



**SOUTH PROGRAMME: Strengthening democratic reform in the southern Neighbourhood**

## Second Progress Report

**Component 2: Promotion of Good Governance: fight against corruption and money laundering**

Programme title	Strengthening democratic reform in the Southern neighbourhood
Reference number	ENPI/2011/280-184
Project starting date	29 December 2011
Project duration	36 months
Implementation	Council of Europe
Component 2.	Good Governance: Fight against corruption and money laundering DG I –Information Society and Action against Crime Directorate
Programme budget	1.052.267 Euros
Date of report	02 August 2013
Reporting period	31 December 2012 – 30 June 2013

## Table of Contents

<b>1.</b>	<b>EXECUTIVE SUMMARY OF THE ACTION .....</b>	<b>4</b>
1.1	STATE OF THE COOPERATION IN MOROCCO .....	4
1.2	STATE OF THE COOPERATION IN TUNISIA .....	4
<b>2.</b>	<b>SPECIFIC ACTIVITIES AND BENCHMARK FULFILLMENT (JANUARY –MAY 2013) .....</b>	<b>5</b>
2.1	SUMMARY OF EXPECTED RESULTS FOR MOROCCO AND TUNISIA .....	5
2.2	MOROCCO - PROMOTION OF GOOD GOVERNANCE: FIGHT AGAINST CORRUPTION AND MONEY LAUNDERING .....	6
2.3	TUNISIA – PROMOTION OF GOOD GOVERNANCE: FIGHT AGAINST CORRUPTION AND MONEY LAUNDERING .....	9
2.4	POSTPONED ACTIVITIES .....	11
<b>3.</b>	<b>COOPERATION WITH STAKEHOLDERS IN MOROCCO.....</b>	<b>11</b>
3.1	MOROCCO COUNTERPART AND BENEFICIARIES .....	11
3.2	STATE OF THE COOPERATION .....	11
<b>4.</b>	<b>COOPERATION WITH STAKEHOLDERS IN TUNISIA.....</b>	<b>12</b>
4.1	TUNISIA COUNTERPART AND BENEFICIARIES.....	12
4.2	STATE OF THE COOPERATION .....	12
<b>5.</b>	<b>COOPERATION WITH THIRD PARTIES.....</b>	<b>12</b>
<b>6.</b>	<b>COMPONENT ACHIEVEMENTS AND RISKS .....</b>	<b>13</b>
6.1	ACHIEVEMENTS.....	13
6.2	RISKS .....	13
<b>7.</b>	<b>COMPONENT VISIBILITY ACTIONS.....</b>	<b>13</b>
<b>8.</b>	<b>UPDATED CALENDAR OF ACTIVITIES .....</b>	<b>14</b>

---

For any additional information please contact:

Council of Europe  
F-67075 Strasbourg Cedex FRANCE  
Tel: +33 388 41 26 29/Fax +33 3 88 41 27 05  
Email: [guillaume.parent@coe.int](mailto:guillaume.parent@coe.int)  
Web: [www.coe.int/](http://www.coe.int/)

This document has been produced with the financial assistance of the European Union. The views expressed herein can in no way be taken to reflect the official opinion of the European Union or the Council of Europe.

## Abbreviations

<i>Alliance Tunisienne pour l'Intégrité et la Transparence</i>	ATIT
<i>Antenne marocaine des Parlementaires de la région Arabe contre la corruption</i>	ARPAC-net
<i>Arab Region Parliamentarians Against Corruption</i>	ARPAC
<i>Assemblée Nationale Constituante</i>	ANC
<i>Association des barreaux du Maroc</i>	ABM
<i>Centre d'Assistance Juridique Anti-corruption</i>	CAJAC
<i>Confédération Générale des Entreprises du Maroc</i>	CGEM
<i>Council of Europe</i>	COE
<i>European Union Delegation</i>	EUD
<i>Group of States against Corruption/Groupe des Etats contre la Corruption</i>	GRECO
<i>Inspection Générale de l'Administration Territoriale</i>	IGAT
<i>Instance Centrale de Prévention de la Corruption</i>	ICPC
<i>Instance Nationale de Lutte contre la Corruption</i>	INLUCC
<i>Middle East &amp; North Africa Financial Action Task Force</i>	MENA/FATF
<i>Ministère de la fonction publique et de la modernisation de l'administration</i>	MFPMA
<i>Ministère de la gouvernance et de la lutte contre la corruption</i>	MGLC
<i>Ministère de la Justice et des Libertés</i>	MOJL
<i>Unité de traitement du Renseignement Financier</i>	UTRF
<i>United Nations Convention against corruption</i>	UNCAC

## **Executive summary of the Action**

The objective of the project aims at promoting good governance notably through increased prevention of corruption and money-laundering on the basis of the relevant Council of Europe standards, mechanisms and instruments and to improve the basic framework for regional co-operation in this respect

The inception phase of the project ended in December 2013 following the organisation a second start-up activities mission in Tunis (10-14 December 2013). List of activities and calendar in Morocco were adopted by stakeholders in Morocco in November 2012 and in February 2013 by stakeholders in Tunisia.

During the reported period (January-May 2013), four activities were carried out. Including the first activity aimed at familiarizing Moroccan stakeholders to GRECO & MONEYVAL methodologies took place on 17-18 October 2012 in Strasbourg, five activities have been finalised out of 31 activities foreseen.

The Project established good working relations with national coordinating institutions in Morocco and Tunisia.

The Project established good working relations with other international organizations providing technical assistance: OECD and UNDP in order to limit the duplication of efforts.

### **1.1 State of the cooperation in Morocco**

On 13 June 2013, Activity M3.1 took place in Rabat (Morocco). At the request of the Moroccan anti-corruption agency (ICPC), the Council of Europe has undertaken a review of the methodology used by the Moroccan authorities to assess risks in the areas of health and transport in the light of its experience in East Central Europe.

In support of this comparison, the workshop contributed to present the goals and challenges of such an exercise. At this occasion a detailed presentation of the tools needed for this exercise was done, especially the questionnaire developed through previous cooperation programs in Central and Eastern Europe.

As a follow-up to this activity, the Council of Europe will specifically support one sector to launch a risk analysis in accordance with the methodology developed in the framework of CoE's cooperation in Central and Eastern Europe.

On 10 July 2013, the assessment of the anti-corruption legal framework (diagnostic) was launched (Activity M.1.2) at the occasion of a seminar with participation of focal points appointed by each institution to be assessed.

### **1.2 State of the cooperation in Tunisia**

On 8-12 April 2013, the Council of Europe organised a study-visit (T3.1) in France, Slovenia and Croatia to familiarise Tunisian stakeholders to the organisation and work of different models of anti-corruption agencies. The collected documentation will contribute to the work of the president of the Tunisian anti-corruption agency (*Instance nationale de lutte contre la corruption*, INLUCC) to prepare the currently missing internal rules necessary to strengthen the institution as indicated in the workplan.

On 18 June 2013, Activity T3.3 was held in Tunis (Tunisia) in partnership with the Ministry of governance to familiarize good governance unit representatives from three particularly sensible sectors (customs, tax administration and State's patrimony) to Council of Europe's methodologies on risk assessment.

This workshop was aimed at presenting the goals and challenges of such an exercise. At this occasion a detailed presentation of the tools needed for this exercise was done, especially the questionnaire developed through previous cooperation programs in Central and Eastern Europe.

As a follow-up to this activity, the Council of Europe will specifically support one unit of good governance in the implementation of its risk assessment.

The good governance and fight against corruption units have been established in each ministry and governorate under circular-letters 16 and 55-2012. A law is being prepared in order to specify their powers and organizational advantage: The training workshop on risk assessment methodologies will be held.

### **SPECIFIC ACTIVITIES AND BENCHMARK FULFILLMENT (January –May 2013)**

#### **1.3 Summary of Expected Results for Morocco and Tunisia**

**Objective:** Enhancing the political and democratic reform process in countries of the region.

**Specific Objective:** Promoting good governance notably through increased prevention of corruption and money-laundering on the basis of the relevant Council of Europe standards, mechanisms and instruments and to improve the basic framework for regional co-operation in this respect.

**Overall Result:** The main Council of Europe and European Union standards and best practices in terms of mechanisms and instruments to control and combat corruption, money-laundering and terrorism financing are introduced into the beneficiary policy framework and institutional setup. The relevant capacities of the judiciary and law-enforcement agencies are increased. The basic framework for regional co-operation is improved.

**Expected Result I:** Recommendations and policy advice in the area good governance and fight against corruption are made available following assessment of the anti-corruption's legal and institutional framework on basis of the GRECO methodology.

**Expected Result II:** Increased capacities on legislative reforms through legal advice and legal drafting concerning administrative structures through knowledge sharing of good practices and cooperation with civil society.

**Expected Result III:** Available policy advice and sector risk analysis to relevant institutions concerning good governance and corruption prevention tools/methodologies.

**Expected Result IV:** Provision of training modules and awareness raising for those relevant institutions and civil society groups in the area of good governance and fight against corruption and Economic Crime.

#### 1.4 Morocco - Promotion of Good Governance: fight against corruption and money laundering

Expected Result I: Assessment of the legal and institutional framework	
<b>Activity No.M1.2</b>	Preparation and introduction through a Training Seminar of the Questionnaire of Assessment
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Drafting the assessment questionnaire on the basis of the GRECO models</li> <li>▪ Drafting the terms of reference of the assessment process</li> <li>▪ Presentation of the assessment questionnaire/TOR to key national institutions focal points requested to fill the questionnaire</li> <li>▪ Identification of the experts for the assessment (national and international)</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Assessment questionnaire on the basis of the GRECO model available in French and English</li> <li>▪ Terms of reference of the assessment process</li> <li>▪ Assessment report published and disseminated to all relevant structures</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ Assessment questionnaires and terms of reference were finalised in February 2013 and sent for approval. Approval granted in May 2013</li> <li>▪ Identification of the international experts for the assessment in February 2013</li> <li>▪ Identification of local experts for the assessment in June 2013</li> <li>▪ Training seminar for key national institutions on the assessment questionnaire was held on 10 July 2013</li> </ul>
<b>Activity No.M1.3</b>	Launch of the assessment process (on-site visits by the experts team consisting of 6 experts appointed by the Council of Europe and 2 Moroccan experts)
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Assessment questionnaire is made available to institutions to be assessed and filled</li> <li>▪ On-site visits of experts are held</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Assessment questionnaire is filled by focal points</li> <li>▪ Draft assessment report is drafted by experts on the basis of information collected during the on-site visits</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ Assessment questionnaire is made available to institutions in June 2013</li> <li>▪ Key national institutions Focal points are requested to fill questionnaire by August 31<sup>st</sup></li> <li>▪ On-site visits are scheduled from 30 September to 4 October 2013</li> <li>▪ CoE Conventions on corruption were translated into Arabic. The Arab text was reviewed by the Moroccan partner (ICPC)</li> </ul>

Expected Result II: Legislative Reforms	
<b>Activity No.M2.1</b>	Provide legal advice and analysis in the context of the drafting of the Law of the future <i>Instance nationale de probité, de prévention et de lutte contre la corruption</i> and other provisions of the associated regulatory framework
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Good practice examples of anti-corruption agencies in Europe are collected</li> <li>▪ Legal expertise on draft legislation</li> </ul>
<b>Objectively verifiable</b>	<ul style="list-style-type: none"> <li>▪ Good practice examples of anti-corruption agencies in Europe is made available to the ICPC</li> </ul>

<b>indicators</b>	<ul style="list-style-type: none"> <li>▪ Expert opinion is made available to ICPC</li> </ul>
<b>Progress made/Follow up</b>	Initially programmed to provide support to draft the Law, this activity should have started already in 2012. Due to a favourable momentum, the draft law has already passed several steps before it was tabled to the General Secretariat of the Government. ICPC requested that CoE support will be provided after the adoption of the Law by the Parliament and centred on the drafting of the implementing regulation (expected in the Autumn 2013)
<b>Activity No.M2.3</b>	Provision of a training on the methodology on corruption proofing of legislation
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Organisation of the training</li> <li>▪ Identification of the participants</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Terms of references are drafted</li> <li>▪ The training is held</li> <li>▪ Training material is provided to participants</li> </ul>
<b>Progress made/Follow up</b>	Following the meeting with Parliamentarians on 12 June 2013, the decision was taken to enlarge target-attendance to the workshops of civil servants of Ministries in charge of the drafting of laws
<b>Activity No.M2.4</b>	Supporting the ICPC in its advisory role on the national dialogue concerning the reform of justice sector
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Expert is commissioned at the request of ICPC</li> <li>▪ Expert opinion is delivered</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Expert opinion is delivered to ICPC</li> </ul>
<b>Progress made/Follow up</b>	CoE intervention has not been solicited at this level yet

<b>Expected Result III: Policy Advice</b>	
<b>Activity No.M3.1</b>	Organisation of one or two technical workshop addressed to relevant institutions dedicated to the review of the results of the risks analysis in the sector of health and transportation
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Drafting of the terms of reference of the training workshop on risk assessment methodologies</li> <li>▪ Drafting a review of the results of the risks analysis in the sector of health and transportation</li> <li>▪ Organising a training workshop on CoE methodologies to carry out risk assessment</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Terms of reference are validated</li> <li>▪ Training expert appointed</li> <li>▪ Training material made available to participants</li> <li>▪ Comparative analysis of the methodologies to carry out risk assessment analysis delivered</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ Terms of reference validated by partners</li> <li>▪ Training expert contracted</li> <li>▪ Training workshop took place on 13 June 2013 in Rabat (Morocco)</li> <li>▪ Comparative analysis is delivered at the occasion of the training</li> </ul>
<b>Activity No.M3.2</b>	Carrying out two Analyses of the risks in sectors that are the most exposed to the corruption risks for chosen administrations/private sector

<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Identification of the sector to analyse</li> <li>▪ Identification of key experts (national and international)</li> <li>▪ Provision of CoE methodologies on risk assessment</li> <li>▪ Risk assessment report is drafted</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ CoE methodologies on risk assessment are delivered</li> <li>▪ Delivery of risk assessment report</li> </ul>
<b>Progress made/Follow up</b>	Department of external trade was suggested to carry out a risk assessment under CoE methodologies (to be officially confirmed by ICPC)
<b>Activity No.M3.3</b>	Provision of tools (objectively verifiable indicators) and methodologies and exchange of good practice on the conception and the implementation of strategies and policies in anti-corruption and combating economic crime, including the follow-up of the level of implementation
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Expert is commissioned</li> <li>▪ Definition of CoE intervention on objectively verifiable indicators is decided in the scope of the national inquiry planned by ICPC</li> <li>▪ Provision of Expert opinion</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Expert Opinion is delivered</li> </ul>
<b>Progress made/Follow up</b>	Contribution of CoE will be defined on the basis of terms of reference of the national inquiry currently being developed by UNDP expert (Autumn 2013)

<b>Expected Result IV: Trainings</b>	
<b>Activity No.M4.1</b>	Organisation of a certified training and delivery of a module on guidelines concerning the design, implementation and performance evaluation of anti-corruption and good governance policies for the public sector
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Definition of the terms of reference</li> <li>▪ Identification of the expert</li> <li>▪ Translation in French of CoE guidelines on designing and implementing AC policies</li> <li>▪ Preparation of the training workshop</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ The module is delivered</li> <li>▪ The training is held</li> <li>▪ Participants receive a certificate</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ Expert is identified</li> <li>▪ Translation of the handbook "Designing and Implementing Anti-corruption Policies" elaborated under EAP EU/CoE joint project is ongoing</li> <li>▪ Cooperation with the main beneficiary institution has been difficult. Communication was re-established in July 2013</li> <li>▪ Activity is scheduled second half 2013</li> </ul>
<b>Activity No.M4.2</b>	Organisation of a certified training and delivery of a module on guidelines concerning the design, implementation and performance evaluation of anti-corruption and good governance policies for the private sector
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Identification of the expert</li> <li>▪ Adaptation of COE guidelines on designing and implementing AC policies</li> <li>▪ Preparation of the training workshop</li> </ul>
<b>Objectively verifiable</b>	<ul style="list-style-type: none"> <li>▪ The module is delivered</li> <li>▪ The training is held</li> </ul>



<b>indicators</b>	<ul style="list-style-type: none"> <li>Participants receive a certificate</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>Expert is identified</li> <li>Activity is scheduled second half of 2013 in continuation of activity M4.1</li> </ul>

## 1.5 Tunisia – Promotion of Good Governance: fight against corruption and money laundering

<b>Expected Result II:</b>	
<b>Activity No.T2.1</b>	Provision of good practices and European models for Editorial Committees of Ministry of Governance and Tunisian Bar Association on issues related to codes of ethics
<b>Actions</b>	<ul style="list-style-type: none"> <li>Good practice examples in Europe are collected and documented</li> <li>Terms of reference are drafted</li> <li>Seminar is organised to introduce the good practice examples</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>Editorial Committees are appointed</li> <li>Terms of reference are adopted</li> <li>Seminar is held</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>Good practice examples are being collected (Belgian <i>Ordre des Barreaux francophones et germanophone</i> published in January 2013 a new code of deontology, French <i>Règlement intérieur national</i>, Geneva Bar association <i>Us et coutumes</i>), Council of Bars and Law Societies of Europe (CCBE)'s Charter, last edition 2010)</li> <li>Ministry of governance suggested the COE to support the Ministry of state property to draft its own code of ethics (to be confirmed by the Ministry of state property)</li> <li>Experts are being identified and terms of reference under preparation</li> </ul>
<b>Activity No.T2.3</b>	Provision of legislative advise and legal drafting reviews in support of the drafting of the future Anti-corruption Law
<b>Actions</b>	<ul style="list-style-type: none"> <li>Good practice examples in Europe are collected and documented</li> <li>Terms of reference are drafted</li> <li>Colloquium is organised to introduce the good practice examples</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>Terms of reference are adopted</li> <li>Colloquium is held</li> </ul>
<b>Progress made/Follow up</b>	The adoption of the AC national strategy was postponed from December 2012 to October 2013. (CoE involvement is not requested at this level of the project)
<b>Activity No.T2.4</b>	Raising awareness of the Parliamentarians concerning implementation of Anti-corruption international standards on financing of political parties through the exchange of good practices with international partners.
<b>Actions</b>	<ul style="list-style-type: none"> <li>Definition of the terms of reference</li> <li>Identification of the expert(s)</li> <li>Preparation of the workshop</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>Editorial committees are appointed</li> <li>Terms of reference are adopted</li> <li>Workshop is held</li> </ul>
<b>Progress made/Follow up</b>	The Ministry of governance requested to extend the scope of the activity to the financing of nongovernmental organisations in the context of the fight against terrorism financing. Interest was expressed concerning voluntary guidelines for EU based non-profit organisations and the achievements of the working group on Foundations and the European Foundation Centre.

<b>Expected Result III: Policy Advice</b>	
<b>Activity No.T3.1</b>	Strengthening of the capacities of the National Instance for the fight against Corruption (INLUCC) through the sharing of information and good practices as well as establishment of professional networks with homologue institutions in Europe.
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Identification of up to three institutions that could be of relevance and interest as good practices and models for the INLUCC in order to allow them that in the future they can determine the model of their own constitutionally reformed institution</li> <li>▪ Initiation of communication and drafting of Study Visit Programme</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Study visit takes place in up to three countries in Europe</li> <li>▪ Sharing good practices and establishment of networking capacities is made available and documented</li> <li>▪ Three agency models available for use and review by the national experts prior to determining the future model of INLUCC which has to be regulated by the Constitution</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ A delegation of 10 participants from relevant institutions in Tunisia visited from 8 to 12 April 2013 France, Croatia and Slovenia's Anti-corruption agencies</li> <li>▪ The synopsis of the visit including documentation was sent to participants on 15 May 2013</li> </ul>
<b>Activity No.T3.2</b>	Provision of assistance on introducing internal rules concerning the instance's status of the staff and their role and internal rules in managing and processing cases as well as safeguarding confidentiality and secrecy of cases
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Drafting the terms of reference aiming the preparation of internal documents</li> <li>▪ Appointment of an expert to follow the drafting process</li> <li>▪ Supporting the internal drafting committee in charge of the preparation of internal regulation and code of procedure</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Appointment of the drafting committee when the INLUCC's governing body "Council" is operational</li> <li>▪ Meeting of the drafting committee</li> <li>▪ Drafting of Internal rules (internal regulation and code of procedure)</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ Terms of reference drafted and being approved by INLUCC</li> <li>▪ Expert identified for the activity</li> </ul>
<b>Activity No.T3.3</b>	Providing tools and methodologies as well as capacity building in support to the design of three major Sector Analysis (i.e. customs, tax administration and Property administration) to be carried out by the respective good governance and Anti-corruption units ( <i>Cellules de Bonne Gouvernance et de Lutte Contre la Corruption</i> )
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Identification of the trainer</li> <li>▪ Drafting of the terms of reference</li> <li>▪ Preparation of the training material</li> <li>▪ Organisation of a training seminar</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Terms of reference are validated</li> <li>▪ Training workshop is held</li> <li>▪ Training material is provided</li> </ul>
<b>Progress made/Follow up</b>	<ul style="list-style-type: none"> <li>▪ trainer is commissioned</li> <li>▪ Training workshop took place in Tunis on 18 June 2013</li> <li>▪ Support to the risk assessment of the Ministry of State Property to be launched at the end of 2013</li> </ul>

Expected Result IV: Trainings	
<b>Activity No.T4.1</b>	Specialised and multi-disciplinary training for INLUCC staff, judges, prosecutors and judiciary police agents to carry out administrative inquiries (or criminal investigations related) concerning economic crime and corruption related-cases.
<b>Actions</b>	<ul style="list-style-type: none"> <li>▪ Drafting of the terms of reference</li> <li>▪ Participants are identified (including staff members of the Judiciary Financial Pole)</li> <li>▪ Specialist trainings are identified</li> <li>▪ Trainers are identified</li> <li>▪ Training are organised</li> </ul>
<b>Objectively verifiable indicators</b>	<ul style="list-style-type: none"> <li>▪ Trainers are commissioned</li> <li>▪ Trainings are held</li> </ul>
<b>Progress made/Follow up</b>	INLUCC experts expressed interest for training on forensic accounting in the course of activity T3.1

## 1.6 Postponed Activities

See updated calendar under #8.

## COOPERATION WITH STAKEHOLDERS IN MOROCCO

### 1.7 Morocco Counterpart and beneficiaries

- *Instance Centrale de Prévention de la Corruption (ICPC);*
- *Unité de Traitement du Renseignement Financier (UTRF);*
- *Ministère de l'Intérieur – Inspection Générale de l'Administration Territoriale (IGAT);*
- *Ministère de l'Intérieur – Direction Nationale de la Sureté Nationale (DNSN);*
- *Ministère de la Justice et des Libertés – Direction des affaires pénales et des grâces (MOJL);*
- *Ministère de la Fonction Publique et de la Modernisation de l'Administration (MFPMA);*
- *Association des barreaux du Maroc (ABM);*
- *Association marocaine de lutte contre la corruption - Transparency Maroc – Le Centre d'Assistance Juridique Anti-corruption (CAJAC);*
- *Antenne marocaine des Parlementaires de la région Arabe contre la corruption (ARPAC-net);* and
- *Confédération Générale des Entreprises du Maroc – Commission d'Ethique et Déontologie (CGEM-CED).*

ICPC recommended extending the cooperation to:

- *Banque du Maroc (Central Bank); and*
- *Office des changes.*

### 1.8 State of the Cooperation

In the reported period, the cooperation with the coordinating institution in Morocco (ICPC) was successful and regular (on a weekly basis). The institution has provided support in the organisation of activities, partly in undertaking coordination of national authorities.

ICPC acknowledged capacity limitations due to the extensive scale of international cooperation it is currently undertaking. This situation has already caused extra delays. The absorption capacity may meet limits in the future.

## **COOPERATION WITH STAKEHOLDERS IN TUNISIA**

### **1.9 Tunisia Counterpart and beneficiaries**

- *Ministère de la gouvernance et de la lutte contre la corruption (MGLC);*
- *Ministère de l'Intérieur;*
- *Ministère de la Justice;*
- *Instance nationale de Lutte contre la Corruption (INLUCC);*
- *Ordre national des Avocats de Tunisie;*
- *Ordre des Experts Comptables de Tunisie;*
- *Assemblée nationale Constituante (ANC); and*
- Civil Society.

At the request of nongovernmental organisation RNAC, the cooperation with *Alliance Tunisienne pour l'Intégrité et la Transparence (ATIT)* was extended to the "Civil Society" in general including RNAC that left ATIT board in February 2013.

### **1.10 State of the Cooperation**

Due to political instability, implementation of activities suffered of delays for decisions.

For example, the appointment of the members of the delegation participating to activity T3.1 was particularly long and effective on 21 March 2013 only (6 weeks). At this occasion, it was nevertheless possible to testify the support by beneficiaries to the CoE cooperation. Even if Ministry of Justice could not finally appoint any delegate, important efforts were mobilised. Participants to the delegation were high level officials who showed interest and contributed actively to the various meetings organised.

Regular telephone reports are held with *Ministère de la gouvernance et de la lutte contre la corruption* to follow the progress of activities.

Cooperation with *Instance nationale de Lutte contre la Corruption* is successful as proved by evaluation forms for Activity T3.1 and prospect for cooperation under activity T3.2.

## **COOPERATION WITH THIRD PARTIES**

Initiated during inception phase, a regular exchange of information was set-up with OECD and UNDP by telephone and email.

In margin of the meeting of the steering committee in Paris, SNAC Project Manager met homologues at OECD and SIGMA.

Periodical exchange of information by Email and telephone is held between Council of Europe and colleagues of OECD (Department on Public governance and Territorial Development) and UNDP.

OECD invited CoE Representative in Tunis to attend events while CoE took profit of the study-visit of the Tunisian delegation in Paris (T3.1) to arrange a visit to OECD office in Paris in the agenda.

## **COMPONENT ACHIEVEMENTS AND RISKS**

### **1.11 Achievements**

The workplan is being implemented. Four activities were completed during the assessed period, 10 activities are being processed. At this level, delays are still under control and the activities should be finalised by the end of the Programme (December 2014).

### **1.12 Risks**

**Risk for the duplication of efforts with other international organisations** persists. Routine exchange of information was set-up with OECD and UNDP in order to limit duplication of efforts.

CoE could testify **limitation in the absorption capacity of main partners** in Morocco and Tunisia.

Both coordinating bodies of the CoE technical cooperation in Tunisia and Morocco have shown limits in their capacity to respond to proposal for activities for reason of agenda. Although the commitment and professionalism of staff, this has caused delays in the organisation of activities. Both *Instance centrale de prevention de la corruption* and *Ministère de la gouvernance* are supervising a wide scope of technical assistance with limited staff resources.

## **COMPONENT VISIBILITY ACTIONS**

Bilingual project website (English and French) has been set up under COE's Economic Crime Section web page and is regularly updated with project news, upcoming events and outputs: (<http://www.coe.int/snac>). This website complements the general web portal setup by the Office of the Directorate General on Programmes (<http://south-programme-eu.coe.int/>).

[Council of Europe](#) > [Human Rights and Rule of Law](#) > [Action against economic crime](#)

## Action against economic crime

### South Programme - Component 2

#### Promotion of Good Governance and Fight against corruption (SNAC)

Funded  
by the European Union



EUROPEAN UNION



COUNCIL OF EUROPE  
CONSEIL DE L'EUROPE

Implemented  
by the Council of Europe

The joint programme of the European Union and the Council of Europe "Strengthening democratic reform in the Southern Neighbourhood (South Programme) - Component 2" aims at promoting good governance through increased prevention of corruption and money-laundering in the Southern Neighbourhood (Morocco, Tunisia etc.). It is fully funded by the EU and implemented by the Council of Europe.

The 3-year programme was initiated on the base of many actions led by the international community in support to good governance and promotion of the rule of law following the Arab Spring (2011). Signed on 17 January 2012, the Programme targets public authorities and the civil society to support commitments to reform, on the independence and efficiency of the judiciary, corruption and human trafficking and to promote human rights and democratic values. The component 2 of the Programme aims at the implementation of high-standards for democratic governance to fight corruption, money-laundering and terrorism financing. It responds to a high level priority of all countries in the region, the European Union and the Council of Europe.

Middle East and North Africa (MENA) region has manifested in many occasions the interest in strengthening cooperation with the Council of Europe to combat corruption and money-laundering. Therefore the programme is expected to

#### PROJECT DOCUMENTATION

- ▶ Description of Action for Morocco
- ▶ Description of Action for Tunisia
- ▶ Workplan of Activities
- ▶ Activity Progress Report

#### STEERING COMMITTEE

- ▶

#### USEFUL LINKS

- ▶ [South Programme Website](#)
- ▶ [North South Centre \(CoE\)](#)
- ▶ [EU delegation in Morocco](#)
- ▶ [EU delegation in Tunisia](#)

#### MEDIA CORNER

- ▶ Past activities
- ▶ Photo Gallery

Programme visibility is ensured through the inclusion of the project logo on the website and each project paper. In addition, visibility material such as document folders and sticky notes are being used and handed out at each activity.

The project will ensure the visibility of the EU's contribution at all stages of its activities. The CoE is taking all appropriate measures to publicise the fact that the project is being received from a European Union agreement. All reporting and information used and disseminated will acknowledge that actions have been carried out "Funded by the European Union, implemented by the Council of Europe" by also displaying in an appropriate way the European Union logo.

## UPDATED CALENDAR OF ACTIVITIES

**Strengthening democratic reform  
in the southern Neighborhood**

Funded  
by the European Union



COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Implemented  
by the Council of Europe

**Calendar SNAC activities**

		PLANNED (WORKPLAN)	POSTPONED	STATUS
<b>Expected Result 1:</b> Recommendations and policy advice in the area good governance and fight against corruption are made available following assessment of the legal and institutional framework on basis of the GRECO methodology.			Insert date	Yes/No Completed/on-going/ planned for___/cancelled
M.1.1	Introduction to GRECO methodologies increasing the capacities in implementing European standards, monitoring tools and networking opportunities	17/18 Oct 2012		Completed
M.1.2	Drafting and presentation of the Assessment Questionnaire at the occasion of a training seminar	Q1 2013	10 July 2013	Completed
M.1.3	Launch of the assessment process (on-site visits by the experts team consisting of 6 experts appointed by the Council of Europe and 2 Moroccan experts)	Q2/3 2013	30 September-4 October	on-going
M.1.4	Discussion of the draft report with stakeholders	Q3 2013	Q4 2013	
M.1.5	Finalisation of the report and drafting of recommendations	Q4 2013		
M.1.6	Presentation of the results and recommendations at the occasion of a plenary session with the administration,	Q4 2013	Q1 2014	



	parliamentarians, judiciary, the civil society and international partners			
M.1.7	Publication of the report and recommendations	Q1 2014		
T.1.1	Introduction to GRECO methodologies increasing the capacities in implementing European standards, monitoring tools and networking opportunities	Q1 2014		
<b>Expected Result 2:</b> Increased capacities on legislative reforms through legal advice and legal drafting concerning administrative structures through knowledge sharing of good practices and cooperation with civil society.			Insert date	Yes/No Completed/on-going/ planned for ___/cancelled
M.2.1	Provide legal advice and analysis in the context of the drafting of the Law of the future "Instance nationale de probité, de prévention et de lutte contre la corruption" and other provisions of the regulatory framework associated	2013-2014	Intervention favoured at the level of the implementation decree	Delayed
M.2.2	Provision of a training programme on the design and implementation of dispositions on deontology in the public sector, in the private sector and conflict of interests	Q3 2013 - 2014		on-going
M.2.3	Provision of a training on the methodology on corruption proofing of legislation	Q2 2013 - 2014		on-going



M.2.4	Supporting the ICPC in its advisory role on the national dialogue concerning the reform of justice sector	2013-2014		Delayed
T.2.1	Provision of good practices and European models for Editorial Committees of Ministry of Governance and Tunisian Bar Association on issues related to codes of ethics	Q2 2013	Q3 2013	on-going
T.2.2	Increasing capacities in implementing international law standards when reviewing and improving current national legislation in the area of corruption and economic crime	Q2 2013 - 2014		on-going
T.2.3	Provision of legislative advice and legal drafting reviews in support of the drafting of the future Anti-corruption Law	Q2 – Q4 2013	Strategy not finalised	Delayed
T.2.4	Raising awareness of the Parliamentarians concerning implementation of Anti-corruption international standards on financing of political parties through the exchange of good practices with international partners.	Q2-2013 – Q1 2014	2 <sup>nd</sup> term 2013 extended to AML/FT: funding of NPO	on-going
<b>Expected Result 3:</b> Available policy advice and sector risk analysis to relevant institutions concerning good governance and corruption prevention tools/methodologies.			Insert date	Yes/No Completed/on-going/ planned for ___/cancelled
M.3.1	Organisation of one or two technical workshop addressed to relevant institutions dedicated to the review of the results of the risks analysis in the	Q1-2013	13 June 2013	Completed

	sector of health and transportation			
M.3.2	Carrying out <del>two Analyses</del> <b>one Analysis</b> of the risks in sectors that are the most exposed to the corruption risks for chosen administrations/private sector	Q4 2013	Directorate of External Trade tbc	
M.3.3	Provision of tools (objectively verifiable indicators) and methodologies and exchange of good practice on the conception and the implementation of strategies and policies anti-corruption and combating economic crime, including the follow-up of the level of implementation	Q2 2013	<b>October 2013</b>	<b>Delayed</b>
M.3.4	Conference on exchange of good practice with European parliamentarians of those commissions involved in the drafting of legislation and those of monitoring the implementation of anti-corruption policies and strategies	Q1 2014	<b>Q2 2014</b>	
T.3.1	Strengthening of the capacities of the National Instance for the fight against Corruption (INLUCC) through sharing of information and good practices as well as establishment of professional networks with homologue institutions in	Q1 2013	<b>8-12 April 2013</b>	<b>Completed</b>

	Europe			
T.3.2	Provision of assistance on introducing internal rules concerning the instance's status of the staff and their role and internal rules in managing and processing cases as well as safeguarding confidentiality and secrecy of cases	2013-2014	1 <sup>st</sup> working seminar on 25-26 September 2013	on-going
T.3.3	Providing tools and methodologies as well as capacity building in support to the design of three major Sector Analysis (i.e. customs, tax administration and Property administration) to be carried out by the respective good governance and Anti-corruption units (Cellules de Bonne Gouvernance et de Lutte Contre la Corruption)	Q2-Q3 2013	18 June 2013 RA (Biens de l'Etat) TBC	First part completed
<b>Expected Result 4:</b> Provision of training, modules and awareness raising for those relevant institutions and civil society groups in the area of good governance and fight against corruption and Economic Crime.			Insert date	Yes/No Completed/on-going/ planned for ___/cancelled
M.4.1	Organisation of a certified training and delivery of a module on guidelines concerning the design, implementation and performance evaluation of anti-corruption and good governance policies for the public sector	Q4 2013	4 November 2013 TBC	on-going

M.4.2	Organisation of a certified training and delivery of a module on guidelines concerning the design, implementation and performance evaluation of anti-corruption and good governance policies for the private sector	Q2-2013	5 November 2013 TBC	on-going
M.4.3	Conference of multi-stakeholders including public/private sector and the civil society on the guidelines concerning the design , implementation and performance evaluation of anti-corruption and good governance policies	Q3-2013	Q4 2013	
M.4.4	Organisation of a certified training on the basic elements of the fight against corruption and its institutional and legal aspects for public officials	Q3 2013		
M.4.5	Training of trainers on criminal law proceeding on infractions concerning economic crime for the law enforcement agents or and other relevant agencies	Q3 2013		
M.4.6	Training of trainers on administrative inquiries on corruption cases or/and other administrative violations for the law enforcement agents or and other relevant agencies	Q1 2014		
T.4.1	Specialised and multi-disciplinary training for INLUCC staff to carry out administrative inquiries (or criminal investigations related) concerning economic crime and corruption related-cases.	2013-2014		on-going

T.4.2	Multi-disciplinary training of trainers aimed at strengthening capacities of the private attorneys and agents of the law (Auxiliaires de Justice) ie. Court Experts and lawyers when dealing with the detection of corruption and conflict of interests	2013-2014		<b>on-going</b>
-------	---	-----------	--	-----------------

**Strengthening democratic reform  
in the southern Neighborhood**

Funded  
by the European Union



COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Implemented  
by the Council of Europe

MAE responsible for the Component: DGI-Action against Crime Department/Economic Crime Cooperation Unit

Name of the contact person for the Component: Igor NEBYVAEV for Ardita ABDIU / Guillaume PARENT

Signature: N/A

Location: Strasbourg

Date report due: 9 August 2013

Date report sent: 5 August 2013