



Fourth Internal Progress Report

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

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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
Web: www.coe.int/

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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 d'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 & 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

I. EXECUTIVE SUMMARY OF THE ACTION

The objective of the project is to promote 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 reporting period covers activities implemented from 1 January to 20 June 2014 based on an updated calendar of activities, which takes into consideration the current situation in Tunisia and the difficult cooperation with some beneficiaries in Morocco. A total of project 11 activities have been implemented during this period. For Morocco they included the finalization, presentation and publication of the Anti-corruption assessment using GRECO methodologies (M1.5, M1.6, M1.7), assistance in the drafting of internal rules of the ICPC (M2.1) and training on criminal investigation of corruption and economic crime offences (M4.5). For Tunisia these activities included assistance to the drafting of AC Law (T2.3), assistance in the drafting of internal rules of the INLUCC (T3.2), a Risks Assessment in the sector of public properties (T3.3), multidisciplinary training on financial investigations (T4.2) as well as a study visit to the Council of Europe Headquarters in Strasbourg, which served a number of different purposes: to acquaint Tunisian authorities with CoE standards on the fight against economic crime (Activity T1.1), raising awareness on international standards in the area of financing of political parties and non-profit organizations (T2.4) . As of June 2014, seventeen activities out of the thirty envisaged by the project workplan have been effectively delivered and closed. Another fourteen activities which cover the remainder of the SNAC Workplan, are being implemented and are set for completion in due time in the next two reporting periods.

In the implementation of the workplan, the Council of Europe has involved experts from 12 member states in order to provide broad range of European practices in various anti-corruption issues. (Albania, Belgium, Croatia, France, Germany, Italy, Moldova, Portugal, Serbia, Slovenia, Spain, United Kingdom).

When possible, the Council of Europe has also involved Moroccan and Tunisian experts in order to develop local expertise on European AC standards.

1. State of cooperation in Morocco

In the period under review the cooperation with Morocco was centred around the assessment of the national anti-corruption framework based on the GRECO methodology. The assessment has been instrumental in identifying systemic gaps and major priorities for further anti-corruption reforms in Morocco. The final assessment report contains a total of 66 Recommendations covering various aspects of the anti-corruption regime of Morocco. These results have also considerably facilitated the delivery of the technical assistance with regard to other activities implemented by SNAC, which have been adapted to better respond to the needs and gaps identified in the assessment. The ownership of technical assistance on the part of beneficiaries has also significantly increased. A major landmark for the activity has been the presentation of the AC assessment report to policymakers and the broader public organized on 20 February 2014 in Rabat.

The SNAC project team has experienced complications in the delivery of several important activities, such as the drafting of the national AC Strategy, which is under the remit of the Ministry of Public Administration. The main obstacle has been the difficulty to establish and maintain efficient communication with this agency.

2. State of the cooperation in Tunisia

During the period under review cooperation activities further focused on strengthening of the Tunisian anti-corruption agency, *Institution nationale de lutte contre la corruption* and implementation of Council of Europe methodologies on Corruption Risks assessment.

Following the adoption of the new Constitution, the Instance is expected to be strengthened, particularly in its role to investigate cases of corruption and good governance. For its part the Council of Europe has assisted in designing the internal regulatory framework of the INLUCC. INLUCC has also requested the CoE to contribute to the preparation of the law on the new anti-corruption agency as stated in the Constitution.

An important interagency activity involving beneficiaries from public administration and the civil society took place on 12-13 June 2014 at the Council of Europe Headquarters in Strasbourg. Tunisian authorities were acquainted with the practices of various bodies of the Council of Europe, particularly the work of GRECO, MONEYVAL, PACE and the Venice Commission in the economic crime area. The meetings also included a presentation by Moroccan experts of the results achieved by SNAC in assessing the anti-corruption framework of Morocco using GRECO methodologies. At the request of the Tunisian authorities and as a means for preparation for future reforms, the Council of Europe presented its standards and methodologies on political party financing and the financing of non-profit organisations.

II. SPECIFIC ACTIVITIES AND BENCHMARK FULFILLMENT (January –June 2014)

1. 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.

2. Morocco - Promotion of Good Governance: fight against corruption and money laundering

Expected Result I: Assessment of the legal and institutional framework	
Objectively verifiable indicators	<ul style="list-style-type: none"> ▪ Reports: 4 ▪ Assessment Report: 1 (200 pages) ▪ Number of recommendations: 66 ▪ Participation: M1.1 (22 participants including 7 women), M1.2 (26 participants including 3 women), M1.3 (73 participants including 11 women), M1.4 (10 participants including 2 women), M1.5 (57 registered participants including 9 women), M1.6 (registered 68 participants including 9 women) ▪ Press review: large media coverage in the newspapers, on the web, on television and radio (more than 20 items)
Progress made under ER 1	Activities delivered: M1.1 (Oct 2012), M1.2 (Jul 2013), M1.3 (Oct 2013), M1.4 (Nov 2013), M1.5-6 (February 2014), M1.7 (June 2014)
Activity No.M1.1 Delivered in 2012	Introduction to GRECO methodologies increasing the capacities in implementing European standards, monitoring tools and networking opportunities <ul style="list-style-type: none"> ▪ Presentation of the methodologies on assessing legal and institutional frameworks concerning corruption and money-laundering aspects as applied by GRECO and Moneyval to combat corruption and economic crime ▪ Review and discussion of other Council of Europe mechanisms and structures carrying out political and technical level monitoring and evaluation: such as those applied by Parliamentary Assembly and the European Court of Human Rights
Activity No.M1.2 Delivered in 2013	Preparation and introduction through a Training Seminar of the Questionnaire of Assessment <ul style="list-style-type: none"> ▪ Drafting the assessment questionnaire on the basis of the GRECO model ▪ Drafting the terms of reference of the assessment process ▪ Assessment questionnaires and terms of reference were finalised in February 2013 and approved by ICPC in May 2013 ▪ International experts for the assessment were identified in February 2013 ▪ Developing local expertise on GRECO methodologies (participation of 2 local experts in on-site visits), local experts for the assessment were identified in June 2013 ▪ Training seminar for key national institutions on the assessment questionnaire was held on 10 July 2013
Activity No.M1.3 Delivered in 2013	Launch of the assessment process (on-site visits by the local and international experts team) <ul style="list-style-type: none"> ▪ On-site visit in September-October 2013 ▪ Draft report is made available
Activity No.M1.4 Delivered in 2013	Review and Discussion of the draft assessment with local stakeholders <ul style="list-style-type: none"> ▪ Meeting in Paris of experts with beneficiaries on the drafting of recommendations (November 2013) ▪ Dissemination of the report for comments to beneficiaries in December 2013 ▪ Translation of CoE Conventions on corruption into Arabic

Activity No.M1.5 Delivered in 2014	Plenary Session Review: Finalisation of the assessment and of recommendations
Actions	<ul style="list-style-type: none"> Final review of the list of recommendations
Progress made/Follow up	<ul style="list-style-type: none"> Finalisation of the draft AC Diagnostic Report in January 2014 on the basis of comments Plenary session with beneficiaries in February 2014
Activity No.M1.6 Delivered in 2014	Presentation of the results and recommendations with the administration, parliamentarians, judiciary, the civil society and international partners. Presentation of Council of Europe standards
Actions	<ul style="list-style-type: none"> Public event with large media coverage Dissemination of Council of Europe Conventions on corruption in Arabic and French
Progress made/Follow up	<ul style="list-style-type: none"> Public event in February 2014 Dissemination of the list of recommendations and executive summary in Arabic, French and English Dissemination of the CoE Conventions on corruption in Arabic to participants
Activity No.M1.7 Delivered in 2014	Publication of "Diagnostic of the AC framework" - The Anti-corruption Assessment.
Actions	<ul style="list-style-type: none"> Finalisation of the report Translation of the report into Arabic Dissemination of the final report in Arabic and French
Progress made/Follow up	<ul style="list-style-type: none"> Finalisation of the report in April 2014 Translation into Arabic underway/ Review of the translation by ICPC to be performed in June 2014 Printing of the report in July 2014 Dissemination of the final report in Arabic and French in July 2014
Overall assessment under ER1	<p>Activities under ER1 have been fully completed. The AC Diagnostic has been instrumental in identifying systemic gaps and major priorities for further anti-corruption reforms in Morocco. The ownership of technical assistance on the part of beneficiaries has also profited from this positive momentum.</p> <p>The AC diagnostic was extensively covered by the media (See COMPONENT VISIBILITY ACTIONS)</p>

Expected Result II: Legislative Reforms	
Objectively verifiable indicators	<ul style="list-style-type: none"> Number of legal expertise delivered: 2 Number of trainees trained: 15
Progress made under ER 2	<p>Activity delivered: M2.1</p> <p>Activities underway: M2.2 and 2.3</p> <p>M2.4 was cancelled</p>
Activity No.M2.1 Delivered in 2014	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
Actions	<ul style="list-style-type: none"> Provision of a Technical Paper on "Good practices examples and templates on the internal rules for anti-corruption and prevention agencies" Provision of a technical paper on "Investigation capacities of the Moroccan ACA" Workshop on "How to draft internal rules" for the "Instance Nationale de probité".

Progress made/Follow up	<ul style="list-style-type: none"> Two fact finding missions carried out (February /March 2014) Two technical papers of expertise delivered in April 2014 Seminar on “guidelines/technical paper expertise in June 2014
Activity No.M2.2	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
Actions	<ul style="list-style-type: none"> Review of the standards and good practice examples available in Europe on deontology and conflict of interest Training seminar on the European standards of deontology and conflict of interests for private sector stakeholders Second session to be addressed to Parliamentarians
Progress made/Follow up	<ul style="list-style-type: none"> Activity to build upon diagnostic assessment recommendations Team of experts identified and engaged Sessions scheduled for September 2014
Activity No.M2.3	Provision of a training on the methodology on corruption proofing of legislation
Actions	<ul style="list-style-type: none"> Identification of institutions/areas of legislation Drafting guidelines in the form of a technical paper on corruption proofing for parliamentarians and civil servants in charge of the drafting of laws to detect corruption risks (2 sessions) Terms of reference for corruption proofing in the legislative drafting process in Morocco Drafting of guidelines and explanatory conference
Progress made/Follow up	<ul style="list-style-type: none"> Involving of legal offices/services of public administration Team of experts identified and engaged Based on case study –contribution from domestic institutions Training for up to 40 civil servants dealing with corruption proofing scheduled for September 2014
Activity No.M2.4 Cancelled	Supporting the ICPC in its advisory role on the national dialogue concerning the reform of justice sector
Progress made/Follow up	ICPC did not request international cooperation on this issue. The Charter of justice was published in September 2013, the activity has been cancelled. Replaced with an additional session under Activity M2.2 on the Conflict of Interests (for MPs) Potential 2nd Risk Assessment – TBD
Overall assessment under ER2	The activities under ER 2 are expected to be completed by the end of the Programme.

Expected Result III: Policy Advice	
Objectively verifiable indicators	<ul style="list-style-type: none"> Report: 1 Number of risk assessments under way: 1 Number of trainees trained: M3.1 (19 participants including 9 women)
Progress made under ER 3	Activities delivered: M3.1 Activities underway: M3.2, M3.3 and 3.4
Activity No.M3.1 Delivered in 2013	Organisation of one technical workshop addressed to relevant institutions dedicated to the review of the results of the risks analysis in the sector of health and transportation <ul style="list-style-type: none"> Review of existing risk analysis on health and transportation Review of applied methodology Vs. CoE methodology (June 2013) Available CoE methodology on risk assessments

Activity No.M3.2	Carrying out one Risks Analysis (Ministry of Foreign Trade)
Actions	<ul style="list-style-type: none"> ▪ Identification of the sector to be analysed ▪ Drafting the terms of reference of a risk assessment ▪ Carrying out the Risk assessment ▪ Technical workshop on the results of the Risks Assessment
Progress made/Follow up	<ul style="list-style-type: none"> ▪ Terms of reference for the activities were adopted in December 2013 ▪ Team of experts identified and engaged ▪ Questionnaire was sent to the ministry of external trade for completion ▪ 1st on-site visit in June 2014; 2nd visit scheduled for September 2014 and closing activities in November 2014
Activity No.M3.3	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
Actions	<ul style="list-style-type: none"> ▪ Dissemination of European good practice examples of objectively verifiable indicators used to monitor and assess the implementation of national AC strategy ▪ Drafting terms of reference for the provision of the objectively verifiable indicators for the new national anti-corruption strategy ▪ Delivery of the objectively verifiable indicators in a technical paper
Progress made/Follow up	Delay on feedback from beneficiary due to institutional change of management. This activity is linked to other activities on the drafting of the national AC strategy: M4.1, 2 and 3)
Activity No.M3.4	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
Actions	<ul style="list-style-type: none"> ▪ Introduction by Conference on European and international standard on political parties financing and implementation of the rules in the form of a technical paper
Progress made/Follow up	<ul style="list-style-type: none"> ▪ Activity based on recommendation from AC Assessment ▪ Team of experts identified ▪ Activity scheduled for October 2014
Overall assessment under ER3	The activities under ER 3 are expected to be completed by the end of the Programme.

Expected Result IV: Trainings	
Objectively verifiable indicators	<ul style="list-style-type: none"> ▪ Number of trainees trained: 25
Progress made under ER 4	Activity delivered: M4.5 Activities underway: M4.1, 4.2, 4.3, 4.4 and 4.6
Activity No.M4.1	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
Actions	<ul style="list-style-type: none"> ▪ Training stakeholders of the new AC national strategy to understand, critically review and contribute to the design and implementation of the Moroccan anti-corruption strategy ▪ Translation in French of CoE guidelines on designing and implementing AC policies ▪ Follow-up to the drafting of the national AC strategy

Progress made/Follow up	<ul style="list-style-type: none"> Translation in French and review of the CoE handbook “Designing and Implementing Anti-corruption Policies” is done and will be used in further implementation of this activity 1 day training for up to 40 civil servants delayed for the second half of 2014, due to lack of communication from the Ministry of Public Administration
Activity No.M4.2	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
Actions	<ul style="list-style-type: none"> Training private sector representatives to understand, critically review and contribute to the design and implementation of the Moroccan anti-corruption strategy 1 day training for up to 40 stakeholders scheduled for June 2014
Progress made/Follow up	Activity linked to M4.1
Activity No.M4.3	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
Actions	<ul style="list-style-type: none"> Review of the progress of the preparation of the national AC strategy at the occasion of a conference with participation of the civil society
Progress made/Follow up	Activity linked to M4.1
Activity No.M4.4	Organisation of a certified training on the basic elements of the fight against corruption and its institutional and legal aspects for public officials
Actions	<ul style="list-style-type: none"> Introducing basic elements at the occasion of a 2-day training seminar for 40 participants Translation into French of the training manual on basic anti-corruption concepts
Progress made/Follow up	<ul style="list-style-type: none"> Translation into French of the manual finalised in May 2014 Development of a glossary on AC basic concepts (English/French/Arabic) in the form of a technical paper delivered in August 2014 (Moroccan) 2 day training for up to 40 stakeholders scheduled for September 2014
Activity No.M4.5 Delivered in 2014	Training of trainers on criminal law proceeding on infractions concerning economic crime for the law enforcement agents or and other relevant agencies
Actions	<ul style="list-style-type: none"> Drafting terms of reference Training on criminal law proceedings
Progress made/Follow up	<ul style="list-style-type: none"> Activity based on recommendation from AC diagnostic 1 day training of 24 specialists on criminal law investigation techniques held on 13 March 2014
Activity No.M4.6	Training of trainers on administrative inquiries on corruption cases or/and other administrative violations for the law enforcement agents or and other relevant agencies
Actions	<ul style="list-style-type: none"> Drafting terms of reference Training on administrative inquiries
Progress made/Follow up	<ul style="list-style-type: none"> Terms of reference made available to beneficiaries in June 2014 Training session on administrative inquiries (October 2014)
Overall assessment under ER4	The activities under ER 4 are expected to be completed by the end of the Programme.

3. Tunisia – Promotion of Good Governance: fight against corruption and money laundering

Expected Result I: Assessment of the legal and institutional framework	
Objectively verifiable indicators	<ul style="list-style-type: none"> Number of trainees trained: 20
Progress made under ER 1	Activities underway: T1.1
Activity No.T1.1 Delivered in 2014	Introduction to GRECO methodologies increasing the capacities in implementing European standards, monitoring tools and networking opportunities
Actions	<ul style="list-style-type: none"> Presentation of the methodologies on assessing legal and institutional frameworks concerning corruption and money-laundering aspects as applied by GRECO and Moneyval to combat corruption and economic crime Review and discussion of other Council of Europe mechanisms and structures carrying out political and technical level monitoring and evaluation: such as those applied by Parliamentary Assembly and the European Court of Human Rights
Progress made/Follow up	<ul style="list-style-type: none"> Activity carried out on 12/13 June 2014
Overall assessment under ER1	Activities under ER1 are fully completed.

Expected Result II: Legislative Reforms	
Objectively verifiable indicators	<ul style="list-style-type: none"> Number of legal expertise delivered: 1 Number of trainees trained:
Progress made under ER 2	Activities underway: T2.1, 2.2, 2.3 and 2.4
Activity No.T2.1	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
Actions	<ul style="list-style-type: none"> Good practice examples in Europe are collected and documented Support to the drafting of two codes of ethics Drafting terms of reference for the 2 codes of ethics
Progress made/Follow up	<ul style="list-style-type: none"> Code of ethics for the staff members of the INLUCC delivered in March 2014 State secretariat of governance suggested the CoE to support the state secretariat of state property to draft its own code of ethics (to be confirmed by the state secretariat of property)
Activity No.T2.2	Increasing capacities in reviewing and improving current national legislation (corruption proofing).
Actions	<ul style="list-style-type: none"> Identification of institutions/areas of legislation drafting Terms of reference for corruption proofing in the legislation drafting process in Tunisia Drafting of guidelines and explanatory conference
Progress made/Follow up	<ul style="list-style-type: none"> Identification of institutions/areas of legislation drafting (existing legislation on NGO registration and draft law on charities)

	<ul style="list-style-type: none"> ▪ Institutions to participate to the activity are identified (Legal Department of the administration of the Prime Minister) ▪ Experts are identified and contracted ▪ Texts to be analysed at the occasion of the activity are identified (existing legislation on NGO registration and draft law on charities) ▪ Conference scheduled in September 2014
Activity No.T2.3	Provision of legislative advise and legal drafting reviews in support of the drafting of the future Anti-corruption Law
Actions	<ul style="list-style-type: none"> ▪ Provision of good practices available in Europe of action plans aiming the adoption of national anti-corruption strategies ▪ Provision of guidelines in the form of a technical paper
Progress made/Follow up	<ul style="list-style-type: none"> ▪ Technical expertise paper on good practices examples of European anti-corruption legal frameworks made available in April 2014 ▪ Workshop “from INLUCC to the National Instance of good governance and fight against corruption: implementing article 130 of the Tunisian Constitution of 26 January 2014” (June 2014)
Activity No.T2.4	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. Risk Assessment on financing of non profit organisations
Actions	<ul style="list-style-type: none"> ▪ Conference/workshop on European and international standard on political parties financing and non-profit organizations
Progress made/Follow up	<ul style="list-style-type: none"> ▪ Working session on political party financing at the occasion of activity T1.1 in June 2014 ▪ Working session on NPO financing at the occasion of activity T1.1 in June 2014
Overall assessment under ER 2	The activities under ER 2 are expected to be completed by the end of the programme.

Expected Result III: Policy Advice	
Objectively verifiable indicators	<ul style="list-style-type: none"> ▪ Reports: 5 ▪ Number of participants : T3.1 (40 participants including 23 women); T3.2 (24 participants including 6 women); T3.3 (35 participants including 14 women)
Progress made under ER 3	Activities delivered: T3.1 (Apr 2013), T3.2 (March 2014) and T3.3 (May 2014)
Activity No.T3.1 Delivered in 2013	Sharing information and good practice example with ACA in Europe <ul style="list-style-type: none"> ▪ 3 study visits in Europe: France, Slovenia & Croatia (April 2013) ▪ 10 civil servants and national experts
Activity No.T3.2 Delivered in 2014	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
Actions	<ul style="list-style-type: none"> ▪ Dissemination of European good practice examples of internal documents ▪ Explanatory workshops on international practice ▪ Drafting internal rules and code of procedure
Progress made/Follow up	<ul style="list-style-type: none"> ▪ 6 working seminars with the participation of international and local expertise between September 2013 and March 2014

	<ul style="list-style-type: none"> Final Draft delivered in March 2014 Technical paper on methodologies delivered in June 2014
Activity No.T3.3 Delivered in 2014	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>)
Actions	<ul style="list-style-type: none"> Training seminar on CoE methodologies on risk assessment for the Anti-corruption units Drafting terms of reference for the risk assessment of the state secretariat of State Property Carrying out one risk assessment Explanatory seminar on outcome of risk assessment Delivery of tool
Progress made/Follow up	<ul style="list-style-type: none"> Training workshop on methodologies took place in Tunis on 18 June 2013 Risk assessment report was delivered in April 2014 Risk assessment tool was delivered in May 2014
Overall assessment under ER 3	Activities under ER3 are closed.

Expected Result IV: Trainings	
Objectively verifiable indicators	<ul style="list-style-type: none"> Number of trainees trained: 20
Progress made under ER 4	Activities underway: T4.1 and 4.2
Activity No.T4.1	Specialised training on AC proceedings
Actions	<ul style="list-style-type: none"> Training on investigation techniques for INLUCC staff members, judges, prosecutors (including the Pôle judiciaire financier) and judiciary police agents
Progress made/Follow up	<ul style="list-style-type: none"> Session on criminal law proceedings held in June 2014 Session on administrative inquiry scheduled for September 2014
Activity No.T4.2	Training of lawyers and chartered accountants on basic concepts
Actions	<ul style="list-style-type: none"> Training on basic concept of corruption Development of a glossary on AC basic concepts (English/French/Arabic) in the form of a technical paper (Tunisian)
Progress made/Follow up	<ul style="list-style-type: none"> Sessions to be held in September 2014
Overall assessment under ER4	The activities under ER 4 are expected to be completed by the end of the project.

4. Postponed Activities

See updated calendar under Section VIII.

III. COOPERATION WITH STAKEHOLDERS IN MOROCCO

1. Morocco Counterpart and beneficiaries

Main counterpart:

- *Instance Centrale de Prévention de la Corruption (ICPC);*

Beneficiaries :

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

2. 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.

Beneficiaries demonstrate a high degree of ownership of Project activities, which was particularly manifested during the final event of the AC Diagnostic.

A significant difficulty in the implementation of activities related to the AC strategy is the lack of cooperation/communication from the Ministry of Public Administration (MPA). Despite repeated attempts by the CoE Secretariat and main counterpart (ICPC) to bring the MPA on board, efficient contact has not yet been established.

IV. COOPERATION WITH STAKEHOLDERS IN TUNISIA

1. Tunisia Counterpart and beneficiaries

Main counterpart:

- *Ministère de la gouvernance et de la lutte contre la corruption (MGLC);*

Beneficiaries:

- *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.

2. State of the Cooperation

Due to political instability, implementation of activities suffered from continuous delays. Reluctance by the main counterpart institution to undertake any interagency facilitation has fully placed this task on the SNAC Project team, which has not yet experienced any difficulties in liaising with other agencies. The Ministry of Justice has been particularly helpful in gathering an interagency audience for the training seminar on criminal investigation techniques in economic crime and corruption.

V. COOPERATION WITH THIRD PARTIES

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

VI. COMPONENT ACHIEVEMENTS AND RISKS

1. Achievements

The workplan is being implemented. Seventeen activities have been completed. 14 activities are underway. At this time, delays are manageable and the activities should be finalised by the end of the Programme (December 2014).

2. Risks

Political instability is a major risk in Tunisia. Workplan's implementation is complex and jeopardised. In addition the cooperation with the main counterpart institution was considerably reassessed during the reported period, due to the fact that the state secretariat of governance stepped-out from several activities to leave leadership to other stakeholders.

In Morocco, **cooperation with the Ministry of Public Administration** has proven difficult and sporadic cooperation has caused significant delays in the implementation of the workplan.

Risk for the duplication of efforts with other international organisations persists although routine exchange of information was set-up with OECD and UNDP in order to limit duplication of efforts. One specific example has been the duplication of training sessions on financial investigations with the UNDP in the Ministry of Justice in June 2014. The CoE Office in Tunis should reach out to partners as well as local counterparts to streamline and coordinate activities and exclude the risks of future duplication.

VII. COMPONENT VISIBILITY ACTIONS

Bilingual project website (English and French) has been set up under the CoE Economic Crime Cooperation Unit 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

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 technical paper. For each activity, the logo of the Programme is screened and top-expos are used for each activity on the spot. In addition, visibility material such as document folders and notepads 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 financed by the European Union. All reporting and information used and disseminated acknowledge that project activities have been "Funded by the European Union, implemented by the Council of Europe" by also displaying in an appropriate way the European Union logo.

In the period under review, the activities linked to the AC Diagnostic of Morocco enjoyed large media coverage.

Newspapers and websites:

- Al Ittihad Al Ichтираqui, Quotidien en langue arabe, Les experts du Conseil de l'Europe recommandent l'application du décret 36 de la constitution, Article paru le 21/02/2014 en page : 2 / 16
- Aujourd'hui, lutte contre la corruption, le-Maroc jugé trop mou, 20/02/2014
- L'Economiste, Quotidien en langue française, Anti-corruption : Nécessité de réduire la portée du secret professionnel, Article paru le 21/02/2014 en page : 18 / 48
- les Eco, Corruption : le rapport accablant du Conseil de l'Europe, 18/02/2014
- Les Inspirations Eco, Quotidien en langue française, Corruption : Les experts européens épinglent les parlementaires, Article paru le 21/02/2014 en page : 30 / 32
- Libération, Quotidien en langue française, L'Europe diagnostique la corruption, article paru le 19/02/2014 en page 3/16
- Libération, Quotidien en langue française, Le Conseil de l'Europe recommande la mise en œuvre de l'article 36 de la Constitution, Article paru le 21/02/2014 en page : 3 / 16
- lemag.ma, Site web en langue française, Maroc : Une enquête nationale sur le ressenti vis-à-vis de la corruption, Article paru le 21/02/2014 en page : 1 / 1
- Médias 24, Le Conseil de l'Europe épingle le Maroc sur la lutte contre la corruption, 20/02/2014
- Médias 24, Abdessalam Aboudrar y croit encore, 20/02/2014
- menara.ma, Site web en langue Arabe et Français, Une grande enquête nationale sur la corruption bientôt lancée, Article paru le 21/02/2014 en page : 1 / 1
- L'Opinion, Quotidien en langue française, Corruption, gouvernance et blanchiment d'argent dans la ligne de mire des experts, Européens, Article paru le 22/02/2014 en page : 4 / 32
- Rissalat Al Oumma, Quotidien en langue arabe, Entre lutter contre la corruption et instaurer la culture de la Détérioration, Article paru le 21/02/2014 en page : 1 / 16
- Rissalat Al Oumma, Quotidien en langue arabe, Abdeslam Aboudrar : "Aucun organisme ne peut à lui seul lutter contre la corruption malgré la volonté et les moyens dont il dispose", Article paru le 21/02/2014 en page : 3 / 16
- Sahifat Al Nass, Quotidien en langue arabe, Un rapport du Conseil de l'Europe dévoile la propagation de la corruption entre les juges et les policiers, Article paru le 21/02/2014 en page : 4 / 20
- Telquel, Hebdomadaire en langue française, Au royaume de la corruption, Article paru le 21/02/2014 en page : 16 / 76
- La Vie Eco, Hebdomadaire en langue française, Les finances de nos partis inquiètent les Européens, Article paru le 21/02/2014 en page : 8 / 60
- Yabiladi, Le Conseil de l'Europe accable le Maroc

TV coverage on SNRT1 and 2M

Radio coverage on Lux Radio

International coverage:

- Denuncian que marruecos carece de una politica nacional contra la corrupcion ,
20/02/2014 - Agencia EFE / Spain
- Magharebia (Washington DC), Morocco Corruption Threatens Development, by
Siham Ali, 24 february 2014

Funded
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CONSEIL DE L'EUROPE

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VIII. CALENDAR SNAC ACTIVITIES

		PLANNED (WORKPLAN)	POSTPONED	STATUS
Expected Result 1: 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 2013	Completed
M.1.4	Discussion of the draft report with stakeholders	Q3 2013	20-21 November 2013	Completed
M.1.5	Finalisation of the report and drafting of recommendations	Q4 2013	18-19 Feb 2014	Completed

M.1.6	Presentation of the results and recommendations at the occasion of a plenary session with the administration, parliamentarians, judiciary, the civil society and international partners	Q4 2013	19 Feb 2014	Completed
M.1.7	Publication of the report and recommendations	Q1 2014	August 2014	on-going
T.1.1	Introduction to GRECO methodologies increasing the capacities in implementing European standards, monitoring tools and networking opportunities	Q1 2014	June 2014	Completed
Expected Result 2: 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	- Fact-finding mission 1: 20-21/02/2014 - Fact-finding mission 2 : 24-25/03/2014 - 2 TP made available April 2014	Completed
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	October 2014	on-going
M.2.3	Provision of a training on the methodology on corruption proofing of legislation	Q2 2013 - 2014	December 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		Cancelled
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	September 2014	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	September 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	- TP made available April 2014 - Working Seminar on 25 June 2014	on-going
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.	Q1 2014	- Working Seminar on 12 June 2014 (PPF financing) Working Seminar on 13 June 2014 (NPO financing)	Completed
Expected Result 3: 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 technical workshop addressed to relevant institutions dedicated to the review of the results of the risks analysis in the sector of health	Q1 2013	13 June 2013	Completed

	and transportation			
M.3.2	Carrying out one Analysis of the risks in sectors that are the most exposed to the corruption risks for chosen administrations/private sector	Q4 2013	-- Fact-finding mission 1: 18-19/06/2014	on-going
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	Q3 2014	Delayed
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	Q4 2014	on-going
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	8-12 April 2013	Completed

	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	<ul style="list-style-type: none"> - 1st working seminar on 25-26/09/2013 - 2nd working seminar on 28-29/10/2013 - 3rd working seminar on 2-3/12/2013 - 4th working seminar on 6-7/01/2014 - 5th working seminar on 3-4/02/2014 - 6th working seminar on 3-4/03/2014 	Completed
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	<ul style="list-style-type: none"> - Training seminar on 18/06/2013 - Risk Assessment launched in October 2013 - Fact-finding mission 1: 18-19/12/ 2013 - Fact-finding mission 2 : 4-7/02/2014 - Report sent in April 2014 - Tool sent in May 2014 	Completed
Expected Result 4: Provision of training, modules and awareness rising 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	Q1 2013	June 2014	Delayed

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	June 2014	Delayed
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	June 2014	Delayed
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	September 2014	on-going
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	- Training on 13 Mar 2014	Completed
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	October 2014	on-going
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	- Training on Criminal law investigation techniques on 10 June 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	September 2014	on-going
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Strengthening democratic reform in the southern Neighbourhood



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

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

Signature: N/A

Location: Strasbourg

Date report due: 31 May 2014

Date report sent: 21 July 2013