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1st Annual Report

“Strengthening the Coordination of Anti-Corruption Policies and Practices in Turkey”

TYSAP

TR2009/0136.06

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Abbreviations

Board	The Board of Treasury Controllers
PP	Public Prosecutors
AC	Anti-corruption
BRSA	The Banking Regulation and Supervision Agency
CFCU	The Central Finance and Contracts Unit
CoE	Council of Europe
CPI	Corruption Perception Index
DGI	Directorate General of Human Rights and Rule of Law of Council of Europe
EC	European Commission
EU	European Union
EUD	The European Union Delegation to Turkey
FIMS	The Finance System of CoE
GRECO	Council of Europe's Group of States against Corruption
GET	GRECO Evaluation Team
IPA	The Instrument for Pre-Accession Assistance
LPO	Local Project Officer
LTA	Long-term Advisor
MASAK	Financial Intelligence Unit (Financial Crimes Investigation Board)
MIPD	Multi-annual Indicative Planning Document
MoEU	Ministry of Environment and Urbanisation
MoF	Ministry of Finance
MoI	Ministry of Interior
MONEYVAL	Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism

NGO	Non-Governmental Organisation
OECD	Organisation for Economic Cooperation and Development
OLAF	European Anti-Fraud Office
PIU	Project Implementation Unit
PMIB	Prime Ministry Inspection Board
SC	Steering Committee
SOE	State-Owned Enterprise
SPO	Senior Project Officer
TCA	Turkish Court of Accounts
ToT	Training of Trainers
TYEC	Project on Ethics for the Prevention of Corruption in Turkey 2006-2009
TYEC 2	Project on Ethics for the Prevention of Corruption in Turkey 2012-2014
TYSAP	Project on Strengthening Anti-Corruption Policies and Practices in Turkey
UN	United Nations
UNDP	United Nations Development Programme
UNCAC	United Nations Convention against Corruption
SIGMA	Support for Improvement in Governance and Management (A joint initiative of the OECD and the EU, principally financed by the EU)
WG	Working group

1. DESCRIPTION

1.1 Contact person

Ivan Koedjиков, Head of Action against Crime Department, DG I – Human Rights and Rule of Law, Council of Europe.

1.2 Title of the Action

Strengthening the Coordination of Anti-Corruption Policies and Practices in Turkey (TYSAP)

1.3 Beneficiary Country

Turkey

1.4 Donor Organisation and Contracting Authority

The European Union is the donor organisation for the Project and the Prime Ministry Under secretariat of Treasury – Central Finance and Contracts Unit is the contracting authority.

1.5 Beneficiary Institutions

The main project beneficiary is the Prime Ministry Inspection Board. Co-beneficiaries are Ministry of the Interior Inspection Board; Ministry of Finance Tax Audit Board; Ministry of Transportation, Maritime Affairs and Communication Directorate of Inspection Services; Ministry of Food, Agriculture, and Livestock, Directorate of Guidance and Inspection; Ministry of Labour and Social Security, Labour Inspection Board; Undersecretary of Treasury Controllers; Sworn In Baking Auditors, Ministry of Justice Directorate of International Law and Foreign Relations; Ministry of Environment and Urbanization, Directorate of Guidance and Inspection.

1.6 Implementing Organisation

The Council of Europe is responsible for the implementation of the Project and the use of the Project funds under the European Community agreement with the Central Finance and Contracts Unit. Within the General Secretariat of the Council of Europe in Strasbourg, Directorate General I - Human Rights and Rule of Law, the Directorate of Information Society and Action against Crime, and more specifically the Action against Crime Department, Economic Crime Cooperation Unit is the responsible structure for the overall management and supervision of the Project. A Project Team based in Ankara supported by the Economic Crime Cooperation Unit in the Headquarters of Council of Europe is in charge of day to day implementation of the Project.

1.7 Start Date and End Date of the Reporting Period

29 December 2012 – 28 December 2013

1.8 Contract Number

TR2009/0136.06

2. EXECUTIVE SUMMARY

This report summarizes project activities implemented throughout the 12 months following the signature of the European Union Contribution Agreement TR 2009/0136.06-01/001 (28 December 2012) for the implementation of the action “Strengthening the Coordination of Anti-Corruption Policies and Practices in Turkey”, i.e., the TYSAP Project. The Reporting period spans from 29 December 2012 to 28 December 2013.

During the inception phase the Council of Europe completed the recruitment of the project team, both in the field and in the headquarters by 15 April 2013. The selection of the Long-Term Advisor (LTA) was finalised at the end of May 2013.

The Start-up activities of the project (design of the Workplan as per logical framework of the project’s Description of Action) took place in Ankara during the month of April 2013 and included bilateral and multilateral meetings between the CoE team, representatives of the project’s main beneficiary and co-beneficiary institutions, the CFCU and the EUD. Discussions focused on draft Workplan and Calendar of Activities, project implementation, planning of the first Steering Committee Meeting and the Launching Conference. The Steering Committee met for the first time on 5 June 2013 and agreed with the proposed Workplan and Calendar of Activities. Both documents were adopted on 12 June 2013, when the TYSAP project was officially launched (approximately six months after its commencement). The Launching Conference which took place on 12 June 2013 was attended by high-level officials representing all stakeholders.

In July 2013, the selected LTA unexpectedly decided to disengage from the contract thus from the project. The CoE undertook mitigating measures to substitute the LTA with additional short-term consultants. At the same time the main beneficiary requested to amend the Description of Action (DoA) by removing wording which indicates the position of LTA and re-allocating its budget for a new IT procurement suggesting herein a new component as an additional expected result, originally envisaged to be carried out by the Contracting Authority itself (and not the Council of Europe as per contract). The CoE agreed to the idea only in principle and expressed its readiness to engage in further negotiations as far as concern any DoA or contractual amendment that such new component would entail.

Several deliverables, including setting up of working groups, technical papers and two workshops were delivered between July and December 2013, constituting to a total of nine activities during the first year of the project.

As of October 2013 all activities were put on hold following a decision of an Ad-hoc Meeting of 2 October 2013, attended by PMIB, other co-beneficiaries, CFCU and EUD. Following the meeting the CoE was informed that the beneficiaries would agree to resume implementation of activities only after a formal agreement would be reached on the revision of the Project Fiche, DoA and Budget of Action, related to exclusion of the position of LTA. This *status quo* remained until 6 November 2013 when the 2nd Steering Committee meeting was convened. During this SC meeting, agreement on the issue of LTA, list of international Short-Term Consultants and revision of the Project Fiche for the purpose of introducing a new IT procurement component worth of 50,000.00 EUR was reached between all parties. As agreed, a revised project fiche reflecting both issues (exclusion of LTA provision and

inclusion of software component) would be officially submitted to CoE requiring subsequent changes into the DoA and re-allocation of budget and thus amendment to the contract. Until the date of this report, CoE has not yet received any officially revised project fiche.

All the above events contributed to substantial delays in the implementation of the project. However in November 2013 preparations for substantive activities were re-launched and several working group meetings were held in December 2013. It is expected that the activities will be implemented according to the revised Workplan as far as concerns the remaining period of the project.

3. CURRENT STATUS: COUNTRY SITUATION

3.1 International Monitoring of Progress achieved in Anti-corruption policy

According to Transparency International's 2013 Global Corruption Barometer, a majority of people in Turkey feel that their Government's efforts to fight corruption are effective. When asked how they perceived the change in the level of corruption in Turkey over the past two years, 54 % said that corruption increased while 29% said that corruption decreased. In comparison, the Global Corruption Barometer released in 2010/2011 indicated that 57% of the people in Turkey felt that the level of corruption had increased since 2007 and 26% felt that corruption level had decreased over the same period. There has thus been a slight improvement in people's perceptions of the corruption level in Turkey and the way the Government has been tackling this problem.

The OECD Working Group on Bribery started a third phase evaluation of progress made by State Parties with respect to compliance with the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and related OECD Recommendations. Turkey is expected to be evaluated in March 2014. The evaluation process will concentrate on weaknesses identified in Phase 2, issues raised by changes in domestic legislative or institutional frameworks; enforcement efforts and results as well as other Group-wide, cross-cutting issues, such as corporate liability and mutual legal assistance. Recommendations to Turkey issued by the OECD in 2012 included the full implementation of the National Anti-Corruption Strategy including through the allocation of the necessary resources, and the revision of the legislation on immunities and privileges of top officials.

The latest assessment carried out by the G-20 Anti-Corruption Working Group (ACWG) in 2013 commended Turkey for the enactment of the Ombudsman law in June 2012 and the amendment of its criminal code (articles 252, 254 and 255) in July 2012 to extend the scope of prosecution of domestic and foreign bribery cases. The ACWG is expected to prepare its third monitoring report at the end of 2013.

The European Commission's 2013 Progress Report on Turkey released on October 16, 2013 provides for most of the updates on the country context mentioned in this report.

3.2 Political and Legal Reforms

Drafting a new constitution is one of the top items on the national agenda. A new Constitution would provide the Turkish Government with a significant opportunity to address the need for more transparent and accountable administrative structures.

The President of The Republic of Turkey continues to emphasise the need to pursue political reforms in accordance with Turkey's perspectives for EU accession. However, according to recent reports there has been no progress on alignment with European standards of laws on the closure of political parties or on the financing of political parties and election campaigns.

The High Council of Judges and Prosecutors continues the implementation of its 2012-16 strategic plan improving the transparency of its decisions, and promoting the independence, impartiality and efficiency of the Turkish judiciary. Although the adoption of the 4th Judicial Reform Package reflects some progress made in the area of the judiciary, it is important to note that the length of sentences for bid rigging has been reduced: from 5-12 years to 3-7 years. If no public harm is done to a public institution, the penalty is further reduced to 1-3 years. The EC 2013 Progress Report reminds that Turkey needs to ensure dissuasive penalties in all corruption cases.

3.3 Government Accountability and Civil Society Participation

No progress was made in improving parliament's capacity to monitor performance and audit public expenditure. Concerns remain as regards the persisting parliamentary immunity in corruption cases.

The Turkish Court of Accounts (TCA) Law adopted in July 2012 was amended in a way that is perceived by the EU as weakening the TCA's legal mandate and working procedures, including parliamentary oversight. In December 2012, this amendment was repealed by the Constitutional Court and a new draft law was submitted to parliament in April 2013. The 2013 European Commission Progress Report on Turkey indicated that although the new law mandates the TCA to carry out all types of government auditing, performance audits do not seem to be carried out, proposals for amending the TCA Law raise serious concerns about the independence and effectiveness of TCA audit and control. The EC finds the internal audit system ineffective and subject to confusion between the objectives, roles and responsibilities of internal audit and inspectorate bodies.

The Ombudsman Institution became operational in April 2013. Discussions are being held on draft amendments to grant the Ombudsman the right of own initiative and of conducting on-the-spot checks, and to provide for parliamentary follow-up of his recommendations.

No progress was recorded in expanding consultations with civil society in law-making.

3.4 Implementation of the National Anti-Corruption Strategy and Action Plan (2010-2014)

The implementation of the National Anti-Corruption Strategy and Action Plan continues. In their report to the Ministerial Committee, working groups that were specifically created for implementation of the Strategy and Action Plan, shared policy suggestions including the idea of conducting annual country-wide corruption perception surveys and establishing comprehensive tracking of data on corruption. It appears that civil society was consulted in a limited and ad hoc manner. The EC Progress Report indicates that the anti-corruption agenda would benefit from greater civil society engagement and greater political will for targets to be achieved and a track record of investigations, indictments and convictions to be established.

Following up on GRECO recommendations, the financing of political parties still needs to be addressed, including provisions on prohibited funding sources, donation ceilings, and obligations on candidates to disclose assets and submit financial information during a campaign.

According to the European Commission's Turkey 2013 Progress Report¹, the legal mandate of the PMIB in the area of anti-corruption and the institutional framework for developing policy and monitoring its implementation needs to be strengthened. The Prime Ministry Inspection Board provides technical and secretarial support for the implementation of the Strategy and there is no institution permanently tasked with anticorruption policy development and implementation. The EC Progress Report underlines continued and constructive cooperation between the PMIB and the European Commission on suspected fraud cases. In order to increase the independence of the Anti-Fraud Coordination Service (AFCOS), the PMIB was granted authority to launch investigations on EU funds.

Concerning corruption data, Turkish authorities collect statistics on court decisions in corruption cases as well as figures for bribery, embezzlement, extortion and misuse of power. For these four types of offence, there were 3 902 convictions, 15 265 acquittals and 69 arrests in 2012 according to the latest EC Progress Report. The policy suggestion to establish comprehensive tracking of data on investigation, indictment and conviction is of utmost importance and calls for further efforts in improving data collection and analysis.

3.5 Fight against Money Laundering

In February 2013, the Financial Action Task Force (FATF), the global standard setting body for anti-money laundering and combating the financing of terrorism, had warned Turkey that it would suspend its membership unless Turkey complies with FATF standards for combating money laundering and terrorist financing by late February. On 15 February 2013, Turkey adopted the Law on the Prevention of Financing of Terrorism and in May 2013, a relevant implementing regulation. The FATF welcomed this step which improved the country's compliance with the international standards. However, it has noted that "certain concerns remain, and Turkey should take further steps to implement an adequate legal framework for identifying and freezing terrorist assets under UNSCRs 1267 and 1373.

¹ Turkey 2013 Progress Report accompanying the document Communication from the Commission to the European Parliament and the Council 'Enlargement Strategy and Main Challenges 2013-2014', COM(2013)700 final.
http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/brochures/turkey_2013.pdf

Turkey should also continue to ensure that terrorist financing has been adequately criminalised". The FATF encouraged Turkey to address the remaining strategic deficiencies.²

With respect to Turkey's signatory status to other Money Laundering Conventions, Turkey has not yet ratified the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism.

4 ACTIVITIES AND BENCHMARK FULFILLMENT

4.1 Summary of Implemented Activities

Since the start of the implementation of the project **eleven actions** out of **twenty one**, as initially envisaged by the Workplan, were initiated and only **nine of them implemented**. The activities completed to date only partially contributed to achieving project's expected results. Under the Expected Result No.1 (The current legislative framework covering investigations, information sharing, anti-corruption strategies and coordination of investigations is analysed and compared with the requirements of international conventions. Based on the results, an investigation guide and reporting standards are developed), some progress was made towards the setting up of reporting standards. As for the Expected Result No. 2 (Data regarding investigations of corruption cases is gathered and analysed, and a corruption map of risky areas is produced), some progress was made towards the training of inspectors on developing sector-related anti-corruption strategies as well as corruption risk analysis. No progress has been made under Expected Result 3 (Inspectors are trained on developing sector specific anti-corruption strategies, coordinating corruption investigations, modern investigation, reporting techniques, and information sharing).

Key actions in the reporting period were:

- Completion of a workshop on Reporting Standards;
- Completion of a workshop on Corruption Risk Analysis and Sector-related Anti-Corruption Strategies;
- Adapting for the project purposes, translation into Turkish and dissemination of the CoE's Handbook on Designing and Implementing Anti-Corruption Policies for Different Sectors;
- Preparation of the draft Technical Paper on "Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information Sharing";
- Preparation of the draft Technical Paper on "Turkish Law and International Conventions: Coverage of GRECO, OECD, and UNCAC-Monitoring";
- Organisation of working group meetings that allowed experts, representatives of project beneficiaries to exchange experience and information on reporting standards;
- Organisation of first working group meeting on review and analysis of international and EU good practices;

² FATF Public Statement, 18 October 2013 - <http://www.fatf-gafi.org/media/fatf/documents/statements/18-October-2013.pdf>

- Organisation of first working group meeting on review of national legislative framework regulating the investigation, administrative inquiries and information sharing;
- Organisation of first working group meeting on compliance of domestic regulations with relevant international Conventions.

With regard to compliance with the Calendar of Activities embedded in the Workplan, activities planned between June and September 2013 were delayed due to a general slowing down in the pace of work over the summer and the absence of a Long-term Advisor. Moreover, the religious holidays between July and August 2013 and the unavailability of the key co-beneficiary, Ministry of Justice, to start work on Activity 1 (Analysis of national legislative framework regulating administrative inquiries and criminal investigation) throughout the same period further contributed to delays. Nonetheless, two working group meetings were held during the summer period. The Council of Europe's international experts prepared three draft Technical Papers between June and September 2013, which were translated into Turkish. In September 2013 the TPs were shared with the PMIB, project co-beneficiaries and working group members for review and discussion.

Two workshops were held in September 2013, one on Issues of Corruption Risk Analysis, and Development of sector specific anti-corruption strategies and another on Reporting Standards. Third workshop on International Standards and Regulations on Corruption Investigations was postponed and subsequently scheduled for January 2014. Instead a bilateral meeting between PMIB and the relevant CoE experts was held in September 2013 to discuss the draft TP "Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information Sharing".

The project team became operational in mid-April 2013. Implementation started immediately after the project team was recruited. Consequently, all activities described below were carried out between April and December 2013 even though the reporting period spans from 29 December 2012 to 28 December 2013.

Activities in the Inception Phase

Description of Activity	Status
Recruitment of the Project Team (Strasbourg and Ankara): Local Senior Project Officer (Ankara – 100% time) : Recruited and Operational Local Project Assistant (Ankara – 100% time): Recruited and Operational Senior Project Officer (Strasbourg – 50%): Recruited and Operational Project Assistant (Strasbourg – 50%): Recruited and Operational	Completed
Engagement of Long-Term Advisor Engagement of 5 international Experts for the period of the project's time line	Completed. However, the LTA resigned for personal reasons in July 2013.
Allocation and set up of the Project Office	Completed
Start-up Activities (18-19 April 2013): Introduction of the project to	Completed

counterpart/beneficiary institutions	
Confirmation of Steering Committee Members by Turkish Authorities	Completed
Steering Committee Meeting (5 June 2013): Discussions of draft Workplan and calendar, Announcement of composition of working groups, preparations for the project's Launching Conference)	Completed
Launching Conference (12 June 2013)	Completed

Workplan Activities

Expected Result 1: The current legislative framework covering Investigations, Information-sharing, anti-corruption strategies and coordination of investigations is analysed and compared with the requirements of international Conventions. Based on the results, an investigation guide, and reporting standards are developed.

Activity 1 The national legislative and organisational framework regulating administrative inquiries and criminal investigations, their coordination (i.e., with law enforcement agencies), information-sharing, intelligence and the implementation of the framework are analysed, reports and legislative proposals (if necessary) are prepared via working groups composed of academicians, public officials and other experts. The findings of the reports are discussed.	
Action 1.1	Setting of working groups composed of academicians, public officials and other experts to initiate the review of the national legislative framework regulating the investigation and administrative inquiries procedures and coordination of information share.
	<p>The Prime Ministry Inspection Board (PMIB) submitted a preliminary list of working group members on 19 June 2013. The list included names of co-beneficiary representatives that were selected to participate in the various working groups but did not include any civil society representatives³. Subsequently the list was revised and participation of civil society representatives, including experts from private sector and NGOs is expected.</p> <p>First Working Group meeting has been held in Ankara on 23 December 2013. The main reason for initial delay in holding a WG meeting was the unavailability of the Ministry of Justice representatives during the judicial recess that ended on August 31. The Ministry of Justice's role is essential given its extensive knowledge of the national legislative framework and responsibility for preparing any legislative proposal that may be identified as needed. Further delay were caused by putting on hold of all project activities by the decision of the project's beneficiary</p>

³ The lists of all the working groups included academics from Public Universities that cannot be considered as civil society.

	<p>(PMIB) through the written communication to Council of Europe in October 2013 upon the conditionality of until an agreement on the exclusion of the LTA position would be reached through.</p> <p>First WG meeting was held on 23 December 2013. At the same time, in December 2013 a national STC, nominated by the PMIB was recruited and commenced work to draft a Technical Paper based on the feedback provided by the WG members. The second WG meeting and the subsequent workshop, with participation of international STCs are planned for the second half of January 2014. Initial findings of the WG are expected to be presented at the workshop.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Composition of Working Group; • Agenda of the Working Group Meetings; • List of Legislation to be analysed.
Progress	<p>Minor progress:</p> <ul style="list-style-type: none"> • Working Group set-up; • First WG meetings held on 23 December 2013; • List of legislation to be analysed not prepared.
<p><u>Activity 2</u> International, particularly EU, standards and regulations on corruption investigations, coordination/cooperation and information sharing are reviewed and a report is prepared by a team of experts and discussed.</p>	
Action 2.1	<p>Setting up of working groups composed of international and national experts in order to carry out review and analysis of international and EU good practices. Prepare an Assessment and Analysis Report by the team of experts.</p>
	<p>The preliminary list of WG members submitted by PMIB in June 2013. The list was revised in November 2013.</p> <p>During July-August 2013 one international STC and one expert from the CoE secretariat prepared a Draft Technical Paper "Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information Sharing". The document was submitted to the PMIB in first half of September 2013 and subsequently discussed between the main beneficiary and the international consultants. The latter updated their first draft so as to reflect to changes requested by PMIB. The updated version was shared again with the PMIB to be distributed among the WG members for discussion before the Workshop under Activity 2.2 (on corruption investigation standards and regulations) would be held. A request from the PMIB for further revision was received to address all the comments of the beneficiaries and possibility of producing practical case studies as supplementary materials for the TP were discussed at a Working Group meeting.</p>

	<p>In second half of December 2013 a national STC, nominated by the PMIB was recruited. First WG meeting was held on 23 December 2013.</p> <p>The main beneficiary and co-beneficiaries are expected to provide their further contributions to the draft TP in January 2014. International STCs are ready and on standby to present the finding of the draft TP at the workshop which is expected to be held in the second half of January 2014. Following the workshop and feedback from the WG members, the review of the Draft TP is expected to be prepared.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Composition of Working Group; • Agenda of the Working Group Meetings; • Technical Paper on Assessment/Analysis (Compilation of Good Practices): International and EU good practices on corruption Investigations, coordination, information-sharing and identification of areas for improvement in current Turkish system.
Progress	<p>Some Progress:</p> <ul style="list-style-type: none"> • Working group set up; • Working group meeting held on 23 December 2013; • Draft Technical Paper: "Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information-Sharing" delivered.
Action 2.2	Presentation of the Assessment and Analysis Report at a Workshop on standards and regulations as a Compilation of Good Practices.
	<p>A workshop to present and discuss the first version of the Technical Paper "Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information-Sharing" was scheduled on 16 September 2014.</p> <p>The event was postponed at the last minute at the request of PMIB in order to allow additional time to review the draft TP and discuss it with the Council of Europe experts (authors) before sharing it with WG members. Instead a meeting of PMIB with the international STCs took place in Ankara to discuss the draft TP. Subsequently, the workshop kept being postponed and finally was planned to take place in January 2014.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Workshop Agenda; • Workshop materials; • Workshop List of participants.
Progress	<p>This activity kept being postponed and finally was scheduled to take place in January 2014.</p>

Activity 3

Compliance of the domestic regulation with Council of Europe Criminal Law and Civil Law Conventions, the OECD Convention on Combating Bribery of Foreign Officials and the UN-Convention against Corruption is analysed and gap analysis reports are prepared by a team of national and international experts.

Action 3.1	Assessing specific areas of the conventions not covered in sufficient detail by previous monitoring, reviews, etc.
	A draft Technical Paper on “Turkish Law and International Conventions: Coverage of GRECO, OECD, and UNCAC-Monitoring” was prepared by an international STC and shared with the PMIB for review in the first half of October 2013. As of 28 December 2013 no feedback has been received from the beneficiaries.
Objectively verifiable indicators	Technical paper: List of areas common to international Conventions and Assessment of areas insufficiently covered by previous monitoring.
Progress	A draft TP completed by an international STC. Feedback is now expected from the PMIB and other co-beneficiaries in order to proceed with the Gap Analysis Report.
Action 3.2	Setting up of working groups composed of international and national experts in order to ensure compliance of the domestic regulation with Council of Europe, OECD and UN-Conventions; a gap analysis report is prepared by the team of national and international experts.
	<p>The preliminary list of WG members submitted by PMIB in June 2013 included names of co-beneficiary representatives for this working group. Subsequently the list was revised and participation of civil society representatives is expected.</p> <p>First Working Group meeting was held on 25 December 2013.</p> <p>A national STC has been recruited to review the draft TP in light of the comment of the WG members. A second meeting of the WG is expected to be held in second half of January 2014.</p> <p>Once the WG members review the TP and provide comments the recruited team of national and international STCs will be ready to proceed with preparation of Gap Analysis/Compliance Report.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Composition of Working Group; • Agenda of the Working Group Meetings; • Attendance List; • Technical Paper– Gap Analysis/Compliance Report on Turkish

	regulations and international conventions.
Progress	Some progress: <ul style="list-style-type: none"> • Working Group set up; • First WG meeting held on 25 December 2013; • Tentative agenda of future WG meetings prepared.
<u>Activity 4</u> Based on the findings of the compliance report, policy reports that address possible measures that can be taken to fulfil the requirements of the conventions are prepared by working groups composed of representatives from relevant institutions.	
Action 4.1	Setting up of working groups composed of experts and representatives of relevant institutions.
	The preliminary list of WG members submitted by the PMIB in June 2013 includes names of co-beneficiary representatives. Subsequently the list was revised and participation of civil society representatives is expected.
Objectively verifiable indicators	<ul style="list-style-type: none"> • Composition of Working Group; • Agenda of the Working Group Meetings; • Attendance List.
Progress	Some progress: <ul style="list-style-type: none"> • Working Group set up; • No WG meeting held as of 28 December 2013.
<u>Activity 6</u> Reporting standards are set out by a working group and disseminated to all inspectors, auditors and controllers through a conference.	
Action 6.1	Setting up of working groups composed of experts and representatives of relevant institutions.
	In July 2013, a joint first meeting for members of working groups 6 (Reporting Standards) and 8 (Identification of Corruption Risks and Development of Anti-corruption Strategies) was held. In total the working group on Reporting Standards met 3 times between July 2013 and end of August 2013, and prepared a draft document on reporting standards to be used during the relevant workshop.
Objectively verifiable indicators	<ul style="list-style-type: none"> • Composition of Working Group; • Agenda of the Working Group Meetings.
Progress	Good progress: <ul style="list-style-type: none"> • Working Group set up; • Regular meetings held; • Required pre-workshop activities completed.

Action 6.2	Organisation of 1 workshop on Reporting standards.
	<p>A two-day workshop on Reporting Standards was held on 18-19 September 2013. The workshop gathered experts and representatives of relevant public, private and civil society institutions to discuss national and international best practices in reporting standards, to agree on how Reporting Standards currently in use in Turkey can be improved, and set out the standards to be disseminated to all inspectors, auditors and controllers during the conference planned under activity 6.4 (Conference on Reporting Standards). The CoE provided an expert from the Secretariat.</p> <p>Feedback from workshop participants was collected at the end of the event. Post-workshop materials including a roadmap outlining activities to come after the workshop were shared with participants.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Workshop agenda; • Participants List; • Workshop materials; Feedback Forms, Summary of feedback forms.
Progress	<p>Activity completed:</p> <ul style="list-style-type: none"> • Workshop held; • Workshop materials prepared and distributed; • Feedback forms prepared.
Action 6.3	Finalization of "Reporting Standards"; review and compilation by representatives of beneficiaries and international experts.
	<p>A roadmap for future actions was prepared by the PMIB and shared with participants of the Workshop on Reporting Standards to inform them about the next steps planned and deadlines foreseen for activity on Reporting Standards. According to the roadmap, the draft document on Reporting Standards was expected to be finalised by Working Group members by mid-October 2013, translated into English and shared with the international expert for input. The revised version of the Reporting Standards was to be disseminated via a conference supposed to be held by mid-November 2013. However due to the putting on hold of activities by the main beneficiary in October 2013 finalization of the reporting standards and a Conference on Reporting Standards (Action 6.4) were postponed and rescheduled for first half of 2014.</p>
Objectively verifiable indicators	Technical Paper: Review and Compilation of Best Practices in Reporting Standards.

Progress	No progress has been achieved with regards to the roadmap made since the workshop.

Expected Result 2: Data regarding investigations of corruption cases is gathered and analysed, and corruption map of risky areas are produced.

Activity 8 The maps of corruption prone areas are prepared and appropriate strategies to tackle those risk areas are prepared via working groups composed of members from government agencies, private sector and NGOs.	
Action 8.1	Selection of minimum 10 inspectors from relevant institutions in conjunction with PMIB for participating into the “Identification of Corruption Risks and Development of anti-corruption Strategies”. This activity will serve for preparation of corruption prone areas’ map (risk assessment).
	<p>PMIB informed CoE that the inspectors identified as members of the working group on the Mapping of Corruption-prone Areas are the ones who were selected for participation in the “Identification of Corruption Risks and Development of Anti-Corruption Strategies”. As a result, the list consists of more than 10 inspectors representing all relevant institutions.</p> <p>The WG members attended a first introductory meeting organised by the PMIB in July to provide information about expectations from working groups 6 (Reporting Standards) and 8 (Identification of Corruption Risks and Development of Anti-corruption Strategies). The WG 8 held two additional meetings between the end of July and early September 2013, just days before the workshop under Activity 8.2.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Participant list of the Working Group on Corruption Risk, Anti-Corruption Strategies and Mapping of Corruption-Prone areas. • Minutes of meetings.
Progress	<p>Good progress:</p> <ul style="list-style-type: none"> • List of WG members • ToRs for WG • 3 WG meetings, participants lists, minutes of the meetings
Action 8.2	Organisation of 2 workshops 1) On corruption risks analysis and guidelines on how to carry them;

	2) On sector related anti-corruption strategies addressing issues of and their implementation.
	<p>Inspectors representing the project main beneficiary and co-beneficiary Ministries were trained on how to conduct corruption risk analysis, develop and implement sector specific anti-corruption strategies during a two-day workshop held on 17-18 September 2013. This workshop, led by an international expert, included a number of presentations and hands-on exercises to allow trainees to get an overview and be able to critically reflect on all the steps included in the design and implementation process.</p> <p>Participants to the workshop were handed out the English version of a handbook on “Designing and Implementing Anti-corruption Policies for Different Sectors”. The handbook was translated into Turkish and shared with the beneficiaries. Feedback from workshop participants was collected at the end of the event.</p>
Objectively verifiable indicators	<ul style="list-style-type: none"> • Workshop agenda; • Participants List; • Workshop materials; • Feedback Forms.
Progress	<p>Good progress:</p> <ul style="list-style-type: none"> • Workshop agenda; • Participants List; • Workshop materials distributed: Handbook on “Designing and Implementing Anti-corruption Policies for Different Sectors”; • Feedback Forms.

Other activities

Description of Activity	Status
<p>Second Steering Committee Meeting (6 November 2013)</p> <p>The following agreements were reached between all the stakeholders:</p> <ul style="list-style-type: none"> • Revise the workplan in order to reflect and catch up with delays; • Updated list of the proposed international STCs approved; • List of local STCs to be submitted by the PMIB in the nearest future; • Revised Inception Report presented and approved; • In principle position of the LTA to be removed from the DoA subject of a revised project fiche which would lead the changes in 	Completed

<p>the DoA;</p> <ul style="list-style-type: none"> • In principle new IT procurement component to be added to the DoA and budget through reallocation of funds subject of a revised project fiche which would lead the changes to DoA and budget revision; • Project Fiche to be submitted officially which would lead a subsequent revision of the DoA and Budget of Action. <p>Ad-hoc Meeting attended by PMIB, co-beneficiaries, CFCU and EUD (2 October 2013)</p> <p>On 25 September 2013 the PMIB called an extraordinary Steering Committee Meeting to be held on 2 October 2013 in Ankara. Due to the short notice, the CoE was not able to arrange full-fledged participation and proposed to set a later date for the SC meeting. The PMIB, other co-beneficiaries, the CFCU and the EUD met on 2 October 2013 and it was agreed to put on hold activities until agreement would be reached on how to continue the project implementation without an LTA. Subsequently the CoE was informed about the decisions of the beneficiaries reached at the Ad-hoc Meeting.</p>	
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4.2 Gender Representation in Project Activities

Name of activity	Number of participants	Number of Female participants	Percentage of female participation
Launching Conference (12 June 2013)	138	19	13,768%
1 st Steering Committee Meeting (5 June 2013)	20	6	30%
WG Meeting – Act. 8 (25 July 2013)	22	5	22,72%
WG Meeting – Act. 6 (26 July 2013)	11	2	18,18%
WG Meeting – Act. 6 (21 August 2013)	10	1	10%
WG Meeting – Act. 6 (28 August 2013)	10	2	20%
Workshop – Act. 8.2 (17 September 2013)	30	5	16,6%
Workshop – Act. 8.2 (18 September 2013)	14	5	35,71%
Workshop – Act. 6.2 (18 September 2013)	18	3	16,6%
Workshop – Act. 6.2 (19 September 2013)	21	3	14,28%
2 nd Steering Committee (6 November 2013)	25	6	24%
TOTAL	319	57	17,87 %

4.3 Benchmark Fulfilment

This part of the report provides overview of the progress in light of achieving the expected results of the project for its first of half of implementation period.

The project has faced considerably delays in implementation process related to the departure of the selected Long Term Advisor, reaching agreement with the beneficiaries on selection of international and local Short-Term Consultants, need for introduction of the new project component related to IT procurement, limited availability of beneficiaries in the months of July-August 2013 and putting on hold of activities during October-November 2013. Consequently fulfilment of benchmarks towards achieving expected results has been slow.

Expected Result 1 (The current legislative framework covering investigations, information sharing, anti-corruption strategies and coordination of investigations is analysed and

compared with the requirements of international conventions. Based on the results, an investigation guide and reporting standards are developed).

The drafting of a proposed information-sharing system, analysis of the national legislative framework regulating administrative inquiries and criminal investigations, and of legislative proposals to improve current coordination and information system were delayed due to the unavailability of the Ministry of Justice participation and contributions until September 2013. Complications related to identifying a national consultant suitable to the PMIB who could have been tasked with the analysis of the national legislative and organisational framework also contributed to delays. In December 2013 a national consultant was selected and a Working Group meeting was held. However due to delayed progress on the above-mentioned targets, no findings could be discussed and no workshop could be held during the reporting period.

The benchmark of having International/EU Standards on Corruption Investigations, coordination and information-sharing reviewed by a team of experts has only been partially completed. A Technical Paper "Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information Sharing" was prepared by two international experts, and was further translated into Turkish. The Working Group 2 only met on 23 December 2013. The beneficiaries requested subsequent revision of the TP through including additional case studies based on examples of corruption investigation systems of two European countries. The follow-up work and a workshop were scheduled for January - February 2014.

The Analysis of the compliance of domestic regulation with CoE Criminal Law Conventions, the OECD Convention on Bribery and the UN Convention against Corruption has commenced by preparation of the Technical Paper "Turkish Law and International Conventions: Coverage of GRECO, OECD, and UNCAC-Monitoring" which was shared with the PMIB. The relevant Working Group only met on 25 December 2015. The related gap analysis was not yet conducted as this work would require feedback from the WG on the Technical Paper and the involvement of a national consultant. The national consultant was identified only in late December 2013. The fact that agreement on the suitable date for a meeting of the working group took several months to reach and the failure to identify early on a national consultant suitable to the PMIB contributed to further delays of this activity.

No progress has been made in drafting of an Investigation Guide. The commencement of work has been rescheduled to January 2014. Despite some initial work undertaken in July – September 2013, including working group meetings and a workshop, the Reporting Standards have not yet been either finalised or disseminated to inspectors, controllers and auditors. Follow-up work is scheduled for first half of 2014.

Likewise, there has been no progress on drafting a Training Strategy on the use of the Investigation Guide. The work on the Training Strategy is scheduled to be conducted in first half of 2014.

Expected Result No. 2 (Data regarding investigations of corruption cases is gathered and analysed, and a corruption map of risky areas is produced).

Fulfilment of this Expected Result is related to identification of the required methodology and procedures for data collection, as well as creation of special software. Due to the fact that software development procurement (to be carried out by the contracting authority and not the CoE) had failed the related activities have incurred delays. Nevertheless the relevant Working Group has held two meetings and one workshop was organised.

Expected Result 3 (Inspectors are trained on developing sector specific anti-corruption strategies, coordinating corruption investigations, modern investigation, reporting techniques, and information sharing).

The activities envisaged under this Expected Result have been scheduled in the Workplan for the second year of the project implementation.

5 COOPERATION WITH OTHER STAKEHOLDERS

Communication between the CoE Project Team and the relevant state authorities on implementation of Workplan activities has been fairly good during the reporting period. However, cooperation and progress on project implementation has varied in the last few months. Issues surrounding the Long-term Advisor, short-term consultants and the procurement of IT Software have had an impact on the quality of communication but signatories have been making efforts to maintain good cooperation.

5.1 Counterpart and Beneficiaries

The level of cooperation between the CoE team, the main beneficiary and co-beneficiaries has somewhat varied during the reporting period. Although a confident assessment on this issue is premature, cooperation and responsiveness from the beneficiaries has slowed down since September 2013 when compared to the level of responsiveness in May – July 2013. Encountered difficulties and varied approach to proposed mitigating measures hindered the progress in cooperation with PMIB.

5.2 Other Third Parties

The TYSAP team has maintained constructive cooperation with the European Union Delegation and the Central Finance and Contracts Unit.

6 DIFFICULTIES ENCOUNTERED DURING IMPLEMENTATION PHASE

During the course of implementation the project encountered several difficulties which resulted in significant delays in carrying out Workplan activities. The difficulties were related to the departure of the selected Long Term Advisor, reaching agreement with the beneficiaries on selection of international and local Short-Term Consultants, need for introduction of the new project component related to IT procurement, limited availability of beneficiaries in the months of July-August 2013 and putting on hold of activities during October-November 2013.

In order to make up for the abovementioned delays, the Workplan was revised so that future project activities, given the full commitment and cooperation of the stakeholders, do not suffer from the additional delay.

6.1 Resignation of the Long – Term Advisor

As stipulated in the DoA, the selection of the LTA took place in accordance with the CoE rules, including the CoE Tender Board procedures and was completed by the end of May 2013. The PMIB, the EUD and the CFCU maintained observer status in this process.

The selected LTA took up her duties from June 2013, held bilateral meeting with the PMIB and participated in the Launching Conference on 12 June 2013. However in July 2013, the LTA resigned from the project due to personal reasons. Following the departure of the LTA, as a temporary mitigating measure, the CoE proposed to use additional STCs, as well as to expand the contributions from the CoE Secretariat and the beneficiary. At the same time given the significance of the input that the LTA was to provide (involvement in 37 actions out of a total of 39), the CoE began a formal replacement procedure to recruit a new LTA. From the beginning of this process the PMIB questioned the rationale behind opening up a new recruitment procedure as they had doubts that a suitable candidate would be found. As mentioned above the PMIB raised the issue of altogether abolishing the position of an LTA.

6.2 Selection of Short-Term Consultants

As provided in the DoA, during the inception phase the project team established an initial list of five international STCs with relevant qualifications and shared it, together with experts' Curricula Vitae with the beneficiaries. Initially no objections were raised to the list by the PMIB. Later on the PMIB raised concerns about the CoE procedures for selection of STCs, demanding from the CoE to conduct consultations prior to assigning each STC and to indicate the exact number of STCs to be used in each activity. It was explained to the beneficiary that the CoE had been drawing on expert knowledge based exclusively on professionalism and experience, and no other aspects such as country of origin, age, gender, religion, political views or sexual orientation were taken into consideration. It was also stipulated by the CoE that the input of experts for each action, according to the DoA was foreseen in specific terms of service (working) days for both local and international STCs. At the same time it was also explained to the PMIB that according to CoE procedures for the procurement of intellectual services any external influence as to the selection of a certain consultant was not allowed.

The beneficiary institutions were also requested to provide a list of recommended local experts to be considered as potential national STCs. Names of up to 17 national experts were provided by the main beneficiary and co-beneficiary institutions, however coming to the agreement on selection of specific experts took some time. The final list of local STCs was provided by the PMIB in November 2013, following the Steering Committee and national consultants recruited in December 2013.

6.3 IT Procurement Component

In July 2013, the CoE was informed by the PMIB and the EUD that the procurement of one lot under the IT supply component of the project, provided by the Project Fiche to be carried out by the Contracting Authority, had failed. The component envisaged procurement of IT supplies, namely Software and Website Design, as well as hardware for the IT system, needed to collect, analyse and share data. The procurement of the IT component was considered crucial by PMIB for achievement of the project's Expected Result 2 ("Data regarding investigations of corruption cases is gathered and analysed, and corruption map of risky areas are produced"). With the contracting deadline passed, the EUD advised to consider the option of transferring the item under the CoE Direct Grant, and requesting the CoE handle the IT procurement as per its own rules and procedures. The EUD informed that the process would require changing the Project Fiche. The cost of the item was estimated at approximately 50,000 EUR. However, at the time, it was unclear whether the new item would be covered under the project funds already assigned to the CoE or an additional grant would be given to the CoE for this specific component.

As a courtesy to the beneficiaries, the CoE agreed to handle the procurement and requested that the PMIB would start to draft changes to the Project Fiche while proceeding with activities without incurring any further delays. The PMIB shared the Technical Specifications for the software. The CoE also informed the stakeholders that the procurement procedures would be initiated once the change to the DoA and the Budget of the Action would be signed.

6.4 Putting on Hold of Activities

On 25 September 2013 the PMIB called an extraordinary Steering Committee Meeting to be held on 2 October 2013 in Ankara. The main beneficiary questioned CoE's decision to proceed with the selection procedure for a new Long-Term Advisor. Due to the short notice, the CoE was not able to arrange full-fledged participation and proposed to set a later date for the SC meeting.

The beneficiaries, the CFCU and the EUD met on 2 October 2013 and the subsequent letter with summary of the issues raised and the minutes of the meeting (in Turkish) were sent by the CFCU to the CoE on 10 October 2013. The letter outlined the issues of concern for the beneficiaries including the future of LTA position and assignment of Short-Term Consultants. The CoE was also informed that the PMIB, following the meeting of 2 October 2013, was putting on hold all the activities until an agreement would be reached on the aforementioned issues.

A detailed response letter was sent by the CoE to the CFCU on 24 October 2014 and following e-mail communications with the PMIB a Steering Committee Meeting was scheduled on 6 November 2013.

6.5 Solutions Agreed and Follow-up Steps

The Second Steering Committee Meeting of the TYSAP Project was held on 6 November 2013. Failure to proceed with activities as planned in the revised Workplan and Calendar of Activities; issues concerning short-term and Long-Term experts, the possible introduction of a new IT procurement component were discussed.

The CoE presented an updated list of international short-term consultants as well as a 6 month Activity Plan covering November 2013 to April 2014, revised once again as a consequence of the substantial delays in project implementation.

It was agreed that the position of LTA would be abolished and consequently the tasks initially envisaged for an LTA would be carried out through engagement of additional STCs, increased input from the CoE Secretariat and the beneficiary institutions. The revised list of proposed STCs was approved and from their part the PMIB agreed to send the list of national STCs to be assigned to specific Workplan activities.

It was also decided that the PMIB would initiate changes in the Project Fiche, share them with the CoE for comments and submit the revised document to the EU Ministry for further procedures. The CoE expressed its readiness to engage in further negotiations as far as concern any DoA or contractual amendment for adding IT procurement component as additional expected result of the project. It was also agreed that the procurement would be carried out by the CoE based on its internal rules and the cost of the IT component of 50,000 EUR would be covered from the TYSAP project funds that were initially envisaged for the LTA.

The EUD reminded that activities should continue throughout the process of Project Fiche change.

Following the SC Meeting, in the beginning of December 2013 the revised Workplan was agreed through communication between the CoE and the beneficiary. Preparations for the draft Project Fiche amendments were completed by the PMIB in consultation with the CoE and submitted to the EU Ministry on 18 December 2013.

As of 28 December 2013, project implementation has been proceeding with 2 Working Group meetings held on 23 and 25 December, two national STCs contracted and a workshop with international and local STCs planned for late January 2014.

7 PROJECT ACHIEVEMENTS, RISKS AND CONCLUSIONS

7.1 Achievements

Project implementation has achieved minor progress towards the targeted results by the timeline indicated in the Workplan.

Some progress has been made towards the identification of Reporting Standards and the training on Corruption risks and the development of sector-related anti-corruption strategies. Even though technical papers envisaged under Activity 2 (TP “Corruption Investigations by Inspection Bodies: International Standards on Investigations, Including Coordination and Information Sharing”) and Activity 3 (TP “Turkish Law and International Conventions: Coverage of GRECO, OECD, and UNCAC-Monitoring”) were produced only partial progress has otherwise been achieved, particularly as regards to conducting further workshops. Very minor progress has been achieved on Activity 1 (Analysis of national

legislative framework). No Progress has been achieved on Activities 4 (Compliance of Turkish Regulations with International Conventions and Policy Recommendations), 5 (Development of Investigation Guide for Inspectors, Auditors and Controllers), and 7 (Drafting Training Strategy and training inspectors on collecting and analyzing corruption related data). Therefore, significant efforts by all the stakeholders are necessary in order to ensure proper project implementation and adequate use of TYSAP assistance.

7.2 Risks

The already incurred *significant delays* in project implementation represent a risk to the completion of all project activities by December 2014. Additional delays may not be ruled out as planning for activities depend on the availability of the beneficiaries and experts.

The *lack of a long-term advisor* at the beginning of project implementation increased the challenge of proceeding with activities as planned under the initial Workplan. Disagreements over Short-Term Consultants to be used contributed to delaying activities. Parties have agreed to proceed with alternative solutions, such as increased number of STCs, as mitigation measures.

Introduction of a new IT procurement component and its successful and timely implementation also poses a risk. The failure of the previous tenders, carried out by the contracting authority, to procure the IT software needed for the project has also factored into risks for successful achievement of activities 7 (Drafting Training Strategy and training inspectors on collecting and analyzing corruption related data) and 8 (Preparation of maps of corruption prone areas and appropriate strategies to tackle those risks). Implementation of the new IT component is dependent on Project Fiche change and then subsequent change of the DoA and Budget. Consequently it is expected that a considerable time will lapse until all the procedures are completed.

Tensions created by the aforementioned issues have affected the quality of communication between the main beneficiary and the CoE. It is in the interest of signatories to preserve good communication for successful project implementation.

Serious efforts need to be made by all the stakeholders in order to catch up with delays. Combining activities where possible may help avoid the risk of leaving some activities incomplete at the end of implementation period.

7.3 Conclusions

Throughout the reporting period some progress has been made in implementing substantive activities, however the Project has faced significant impediments and delays, which are likely to have an impact on the implementation of the remaining actions scheduled to take place until the end of the Project (December 2014).

As of 28 December 2013, the project has only partially contributed to meeting Expected Result 1 (The current legislative framework covering investigations, information sharing, anti-corruption strategies and coordination of investigations is analysed and compared with the requirements of international conventions. Based on the results, an investigation guide

and reporting standards are developed) and Expected Result 2 (Data regarding investigations of corruption cases is gathered and analysed, and a corruption map of risky areas is produced). At this stage it is too early to assess progress toward the Expected Result 3 (Inspectors are trained on developing sector specific anti-corruption strategies, coordinating corruption investigations, modern investigation, reporting techniques, and information sharing) as the activities envisaged under this ER have been scheduled in the Workplan for the second year of the project implementation.

Following agreements reached at the Second Steering Committee Meeting, it is expected that activities to will be carried out according to the revised Workplan and will be completed in 2014. Both the Workplan and the Calendar of Activities have been revised for a second time with beneficiaries and the CoE agreeing on the changes made to the initial versions. Priority Activities are 1 (Analysis of national legislative framework), 2 (International standards on corruption investigations), 3 (Gap Analysis of Turkish regulations with International Conventions), 4 (Policy Recommendations for ensuring compliance of Turkish Regulations with International Conventions) and 5 (Development of Investigation Guide for Inspectors, Auditors and Controllers). At the 2nd Steering Committee held on November 6, 2013, all parties agreed to move forward without a Long-term Advisor. Instead, signatories of the Agreement decided to increase the number of short-term consultants to be used in the project. The revised Project Fiche was submitted to the Turkish Ministry of EU Affairs mid-December 2013 for circulation to the relevant authorities as required by the procedure. Following the revision of the Project Fiche the DoA and Budget of the Project are expected be revised.

Female participation and Civil Society representation in project activities have been very low in the first year of the project implementation. The project would benefit from increased participation from both groups in remaining activities.

During the next reporting period, TYSAP will follow-up on activities such as data collection for the mapping of corruption prone areas, the compliance of Turkish regulations with the International Anti-Corruption Conventions, and focus on the analysis of the legislative framework regulating investigations, the drafting of an Investigation Guide, and on developing a sustainable training strategy on the use of the Investigation Guide. TYSAP will also organise public events to discuss the findings of the draft technical reports, brainstorm on possible policy recommendations, disseminate publications, and determine the tools to be include in the User's Guide on corruption risk identification.

8 VISIBILITY

Project news and upcoming events are reported on a section of the Council of Europe Economic Crime website (www.coe.int/corruption) under a section which is exclusively dedicated to the TYSAP project (www.coe.int/tysap). The website report on project activities and ongoing public events is updated on a regular basis. Furthermore, as the Council of Europe's main partner/counterpart in the TYSAP Project, the Prime Ministry Inspection Board has created the link to the project web address on its own webpage.

The project ensures the visibility of the EU's contribution at all stages of its activities. All reporting, printing materials and information used and disseminated acknowledge that "This project is co-financed by the European Union and the Republic of Turkey", and display the bilateral cooperation logo combining the European Union-Republic of Turkey logo per the agreed visibility rules.

Name of the contact person for the Action: Ivan Koedjikov

Signature:

Location: Strasbourg

Date report sent:

9 LIST OF ANNEXES

Annex I: Revised Workplan and Calendar of Activities (November 2013)

Annex II: Revised List of International Short-Term Consultants (November 2013)

Annex III: List of National Short-Term Consultants (November 2013)

Annex IV: List of Working Groups (November 2013)

Annex V: Agenda of the 2nd Steering Committee (6 November 2013)

Annex VI: List of participants of the 2nd Steering Committee (6 November 2013)

Annex VII: Minutes of the 2nd Steering Committee Meeting