

FIGHT AGAINST CORRUPTION AND MONEY LAUNDERING

[illegible]

Strengthening democratic reform in the southern Neighbourhood

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par le Conseil de l'Europe

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

Final Narrative Report

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ABBREVIATIONS

<i>National Federation of Moroccan Bar Associations</i>	ABM
<i>Anti-corruption</i>	AC
<i>Anti-corruption authority</i>	ACA
<i>Anti-Money Laundering and Counter Financing of Terrorism</i>	AML/FT
<i>Moroccan Association of Parliamentarians against corruption</i>	AMPCC
<i>National Constitutional Assembly</i>	ANC
<i>Arab Region Parliamentarians against corruption</i>	ARPAC
<i>Tunisian National Platform of NGOs against corruption</i>	ATIT
<i>Federation of the Moroccan Entrepreneurs of Morocco</i>	CGEM
<i>National Association of National Controllers of the Moroccan administration</i>	CIGMM
<i>Council of Europe</i>	CoE
<i>Ministry of interior-Police</i>	DGSN
<i>Economic Crime and Cooperation Unit of the Action against Crime Department, Directorate of Information Society and Action against Crime, Directorate General I of the Council of Europe</i>	ECCU
<i>European Union</i>	EU
<i>European Union Delegation</i>	EUD
<i>Group of States against corruption</i>	GRECO
<i>Tunisian Anti-corruption Authority established by the constitution</i>	IBOGOLUCC
<i>Existing Moroccan Anti-corruption Authority</i>	ICPC
<i>Ministry of interior-General Inspectorate of administration</i>	IGAT
<i>Ministry of finance-General Inspectorate of finance</i>	IGF
<i>Existing Tunisian Anti-corruption Authority</i>	INLUCC
<i>Moroccan Anti-corruption Authority established by the constitution</i>	INPPLCC
<i>Major administrative entities (Council of Europe)</i>	MAE
<i>Moroccan Ministry of governance</i>	MAGG
<i>Middle East & North Africa Region</i>	MENA
<i>Moroccan Ministry of public administration</i>	MFPMA
<i>Committee of Experts on the Evaluation of Anti Money-Laundering</i>	Moneyval
<i>Office of the Directorate General of Programmes</i>	ODGPROG
<i>Moroccan Ministry of Justice</i>	MOJL
<i>National Association of Chartered Accountants</i>	OECT
<i>National Bar Association of Tunisia</i>	ONAT
<i>Objectively verified indicators</i>	OVI
<i>Parliamentary Assembly of the Council of Europe</i>	PACE
<i>South Programme-Component 2-South Neighbourhood Anti-corruption Project</i>	SNAC
<i>Moroccan Financial Intelligence Unit</i>	UTRF
<i>United Nations Convention against corruption</i>	UNCAC

1. DESCRIPTION

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1.2. Name of Partners in the Action

The South Programme is fully funded by the EU and implemented by the Council of Europe.

1.3. Title of Action

Programme title: "Strengthening democratic reform in the Southern neighbourhood"
Component 2 title: "Promotion of good governance: fight against corruption and money-laundering" (SNAC)

1.4. Contract Number

ENPI/2011/280-184

1.5. Start Date and End Date of the Reporting Period

29 December 2011 – 31 December 2014

1.6. Target Countries

Morocco and Tunisia

1.7. Final Beneficiaries

1.7.1 Morocco Counterpart/Main Beneficiary and other beneficiaries

Main Counterpart:

- *Instance centrale de prévention de la corruption (ICPC)/Moroccan National anticorruption authority;*

Beneficiaries:

- *Association des barreaux du Maroc (ABM)/National Federation of Moroccan Bar Associations;*
- *Association marocaine de lutte contre la corruption/Moroccan association against corruption - Transparency Maroc;*
- *Association marocaine des parlementaires contre la corruption (AMPCC)/Moroccan Association of Parliamentarians against corruption;*
- *Banque du Maroc/Central Bank of Morocco;*
- *Collège des inspecteurs généraux des ministères du Maroc (CIGMM)/Association of national controllers of the Moroccan Administration;*
- *Confédération générale des entreprises du Maroc – Commission d’Ethique et Déontologie (CGEM-CED)/Federation of Moroccan Entrepreneurs of Morocco-National committee on ethics and deontology;*

- *Ministère des affaires générales et de la gouvernance (MAGG)/Ministry of governance;*
- *Ministère de la défense-Gendarmerie Royale/Ministry of defense-Gendarmerie;*
- *Ministère des finances-Douanes/Ministry of finances-Customs;*
- *Ministère des finances-Inspection générale des finances (IGF)/Ministry of finance-General Inspectorate of finance;*
- *Ministère de l'intérieur – Direction générale de la sûreté nationale (DGSN)/Ministry of interior-Police;*
- *Ministère de l'intérieur – Inspection générale de l'administration territoriale (IGAT)/Ministry of interior-General Inspectorate of administration;*
- *Ministère de la Justice et des Libertés – Direction des affaires pénales et des grâces (MOJL)/Ministry of justice-Directorate of criminal law;*
- *Ministère de la fonction publique et de la modernisation de l'administration (MFPMA)/Ministry of public administration;*
- *Office des changes/National currency supervisory Office;*
- *Parliament; and*
- *Unité de traitement du renseignement financier (UTRF)/Financial Intelligence Unit.*

1.7.2 Tunisia Counterpart/Main Beneficiary and other beneficiaries

Main Counterpart:

- *Secrétariat d'Etat chargé de la gouvernance et la fonction publique, State Secretariat for governance and public administration;*

Beneficiaries:

- *Assemblée nationale constituante(ANC)/National Constitutional Assembly;*
- *Alliance tunisienne pour l'intégrité et la transparence (ATIT)/National Platform of NGOs against corruption;*
- *Instance nationale de lutte contre la corruption (INLUCC)/National anti-corruption authority;*
- *Ministère de l'intérieur/Ministry of interior;*
- *Ministère de la justice/Ministry of justice;*
- *Ordre national des Avocats de Tunisie (ONAT)/National Bar Association of Tunisia;*
- *Ordre des experts-comptables de Tunisie (OECT)/National Association of Chartered accountants;*
- *Pôle judiciaire financier/Financial Judiciary Pole;*
- *Réseau national de lutte contre la corruption (RNAC)/National Network against corruption; and*
- *Services du Conseiller juridique et législatif du Premier Ministre/Legal Department of the Prime Minister's office.*

2. EXECUTIVE SUMMARY

The objective of the programme of the European Union and the Council of Europe “Strengthening democratic reform in the Southern Neighbourhood” (South Programme) is to support the democratic reforms in the Southern Mediterranean countries through enhancing the independence of the judiciary, the fight against corruption, the promotion of human rights and democratic values on the basis of the Council of Europe standards, mechanisms and instruments and through improving the basic framework for regional co-operation in these areas. The 3-year Programme was implemented by the Council of Europe from 29 December 2011 to 31 December 2014 and covered cooperation activities with Morocco and Tunisia under four thematic components in the areas listed above.

Component 2 of the programme was aimed at promoting good governance, notably through improved prevention of corruption and money-laundering. It was implemented in the form of a project entitled “South Neighbourhood Anti-corruption” (SNAC), delivered by the Economic Crime and Cooperation Unit (ECCU) of the Action against Crime Department, Directorate of Information Society and Action against Crime, Directorate General I of the Council of Europe.

The project provided assistance to all levels of the anti-corruption systems in both countries, including institutional support to the main anti-corruption agencies of Morocco and Tunisia, guidance in preparing specialised anti-corruption legislation, anti-corruption risk assessments in key vulnerable sectors, and training for a broad range of government and non-government bodies involved in the fight against corruption and economic crime.

Project implementation was characterised by a number of complicating circumstances. The actively shifting institutional landscapes in both Morocco and Tunisia and lack of prior anti-corruption cooperation with the CoE created challenges for the Project team in establishing and consolidating relationships with some beneficiaries. At the same time the Project was able to attain a final implementation rate of 82%, which can be considered as high, given the complicating circumstances. Twenty three activities out of the thirty one initially envisaged by the project workplan were fully delivered. Some activities required the organisation of multiple events, which amounted to a total of 34 events during the lifetime of the Project.

Between 2012 and 2013 the SNAC Project involved a total of 926 participants in all of its activities. Among those, 314 persons participated as trainees in various capacity-building sessions. Women made up 25% of all participants.

In the implementation of the workplan, the Council of Europe engaged experts from 15 member States thus providing a broad range of European practices on anti-corruption from Albania, Belgium, Bosnia and Herzegovina, Croatia, France, Germany, Italy, Latvia, Republic of Moldova, Portugal, Romania, Serbia, Slovenia, Spain, Switzerland and the United Kingdom. The experts worked together with Moroccan and Tunisian experts in order to exchange experience and develop local expertise on European anti-corruption standards.

2.1. Deliverables in Morocco

The project has succeeded in strengthening the anti-corruption framework of Morocco through a significant reinforcement of institutional capacities of the leading anti-corruption authority and development of systemic interagency coordination.

A large component of cooperation with Morocco was dedicated to the assessment of the national anti-corruption framework based on the GRECO methodology. The assessment was instrumental in identifying systemic gaps and major priorities for further anti-corruption

reforms in this country. 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, which have been adapted to better respond to the needs expressed by stakeholders and gaps identified in the assessment. The ownership of technical assistance on the part of beneficiaries significantly increased. The exercise also contributed to the strengthening of the Moroccan anti-corruption authority, which acted as the national coordinator of the AC assessment. Throughout this process its central role in the anti-corruption system was consolidated, significantly improving cooperation with stakeholders inside public administration, civil society and private sector.

In addition the Council of Europe contributed to the introduction and dissemination of new preventive tools to assess corruption risks. Building up on existing risk assessment practices in Morocco, the Council of Europe undertook training for a broad spectrum of authorities on its own methodologies, and subsequently delivered a pilot risk assessment in the sector of external trade. Similar risk-assessment practices have been introduced at the level of legislative drafting (so-called 'corruption proofing' of legislation).

In addition to specific risk-related training, the Council of Europe delivered a number of broader capacity-building exercises for anti-corruption practitioners from various agencies and the non-governmental sector. This included comprehensive trainings on basic concepts on anti-corruption, practical sessions on conflicts of interest, administrative anti-corruption inquiries and criminal financial investigations.

The SNAC project team experienced complications in the delivery of several important activities linked to the drafting of the Moroccan national AC Strategy, which could have served to further ensure the sustainability potential of CoE interventions. The main obstacle was the difficulty to establish and maintain efficient communication with the Ministry of public administration (MFPMA) - the agency responsible for implementation of the AC Strategy. It is essential under the next phase of South Programme that such key stakeholders as the MFPMA be fully engaged in the implementation of activities in order to ensure maximum impact of the cooperation effort.

2.2. Deliverables in Tunisia

The Council of Europe anti-corruption programme in Tunisia has resulted in the strengthening of the existing institutional anti-corruption framework and significantly enhanced the capacities of government authorities in the area of anti-corruption and good governance.

The main focus of the programme has been the building of capacities for the Tunisian anti-corruption agency – the *Instance nationale de lutte contre la corruption* (INLUCC). This has resulted in the preparation and adoption of internal procedures, staffing structure and profiles, and code of ethics for the staff of INLUCC. With the assistance of the Council of Europe significant progress has also been made in the preparation of the law set to reform the anti-corruption agency function as required by the new Tunisian Constitution.

The programme has also made significant steps in setting up a risk-based anti-corruption framework in Tunisia through the promotion of Council of Europe methodologies on the assessment of corruption risk. This included the building of capacities of Tunisian authorities through tailored seminars followed by a full-scale pilot risks assessment carried out by the Council of Europe in the sector of public properties. Capacities to undertake 'corruption proofing' of legislation were also enhanced.

The Council of Europe delivered a programme of training covering a number of key areas, including general awareness-raising on basic anti-corruption concepts, as well as targeted seminars on criminal law investigations, political party financing and the financing of non-profit organisations. The Project also enhanced the capacities of lawyers and chartered accountants in implementing anti-corruption measures through application of deontology practices, as well as standards on the liability of legal persons and professional anti-money laundering obligations.

The implementation of actions suffered from significant weaknesses in interagency coordination and low absorption capacities of some beneficiaries. At the same time the deliverables achieved by the programme in the anti-corruption sector in Tunisia have significant sustainability potential for the institutions overall. It is therefore essential that cooperation in this framework continue in order to build on the outcomes that have been achieved so far in order to ensure efficient implementation and follow-up.

2.3. Recommendations for future actions

Recommendations for Moroccan authorities

- Continue to develop an effective framework for interagency cooperation between ICPC and other stakeholders of the National Integrity system of Morocco including law enforcement authorities and prosecution through the implementation of systemic and practical information sharing arrangements.

Recommendations for Tunisian authorities

- Increase institutional absorption capacities and interagency cooperation of the anti-corruption authority by proceeding with full recruitment of staff envisaged for this authority as soon as possible.

Recommendations in terms of project design and management

- The beneficiary(ies) should be chosen based on a thorough diagnostic review, and taking into account the most significant shortcomings identified, as well as with regard to their capacities in interagency coordination.

- Project activities should be as much as possible designed to address each institution's needs and take into account their absorption capacity limitations.

- A tracking mechanism should be developed and applied to monitor the implementation of technical assistance in the form of a steering committee for the South Programme dedicated to AC/AML/CFT. This steering committee should be composed of focal points of national beneficiaries and meet on a regular basis in the country.

- Technical assistance programmes in the South Programme that are topically related should be designed and as much as possible be implemented in a concerted manner with other MAE of the Council of Europe taking into account their access to different target groups. Joint project delivery will enhance authorities' appreciation of the need to closely cooperate and exchange information. Joint project implementation would also ensure that the impact of each single project on the beneficiaries of the others is maximised and efforts are not duplicated.

- In order to prohibit duplication of efforts and share responsibilities on technical assistance topics, activities should be designed and as much as possible be implemented in a concerted manner with other international organisations. The Council of Europe Offices

should reach out to partners as well as local counterparts to streamline and coordinate activities and exclude the risks of future duplication. Local counterparts should be included in technical assistance coordination forums where possible.

- In order to mobilise and motivate participants, the certification of training should be introduced.

- Develop a specialised pool of translators for the revision of the Arabic version of documentation produced through Council of Europe technical assistance activities on AC/AML/CFT.

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3. DESCRIPTION OF ACTION

3.1. Context of the Cooperation

The 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 Council of Europe (CoE).

Signed on 17 January 2012, the programme consists of four components and 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.

The Middle East and North Africa (MENA) region has manifested in many occasions the interest in strengthening cooperation with the Council of Europe based on the framework of existing Council of Europe instruments and mechanisms, including in the domain of combatting corruption and other forms of economic crime. This was met by the mutual interest of the Council of Europe to share its experience, particularly useful for countries in state of democratic transition. However until 2012 cooperation activities and technical assistance by Council of Europe to the MENA region was sporadic. Morocco and Tunisia were party to a limited number of open partial agreements and ratified several European conventions.

The signature and implementation of the South Programme facility thus significantly expanded the potential for such cooperation to include strategic policy and legislative advice, risk-assessments, training, capacity and institution building, networking modalities among homologue institutions in Europe and the dissemination of good practices, as well as visibility actions and information campaigns, which include outreach to the relevant target audiences in the government sector and civil society, as well as media. In the anti-corruption area, cooperation with the MENA region thus marks the first precedent of CoE technical assistance to non-European countries undertaken at their own request and initiative.

3.2. Approach

For over a decade the Council of Europe has been gathering multidisciplinary experience based on the drafting of AC norms and standards, assessment of implementation and support via technical assistance programmes, in particular for Member-States emerging from the former communist block and in post-war areas, so that these countries could join the European family on equal footing and successfully complete their democratic transition. The intervention of Council of Europe in the South Programme was thus mainly based on such good practice examples. It gave access to a pool of international consultants and experts from the public administrations of 47 Council of Europe Member States, who would be able to share their broad practical experience in the anti-corruption area.

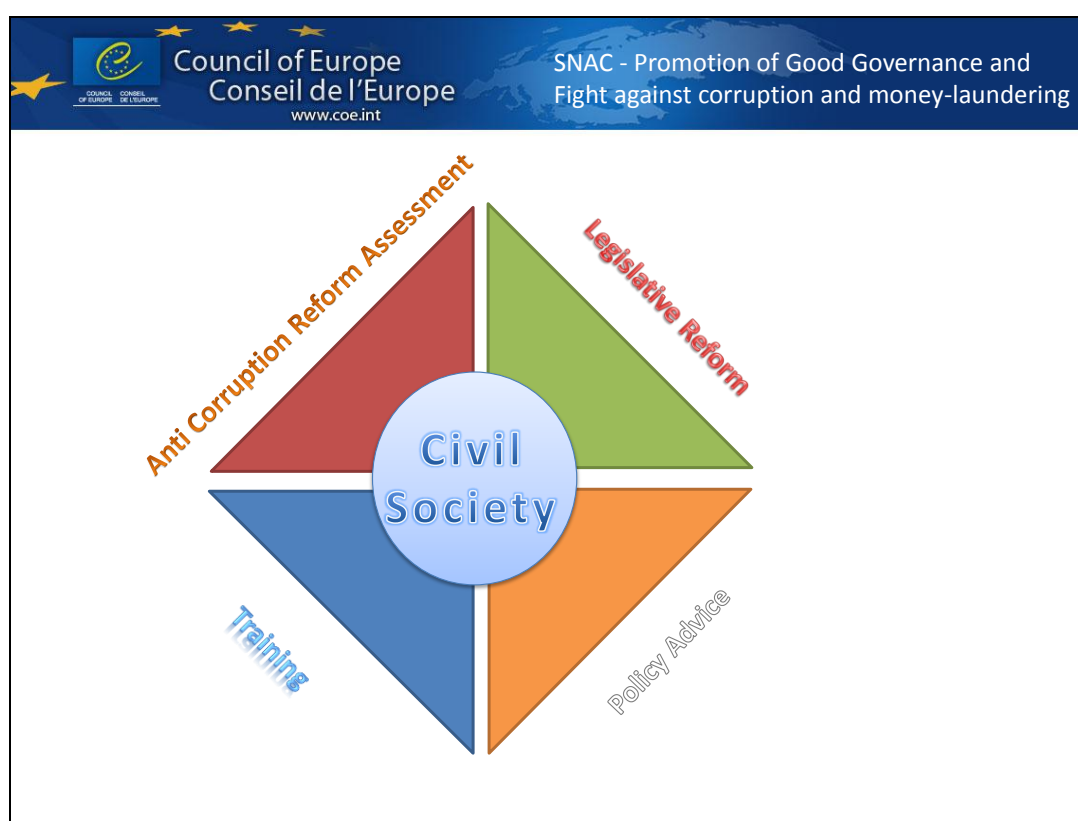
The programme was implemented from 29 December 2011 to 31 December 2014 (36 months) with a budget of 1,052,267 Euro. Component 2 of the programme was implemented in the form of a project entitled South Neighbourhood Anti-corruption (SNAC) implemented by the Economic Crime and Cooperation Unit (ECCU) of the Action against Crime Department, Directorate of Information Society and Action against Crime, Directorate General I of the Council of Europe. For purposes of administrative and networking support of

the Programme, Council of Europe offices were progressively established and staffed in Rabat (Morocco) and in Tunis (Tunisia).

Developing technical assistance in a new environment implied establishing contact with new stakeholders, meeting with local contingencies and new challenges. As a result of active networking and start-up activities the CoE developed efficient working relations with the a number of key agencies involved in anti-corruption activities in Morocco and Tunisia, which served as a solid foundation during the subsequent roll-out of Project activities.

The activities selected for inclusion in the South Programme-Component 2 workplan were developed on the basis of demands and constructive discussions with the authorities of Morocco and Tunisia aiming for the implementation of high-standards of democratic governance and fight against corruption, money-laundering and terrorism financing.

The rationale of the technical assistance in Morocco and Tunisia could not fully follow the contextual framework of technical assistance that Council of Europe provides to Member States, in particular due to the fact that neither of these two countries are signatories to CoE anti-corruption or anti-money laundering instruments, nor are they members of any relevant CoE monitoring mechanisms. In this respect the Programme aimed to envisage certain substitute elements that would ensure the mobilization of all stakeholders and effective delivery of cooperation activities. This involved the following four components to be delivered as part of the cooperation Programme:



1. **Anti-corruption reform assessment:** assessment of the legal and institutional framework on basis of the GRECO methodology to be initiated, aimed at providing recommendations and policy direction in the area good governance and fight against corruption;

2. **Legislative reform:** Increased capacities on legislative reforms through legal advice and legal drafting through knowledge sharing of good practices and co-operation with civil society;
3. **Policy advice:** Available policy advice and sector risks analysis to relevant institutions concerning good governance and corruption prevention tools / methodologies;
4. **Training:** Provision of training, modules and awareness-raising for relevant institutions and civil society groups in the area of good governance and fight against corruption and economic crime.

Awareness rising on the relevant CoE conventions and 'soft law' standards was a transversal component of all four categories of activities listed above.

3.3. 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 risks 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.

3.4. Workplan/other modifications

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

3.4.1. Workplan implementation:

- 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 legal and institutional framework on basis of the GRECO methodology.

ER 1 was implemented through a combination of activities aimed at raising awareness and promoting Council of Europe anti-corruption standards and instruments in Morocco and Tunisia. This included introductory seminars on CoE conventions, GRECO methodologies, as well as the roll-out of a full scale assessment in Morocco based on the GRECO assessment model.

Morocco

An overarching assessment of the entire Moroccan anti-corruption regime (AC Diagnostic) was delivered by the Project using the Group of States against corruption (GRECO) methodology in 2013-2014. It was carried out in the timeframe of approximately 8 months and involved 25 various government agencies, whereby 73 officials were interviewed.

The assessment resulted in the delivery of a comprehensive report, identifying of a large number of gaps and shortcomings in the AC regime. It contained a total of 66 policy recommendations for authorities covering all the components of a national anti-corruption system, including public administration, law enforcement, judiciary, political parties and parliament, as well as the topics of public procurement, confiscation, interagency and international cooperation. The recommendations were largely approved by all stakeholders and serve as a solid tool for the prioritization of any future cooperation activities in Morocco, given the comprehensive nature of the assessment report.

The assessment also resulted in a significant consolidation of the anti-corruption system with the continuous development of a network of focal points within the administration and civil society. It contributed to the strengthening of the central role of the Moroccan anti-corruption authority – *Instance centrale de prévention de la corruption* (ICPC). At the same time some difficulties were faced in engaging the Parliament, which provided a very limited contribution to the assessment.

The next phase of the programme should aim to monitor the level of compliance and progress of reforms recommended by the AC Diagnostic.

Tunisia

Taking into consideration the constitutional situation of Tunisia and the existence of a temporary legal set-up based on law-decrees, it was not possible to launch an overarching assessment of the legal and institutional framework similarly to Morocco. Thus the main focus of activities under this ER was aimed at awareness-raising on CoE anti-corruption instruments and mechanisms.

For this purpose a high level delegation of Tunisian authorities led by Mr Samir Annabi, President of INLUCC and Mr Anouar Ben Khelifa, State Secretary for good governance and public administration came to Strasbourg in June 2014. The delegation also involved parliamentarians, representatives of the Ministries of Justice, Foreign Affairs and others. A presentation of the methodologies on assessing legal and institutional frameworks concerning corruption and money-laundering as applied by GRECO and Moneyval took place in the framework of the visit. The study-visit was also an opportunity to introduce and discuss other Council of Europe mechanisms and structures carrying out political and

technical level monitoring and evaluation, such as those applied by Parliamentary Assembly and Congress of Local and Regional Authorities. At the request of the beneficiaries, AML topics were discussed: political financing in cooperation with Venice Commission, as well as the risks of terrorism financing in the sector of non-profit organisations.

- 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.

Activities under Expected Result II were mainly focused on providing assistance in the preparation of draft laws establishing new anti-corruption authorities in Morocco and Tunisia.

The Moroccan constitution adopted in 2011 foresees the establishment of an *Instance nationale de la probité, de la prévention et de la lutte contre la corruption (INPPLCC)*. For purposes of implementing this constitutional provision several draft laws were prepared spelling out the mandate and status of the new authority. The Council of Europe was solicited to provide a legal opinion on the various drafts and provided two technical papers to this effect. The Council of Europe identified various weaknesses in the proposed mandate and status of the new body concerning the capacities on criminal case investigation and interaction with justice authorities, as well as issues with mobilisation of necessary funds to achieve the new objectives. Another important issue identified by the CoE concerned the operational independence of *NPPLCC* in undertaking inquiries and transferring cases for further criminal investigation to law enforcement and prosecutorial authorities. In the second phase of the South Programme the Council of Europe should continue to provide assistance to the drafting of the future internal rules and procedures for *INPPLCC* once the law is adopted.

The Council of Europe participated in a similar drafting process in Tunisia, where assistance was provided in the preparation of a draft organic law establishing a new anti-corruption authority, as mentioned by the new Tunisian Constitution of January 2014. In this perspective several technical papers were made available and a joint workshop with the Venice Commission was organised to discuss the mandate and status of constitutionally independent bodies. The Council of Europe contribution also assisted in adopting a list of common characteristics of the future five constitutionally independent bodies, including the new anti-corruption authority.

In both countries, the Council of Europe built up capacities of national authorities to undertake 'corruption proofing' of legal texts through a practical exercise involving legal experts in charge of legal drafting in various ministries and agencies. The main beneficiary institutions (ICPC in Morocco and the Legal services of the Prime Minister's Office in Tunisia) expressed their desire to participate in further training activities on corruption proofing of legislation and the preparation of such methodologies.

Under this Expected Result the Council of Europe also enhanced capacities of authorities in the areas of conflict of interest and deontology. In Morocco, a session on these topics was delivered for the ICPC and other public sector authorities based on the Diagnostic Report. Unfortunately it was not possible to effectively involve Parliamentarians despite several attempts through different channels (invitation letters; direct discussions with the members of the Assembly; meetings with members of the Moroccan Delegation to PACE). Another session was requested by the Moroccan association of entrepreneurs (CGEM) specifically targeting the private sector, however due to time constraints and unclear focus it was not possible to organize this activity. An activity for the private sector could be implemented in the second phase of the South Programme focusing on aspects of internal control and AC corporate compliance programmes.

In Tunisia, the Council of Europe delivered a code of deontology addressed to the personnel of INLUCC as an example of good practice. The project also provided guidelines to lawyers and chartered accountants on the preparation and review of their own codes of ethics, which was well received by both professions.

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

The Project made significant progress in developing a risk-based anti-corruption framework in Morocco and Tunisia through the promotion of Council of Europe methodologies on the assessment of corruption risks. In both countries this included the building of capacities of national authorities through tailored seminars followed by full-scale pilot risks assessments in selected sectors.

In Morocco, the Council of Europe organized an activity to disseminate its risk-assessment methodology through a comparative assessment with similar tools already implemented and applied by Moroccan authorities (e.g. with regard to the transportation and health sectors). The Council of Europe methodology was in turn implemented in the Ministry of Foreign Trade. As a result, Council of Europe experts provided 18 recommendations with regard to the functioning of the ministry overall, as well as targeting specific procedural and sectoral aspects.

The seminar on risk-assessment methodologies organized in Tunisia effectively aimed to support the work of good governance and AC units established across various government agencies. The assessment by CoE experts concluded that these Units were effectively non-operational given that neither specific human nor financial resources were allocated. The Council of Europe further undertook a pilot risk-assessment in the Ministry of Public Properties which oversees one of the most corruption-prone sectors in the country (see National Integrity Scan by OECD, 2012). A range of recommendations were produced as a result of the risk-assessment, targeting issues in the internal organisation, rules and proceedings of the Ministry. In the second phase of the programme, it might be fruitful to resume cooperation which this strongly exposed ministry and establish a set of specific actions on the basis of recommendations of Council of Europe experts.

- 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.

Under Expected Result IV both in Morocco and Tunisia, the Council of Europe delivered a similar capacity building and training programme in a number of key areas, including general awareness-raising on basic anti-corruption concepts, as well as targeted seminars on criminal law investigations and administrative inquiries.

Basic anti-corruption concepts training allowed to raise general awareness of staff in the Moroccan and Tunisian anti-corruption authorities regarding all components of anti-corruption systems. Both countries demonstrated significant interest in further expanding this training to involve broader audiences, as well as further tailoring it to the domestic context with local cases. In order to facilitate the training process, the Council of Europe provided a glossary of AC concept in French, English, Arabic and Moroccan dialect.

The training on financial investigations increased capacities of law enforcement authorities in both countries in this area. The trainings included both theoretical sessions and practical case-exercises based on real-life scenarios. The session in Morocco was specifically tailored

to target weakness identified in the AC Diagnostic and improve capacities of law enforcement in uncovering concealed funds.

An initial administrative inquiries training in Morocco allowed to share a broad range of European experiences in this area with competent authorities, and identify a way forward in systematizing the procedure on administrative inquiries in this country. Follow-up was requested by Moroccan authorities in the form of preparation of internal procedures to conduct and document administrative inquiries. A similar seminar could not be implemented in Tunisia in the last quarter of 2014 because of the heavy Tunisian electoral agenda and uncertainty concerning the effective attendance of participants.

The Project also encountered significant difficulties and duplications of some training activities with other international organizations (e.g. training for law enforcement in Tunisia in June 2014, when a parallel training session was held by UNDP on the same day of the CoE activity). It is important that coordination of beneficiary institutions and international providers of technical assistance is organised in the next phase of the programme with active involvement of beneficiaries in order to optimise the delivery of action and limit duplication of efforts.

In both countries, participants' evaluation forms demonstrated high interest for European experience and good practice examples and training material disseminated. It was requested that trainings are repeated on a regular basis, expanded in scope and translated into Arabic in order to strengthen local impact. Certification was identified as a major need among local trainees.

3.4.2. Modification

The workplan was revised in November 2013 in order to facilitate the implementation the activities. The calendar was updated in order to take into consideration the unstable political situation in Tunisia, the difficult cooperation with some beneficiaries in Morocco for activities linked to the preparation of the national AC Strategy and the cancellation of the activity on the reform of justice.

3.5. Assumptions, risks and sustainability

The project suffered from the absence of objectively verified indicators (OVI) to assess progress in the implementation of AC reforms. The next programming phase should identify OVIs specifically committing local institutions to make progress in selected areas of reform.

Limited absorption capacities of some beneficiary institutions also caused delays in the implementation and follow-up of activities, given the broad scope and intensity. In particular beneficiary institutions in Tunisia were experiencing difficulties in undertaking interagency coordination for a range of events, requiring broad participation from other Ministries. This risk should be considered and mitigated in the second phase of the Programme by expanding networking efforts, and specifically targeting interagency coordination capacities of key AC agencies.

Political instability was a major factor in Tunisia delaying implementation of several activities. Coupled with imprecise decision-making processes and competition between beneficiary institutions in charge of AC policies the implementation of workplan activities was frequently put at risk.

In Morocco, cooperation with the Ministry of public administration has proven difficult and sporadic causing delays and incapacity to deliver several activities in the implementation of the workplan, particularly those targeting the National AC Strategy.

Risks for the duplication of efforts with other international organisations persisted although regular exchange on the state of cooperation eventually allowed to mitigate some of these complications.

3.6. Collaboration with other international organisations

In order to limit duplication of efforts, regular exchanges on the progress of activities were organised at the initiative of Council of Europe with other international providers of technical assistance: OECD, UNDP and Sigma. In the course of the next programming phase, the systematic exchange of information should be reinforced in order to guarantee the fair spending of public funds mobilised for technical assistance. A role in the donor coordination framework should be foreseen for the beneficiary institutions themselves in order to avoid duplicating requests on their part, which were frequently observed during project implementation.

4. ASSESSMENT OF ACTIVITIES AND BENCHMARK FULFILLMENT

The achievements relating to the expected results of the project are assessed below taking into consideration of actions effectively delivered and objectively-verifiable indicator such as:

- Number of assessment reports
- Number of technical papers/legal opinion made available
- Number of workshops, seminars and conferences
- Participation

Project reported on activities through the dissemination of synopsis.

4.1. 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"> ▪ Assessment Report: 1 (193 pages/ 66 recommendations) ▪ Technical Paper made available: 1 ▪ Number of on-site visits, workshops, seminars and conferences: M1.1 (1 study-visit, 2 days); M1.2 (1 seminar, 1 day); M1.3 (1 on-site visit, 5 days); M1.4 (2 workshops, 1 day), M1.5 (conference, 1.5 days), M1.6 (public event, 0.5 day) ▪ Participation: see Section IX ▪ Press review: large media coverage in the newspapers, on the web, on television and radio (more than 20 items) see Section VIII
Progress made under ER 1	Activities delivered: M1.1, M1.2, M1.3, M1.4, M1.5 and M1.6 Activity partially delivered: M1.7
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, as well as other 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 took place during a study-visit of the Moroccan delegation to Strasbourg
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"> ▪ Assessment questionnaire on the basis of the GRECO model was drafted ▪ Terms of reference of the assessment process were drafted ▪ 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 ▪ Local expertise on GRECO methodologies was developed through participation of local experts in the assessment, who were identified in June 2013 (participation of 2 local experts in on-site visits) ▪ 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 took place in September-October 2013 ▪ Draft report was 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 was held in November 2013 Dissemination of the report for comments to beneficiaries was done in December 2013 Translation of CoE Conventions on corruption into Arabic was carried out
Activity No. M1.5 Delivered in 2014	Plenary Session Review: Finalisation of the assessment and of recommendations <ul style="list-style-type: none"> Finalisation of the draft AC Diagnostic Report was achieved in January 2014 on the basis of comments Plenary session with beneficiaries took place 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 <ul style="list-style-type: none"> Public event was organised in February 2014 with large media coverage Dissemination of the list of recommendations and executive summary was carried out in Arabic, French and English Dissemination of the CoE Conventions on corruption in Arabic to participants
Activity No. M1.7 Partly delivered in 2014	Publication of “Morocco: Anti-corruption Diagnostic” <ul style="list-style-type: none"> Finalisation of the report took place in April 2014 Translation into Arabic was completed in September 2014/ Review of the translation by ICPC is on-going Printing of the French version of the report in November 2014 Dissemination of the final report in French in December 2014 by ICPC Technical paper by Moroccan experts who contributed to the assessment of Morocco was prepared; the paper was introduced and disseminated at the occasion of the study-visit of the high-level Tunisian delegation in Strasbourg in June 2014
Overall assessment under ER1	Activities under ER1 have been 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 significantly increased based on this positive momentum. The AC diagnostic was extensively covered by the media (See Section VIII)

Expected Result II: Legislative Reforms	
Objectively verifiable indicators	<ul style="list-style-type: none"> Number of legal expertise delivered: 2 Technical Papers made available: 2 Number of on-site visits, workshops, seminars and conferences: M2.1 (2 study-visits, 2 days); M2.2 (1 seminar, 1 day); M2.3 (1 seminar, 2 days) Participation: see Section IX
Progress made under ER 2	Activity delivered: M2.1 Activities underway: M2.2 and 2.3 M2.4 was cancelled

Activity No. M2.1 Delivered in 2014	<p>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</p> <ul style="list-style-type: none"> ▪ A Technical Paper on "Good practices examples and templates on the internal rules for anti-corruption and prevention agencies" was provided ▪ A technical paper on "Investigation capacities of the Moroccan ACA" was provided ▪ Two fact finding missions were carried out (February /March 2014)
Activity No. M2.2 Partly delivered in 2014	<p>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</p> <ul style="list-style-type: none"> ▪ Review of the standards and good practice examples available in Europe on deontology and conflict of interest took place as recommended by AC Diagnostic Recommendation No. 10 in order to define the concept and types of conflicts of interest, and adopt clear rules on dealing with conflicts of interest and on mechanisms for preventing and resolving such conflicts, including sanctions for non-compliance, for the purpose of preventing corruption ▪ Training seminar on the European standards of deontology and conflict of interests addressed to civil servants and ICPC staff members was held in November 2014
Progress made/Follow up	<ul style="list-style-type: none"> ▪ Training seminar on the European standards of deontology and conflict of interests for private sector stakeholders could not be organised due to the insufficient availability of the main beneficiary (CGEM) ▪ Despite several attempts to mobilise Parliamentarians, their participation did not take place at the training seminar held in November 2014
Activity No. M2.3 Delivered in 2014	<p>Provision of a training on the methodology on corruption proofing of legislation</p> <ul style="list-style-type: none"> ▪ Involving of legal offices/services of public administration ▪ Training material based on case studies –contribution from domestic institutions ▪ Training seminar held in December 2014
Activity No. M2.4 Activity cancelled	<p>Supporting the ICPC in its advisory role on the national dialogue concerning the reform of justice sector</p> <ul style="list-style-type: none"> ▪ 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 Civil Servants and MPs)
Overall assessment under ER2	<p>The activities under ER 2 have been completed with the exception of the training activities on deontology and management of conflicts of interests due to the lack of response of the main beneficiary (CGEM).</p> <p>Activity linked to the reform of the justice sector was cancelled at the request of the beneficiary institution and substituted with additional training on deontology</p>

Expected Result III: Policy Advice	
Objectively verifiable indicators	<ul style="list-style-type: none"> ▪ Number of risks assessment reports: 1 ▪ Technical Paper made available: 1 ▪ Number of on-site visits, workshops, seminars and conferences: M3.1 (1 workshop, 1 day); M3.2 (2 on-site visits, 2 days) and 1 seminar, 1 day) ▪ Participation: see Section IX
Progress made under ER 3	Activities delivered: M3.1 and 3.2 Activity partially delivered: M3.4 Activity not delivered: M3.3
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 risks analysis on health and transportation piloted by ICPC ▪ Review of applied methodology vs. CoE methodology (June 2013) ▪ Dissemination of CoE methodology on risks assessments in the form of a Technical paper ▪ 2nd Review of CoE methodology during the training activity on basic concepts in November 2014
Activity No. M3.2 Delivered in 2014	Carrying out one Risks Analysis (Ministry of foreign trade) <ul style="list-style-type: none"> ▪ 1st on-site visit held in June 2014; 2nd visit in September 2014 and closing activities took place in December 2014 ▪ Active participation and involvement of ICPC staff members was ensured in the risk assessment in the Ministry of foreign trade to strengthen local expertise ▪ Risks assessment report in the Ministry of foreign trade delivered in November 2014
Activity No. M3.3 Not delivered	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
Progress made/Follow up	Delay on feedback from beneficiary due to institutional change of management. This activity was linked to other activities on the drafting of the national AC strategy: M4.1, 2 and 3)
Activity No. M3.4 Partly delivered in 2014	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 <ul style="list-style-type: none"> ▪ Efforts to involve Parliamentarians in activities on basic AC concept (including Political Party Financing) and corruption-proofing of legislation failed to solicit their participation ▪ Participation of staff of the Parliament to the activity on corruption proofing of legislation was achieved in December 2014
Overall assessment under ER3	Council of Europe methodology based on risk-assessments was broadly disseminated among public administrations and could be implemented within the Ministry of foreign trade. Activity linked to the preparation of the Moroccan AC national Strategy did not meet the interest of the beneficiary institution despite repeated efforts. Activity addressed to Parliamentarians could not be organised due to the difficulties met to mobilise this specific target group.

Expected Result IV: Trainings	
Objectively verifiable indicators	<ul style="list-style-type: none"> ▪ Technical Papers made available: 3 ▪ Number of training seminars: M4.4 (1 seminar, 2 days); M4.5 (1 seminar, 1 day); M4.6 (1 seminar, 2 days) ▪ Participation: see Section IX
Progress made under ER 4	Activity delivered: M4.4, 4.5 and 4.6 Activities not delivered: M4.1, 4.2 and 4.3
Activity No. M4.1 Not delivered	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 <ul style="list-style-type: none"> ▪ Translation in French and review of the CoE handbook “Designing and Implementing Anti-corruption Policies” was carried out. The technical paper was disseminated to the beneficiary institutions ▪ Terms of reference were drafted and submitted for approval to the main beneficiary institution
Activity No. M4.2 Not delivered	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
Activity No. M4.3 Not delivered	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
Activity No. M4.4 Delivered in 2014	Organisation of a certified training on the basic elements of the fight against corruption and its institutional and legal aspects for public officials <ul style="list-style-type: none"> ▪ Translation into French and dissemination of the training manual on basic anti-corruption concepts took place in May 2014 ▪ A glossary on AC basic concepts (English/French/Arabic) in the form of a technical paper was delivered in August 2014 (Moroccan) ▪ Training workshop was held in November 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 <ul style="list-style-type: none"> ▪ Activity was based on recommendation from AC Diagnostic which commended to introduce a clearly defined mechanism to enable thorough asset investigations to be conducted when investigating corruption and trading in influence, so that any assets derived therefrom can be identified and confiscated (Recommendation No. 52) ▪ Training seminar of specialists on criminal law investigation techniques was held in March 2014
Activity No. M4.6 Delivered in 2014	Training of trainers on administrative inquiries on corruption cases or/and other administrative violations for the law enforcement agents or and other relevant agencies <ul style="list-style-type: none"> ▪ Training session on administrative inquiries held in October 2014 and dissemination of good practice examples and methodologies from Belgium, France, Italy and Switzerland
Overall assessment under ER4	The activities under ER 4 were completed with the exception of activities linked to the national AC strategy

4.2. 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 on-site visits, workshops, seminars and conferences: T1.1 (1 study-visit, 2 days) Participation: see Section IX
Progress made under ER 1	Activity delivered: T1.1
Activity No. T1.1 Delivered in 2014	<p>Introduction to GRECO methodologies increasing the capacities in implementing European standards, monitoring tools and networking opportunities</p> <ul style="list-style-type: none"> Study visit to Strasbourg of a high level delegation was held in June 2014, which included presentation of the methodologies on assessing legal and institutional frameworks concerning corruption and money-laundering aspects as applied by GRECO and Moneyval, as well as other 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
Overall assessment under ER1	Activities under ER1 were fully completed.

Expected Result II: Legislative Reforms	
Objectively verifiable indicators	<ul style="list-style-type: none"> Number of legal expertise delivered: 1 Technical Papers made available: 5 Number of on-site visits, workshops, seminars and conferences: T2.1 (1 workshop, 0.5 workshop); T2.2 (1 seminar, 2 days); T2.3 (1 workshop, 1 day; 1 seminar; 1.5 days) Participation: see Section IX
Progress made under ER 2	Activities delivered: T2.1, 2.2, 2.3 and 2.4
Activity No. T2.1 Delivered in 2014	<p>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</p> <ul style="list-style-type: none"> Code of ethics for the staff members of the INLUCC was delivered in March 2014 Training workshop at the occasion of the training seminar on basic concepts of corruption and deontology of Lawyers and chartered accountants including professional obligations on AML held in September 2014
Activity No. T2.2 Delivered in 2014	<p>Increasing capacities in reviewing and improving current national legislation (corruption proofing)</p> <ul style="list-style-type: none"> Training seminar on corruption proofing of legislation held in September 2014 with Legal Department of the Office of the Prime Minister based on practical cases developed by experts on existing legislation on NGO registration and draft law on charities
Activity No. T2.3 Delivered in 2014	<p>Provision of legislative advice and legal drafting reviews in support of the drafting of the future Anti-corruption Law</p> <ul style="list-style-type: none"> Technical expertise paper on good practices examples of European anti-corruption legal frameworks was made available in April 2014

	<ul style="list-style-type: none"> ▪ Workshop on the implementation article 130 of the Tunisian Constitution of 26 January 2014 held in June 2014 ▪ Technical expertise paper on good practices examples of European anti-corruption legal frameworks made available in April 2014 ▪ The following technical expertise papers were delivered: <ul style="list-style-type: none"> ○ Concept paper on the contribution of INLUCC/IBOGOLUCC on normative activities of good governance and anti-corruption in Tunisia ○ Preparing the status of IBOGOLUCC: establishing the constitutional independent body as mentioned in article 130 of the new Tunisian Constitution ○ Discussion of the draft organic law establishing IBOGOLUCC and modifications to legislative texts on prevention and prosecution of corruption ▪ Joint Seminar with Venice Commission on the status and mandate of constitutional independent bodies as established by article 125 of the Tunisian Constitution of 26 January 2014) held in December 2014
Activity No. T2.4 Delivered in 2014	<p>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.</p> <p>Risks assessment on the financing of non-profit organisations</p> <ul style="list-style-type: none"> ▪ Working session on political party financing at the occasion of activity T1.1 held in June 2014 ▪ Working session on NPO financing and fighting against terrorism financing in the framework of activity T1.1 held in June 2014
Overall assessment under ER 2	Activities under ER 2 are fully completed.

Expected Result III: Policy Advice	
Objectively verifiable indicators	<ul style="list-style-type: none"> ▪ Technical Papers made available: 6 ▪ Risks Assessment Report: 1 ▪ Number of on-site visits, workshops, seminars and conferences: T3.1 (1 study-visit, 5 days); T3.2 (6 workshops, 1.5 days); T3.3 (1 seminar, 1 day; 2 on-site visits, 2 days) ▪ Participation: see Section IX
Progress made under ER 3	Activities delivered: T3.1, T3.2 and T3.3
Activity No. T3.1 Delivered in 2013	<p>Sharing information and good practice example with ACA in Europe</p> <ul style="list-style-type: none"> ▪ 3 study visits held to European countries: France, Slovenia & Croatia in April 2013
Activity No. T3.2 Delivered in 2014	<p>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</p> <ul style="list-style-type: none"> ▪ Dissemination of European good practice examples of internal documents was carried out ▪ Six workshops with the participation of international and local expertise between September 2013 and March 2014 resulted in the

	<p>preparation and adoption of internal procedures, staffing structure and profiles, and code of ethics for the staff of INLUCC</p> <ul style="list-style-type: none"> Final Draft delivered in March 2014 and adopted by the decision-making body of INLUCC in June 2014
Activity No. T3.3 Delivered in 2014	<p>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 public 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>)</p> <ul style="list-style-type: none"> Training seminar on CoE methodologies on risks assessment for the Anti-corruption units held in June 2013 Dissemination of CoE methodology on risks assessments in the form of a Technical paper Risks assessment report based on self-evaluation was delivered in April 2014 (2 on-site visits were carried out) Risk assessment tools were delivered in May 2014
Overall assessment under ER 3	Activities under ER3 were fully completed.

Expected Result IV: Trainings	
Objectively verifiable indicators	<ul style="list-style-type: none"> Technical Paper made available: 1 Number of training seminars: T4.1 (1 seminar, 1 day); T4.2 (1 seminar, 2 days) Participation: see Section IX
Progress made under ER 4	<p>Activity delivered: T4.2</p> <p>Activity partly delivered: T4.2</p>
Activity No. T4.1 Partly delivered in 2014	<p>Specialised training on AC proceedings</p> <ul style="list-style-type: none"> Training seminar on investigation techniques for INLUCC staff members, judges, prosecutors (including the <i>Pôle judiciaire financier</i>) and judiciary police held in June 2014 Training seminar on administrative inquiries could not be implemented in the course of the last quarter of 2014 because of the heavy electoral agenda and uncertainty concerning the involvement of participants
Activity No. T4.2 Delivered in 2014	<p>Training of lawyers and chartered accountants on basic concepts</p> <ul style="list-style-type: none"> Training seminar held in September 2014
Overall assessment under ER4	Activities under ER 4 were fully delivered with the exception of the Training session on administrative inquiries. It could not be delivered in the last quarter of 2014 considering the electoral calendar and difficulties to guarantee participation of the target audience

4.3. Remaining activities

In Morocco:

From the twenty one (21) initial activities of the workplan, fourteen (14) were fully delivered, two (2) were partly delivered, one (1) was cancelled at the request of the beneficiaries and four could not be implemented, primarily due to lack of communication with the expected beneficiary of these activities (the Ministry of public administration).

In Tunisia:

From the ten (10) initial activities of the workplan, nine (9) were fully delivered and one (1) could be partly delivered.

5. COOPERATION WITH STAKEHOLDERS

5.1. State of the Cooperation in Morocco

The cooperation with the coordinating institution in Morocco (ICPC) was regular, comprehensive and successful. The institution provided strong support to the CoE in the organisation of activities, in undertaking coordination of national authorities as well on substantial aspects of implementation of activities (even activities which did not fall under the direct mandate of ICPC). Overall ICPC was able to provide comprehensive support for the implementation of the majority of activities in the workplan. As a result, the capacities of ICPC itself as well as its institutional standing among authorities in Morocco was significantly strengthened.

Other beneficiaries also demonstrated a high degree of ownership of Project activities, which was particularly manifested during the final event of the AC assessment.

A significant difficulty in the implementation of Project activities related to the AC strategy was the lack of cooperation/communication from the Ministry of public administration (MFPMA). Despite repeated attempts by the Council of Europe Secretariat and main counterpart (ICPC) to bring the MFPMA on board, efficient contact could not be established. Therefore a set of important activities centered around the AC strategy could not be implemented.

5.2. State of the Cooperation in Tunisia

Due to political instability, implementation of activities suffered from continuous delays. The limited absorption capacities and competition between the two main AC bodies (INLUCC and State Secretariat for governance and public administration) brought complications to the implementation of the workplan. Due to the poor staffing of these two authorities they were not able to play a constructive role as the coordinators of CoE assistance, particularly from the point of view of facilitating interagency involvement. Thus the function of interagency coordination had to be fully undertaken by the SNAC Project team. As a result the main AC authorities largely forewent the opportunity to enhance their institutional standing among government agencies in Tunisia.

At the same time for some activities the Ministry of Justice and the Legal Department of Prime Minister's office were particularly helpful in gathering an interagency audience for training seminars.

5.3. State of cooperation with third parties

Initiated during inception phase, a regular exchange of information was set-up with OECD and UNDP by telephone and email. Nevertheless duplication of efforts with other international donors did occur, particularly in Tunisia. This could be better averted in the future through more regular donor coordination, as well as by involving beneficiaries in this process in order to prevent parallel request to multiple international organizations on the same topic, as occurred frequently in Tunisia.

6. COMPONENT ACHIEVEMENTS AND RISKS

6.1. Overall objective: assessment of implementation

Overall it can be concluded that the SNAC Project has largely met its general objective 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”*.

Through a multifaceted set of activities the Project has been able to strengthen anti-corruption preventative structures in Morocco and Tunisia, including the main AC institutions, as well as a range of authorities involved in the broader AC system. Based on its own standards and mechanisms, the CoE introduced assessment and methodological practices in both countries, thus enabling authorities to identify and mitigate risks and gaps in the AC regime, and leading to increased sustainability potential including through the prism of regional cooperation.

6.2. Evaluation and monitoring

One midterm evaluation of the programme was completed in March 2014. The conclusions were as follows:

- The project benefited to a significant extent from the Council of Europe’s added value.
- The programme’s relevance was enhanced by its flexibility and ability to respond to needs expressed by target countries.
- The programme design suffered from lack of synergies and ill-defined results or milestones.
- The programme implementation was largely effective, despite significant delays.
- Programme coordination and management are effective.
- The programme is likely to achieve a significant impact.
- The future Council of Europe programme should be conceived as a flexible facility, focused on some core areas of Council of Europe expertise.

6.3. Major challenges and lessons learnt

The Project faced a number of challenges both in Morocco and Tunisia, given the early stages of development of AC regimes in both countries. These intrinsic difficulties were amplified particularly in Tunisia by overall political instability and disarray in interagency processes and low capacities in ministerial structures.

The challenges faced in Tunisia primarily related to absorption capacities of the key beneficiaries – the ILNUCC and the State Secretariat for governance and public administration, in particular due to extremely low staffing levels. This factor and ambiguous

institutional standing of these bodies led to their inability to conduct interagency coordination, placing this task fully on the SNAC Project team. In implementation of future Projects in Tunisia particular attention should be thus paid to establishing efficient frameworks for interagency involvement in project activities.

The competition between the two main AC bodies in Tunisia (State Secretary for governance and INLUCC) introduced additional risk to the implementation of workplan activities. A clear delineation of roles of these bodies in the framework of the second phase of South Programme would be needed in order to avert further complications.

At the same time the project was able to attain outstanding outcomes through activities implemented with other beneficiaries in Tunisia. (e.g. Legal Department of the Prime Minister's Office, General Controller of Administration, Ministry of Justice). The next programming phase should build on the support provided by these agencies to SNAC activities.

In Morocco, the main challenge was establishing cooperation with the Ministry of public administration (MFPMA) responsible for the implementation of the National AC Strategy. At the same time this should not be interpreted as a definitive rejection by MFPMA of cooperation with the Council of Europe. CoE expertise might be required in the future for the implementation of pilot-projects, and negotiations with this agency should be undertaken in a broader framework in order to identify priorities and areas of assistance.

Risk of duplication of efforts with other international organisations existed especially in Tunisia although routine exchange of information was set-up with OECD and UNDP in order to limit possible duplication. The difficulties were partly caused by the fact that beneficiaries addressed similar demands for technical assistance to different international organisations. One specific example in Tunisia has been the duplication of training sessions on financial investigations with the UNDP in the Ministry of Justice in June 2014. Similar demands were even addressed to different Council of Europe MAEs regarding political party financing. This should be mitigated in future Projects by partially involving project beneficiaries in donor coordination mechanisms.

6.4. Recommendations for future actions

Recommendations for Moroccan authorities

- Continue to develop an effective framework for interagency cooperation between ICPC and other stakeholders of the National Integrity system of Morocco including law enforcement authorities and prosecution through the implementation of systemic and practical information sharing arrangements.

Recommendations for Tunisian authorities

- Increase institutional absorption capacities and interagency cooperation of the anti-corruption authority by proceeding with full recruitment of staff envisaged for this authority as soon as possible.

Recommendations in terms of project design and management

- The beneficiary(ies) should be chosen based on a thorough diagnostic review, and taking into account the most significant shortcomings identified, as well as with regard to their capacities in interagency coordination.

- Project activities should be as much as possible designed to address each institution's needs and take into account their absorption capacity limitations.
- A tracking mechanism should be developed and applied to monitor the implementation of technical assistance in the form of a steering committee for the South Programme dedicated to AC/AML/CFT. This steering committee should be composed of focal points of national beneficiaries and meet on a regular basis in the country.
- Technical assistance programmes in the South Programme that are topically related should be designed and as much as possible be implemented in a concerted manner with other MAE of the Council of Europe taking into account their access to different target groups. Joint project delivery will enhance authorities' appreciation of the need to closely cooperate and exchange information. Joint project implementation would also ensure that the impact of each single project on the beneficiaries of the others is maximised and efforts are not duplicated.
- In order to prohibit duplication of efforts and share responsibilities on technical assistance topics, activities should be designed and as much as possible be implemented in a concerted manner with other international organisations. The Council of Europe Offices should reach out to partners as well as local counterparts to streamline and coordinate activities and exclude the risks of future duplication. Local counterparts should be included in technical assistance coordination forums where possible.
- In order to mobilise and motivate participants, the certification of training should be introduced.
- Develop a specialised pool of translators for the revision of the Arabic version of documentation produced through Council of Europe technical assistance activities on AC/AML/CFT.

7. CONCLUSIONS

It can be concluded overall that the SNAC project achieved its intended objective, purpose and expected results. It obtained systemic impact in Morocco and Tunisia by delivering assistance at all levels of the anti-corruption system.

Comprehensive support to the main anti-corruption agencies enhanced their capacities and institutional standing: in the case of Tunisia CoE streamlined internal frameworks and processes of INLUCC, and in the case of Morocco consolidated ICPC's central role among government agencies as the central coordinator for anti-corruption activities. In both countries CoE significantly contributed to the legislative efforts to reform both of these authorities based on the requirements of the newly adopted Constitutions.

CoE introduced risk-based anti-corruption practices in Morocco and Tunisia through application of methodologies, pilot risk assessments of institutions, and legislative exercises on 'corruption proofing'.

A training programme for a broad range of government and non-government bodies involved in the fight against corruption and economic crime was carried out. It included general awareness raising on basic anti-corruption concepts, specialized sessions on deontology and ethics, trainings on administrative inquiries and criminal financial investigations.

The implementation rate of Project activities reached approximately 82%. A total of twenty three (23) activities out of the thirty one (31) initially envisaged by the project workplan were

effectively delivered. Three (3) activities were partly delivered, four (4) activities could not be implemented and one (1) activity was cancelled at the request of the beneficiary organisation.

These results can be assessed as highly positive, given that the South Programme marked the start of CoE cooperation with Morocco and Tunisia in the anti-corruption area, and all relationships and cooperation arrangements with counterparts, as well as logistical support and local offices were newly established. In addition, cooperation with these non-member states meant that the traditional monitoring mechanisms often utilized for benchmarking assistance to CoE members could not be used here, and a different format of engagement needed to be established. In Morocco the AC assessment based on GRECO methodologies proved to be a highly efficient and impactful exercise in this regard.

A number of challenges related to lack of capacities for technical assistance absorption and interagency cooperation in Tunisia, as well as bilateral interaction with specific counterparts in Morocco were noted, and should be taken into account when implementing the second phase of South Programme.

At the same time the majority of project deliverables have the potential to maintain significant impact on the development of policies, institutions and capacities in Morocco and Tunisia. Therefore activities implemented in course of the period 2012-2014 should be regarded as a foundation in any further cooperation and technical assistance process in the second phase of the Programme.

MAE responsible for the Component: DGI-Action against Crime Department

Name of the contact person for the Component: Ivan KOEDJIKOV

Location: Strasbourg

Date report sent: 30 March 2015

8. List of Annexes:

1. Component Visibility Actions
2. Gender participation to technical assistance activities
3. SNAC - Calendar
4. SNAC - List of technical papers
5. SNAC – Workplan

Annex I: Component Visibility Actions

Bilingual project website (English and French) was set up under the Council of Europe Economic Crime and Cooperation Unit web page and was regularly updated with project news, upcoming events and outputs: (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

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

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

Programme visibility was ensured through the inclusion of the project logo on the website and each project technical paper. For each activity, the logo of the Programme was screened and top-expos were used for each activity on the spot. In addition, visibility material such as document folders and notepads were being used and handed out at each activity.

The project ensured the visibility of the EU's contribution at all stages of its activities. The Council of Europe took all appropriate measures to publicise the fact that the project was financed by the European Union. All reporting and information used and disseminated acknowledge that project activities were "Funded by the European Union, implemented by the Council of Europe" by also displaying in an appropriate way the European Union logo.

Few activities attracted extensive media coverage considering their technical level and weak interest of media.

On the contrary, closing activities linked to the AC Diagnostic of Morocco attracted large media coverage in Morocco and abroad.

Newspapers and websites:

- Al Ittihad Al Ichtiraqui, 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, 21/02/2014
- 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, 21/02/2014
- Libération, Quotidien en langue française, L'Europe diagnostique la corruption, 19/02/2014
- Libération, Quotidien en langue française, Le Conseil de l'Europe recommande la mise en œuvre de l'article 36 de la Constitution, 21/02/2014
- lemag.ma, Site web en langue française, Maroc : Une enquête nationale sur le ressenti vis-à-vis de la corruption, 21/02/2014
- 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, 21/02/2014
- L'Opinion, Quotidien en langue française, Corruption, gouvernance et blanchiment d'argent dans la ligne de mire des experts, Européens, 22/02/2014
- Rissalat Al Oumma, Quotidien en langue arabe, Entre lutter contre la corruption et instaurer la culture de la Détérioration, 21/02/2014
- 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", 21/02/2014
- 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, 21/02/2014
- Telquel, Hebdomadaire en langue française, Au royaume de la corruption, 21/02/2014
- La Vie Eco, Hebdomadaire en langue française, Les finances de nos partis inquiètent les Européens, 21/02/2014
- Yabiladi, Le Conseil de l'Europe accable le Maroc, 19/02/2014

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

Unsolicited media coverage of the risk assessment in the Ministry of external trade exposed a partial and limited appreciation of the action:

- AFP, Un rapport du Conseil de l'Europe pointe les "risques de corruption" dans un ministère marocain, 04/12/2014
- AP, Study highlights Morocco corruption risks, 04/12/2014
- EFE Consejo Europa ve alto riesgo corrupción en Ministerio marroquí de Comercio, 04/12/2014
- L'Economiste, Risques de corruption au ministère du Commerce extérieur: rapport très sévère du Conseil de l'Europe, 05/12/2014
- L'Economiste, Le Commerce extérieur évalue ses risques-corruption, 08/12/2014

Annex II: Gender participation in technical assistance activities

Gender participation in SNAC activities 2012

Activities	Men	%	Women	%2	Total	People trained per activity
M.0.1 Mission 1 (inception)	24	80,00	6	20,00	30	
M.1.1	15	68,18	7	31,82	22	9
T.0.1 Mission 1 (inception)	30	81,08	7	18,92	37	
T.0.1 Mission 2 (inception)	17	70,83	7	29,17	24	
Total participants SNAC	86		27		113	
Gender Average SNAC 2012		75,02		24,98		
Total trained						9

Gender participation in SNAC activities 2013

Activities	Men	%	Women	%	Total	People trained per activity
T3.1	17	42,50	23	57,50	40	10
T3.3 (training)	21	60,00	14	40,00	35	31
M3.1	28	73,68	10	26,32	38	32
M1.2	23	88,46	3	11,54	26	22
M1.3	62	84,93	11	15,07	73	
M1.4	10	83,33	2	16,67	12	
T3.2 (3 seminars)	9	75,00	3	25,00	12	
T3.3 (1 visit)	10	83,33	2	16,67	12	
Total participants SNAC	180		68		248	
Gender Average M 2013		82,60		17,40		
Gender Average T 2013		65,21		34,79		
Gender Average SNAC 2013		73,91		26,09		
Total trained						95

Gender participation in SNAC activities 2014

Activities	Men	%	Women	%	Total	People trained per activity
T3.2 (3 seminars)	13	81,25	3	18,75	16	
T3.3 (1 visit)	21	60,00	14	40,00	35	
M1.5	48	84,21	9	15,79	57	
M1.6	59	86,76	9	13,24	68	
M4.5	23	92,00	2	8,00	25	25
M3.2 (2 visits)	12	63,16	7	36,84	19	
M2.1 (2 visits)	22	73,33	8	26,67	30	
T1.1	31	73,81	11	26,19	42	22
T4.1	30	90,91	3	9,09	33	25
T2.2	19	59,38	13	40,63	32	25
T4.2	32	86,49	5	13,51	37	25
M4.6	39	79,59	10	20,41	49	39
M4.4	25	73,53	9	26,47	34	25
M3.2	27	84,38	6	18,75	32	
T2.3	12	57,14	9	42,86	21	
M2.3	21	60,00	11	31,43	35	24
Total participants SNAC	434		129		565	
Gender Average M 2014		79,23		20,77		
Gender Average T 2014		72,71		27,29		
Gender Average SNAC 2014		75,37		24,29		
Total trained						210

Total participants SNAC 2012-2014	700	224	926	
Gender participation average 2012-2014	74,77	25,23		
Total trained 2012-2014				314



Annex III: Calendar of 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	- Executive summary and recommendations : March 2014 - French version of the final report: November 2014 - Arabic version of the final report being currently being revised by beneficiary	Partly completed
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	- Training session addressed to civil servants and parliamentarians : 13 November 2014 - Training session addressed to private sector to be delivered	Partly completed
M.2.3	Provision of a training on the methodology on corruption proofing of legislation	Q2 2013 - 2014	16-17 December 2014	Completed
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	24-25 September 2014	Completed
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	23-24 September 2014	Completed
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	<ul style="list-style-type: none"> - TP made available April 2014 - Working Seminar on 25 June 2014 - TP made available in October and November 2014 - Working Seminar on 28-19 December 2014 	Completed
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	<ul style="list-style-type: none"> - 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 risks 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 and transportation	Q1 2013	13 June 2013	Completed
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	<ul style="list-style-type: none"> - Fact-finding mission 1: 18-19/06/2014 - Fact-finding mission 2: 23-24/09/2014 - Final Seminar: 4/12/2014 	Completed

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		Not delivered
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	16-17 December 2014	Completed
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 Europe	Q1 2013	8-12 April 2013	Completed
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 st working seminar on 25-26/09/2013 - 2 nd working seminar on 28-29/10/2013 - 3 rd working seminar on 2-3/12/2013 - 4 th working seminar on 6-7/01/2014 - 5 th working seminar on 3-4/02/2014 - 6 th 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 - Risks 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		Not delivered
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		Not delivered
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		Not delivered
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	11-13 December 2014	Completed

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	13 March 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	16-17 October 2014	Completed
T.4.1	Specialised and multidisciplinary training for INLUCC staff to carry out administrative inquiries (or criminal investigations related) concerning economic crime and corruption related-cases.	2013-2014	<ul style="list-style-type: none"> - Training on Criminal law investigation techniques on 10 June 2014 - Training on Administrative inquiries to be delivered 	Partly completed
T.4.2	Multidisciplinary 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	24-25 September 2014	Completed

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Mis en œuvre
par le Conseil de l'Europe**Annex IV: List of SNAC Technical Papers (2013-2014)**

Number	Council of Europe Experts	Technical papers	Workplan Activity Reference	Languages
2013				
1	Q. Reed; M. Philips	SNAC TP1/2013 - Guide méthodologique d'évaluation des risques de corruption - Corruption risks assessment methodology guide	M3.1/T3.3	EN/FR
2	T. Hoppe	SNAC TP2/2013 - Concevoir et mettre en œuvre des politiques de lutte contre la corruption - Designing and Implementing Anti-corruption Policies	M4.1-3	EN/FR
3	R. Martinez	SNAC TP3/2013 - Elaborer un règlement intérieur et un manuel de procédures pour l'Instance nationale de lutte contre la corruption	T3.2	FR
4	E. Dunga; S. Gauvin; JM Lequesne; C. Vicleanschi	SNAC TP4/2013 - Diagnostic du cadre anti-corruption	M1.7	FR
2014				
5	L. de Sousa; P. Morais	SNAC TP1/2014 - Rapport d'évaluation des risques dans la gestion des domaines de l'Etat et les affaires foncières de la Tunisie	T3.3	FR
6	M. Trivunovic	SNAC TP2/2014 - Analyse d'une sélection de lois anti-corruption européennes de lutte et de prévention - Analysis of key preventative anti-corruption policies from a selection of European countries	T2.3	EN/FR
7	D. Kos	SNAC TP3/2014 - les capacités d'enquête de l'Instance anti-corruption marocaine (classified) - The new investigation capacities of the Moroccan anti-corruption Authority (classified)	M2.1	EN/FR
8	R. Martinez	SNAC TP4/2014 - Elaborer un règlement intérieur et autres documents internes pour l'Instance centrale de prévention de la corruption et l'Instance nationale de la probité et de lutte contre la corruption	M2.1	FR
9	R. Martinez	SNAC TP5/2014 - Règles internes et code de déontologie de l'INLUCC (classified) - الهيئة الوطنية لمكافحة الفساد	T3.2	AR/FR
10	R. Martinez	SNAC TP5bis/2014 - Manuel de traitement des affaires de corruption (classified)	T3.2	FR
11	R. Martinez	SNAC TP5ter/2014 - Manuel de gestion administrative des dossiers de corruption (classified)	T3.2	FFR
12	T. Hoppe	SNAC TP6/2014 - Les bases conceptuelles de la lutte contre la corruption - Basic Anti-Corruption Concepts	M4.4/T4.2	EN/FR
13	A. Ait Taleb; A. Setti	SNAC TP7/2014 - Revue et analyse de la contribution des experts marocains au Diagnostic du cadre institutionnel et législatif mené selon la méthodologie développée par le Groupe d'Etats contre la corruption (GRECO)	T1.1	FR
14	L. de Sousa; P. Morais	SNAC TP8/2014 - Outil d'évaluation des risques et orientation - Risk assessment tool and guidance	T3.3	EN/FR
15	G. Barker	SNAC TP9/2014: - Méthodologie d'évaluation des risques de blanchiment d'argent et de financement du terrorisme concernant le secteur des organisations à but non lucratif	T2.4	FR
16	Y. El Fallah; E. Pelisser;	SNAC TP10/2014 - Glossaire Français-Anglais-Marocain sur les termes de la corruption	M4.4	AR/EN/FR
17	R. Martinez	SNAC TP11/2014	T2.3	FR

		- Note conceptuelle sur la contribution de l'INLUCC/IBOGOLUCC à l'activité normative nationale relative à la lutte contre la corruption et en faveur de la bonne gouvernance		
18	R. Martinez	SNAC TP12/2014 - Préparer le statut de l'Instance de bonne gouvernance et de lutte contre la corruption : établir l'autorité constitutionnelle indépendante conformément à l'article 130 de la constitution du 26 janvier 2014	T2.3	FR
19	R. Martinez	SNAC TP12bis - Note sur la structure de la loi sur l'IBOGOLUC et les modifications à effectuer aux autres dispositions législatives relatives à la prévention et la répression de la corruption	T2.3	FR
20	F. Cardona; L. de Sousa	SNAC TP13/2014 - Analyse des risques dans le commerce extérieur du Maroc (classified) - Corruption risks assessment of the Ministry of foreign trade (classified)	M3.2	EN/FR

This Report presents the outcomes of the three-year SNAC project addressing corruption and money laundering in Tunisia and Morocco. It contains the description and analysis of delivered activities as well as recommendations for future action.

SNAC project was developed as part of the European Union - Council of Europe joint programme “Strengthening Democratic Reform in the Southern Neighbourhood” 2012-2014, most commonly known as South Programme I. Launched in January 2012, South Programme I aimed to accompany democratic and political reforms in the Southern Mediterranean countries, following a demand driven and targeted approach. Financed by the European Union and implemented by the Council of Europe, the programme covered four areas: reforming the judiciary, promoting good governance, strengthening the protection of human rights and democratic values in the region. Component 2 of the Programme focused on promotion of good governance through increased prevention of corruption and money laundering on the basis of the relevant Council of Europe standards, mechanisms and instruments, and on improving the basic framework for regional co-operation.

www.coe.int/snac

<http://south-programme-eu.coe.int/>

The Economic Crime and Cooperation Unit at the Directorate General Human Rights and Rule of Law of the Council of Europe is responsible for designing and implementing technical assistance and co-operation programmes aimed at facilitating and supporting anti-corruption, good governance and anti-money laundering reforms in the Council of Europe member states, as well as in some non-member states.

www.coe.int/corruption

The Council of Europe is the continent’s leading human rights organisation. It comprises 47 member states, 28 of which are members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

www.coe.int

The European Union is a unique economic and political partnership between 28 democratic European countries. Its aims are peace, prosperity and freedom for its 500 million citizens – in a fairer, safer world. To make things happen, EU countries set up bodies to run the EU and adopt its legislation. The main ones are the European Parliament (representing the people of Europe), the Council of the European Union (representing national governments) and the European Commission (representing the common EU interest).

<http://europa.eu>

