promoters enforced. The early warning mechanism in case of identified serious problems or obstacles shall be integral part of OSM.

### **3) Review of Programme**

Review of the Programme would comprise of the review of the Project, as the programme consists of a single pre-defined project with a clearly defined and measurable outcome, that shall be assessed and measured prior to and after the project implementation, via “project evaluation” (see chapter 5.2). Other aspects, which are normally being assessed within the programme review, will be discussed within the OSM report of the project as described in section 2) above.

### **4) Changes of project**

Project modifications are described under Art.14.6 of Regulation. The monitoring tools described above may either assist in identifying needs for project modifications or in verification of efficiency and added value of proposed project modifications.

## **3.13. Information and publicity**

The Programme publicity CZ 10 will be ensured by the Programme Operator Ministry of Finance, in close cooperation with Project Promoter – the FAU of the Ministry of Finance as a guarantee of technical questions of the Programme preparation and implementation.

All publicity measures within the Programme/predefined projects will be implemented in compliance with Information and Publicity requirements stated in Annex 4 to Regulation on the implementation, Article 4.7.2 of the Regulations and Communication strategy for Czech Republic.

In accordance with the requirements of donor states the two web addresses were develop web side – [www.eeagrants.cz](http://www.eeagrants.cz) and [www.norwaygrants.cz](http://www.norwaygrants.cz) .

All relevant information on Financial Mechanism EEA 2009-2014 and Programme CZ 15 will be published on [www.eeagrants.cz](http://www.eeagrants.cz) as well as the relevant information on Norwegian Financial Mechanism 2009-14 on [www.norwaygrants.cz](http://www.norwaygrants.cz).

The same information will be also published in English by the Council of Europe as the Project Partner on its website.

The Programme Operator will ensure the publication of all relevant information on web pages [www.mfcr.cz](http://www.mfcr.cz) in both languages, Czech and English.

The Project Promoter, the Ministry of Finance, shall:

- publish project documents for this programme (methodologies, manuals, instructions) on [www.justice.cz](http://www.justice.cz).
- hold informational seminars for target groups.

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- issue press releases or articles concerning the project.
- include applicable logos and information on financing via the EEA/Norwegian FM.

Detailed information on the Programme and Project publicity is described in a Communication plan attached to this Programme proposal. All publicity measures will be implemented in accordance with this Communication plan.

### 3.14. Management

#### 3.14. 1 Management structure

The Programme Operator is the Ministry of Finance. The Programme is managed by the Department of International Relations (Dept. N<sup>o</sup>: 58) of the MoF that consists of following units:

- the CFA 1 and CFA 2 Units - are responsible for the Programme preparation, implementation, monitoring and evaluation.
- the CFCU - unit is responsible for Programme financial issues.

#### **The CFA1 Unit for Programming and Coordination (Unit N<sup>o</sup>: 584 of the MoF):**

- Programme preparation including of all Programme parts
- elaboration of any additional documents according to the FMO requirements
- preparation of the Programme Agreements
- signature of the Programme Agreements
- approval of final detail version of the Pre-Defined Project
- preparation of the Programme Annual Report
- preparation of all relevant documents for the Monitoring and Annual meetings
- administration of the Programme Steering Committee
- ensuring of Programme publicity

#### **the CFA2 Unit for Implementation, Monitoring and Evaluation (Unit N<sup>o</sup>: 581 of the MoF)**

- administration of the Programme: participation in Steering Committee, coordination of risk management and risk analysis and its update, monitoring of achievement of declared outcomes and outputs, administration of Programme modifications, dealing with substantial modifications at the Steering Committee, elaboration of annual monitoring plan, use of IT system for Programme implementation, archiving of all relevant documents
- monitoring of project: regular monitoring and certification of interim project reports and final project report in terms of project progress and achievement of declared goals and results, administration and approval of project modifications, check of project sustainability and fulfilment of project conditions
- reporting to national and international authorities (NFP, CA, AA, FMO etc.): cooperation on preparation of the IFR, APR, FPR, cooperation on preparation of requests for substantial modifications of the Programme and reallocations between Programmes to NFP/FMO and preparation of documents for AM/Monitoring Committee for approval of the substantial Programme modifications, providing information on evaluation of the Programme for Strategic Report, providing regular statistical information about projects to the FMO, elaboration of other documents required.

### **the Unit for Contracting and Financing ( CFCU - Unit N<sup>o</sup> 585 of the MoF)**

- Issue a Decision on the award of the grant / amendments of Decision
- control of public procurement
- assessment and approval of changes in projects (financial section)
- financial control of Interim Reports and Final Report
- project financing - interim payments , final payments
- register of irregularities
- Annual reports of Programme – financial part

At the beginning a project team and the Steering Committee will be established with the participation of other ministries, Regions, and experts on working with the public and project evaluation. The Steering Committee will take final recommendation and modification of PDP and all key issues related to the Programme implementation.

For the programme, or project respectively, corresponding management structure will be proposed. The proposal shall draw on current experience with implementation of projects funded from the EU funds and programmes of bilateral cooperation.

The management structure shall include the Programme Steering Committee and Project Implementation Team according to the themes proposed. In addition, steering committee for each project phase may be established.

The Steering Committee of the program will be composed of representatives of the Ministry of Finance (MF) as the team leader and the Ministry of Interior (MI) (the Police of the Czech Republic respectively), the Office of Government (permanent members), the Council of Europe (advisory member).

This Committee will supervise the programme implementation, monitor the achievement of objectives and monitoring indicator of the programme and address problems that may arise in connection with the risks defined.

The Implementation team will be set up for individual themes; these will be composed of representatives of MF, MI (Police of the Czech Republic), the Office of Government, or the Ministry of Justice and other selected supreme authorities of government administration. The Implementation Team will be responsible for implementation of project activities and shall inform the Steering Committee of the progress made and potential problems concerning project.

The project as a whole will be governed by the rules of Financial Mechanisms of EHP/Norway 2009 – 2014, by Czech legal regulations and internal regulations of stakeholder subjects.

The PSC will be established within the two months Inception Phase after the Programme Agreement is signed and prior to commencement of Project activities.

Organisation chart of the Programme management structure is enclosed as Annex V.

All CVs of key personnel is enclosed as Annex VI.

### **3.14.2 Timeline**

**The programme shall commence in \_\_\_\_\_2012 and finish in December 2014 An Indicative Calendar of Activities is enclosed in Annex II.**

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<b>3.14.3. Calls</b>
<b>NA</b>
<b>3.14.4. Project selection</b>
<b>NA</b>
<b>3.14.5. Financial management</b>
<p>Financial management will be executed by the Central Finance and Contracting Unit of the PO. It shall</p> <ul style="list-style-type: none"><li>- Issue a Decision on the award of the grant or Act of similar effect to Project Promoter / amendments to these Decisions</li><li>- <b>Oversee public procurement</b> – plan of public procurement, checking of evaluation and qualification criteria</li><li>- <b>Execute interim payment and final payment</b></li><li>- Proof of expenditures - financial documents annexed to Interim and Final reports and payment requests - checking invoices or other documents of equivalent probative value, bank statements, eligibility of expenditure</li><li>- The final request will be paid when the final financial audit, is closed and settled</li><li>- Maintain separate bank account for re granting and for management of the programme</li></ul>
<b>3.14.6. Modification of projects</b>
<p>Under the CFA2 Unit for Implementation, Monitoring and Evaluation –responsibilities</p> <p><b><u>I. Modification of the pre-defined project</u></b> The contractual and implementation framework of the project will be set in the Decision on the Award of the Grant (administrative act of similar effect and content as the Project Contract), further referred to as the <i>Decision</i>. The Decision will contain all provisions listed in Regulation, Art. 6.7, other relevant provisions of the Czech legislation and project LogFrame.</p> <p>Detailed budget shall be annexed to the Decision and structured to budget headings (groups of budget lines of itemised costs and unit prices).</p> <p>Promoters will be obliged to implement the project in line with the Decision in order to fulfil declared project outcomes and outputs and respect the budget structure, including the limits of defined budget headings.</p> <p>Any deviation from the Decision and its annexes shall be subject to the rules on project modifications.</p> <p><b>I/1. Substantial project modifications that require prior written approval of the PO:</b></p> <ul style="list-style-type: none"><li>a) modifications that do affect the scope, objective and results of the project incl. project indicators</li><li>b) inclusion of new activity or additional budget line</li><li>c) increase of the management costs of the project</li><li>d) extension of the project behind the set deadlines for achievement of project objective or final eligibility</li><li>e) transfer between budget headings involving a variation higher than set percentual or absolute value limits (cumulatively)</li><li>f) transfer within budget headings (between budget lines) involving set percentual limits of the total allocation of relevant budget heading</li><li>g) changes affecting the grant rate (i.e. change of the legal form of the Promoter, VAT status or co-financing source etc.)</li><li>h) changes of the project partner or changes to partnership agreement that affect goals or financial scope of the partnership</li></ul>

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- i) increase of project grant amount in accordance with the Regulation, Art. 6.9

Significant modifications listed under 1a) may be subject to decision of the Steering Committee provided that the PO concludes that they may affect the programme outputs/outcomes.

Decisive date of the approval of significant modifications is the date of the PO approval letter.

### I/2. Not substantial project modifications reported ex-post to the PO within the nearest interim/final project reports

- a) transfer within the budget headings involving cumulative limits in CZK.
- b) transfer between budget headings involving a variation lower than set percentual or absolute value limits (cumulatively)
- c) changes within budget lines (change of itemised costs and unit prices)
- d) deviations from the project schedule that do not affect the deadlines referred to under 1 d)
- e) changes of administrative nature (change of the project contact person, address etc.)

Insignificant changes, if justified, are approved via certification of relevant interim/final report informing on the modification(s) by the PO. If need be, the PO may request additional information on changes during the certification procedure.

All approved significant project modifications and relevant insignificant project modifications that shall affect the Decision will be reflected in the Addendum to the Decision of the award of the grant/Act of similar effect.

## 3.15. Budget

### 3.15.1 Budget headings

					Non-eligible expenditure (d) €	Total expenditure (e) = (c) + (d) €
	Norway FM (a)	National cofinancing (b)	Total eligible expenditure (c) = (a)+(b)			
	€	€	€	% of total		
Programme management	56130	0	56130	3,2	0	56130
2503 Enhanced capacity and quality of the services provided by public institutions, local and regional authorities through enhanced institutional capacity and human resources development	1 66308	0	1664308	94,6	0	1664308
Funds for bilateral relations	26 400	0	26 400	1,5	0	26 400
Complementary action	10000	0	10000	0,5	0	10000

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Preparation of Programme proposal	3162	0	3162	0,2	0	3162
Reserve for exchange rate losses	0	0	0	0	0	0
<b>TOTAL</b>	<b>1 760 000</b>	<b>0</b>	<b>1 760 000</b>		<b>0</b>	<b>1 760 000</b>

### Annual breakdown of the Norway Financial Mechanism contribution

Budget heading	2012	2013	2014	2015	2016	2017	Total
Programme management	0	8124	20748	22944	4314	0	56130
2503 Enhanced capacity and quality of the services provided by public institutions, local and regional authorities through enhanced institutional capacity and human resources development	0	1090000	574308	0	0	0	1664308
Funds for bilateral relations	0	13200	13200	0	0	0	26400
Complementary action	0	0	10000	0	0	0	10000
Preparation of Programme proposal	3090	72	0	0	0	0	3162
Reserve for exchange rate losses	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>3090</b>	<b>1111396</b>	<b>618256</b>	<b>22944</b>	<b>4314</b>	<b>0</b>	<b>1760000</b>

### Detailed budget for the management costs of the Programme Operator

Cost category	2011	2012	2013	2014	2015	2016	2017	Total
Preparation of Programme implementation	0	0	1410	1412	0	0	0	2822
Project appraisal and selection	0	0	2489	2489	0	0	0	4978
Payment claim verification, transfer of payments	0	0	0	428	428	0	0	856
Monitoring of projects	0	0	0	738	738	0	0	15476
Audits and on-the-spot verification of projects	0	0	0	3575	9655	0	0	13230
Promotion and information	0	0	3753	3753	3753	3753	0	15012
Reporting to donors and national authorities	0	0	472	1354	1370	560	0	3756
Establishment and operation of bank accounts	0	0	0	0	0	0	0	0
Overheads	0	0	0	0	0	0	0	0
<b>Total</b>		<b>0</b>	<b>8124</b>	<b>20749</b>	<b>22944</b>	<b>4313</b>	<b>0</b>	<b>56130</b>

### Detailed budget for preparation of Programme proposal

Cost category	Units	Unit cost	Amount (€)
Salaries of staff of the Programme Operator			645
Travel and subsistence allowance	0	0	0

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Feasibility studies, including expert fees	0	0	0
Translation costs			703
Preparation for public procurement and state aid	0	0	1814
Public consultation	0	0	0
<b>Total</b>			<b>3162</b>

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## Detailed budget for Pre-defined project

Budget of Project to ensure improved implementation of selected GRECO recommendations (AC-CZ)

Strengthened institutional capacity and human resource development in public institutions, local and regional authorities in Czech Republic within the agreed priority sectors

Budget set with co-financing and the VAT

Expenses					
	International/local experts (fee)	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1 A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available.	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	per day	6	400	2400
	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per day	20	400	8000
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of the	per day	9	400	3600
Output 1.2 Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Republic	per day	8	400	3200
	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	per day	0	400	0
Output 2.1 Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations for	per day	18	400	7200
	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studies	per day	15	400	6000
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	per day	4	400	1600
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acquired	per day	2	400	800
Output 2.2 Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to learn	per day	0	400	0
	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	per day	60	400	24000
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selected	per day	30	400	12000
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project should	per day	28	400	11200
Output 3.1 Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	per day	0	400	0
	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); identification	per day	30	400	12000
Output 3.2 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and share	per day	40	400	16000
	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	per day	30	400	12000
Output 4.1 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who report	per day	17	400	6800
	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of	per day	14	400	5600
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquired	per day	7	400	2800
<b>total</b>					<b>135200</b>

Expenses

	Per diems (international/between countries)	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1 A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available.	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	per diem	5	230	1150
	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per diem	0	230	0
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of t	per diem	3	230	690
Output 1.2 Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Re	per diem	0	230	0
	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	per diem	0	230	0
Output 2.1 Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations f	per diem	6	230	1380
	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studi	per diem	0	230	0
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	per diem	2	230	460
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acqu	per diem	0	230	0
Output 2.2 Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to lea	per diem	40	230	9200
	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	per diem	32	230	7360
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selec	per diem	0	230	0
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project shou	per diem	24	230	5520
Output 3.1 Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	per diem	0	230	0
	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); ide	per diem	0	230	0
Output 3.2 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and shar	per diem	40	230	9200
	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	per diem	9	230	2070
Output 4.1 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who rep	per diem	5	230	1150
	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of	per diem	6	230	1380
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquir	per diem	0	230	0
				<b>total</b>	<b>39560</b>

Expenses

	International travel	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1 A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available.	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	per flight	1	1000	1000
	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per flight	0	1000	0
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of t	per flight	1	1000	1000
Output 1.2 Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Re	per flight	0	1000	0
	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	per flight	0	1000	0
Output 2.1 Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations f	per flight	3	1000	3000
	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studi	per flight	0	1000	0
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	per flight	1	1000	1000
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acqu	per flight	0	1000	0
Output 2.2 Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to lea	per flight	10	1000	10000
	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	per flight	8	1000	8000
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selec	per flight	0	1000	0
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project shou	per flight	8	1000	8000
Output 3.1 Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	per flight	0	1000	0
	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); ide	per flight	0	1000	0
Output 3.2 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and shar	per flight	10	1000	10000
	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	per flight	3	1000	3000
Output 4.1 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who rep	per flight	1	1000	1000
	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of	per flight	2	1000	2000
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquir	per flight	0	1000	0
				<b>total</b>	<b>48000</b>

Expenses

	Local travel for experts	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1 A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available.	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	per trip	1	150	150
	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per trip	1	150	150
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of t	per trip	2	150	300
Output 1.2 Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Re	per trip	2	150	300
	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	per trip	0	150	0
Output 2.1 Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations f	per trip	3	150	450
	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studie	per trip	1	150	150
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	per trip	1	150	150
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acqui	per trip	1	150	150
Output 2.2 Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to lea	per trip	10	150	1500
	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	per trip	12	150	1800
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selec	per trip	1	150	150
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project shou	per trip	12	150	1800
Output 3.1 Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	per trip	0	150	0
	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); ide	per trip	2	150	300
Output 3.2 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and shar	per trip	10	150	1500
	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	per trip	9	150	1350
Output 4.1 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who rep	per trip	2	150	300
	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of	per trip	7	150	1050
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquir	per trip	1	150	150
				<b>total</b>	<b>11700</b>

Expenses					
	Publication	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1 A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available.	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	per event	0,1	2000	200
	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per event	0,1	2000	200
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of t	per event	1	2000	2000
Output 1.2 Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech R	per event	1	2000	2000
	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	per event	1	2000	2000
Output 2.1 Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations f	per event	0,1	2000	200
	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studi	per event	0,1	2000	200
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	per event	0,1	2000	200
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acqu	per event	1	2000	2000
Output 2.2 Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to lea	per event	0,1	2000	200
	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	per event	0,1	2000	200
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selec	per event	0,1	2000	200
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project shou	per event	1	2000	2000
Output 3.1 Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	per event	0,1	2000	200
	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); ide	per event	1	2000	2000
Output 3.2 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and shar	per event	0,1	2000	200
	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	per event	1	2000	2000
Output 4.1 Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who rep	per event	0,1	2000	200
	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of	per event	0,1	2000	200
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquir	per event	1	2000	2000
<b>total</b>					<b>18400</b>

Expenses

	Interpretation/translation	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	man day (per pages)	1	400	400
A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available.	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per study	1	2000	2000
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of t	man day (per pages)	1	400	400
Output 1.2	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Re	man day (per pages)	1	400	400
Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	man day (per pages)	1	400	400
Output 2.1	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations f	man day (per pages)	1	400	400
Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studie	man day (per pages)	1	400	400
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	man day (per pages)	1	400	400
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acqui	man day (per pages)	1	400	400
Output 2.2	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to lea	man day (per pages)	1	400	400
Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	man day (per pages)	1	400	400
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selec	per study	1	2000	2000
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project shou	man day (per pages)	1	400	400
Output 3.1	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	man day (per pages)	1	400	400
Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); ide	per study	1	2000	2000
Output 3.2	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and shar	man day (per pages)	1	400	400
Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	man day (per pages)	1	400	400
Output 4.1	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who rep	man day (per pages)	1	400	400
Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of	man day (per pages)	1	400	400
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquir	man day (per pages)	1	400	400
				<b>total</b>	<b>12800</b>

Expenses

	Other cost (lease, technology etc.)	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	per event	2	3100	6200
A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	per event	1	3100	3100
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of the	per event	2	3100	6200
	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Republic	per event	1	3100	3100
Output 1.2	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	per event	1	3100	3100
Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication					
Output 2.1	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations for	per event	2	3100	6200
Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studies	per event	1	3100	3100
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	per event	2	3100	6200
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acquired	per event	2	3100	6200
	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to learn and share	per event	1	3100	3100
Output 2.2	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	per event	3	3100	9300
Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selected	per event	1	3100	3100
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project should	per event	4	3100	12400
	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	per event	2	3100	6200
Output 3.1	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); identification	per event	1	3100	3100
Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.					
Output 3.2	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and share	per event	2	3100	6200
Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	per event	4	3100	12400
Output 4.1	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who report	per event	1	3100	3100
Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of the	per event	3	3100	9300
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquired	per event	1	3100	3100
<b>total</b>					<b>114700</b>

Expenses of IT

Management of project	unit	number of unit	unit rate in EUR	cost in EUR
Documentation-projects	per event	1	180000	180000
Design and delivery HW, SW	per event	1	850000	850000
Realization phase of the project	per event	1	160000	190000
Training users and administrators	per event	1	40000	50000
Maintenance, data base	per event	1	220000	220000
<b>total</b>				<b>1490000</b>

Expenses					
	Management of project	unit	number of unit	unit rate in EUR	cost in EUR
Output 1.1	1.1.1. Organisation of brainstorming workshop with institutions involved in anti-corruption to facilitate the discussion and exchange of	man day	15	330	4950
A comprehensive study is available identifying existing and potential risks and threats in the area of corruption and related crime; policy recommendations on risk and threat mitigation are available	1.1.2. Preparation of a comprehensive risk/threat assessment study (including typologies and policy recommendations for improvement)	man day	10	330	3300
	1.1.3. Workshop on launching and publication of the results from the assessment study and its recommendations for improvement of the	man day	15	330	4950
	Output 1.2	1.2.1. Preparation of the communication strategy/Plan for FAU and other institutions dealing with anti-corruption issues in the Czech Republic	man day	10	330
Increased public awareness of the Anti-corruption and Anti-money laundering System in the Czech Republic through a comprehensive communication	1.2.2. Dissemination and publication of awareness campaign /visibility items to public and professionals.	man day	5	330	1650
	Output 2.1	2.1.1. Workshop on international best practices on criminal liability of legal entities, with the aim to produce specific recommendations for	man day	20	330
Capacities of government authorities to implement legislation on the liability of legal entities are enhanced.	2.1.2. Training manual and training of trainers for police, prosecutors and judges on practical implementation issues including case studies	man day	20	330	6600
	2.1.3. Concluding workshop on methods of implementing regimes for criminal liability of legal entities for Czech Republic.	man day	20	330	6600
	2.1.4. Collection of selected workshop lectures as a training tool towards the end of the project, which should summarize the newly acquired	man day	15	330	4950
	Output 2.2	2.2.1. Study visit to foreign units and administrative bodies to the countries (for example Norway, Germany, UK, USA etc.) in order to learn and share	man day	10	330
Capacities of government authorities to disclose, investigate, prosecute and adjudicate corruption-related cases are enhanced, legislative proposals are available to strengthen the asset recovery regime, capacities of government authorities to recover assets from corruption are enhanced	2.2.2. Organisation of two workshops (3 days each) with participation of the members of the Police of the Czech Republic, representative	man day	25	330	8250
	2.2.3. Comparative study of the Czech legislation with legislative regulation of selected countries concerning asset recovery regimes. Selected	man day	10	330	3300
	2.2.4. Organisation of two day international conference aimed at seizure of assets where results achieved under 2.2.3 of the project should	man day	20	330	6600
	Output 3.1	3.1.1. Organisation of the regional workshops with participation of legal experts from the Ministry of Interior, the Ministry of Justice and	man day	15	330
Legal analysis and legislative proposals are available on strengthening the regulatory regime of political party and election campaign financing.	3.1.2. Comparison of the Czech legislation with legal regulation of financing of political parties (e.g. in Norway, Germany, UK and USA); identification	man day	10	330	3300
	Output 3.2	3.2.1. Organisation of study visits with foreign units combating corruption in e.g. Norway, Germany, UK or USA in order to learn and share	man day	10	330
Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	3.2.2. Organisation of the conference with international participation from e.g. Norway, Germany, UK, USA and the Czech Republic aimed	man day	30	330	9900
	Output 4.1	4.1.1. Preparation of a project to establish the whistleblowers' centre which provides legal service and support to whistleblowers who report	man day	10	330
Capacities of government authorities to effectively enforce the oversight and regulatory regime and identify violations are enhanced.	4.1.2. Organisation of workshop with participation of experts from abroad with an aim to learn know-how concerning the application of the	man day	20	330	6600
	4.1.3. Publication from selected workshop lectures as a training tool towards the end of the project, which should summarize the acquired	man day	10	330	3300
	CoE	Project Advisor, A1/A2 (part-time)	amount	2	49600
CZ+CoE	Other cost of management	amount	1	24325	24325
<b>total</b>					<b>222525</b>

<b>Total cost in EUR of all activities and management of the project</b>				<b>2092885</b>
2503 allocation				1674308
20% co-financing				418577
<b>Total amount of the program PA25</b>				<b>EUR 2092885</b>

## CZ 10

### 3.15.2 Advance payment

*Complete the table below, and provide a justification for the need of advance payment.*

*Also ensure the information provided in the Statistical attachment is provided here.*

Budget heading	Advance requested (€)
Programme management	
(enter the first outcome)	
(enter the second outcome)	
(enter more outcomes as needed)	
Funds for bilateral relations	
Complementary action	
Preparation of Programme proposal	
Reserve for exchange rate losses	
<b>TOTAL</b>	

## CZ 10

### 3.16 Overview of annexes required to the Programme proposal

I.	List of abbreviations
II.	Pre-defined project
III.	Monitoring plan
IV.	Communication Plan
V.	Chart(s) showing the management structure
VI.	CVs of key personnel
VII.	Needs assessment study

## CZ 10

### 3.17 Signatures

#### For the Programme Operator

I certify that I am duly authorised to sign this proposal on behalf of the Programme Operator, that I have thoroughly reviewed all statements and information provided in this proposal and that they are correct and accurate. I confirm that this Programme will be carried out as described in this proposal and that the grant requested reflects correctly what is reasonably needed as a minimum for the Programme to proceed and to be completed.

I accept that the FMO may publish a summary of this Programme proposal on its website and that the proposal may be subject to disclosure under the Freedom of Information Acts of the EEA EFTA states.

				Optional second signature		
Name	Ms Eva Anderová					
Position	Director orf International Relations Dept.					
Organisation	Ministry of Finance					
Signature						
	Day	Month	Year	Day	Month	Year
Date						

## CZ 10

### For the Programme Partner (repeat as necessary)

I certify that I am duly authorised to sign this proposal on behalf of my organisation, and that this organisation agrees to participate in the implementation of this Programme. I have thoroughly reviewed all statements and information provided in this proposal, and they correctly and accurately describe my organisation's roles and responsibilities towards this Programme.

				Optional second signature		
Name	Mr Milan Cícer					
Position	Director of Financial Analytical Dept.					
Organisation	Ministry of Finance					
Signature						
	Day	Month	Year	Day	Month	Year
Date						

### For the National Focal Point

I certify that I am duly authorised to sign this Programme proposal on behalf of the National Focal Point that I have reviewed all statements and information provided in this proposal and that I confirm that it is in accord with the Memorandum of Understanding.

				Optional second signature		
Name	Mr Tomáš Zídek					
Position	Deputy Minister					
Organisation	Ministry of Finance					
Signature						
	Day	Month	Year	Day	Month	Year
Date						