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Inception Report

“CONSOLIDATING ETHICS IN THE PUBLIC SECTOR IN TURKEY”
TR2009/0136.05-01/001

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List of Abbreviations

CEPS	Council of Ethics for the Public Service
CFCU	Central Finance and Contracts Unit
CoE	Council of Europe
DoA	Description of Action
EU	European Union
EUD	Delegation of the European Union to Turkey
GRECO	Group of States Against Corruption
JP	Joint Programme
LTA	Long Term Advisor
NGO	Non Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PM	Prime Ministry
PMT	Project Management Team
SCM	Steering Committee Meeting
STE	Short Term Expert
TI	Transparency International
ToR	Terms of Reference
TYEC 1	Project on Ethics for the Prevention of Corruption
TYEC 2	Project on Consolidating Ethics in the Public Sector
WG	Working Group

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1 Project Synopsis

Project title	Consolidating Ethics in the Public Sector in Turkey
Project No	TR2009/0136.05-01/001
Beneficiary Country	Turkey
Beneficiary Institution	Council of Ethics for the Public Service
Project starting date	29 March 2012
Contracting Authority	Central Finance and Contracts Unit
Funding	European Union (80%), Council of Europe (10%), Turkish Authorities (10%)
Project duration	24 months (30 March 2012- 30 March 2014)
Implementing Organisation	Council of Europe Directorate General of Human Rights and Rule of Law Information Society and Action Against Crime Directorate Action Against Crime Department Economic Crime Unit
Project budget	1,310.000 Euro
Date of report	31 July 2012
Reporting period	30 March – 30 June 2012
Objective	The overall objective of TYEC2 is to contribute to the prevention of corruption in Turkey in accordance with European and other international standards.
Project Results	<ol style="list-style-type: none"> 1. Enhanced capacities of the Council of Ethics for Public Service to promote awareness of the Regulation and support the integration of ethics' principles and requirements of the Code of Ethics in the daily work of the Turkish administration. 2. Enhanced capacities of Ministries to promote the integration of ethics principles and requirements of the Code of Ethics in the daily work of the Turkish administration. 3. Embedded knowledge on ethics' principles and the Regulation in the Turkish administration and increased public and institutional awareness on these issues.
Project Activities	<ol style="list-style-type: none"> 1. The staff of the Council of Ethics for Public Service are trained and have the necessary working tools and procedures to manage, oversee and measure the dissemination and implementation of the Training Strategy. 2. At least 100 trainers from central and local government are trained and able to deliver ethics training. 3. Council of Ethics for Public Service is supported to coordinate measures to promote ethics and the Training Strategy in Turkey through establishing an Ethics Coordinating Committee 4. The development of code of conduct for state universities and professional associations is supported and the capacity of their ethics commissions is improved to train in the Code 5. Recommendations of the Research Studies (TYEC 1) in institutions previously involved are implemented 6. Ethics Commissions are supported in devising and delivering the training strategy and monitoring its implementation 7. The training strategy is implemented on ethics and materials for its application at governorate and local government levels in coordination with

	<p>the Ministry of the Interior</p> <p>8. The General Directorate of the Land Registry is supported as an 'Island of Integrity' in terms of the effectiveness of a comprehensive ethical environment as the basis for the development of a wider cross-public sector on which future prevention strategies may be based.</p> <p>9. Awareness campaigns developed for prevention of corruption in ministries, schools and universities, and the general public through dissemination of audio-visual materials and networking relations with media and NGOs are established</p>
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2 Project Context: Implementation Environment and Arrangement

2.1 Executive Summary

The Project on Consolidating Ethics in the Public Sector in Turkey (TYEC 2) is a follow-up project to TYEC 1 (Project on Ethics for the Prevention of Corruption in Turkey) which was implemented between December 2007 and November 2009. The TYEC 1 project was the first joint project of the Council of Europe (CoE) and the European Union (EU) in the field of good governance and consolidation of ethical standards in order to prevent corruption. The final report of the TYEC 1 project identified a number of issues that still need to be addressed in the field of ethics and prevention of corruption - *inter alia*, the report recommended further training of trainers in the Turkish public sector, strengthening and developing the capacities of the Ethics Commissions to implement the Regulation on the Principles of Ethics Behaviour of the Public Officials and Application Procedures and Essentials (no. 25785, 04/13/2005), and enhancing public awareness not only on the role of ethics in the public sector but also on the implementation of ethical standards in daily contacts with public officials. In other words, further action was deemed necessary to continue providing technical assistance to the Council of Ethics for the Public Service (primary beneficiary of the both projects), Ethics Commissions and specific ministries.

The TYEC 2 project also aims to support the implementation of the National Anti-Corruption Strategy ("The Strategy of Increasing Transparency and Strengthening the Anti-Corruption Efforts (2010-2014)") which was adopted by the Council of Ministers in February 2010 and which provides for the Council of Ethics a role to determine the principles of ethical behaviour for each and every profession within the public sector.

In view of that, and through its expected results, the TYEC 2 project will build upon the achievements of TYEC 1 and will seek further improvements in the field of ethics and anti-corruption taking into account relevant recommendations of the Council of Europe Group of States against Corruption (hereinafter 'GRECO') and of other international mechanisms.

This Inception Report describes the period of 3 months from the moment the project's contractual arrangement has been countersigned. It discusses the context that led to the initiation of the project and outlines the project objectives, activities and outputs. It lists the iterative process through which the project proposal passed; this included the development of a workplan which was discussed and confirmed at the Start-up meetings on 14-15 June 2012.

The Inception Report in addition presents the Workplan in detail, addressing the key issues such as: objectives; approach taken; anticipated work to be undertaken; use of long term and short term experts; risk factors and risk mitigation; and indicative timetable. It considers the delivery and management arrangements that will underpin the implementation of the project, and how the project will identify and brand itself and those of the participating institutions. It presents the current budget framework. Finally it considers overall risk and sustainability issues that may impact the effectiveness of the project objectives.

The Project Management Team and their Turkish counterparts have reviewed and assessed the project proposal against practical implementation issues. The outcome is a Workplan that reflects most, if not all, the project proposal and provides agreed deliverables to a stated timetable. The inception period allowed the Workplan to be considered by a range of stakeholders, from public and private sectors, universities and NGOs.

2.2 Country Context

There have been a number of external reviews of ethics and corruption in Turkey including the EC Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the:

- Accession Partnership with Turkey¹;
- the Council of Europe Group of States against Corruption (GRECO) report on Turkey²;
- 2007³, 2009⁴, 2010⁵ and 2011⁶ European Commission (EC) Progress Reports on Turkey; and
- Turkey's progress in implementing the OECD Anti-Bribery Convention⁷

The Council of Europe Group of States against Corruption (GRECO) in its Joint First and Second Evaluation Round Report on Turkey made two recommendations to Turkish authorities concerning the ethics – GRECO concluded that Turkish authorities shall *'provide the Ethics Council with sufficient independence, providing it with an appropriate budget, and staff that would enable it to promote and promulgate the new codes of ethics throughout public administration; to properly investigate claims made against senior officials and undertake proactive studies into particular areas of concern in respect of ethical behaviour and corruption in public administration (Recommendation XII); and shall 'develop training material to be used in the training of all civil servants on the new Code of Ethics and anti-corruption policies and to require all ministries and civil service bodies to include this training as a part of their curriculum; it should be ensured that it forms a core part of induction training for new civil servants as well as in the in-service training (Recommendation XIII).'*¹

The compliance with those recommendations was subject to review of GRECO's Addendum to the Compliance Report on Turkey adopted in June 2010. This report stated that Recommendation XII

¹ COUNCIL DECISION of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey (2006/35/EC).

² GRECO Joint First and Second Round Evaluation Report on Turkey (GRECO Eval I-II Rep (2005) 3E), adopted 6-10 March 2006; 1st and 2nd round Evaluation' Compliance Report of April 2008; GRECO 3rd Round Evaluation Report on Turkey adopted 22-26 March 2010; GRECO 3rd Round Compliance Report adopted on 20-23 March 2012.

³ Commission Staff Working Document. Turkey 2007 Progress Report Accompanying the Communication from the Commission to the European Parliament and the Council; Enlargement Strategy and Main Challenges 2007-2008. Commission of the European Communities, Brussels, 6 November 2007.

⁴ Commission Staff Working Document. Turkey 2009 Progress Report Accompanying the Communication from the Commission to the European Parliament and the Council; Enlargement Strategy and Main Challenges 2007-2008. Commission of the European Communities, Brussels, 14 October 2009.

⁵ Commission Staff Working Document. Turkey 2010 Progress Report Accompanying the Communication from the Commission to the European Parliament and the Council; Enlargement Strategy and Main Challenges 2011-2012. European Commission, Brussels, 9 November 2010.

⁶ Commission Staff Working Paper. Turkey 2011 Progress Report Accompanying the Communication from the Commission to the European Parliament and the Council; Enlargement Strategy and Main Challenges 2011-2012. European Commission, Brussels, 12 October 2011.

⁷ OECD Follow-up Report on the Implementation of the Phase 2 &Phase 2bis Recommendations (adopted on 18 March 2010)

was 'partially implemented' while recommendation XIII was considered to be 'dealt with in a satisfactory manner'. According to this report Turkey had implemented 15 out of 21 recommendations. Furthermore the GRECO Addendum to the Compliance Report suggests further efforts, in particular to broaden the representation of the anti-corruption oversight body, to enhance the independence of the judiciary, and to reform the system of immunities and to finally establish the Ombudsman institution. The constitutional amendments provide the basis for progress on enhancing the independence of the judiciary and an Ombudsman institution.

The Ethics Board (Council) for Civil Servants was first time mentioned in EC Progress Report for 2009. The report referred to four decisions the Council had published concerning non-compliance with ethics rules by public officials, including an elected mayor and managers of public companies. However, the report also states the lack of progress on "extending the ethics rules to academics, military personnel and the judiciary." In addition the report assesses and refers to certain aspects of reforms including a number of internal initiatives to address the prevention of corruption, including legislative and institutional reform to combat corruption.

In December 2009, the Prime Ministerial Inspection Board [PMIB] was appointed as the counterpart of the European Anti-Fraud Office (OLAF) and was given the task of Anti-Fraud Coordination Structure (AFCOS) responsible for investigation of irregularities in the context of financial cooperation between the EU and Turkey. [...] EC Progress Report (2010) stated that '*Overall, progress has been made as regards the development of a comprehensive anticorruption strategy and action plan and of a body to oversee and monitor its implementation, thus addressing Accession Partnership priorities. However, effective implementation of the strategy is necessary to reduce corruption which remains prevalent in many areas. Turkey needs to develop a track record of investigations, indictments, and convictions.*'⁸ Consequently, the National Anti-Corruption Strategy was published in the Official Gazette on 22 February 2010.

In the 2011 EC Progress Report, it is mentioned that 5928 civil servants working for central and local government received training on ethics between October 2010 and July 2011. However, no progress has been made on extending codes of ethics to academics, military personnel or judiciary.

The 2011 EC Progress Report, also assesses the reform of the public administration, stating that '*Overall, there has been some progress in legislative reforms with regard to the public administration and civil service. Attention needs to be paid to establishment of the Ombudsman institution. Greater political support for public administrative reform and decentralisation is necessary.*'

According to a peer review conducted in 2011⁹, the establishment of the Council of Ethics is a commendable initiative. The undertaken studies, the training programs, the Code of Ethics and the manner of its distribution - all give the impression of mature consideration and high professionalism.

⁸ Of 9 November 2010, SEC(2010) 1327,

http://ec.europa.eu/enlargement/pdf/key_documents/2010/package/tr_rapport_2010_en.pdf, p. 14.

⁹ Peer Review Mission on the Fight Against Corruption, W. de Pauw, 17-21 January 2011.

Another peer review mission on judiciary and fundamental rights¹⁰ conducted in 2011 also suggests that, in order to create a common understanding on ethical standards, Council of Ethics for the Public Service should also have responsibility for the supervision of those standards for the military, universities and the judiciary.

Relevant ratings for the last 5 years show some progress as far as concern public perception on corruption, issues concerning bribe payers and level of easiness of doing business in Turkey. Table below specifies the different indexes in last years:

INDEX	CPI ¹¹					BPI ¹²	EDBI ¹³	
	2007	2008	2009	2010	2011	2011	2011	2012
Turkey	4,1 (64)	4,6 (58)	4,4 (61)	4,4 (56)	4,2 (61)	7,5 (28)	73	71

2.3 TYEC 1 Project

TYEC 1 project implemented in period 2007-2009 identified the following issues that needed to be addressed:

- Further training of trainers within the Turkish public sector, especially in the rural areas is needed.
- Ethics Commissions need to be further strengthened and developed to fully implement the Regulation and of the ethics training packages;
- The public need to be educated not only about the role of public ethics but also of the need for public officials to be educated on how to behave more ethically in their dealings with public.

In other words, for the TYEC 1 Project to sustain and ensure its impact – beyond the achievement of its objectives until year 2009 – further actions and support are necessary to continue and extend with both: the Council of Ethics for Public Service; and Ethics Commissions and specific ministries. This was confirmed by a an independent evaluation of the TYEC 1 which noted that: “the project’s

¹⁰ Peer Review Mission, Judiciary and Fundamental Rights, Anti-Corruption, Ursula Neder, 17-21 January 2011.
¹¹ The Corruption Perception Index (CPI) Score relates to perceptions of the degree of corruption as seen by business people and country analysts, and ranges between 10 (highly clean) and 0 (highly corrupt). The results draw from polls of independent institutions. 158 (2005), 163 (2006), 179 (2007), 180 (2008), 180 (2009), 178 (2010) and 183 (2011) states were rated.
¹² The Transparency’s Bribe Payers Surveys evaluates the supply side of corruption – the propensity of firms from industrialised countries to bribe abroad.
¹³ The World Bank’ Survey on “Doing business” – Ease of Doing Business Index (EDBI): Economies are ranked on their ease of doing business, from 1 – 183, with first place being the best. A high ranking on the ease of doing business index means the regulatory environment is conducive to the operation of business. This index averages the country’s percentile rankings on 10 topics, made up of a variety of indicators, giving equal weight to each topic.

timeframe of two years might be too tight for reaching out to the actual number of public servants within the scope of the project's trainings". It further stated that "in order to further strengthen sustainability of the project" a national plan was needed to set out "concrete steps and the necessary timeframe for cascading ethics training to a total of about 3 million public servants (and) support the Council of Ethics for Public Service in assisting the senior management and Ethics Commissions of central and local administrative units in drafting, implementing, and constantly updating a unit plan, providing the necessary steps and timeframe for cascading ethics training to the public servants in the respective unit's jurisdiction". During the TYEC 1 project lifetime 53 Chairs of different Ethics Commissions, 107 Ethics Commissions' members and 118 senior public officials from the central government were trained. Moreover, 250 officials, including Governors, Mayors, Deputy Governors and Secretary Generals from the local and regional authorities passed the training as well.

Therefore, the purpose of the second project will be based on the findings of the TYEC 1 Project's Implementation Guide and comments of the Interim Review. There are three stated objectives:

- Embed and consolidate the work from the first project;
- Extend the cascade training and prevention of corruption awareness; and
- Focus on key ministries and areas to develop ethics work.

TYEC 1 has established a solid basis for further work and a clear focus on what can now be developed. TYEC 2 adheres strongly to mainstream proposals both from GRECO and the Turkish government and offers identifiable and concrete objectives and outputs.

3 Legal and Institutional Framework

This section discusses the legal and institutional focus of the recommendations on the role of the Council of Ethics for the Public Service on which the project is based. Specifically it describes the work and composition of the Ethics Council and previous work on an anti-corruption strategy.

In the last few decades governments in both developed and developing countries, with the encouragement and support of various regional and international organisations, have made genuine efforts first to equip their national public administrations against all kinds of unethical conduct including corruption and with some legal instruments (e.g. codes of ethics) and institutional mechanisms (e.g. ethics boards and/or anti-corruption agencies); and then to make these instruments and mechanisms work in practice through various awareness and training programmes. Similar efforts have been seen in Turkey in the 2000s.

Turkish public administration has experienced serious and gradually expanded ethical crises since the second half of the 1970s. These crises are not only a part of global ethical crises in public administration, but also a result of a broad structural and operational degeneration of the Turkish political-bureaucratic system. The rapid social and economic transformation of society since the early 1980s has contributed to the erosion of social values in Turkey. Such eroded social values have also influenced all activities of the Turkish bureaucracy. Therefore widespread bureaucratic corruption and unethical conduct has become a feature of the political-administrative culture of Turkey. Different types of corruption and unethical conduct in various subsectors of the Turkish public sector (e.g. public bidding, planning at local level, law enforcement, health services, title/land registry, customs services) have come to be regarded as ordinary by the public, in spite of measures recently taken by political and administrative authorities and relative improvement in public perception of corruption and unethical conduct and in the number of corruption cases as a consequence of these measures.

3.1 National Ethics Legislation

The most important items of Turkish national legislation for securing ethical conduct and combating corruption are as follows:

- The 1982 Constitution.
- The Civil Servants' Law dated 1965 and numbered 657.
- The Turkish Penal Code dated 2004 and numbered 5237.
- The Law for Financial Disclosure and Combating Bribery and Corruption dated 1990 and numbered 3628.
- The Law concerning Prohibited Activities of Former Public Servants dated 1981 and numbered 2531.
- The Law concerning the Trials of Civil Servants and Other Public Servants dated 1999 and numbered 4483.
- The Law concerning the Use of the Right to Petition dated 1984 and numbered 3071.
- The Law about the Right of Access to Information dated 2003 and numbered 4982.
- The Law concerning the Foundation of the Council of Ethics for the Public Service dated 2004 and numbered 5176.
- By-Law concerning the Principles of Ethical Behaviour of Public Servants dated 2005.
- The Law about the Prevention of Money Laundering dated 1996 and numbered 4208 and the Law about the Prevention of Laundering Income from Crime dated 2006 and numbered 5549.
- The Public Procurement Law dated 2002 and numbered 4734 and the Public Procurement Contracts Law dated 2002 and numbered 4735.
- The Law about Public Financial Management and Control dated 2003 and numbered 5018.
- The Law about the Court of Accounts dated 2010 and numbered 6085.

The major pieces of Turkish national legislation comprise various necessary legal instruments for preventing unethical conduct including many kinds of corruption. Various instruments included in different codes of conduct for public servants developed by the regional or international organisations are also prescribed in this legislation.

Formal rules for officials of the public administration of Turkey have been in force since the mid-1960s. However, the establishment of the Council of Ethics for the Public Service (CEPS) and the subsequent adoption of a code of ethics now offer an opportunity to create a culture of ethics in the public administration in line with the requirements of good governance. The Council and the Code of Ethics also have the potential to become building blocks of a strategy for the prevention of corruption in Turkey.

The Council of Ethics consists of eleven members elected by the Council of Ministers for a period of four years and a smaller secretariat. The tasks of the Council are:

to determine whether public officials adhere to the Code of Ethics while performing their duties
to investigate claims that the principles of the Code have been violated by a senior public official with a minimum rank of general manager or equivalent
to inform the relevant authorities on the results of such investigations
to carry out or to commission studies and research which help establish a culture of ethics throughout the public administration.

In addition, the Code of Ethics (Article 25) gives the Council with the task of preparing, coordinating and executing training programmes for public officials or to cooperate with relevant ministries, other public institutions, universities, local administrations and non-governmental organisations in their fields about this matter.

Following the establishment of the CEPS, a brand new By-Law was prepared by the CEPS in 2005. This By-Law also determines quite similar principles of ethical behaviour (see art. 5 to 22) to those prescribed. These principles support the present legislative framework for an ethical environment:

- Public service consciousness in performing a duty (art. 5).
- Consciousness of serving the community (art. 6).
- Compliance with the service standards (art. 7).
- Commitment to the objective and mission of public agency (art. 8).
- Integrity and impartiality (art. 9).
- Respectability and trust (art. 10).
- Decency and respect (art. 11).
- Notification to the authorities (art. 12).
- Avoiding conflict of interest (art. 13).
- Prohibition against the misuse of duty and authority for deriving benefits (art. 14).
- Prohibition of receiving gifts or deriving benefits (art. 15).
- The proper use of public properties and resources (art. 16).
- Avoiding extravagance and waste (art. 17).
- Unauthorised and factitious statements (art. 18).
- Notification, transparency and participation (art. 19).
- Accountability of administrators (art. 20).
- Restrictive relations with former public servants (art. 21).
- Declaration of assets (art. 22).

In addition to those principles determined in the By-Law, public agencies can submit their own institutional principles of ethical behaviour, in accordance with the feature of service or duty they perform, for examination and approval by the CEPS (art. 26).

3.2 Council of Ethics

In 2004, a reform aimed at establishing an administration system based on standard ethical values was initiated. Accordingly and by Law No. 5176 on the Establishment of the Council of Ethics for the Public Service and Amendments to some Laws, a new structure was introduced, that is the Council of Ethics for the Public Services within the Prime Ministry. This body seeks to prevent corruption and enhance ethical values and transparency within the public administration of Turkey.

Consequently, to implement the Law No. 5176, a "Regulation on the Ethical Rules of Conduct for Public Officials and the Procedures and Principles for Application" was prepared by the Council of Ethics for the Public Service in 2005. The regulation brings together the collection of ethical rules of conduct that must be respected by public officials.

The purpose of the Regulation is to embed a culture of ethics in public service, to determine the ethical rules of conduct that must be followed by public officials in the performance of their duties, to assist them in acting according to these principles and to increase the society's trust in the public administration. Public officials are obliged to abide by the ethical principles of conduct set forth in the Regulation in the performance of their duties. These principles constitute a part of the legislative provisions that regulate the employment of public officials. All public officials with the exception of the president, parliamentarians, ministers, members of the Turkish Armed Forces, members of the judiciary and universities are in the scope of Law No. 5176 and the related regulations.

Furthermore, "The Strategy of Increasing Transparency and Strengthening the Anti-Corruption Efforts (2010-2014)" which was adopted by the Council of Ministers in February, 2010 gives the Council of Ethics for Public Service the role to determining the principles of ethical behaviour for each and every profession within the public sector.

3.3 Ethics Commissions

In addition to the CEPS at national level, institutional "ethics commissions" or "public ethics commissions" are established in public organisations under the By-Law dated 2005 (art. 29). Although they are not prescribed by the Law numbered 5176, Ethics Commissions were established by the CEPS under the By-Law dated 2005 in order to assist its institutional tasks. An ethics commission consisting of at least 3 people from the public organisation concerned is founded by the highest administrator of the organisation.

Public organisations which are responsible for establishing an institutional Ethics Commission (ministries; related, affiliated and liaising central public organisations; autonomous administrative authorities; governorships; district governorships; special provincial administrations; metropolitan municipalities; municipalities; state-owned enterprises, etc.) are mentioned in article 2 of the By-Law. There are now about six thousand public officials in the country who are in charge of approximately two thousand Ethics Commissions.

Commissions were set up in order to establish and develop an ethical culture, to advise on and direct the problems that public servants face concerning principles of ethical conduct and to evaluate ethical practices in public organisations. The highest administrator determines for how long the members of the Commission will work and other related matters. The resumes and the corresponding addresses of members of the Commission are sent to the CEPS within three months. These Commissions work in co-operation with the CEPS (art. 29).

When the legal position (structure, duties and authorities) and operational aspect of Ethics Commissions are taken into consideration, the following points can be highlighted: Since Ethics Commissions are established by a by-law, their legal foundation is not strong enough. Furthermore,

their scope of duty in terms of the personnel they cover is limited (art. 2 of the By-Law) in accordance with the Law numbered 5176 (art. 1). This is a significant deficiency for them, as it is for the CEPS mentioned above, for combating corruption through embedding ethical principles in the public service.

3.4 Prime Ministry Inspection Board (PMIB)

The Prime Ministry Inspection Board (PMIB) was established in 1984. It derives its authority from Article 112 of the Turkish Constitution, which gives the Prime Ministry oversight and inspection authority of the Ministries'. PMIB Inspectors are appointed upon approval of the Prime Minister and carry out their duties on his behalf. As for corruption allegations concerning cabinet ministers or the Prime Minister, Parliament can establish investigative commissions to examine the case. A majority vote is needed to refer these cases to the Supreme Court for further action.

The PMIB is the leading public agency setting up the general principles of inspection and auditing regarding the effective and efficient inspection system for all public institutions. It also carries out inspections and investigations at all public institutions and organisations, their affiliates and corporations, and coordinates the efforts for prevention and fight against corruption.

3.5 International Conventions

In addition to the national laws, various international conventions about combating corruption have also been signed and ratified by the Turkish authorities in recent years. These conventions, which have the force of law according to article 90 of the Constitution, are as follows:

- The OECD Convention of 1997 on Combating the Bribery of Foreign Public Officials in International Business Transactions (ratified in 2000).
- The 1997 Council of Europe Civil Law Convention on Corruption (ratified in 2003).
- The 1998 Council of Europe Criminal Law Convention on Corruption (ratified in 2004).
- The United Nations Convention against Corruption (ratified in 2006).

In addition, Turkey approved the recommendations made by the "OECD Financial Action Task Force on Money Laundering" (FATF) in 2003. As mentioned above, as a consequence of the ratification of the 1997 Council of Europe Civil Law Convention on Corruption by the Turkish Parliament in 2003, Turkey became a member of GRECO in 2004. Turkey also participates in monitoring the application of anti-corruption measures taken by the "OECD Working Group on Bribery in International Business Transactions".

Meanwhile, some principles of international conventions have been partly incorporated into Turkish domestic legislation (e.g. the Law Amending Certain Laws for the Prevention of Bribing Foreign Public Officials dated 2003 and numbered 4782) in order to implement international standards in those conventions.

4 Project Expected Results, Detailed Workplan

Ethics Commissions will enhance the Council of Ethics for Public Service's support and monitoring roles, and ensure the sustainability of ethics training within ministries.

The role of the Council of Ethics for Public Service will encourage intra- and inter-ministerial coordination and cooperation; the public and institutional awareness campaigns will encourage the promulgation of ethics and ethical environments across Turkey.

The project will improve the situation of the targeted groups by:

Institutionalising the role of the Council of Ethics for Public Service as a training resource by: having professional trainers to develop a systematic training programme for those public bodies; providing a support to Ethics Commissions in devising training strategies and implementing training programmes; updating and expanding the available training material.

Consolidating the ethics training within ministries, with the Council of Ethics providing a monitoring and quality assurance process.

Raising the public awareness on ethics and greater understanding of the citizen-public official relationship.

The project will be owned by the Council of Ethics for Public Service, Ethic Commissions and the ministries.

Awareness raising, peer to peer reviews of certain standards and guidelines as well as training when carrying out project activities will be the tools which will provide further impact and ensure sustainability. Sustained actions which took place in the past and during TYEC 1, have already created a multiplier effect and thus have proved to have been the right tools for this kind of action. Furthermore, the Ethics training programme are expected to have a "domino" effect in the sense that new trained trainers joining the already established Ethics Trainers' pool will then become a continuous base and provide and furnish frequent trainings which were carried out in the past by a smaller group of trainers.

The project will engage 100 trainers under its Activity 2. The trainers will be selected from 4 main institutions: Directorate General of Title/Land Registry, Ministry of Finance, Ministry of National Education and Ministry of Interior (local administrations). Each institution will have 25 trainers. The criteria for trainers' selection would include the following: experience in designing and conducting ethics related trainings, presentation skills, working experience in the public administration/institution, experience in drafting ethics/integrity related legislation, knowledge of relevant international standards in ethics and anti-corruption, fluency in English, academic background, etc.

The trainees are expected to be the members of the internal audit units, inspection boards, training units and similar at the field.

To support the ethics training package at local level, the project will also select and train trainers from governorates, special provincial administrations and municipalities. Given that there are 16 main municipalities in Turkey, the project plans to train two trainers per municipality, which means that a total of 32 local officials shall become certified trainers.

Under Activity 8 a number of trainings at the Directorate General of Title/Land Registry will be organised. These trainings will be conducted by the trainers from the institution. The Land Registry trainers already possess huge experience in delivering ethics trainings to their staff in a large scale at the field level.

Once the training modules are customised the project will start with the trainings implementation.

Furthermore, the overall public administration and its members, especially those of working at the "pilot" institutions, will benefit directly and indirectly from the activities in this project: training given by

the trained trainers, and also the launching and application of the new codes of conduct, should help improve ethical standards.

All training materials, newly developed codes, awareness raising tools and plans developed during this project, will serve in doubt as a part of the daily work tools for the Ethics Council.

More over the expected results will have an impact which will be measured through the following measurable verifiable indicators:

Expected Results	Measurable Indicators
<p>1 Enhanced capacities of the Council of Ethics for Public Service to promote awareness of the Regulation and support the integration of ethics' principles and requirements of the code of ethics in the daily work of the Turkish administration</p>	<ul style="list-style-type: none"> ▪ Number and quality of monitoring reports on ministry training strategy and programmes ▪ Number of complaints received, self-initiated and investigated by the Council of Ethics for Public Service ▪ Number of training events delivered by the Council ▪ Establishment of training unit in the Council ▪ Number of regular Meetings of Ethics Coordinating Committee
<p>2 Enhanced capacities of Ministries to promote the integration of ethics principles and requirements of the code of ethics in the daily work of the Turkish administration</p>	<ul style="list-style-type: none"> ▪ Production of Ministerial/Institutional Plans for ethical environments; ▪ Adapted Training Strategy and training materials; ▪ Number of intra-ministry trainers trained; ▪ Number of training activities carried out by trainers; ▪ Number of complaints submitted to the Council of Ethics for Public Service from the public bodies; ▪ Number of initiated disciplinary procedures by ministries and dealt through disciplinary boards concerning ethics violations.
<p>3 Embedded knowledge on ethics' principles and the Regulation in the Turkish administration and increased public and institutional awareness on these issues</p>	<ul style="list-style-type: none"> ▪ Number of booklets, leaflets and other publicity material produced and disseminated; level of outreach ▪ Number of seminars, panels, conferences organized; ▪ Number of media articles on ethics; ▪ Number of TV programmes on ethics; ▪ Number and type of adverts placed in media; ▪ Surveys on public opinion and public officials.

The Workplan was develop as to reflect the Expected Results through nine (9) different activities, each one being branched into a number of sub-activities targeting different themes or audience. The overall Workplan and specific 6-months Workplan (for period June-December 2012) are further elaborated in Sections 6 and 7 of this report.

5 Detailed Workplan

This section discusses the delivery of the Workplan by the activities outlined. Each is discussed as follows:

- Introduction
- Objectives
- Approach taken
- Anticipated work to be undertaken
- Use of STEs and LTA
- Risk factors and risk mitigation
- Timetable

Activity 1

The staff of the Council of Ethics is trained and have the necessary working tools and procedures to manage, oversee and measure the dissemination and implementation of the Training Strategy.

Activity 1 has a number of sub-activities as follows:

Activity 1.1	▪ Revise and update the existing training module and develop new materials where necessary
Activity 1.2	▪ Train the training staff of the Secretariat in Training of Trainers programmes
Activity 1.3	Strengthen the communication and IT skills of the Secretariat through specially tailored trainings (language, communication and computer skills)
Activity 1.4	Train the training staff of the Secretariat in e-based learning
Activity 1.5	Train the training staff of the Secretariat in supporting the Ethics Commissions in developing and adapting the training strategy
Activity 1.6	▪ Train the training staff of the Secretariat in monitoring and measuring the delivery and impact of training events
Activity 1.7	▪ Train the training staff of the Secretariat in developing a Continuous Professional Development programme for existing trainers

Introduction

In order to develop a training package, the TYEC 1 materials will be reviewed and existing materials on ethics training available in other countries will be collected, collated, reviewed and translated. Following this a coherent training package/curriculum for ethics training, based on the provisions of the Code of Ethics, will be drafted, tested and made available to different institutions for in-service training in the form of a CD suitable for computer-based training.

The Council of Ethics for the Public Service has a training unit and can deliver several ethics training modules which were developed during the TYEC 1. The trainers which are staff of the Council of Ethics will be trained on the delivery methodologies, adult teaching, presentation skills, monitoring & evaluation, etc.

Objectives

Following the recommendations of GRECO – that the Council develop training material to be used in the training of all public officials in the Code and to require all ministries and civil service bodies to include this training as part of their curriculum for new civil servants as well as in the in-service training – a central role of the Council will be to develop a Turkish-relevant training package useable across the public sector. The package should be based on the Code and should be accessible and user-friendly. It should incorporate the latest inter-active techniques, be easy to maintain and update, and able to be used by those trained – and those the trainers train.

The secretariat needs strengthening in terms of the fulfillment of its duties. The secretariat should be able to cope with the training needs arising from various institutions. The TYEC 1 training pool should be re-connected.. The link between the Ethics Commissions and the Council -the trainers- needs to be developed.

Approach taken

A number of public service or public sector ethics commissions have devised and developed training materials suitable for class-room, PC and personal use. Rather than re-invent the learning techniques and processes followed by other agencies, the project should collect and collate training packages, review their adaptability and accessibility, and then, subject to copyright and other permissions, develop a Turkish-related training package.

The TYEC 1 has published training materials. These materials will be reviewed and updated.

The capacity for managing training needs to be increased. This will be achieved by concentrating on the training unit of the Council of Ethics and ethics trainers.

Anticipated work to be undertaken

A range of training materials will be collected and then compared against a number of categories. These categories are likely to include: relevance, ease of use as training material, adaptability to different learning media, ease of updating, and so on.

Where material is considered suitable, then copyright and other permissions will be sought.

If received, material will be adapted to (i) reflect the requirements of the Articles of the Code and (ii) reflect case study, basket case material and other examples relevant to the Turkish context.

Use of STEs

National STEs will be appointed with experience in the development of training materials and with experience in the development of case studies and other illustrative material to be included in the package. It is expected that at least one STE will have knowledge of working with electronic media.

Risk factors and risk mitigation

There is a low expectancy that copyright and other permissions will not be granted.

It is likely that case studies will be Ministry specific and therefore their usage in different institutions might not be possible.

Timetable

Training module development will be done in September-October 2012.

A ToT is scheduled for October 2012.

Training of the secretariat will be done between September 2012 – January 2013.

E-based learning activities will be initiated on October 2012.

Ethics Commission support training is planned for November 2012.

Monitoring & evaluation training is planned for December 2012.

A support on continuous development programme will be done in the first quarter of 2013.

Activity 2

At least 100 trainers from central and local government are trained and able to deliver ethics training.

Activity 2 has a number of sub-activities as follows:

Activity 2.1	<ul style="list-style-type: none">Select 100 trainers from central and local government in conjunction with Ethics Commissions (with specific allocations for the Ministry of Interior, the Land Registry and the internal auditors)
Activity 2.2	<ul style="list-style-type: none">Training of these Trainers on the application of the Training Package
Activity 2.3	Training of these Trainers on tools and methodology of adult training techniques

Introduction

To support the ethics training package, the project will select and then train 100 trainers from public institutions and support the trainers in the delivery of initial training activities.

Objectives

Given its primary responsibilities, and with its current capacity, the Council of Ethics is likely to take on a substantive training function to expand ethics training and awareness. In order to achieve this objective – especially considering that it is rolling-out training not only to new public officials, but also as part of continuing professional development for career public officials – a training capacity needs to be developed.

Approach taken

To achieve this objective, the project will collect and collate training of training material. The material has proved to be relatively generic. Training of trainers material will be developed as a facilitation pack and integrated into the module pack.

Anticipated work to be undertaken

The LTA and STEs will prepare a generic trainer of trainers pack with the intention that this will be used a) for the training of trainers and b) it will be sufficiently flexible and accessible that the first 25 trainers can use the material for training further trainers within their own institutions.

The Council of Ethics will consult with Ethics Commissions to identify suitable personnel for training.

A training programme for the trainers will be undertaken. The programme will involve both how to deliver ethics training and how to train further trainers.

The project will accompany and support the trained trainers in (i) how to establish a PC-based interactive ethics awareness and training programme and (ii) in face-to-face delivery.

The training sessions will involve 25 participants at a time. Institutions will be trained together for most of the training, but there will be opportunities to work on their own institutions; especially on institution specific case studies.

The trained trainers, with the support of the Council of Ethics and the PMT, will provide a series of face-to-face training events across Turkey, using major and regional centres for delivery.

Use of STEs

There a number of Turkish universities, research institutes and other agencies suitable for providing training of trainers programmes. The PMT proposes that a list of suitable national training of trainers providers is identified to begin the delivery of the programme.

Risk factors and risk mitigation

The main risk lies in the identification of existing personnel with both experience of training and of ethics. A supplementary risk is that the pool of trained trainers diminishes before they are able to cascade the training component to other personnel.

Each institution will be working on its case studies. Although this might be useful for the training participants, there might be too many materials developed outside the project and this might be difficult to coordinate.

Timetable

The trainers will be selected by October-November 2012

The trainings are scheduled for first half of 2013.

Activity 3

Council of Ethics for the Public Service is supported to coordinate measures to promote ethics and the Training Strategy in Turkey through establishing a Platform for Ethics.

Activity 3 has a number of sub-activities as follows:

Activity 3.1	<ul style="list-style-type: none">Prepare a draft terms of reference for the new established Platform for Ethics and support the organisation of regular meetings of the Platform
Activity 3.2	<ul style="list-style-type: none">Develop proposals and policy advice when required as input to overall national policies concerning ethics and the Training Strategy in Turkey.
Activity 3.3	<ul style="list-style-type: none">Support the development of a web-based information and awareness portal for public officials
Activity 3.4	<ul style="list-style-type: none">Support the development of a public website in both English and Turkish

Introduction

To support the ethics training package, and the training strategy and public ethics/integrity in general, the project will support the establishment of the Platform for Ethics. This mechanism would be a movement initiated by the Council of Ethics, involving public institutions, private sector, NGOs, professional associations, academia and media.

Objectives

The purpose is to establish a forum which would bring together various organisations and senior officials, to discuss and debate their Codes of Ethics, its applicability and its relevance, the roles of the Council of Ethics, the responsibilities of senior officials to implement ethics training within their institutions, as well as how breaches will be addressed.

The Platform is seen as a body which will promote ethics in general.

Approach taken

The project would support the organisation of regular meetings (once every six months) with the technical commission assisting the Platform and help develop proposals for improved management, coordination and monitoring of ethics strategies in Turkey.

More detailed work on the strategy will be undertaken by the LTA and STEs in agreement with the technical commission.

The secretariat of the Council of Ethics will take on the role of secretariat of the platform.

A web site will be built and managed.

Anticipated work to be undertaken

Develop a terms of reference for the Platform.

Discuss with the Council of Ethics possible (but not exclusive) areas for possible tasks or areas of work.

Draw up a list of potential participants.

Material on good practice examples of such a platform will be collected into a discussion paper.

Workshops will be held with institutions to discuss the papers and to listen to the views of national and international experts.

Use of STEs

It is anticipated that a number of events may include one or two national STEs to provide overviews of the ethics context.

Risk factors and risk mitigation

The major risk is that the Government does not provide the necessary resources and support, with the consequence that the Council of Ethics fails to address a raising work load and attracts adverse criticism.

Timetable

The TOR will be available by end 2012.

Platform will be active by the first half of 2013.

Activity 4

The development of code of conduct for state universities and professional associations is supported and the capacity of their ethics commissions is improved to train in the Code.

Activity 4 has a number of sub-activities as follows:

▪ Activity 4.1	▪ Organise seminars on developing codes of conduct for universities and professional organisations to identify the possibilities for development of such codes.
▪ Activity 4.2	▪ Support the development of such codes through workshops and advice
▪ Activity 4.3	▪ Train Ethics Commissions on implementation of code and training for staff and/or members

Introduction

The various reports on ethics/anti-corruption/good governance in Turkey suggest that the Code be extended to other parts of the public service. Specifically the project proposes the possible extension of the Code for the state universities.

Objectives

While there is likely to be a discussion on whether the Code and the remit of the Council of Ethics is extended to the universities or whether the institutions are invited to replicate both the Code and an equivalent institution to the Council of Ethics, the objective of the component is to initiate the debate with the universities and provide technical and other support to devise and develop an appropriate code and relevant procedures.

Approach taken

Universities are strongly independent and cannot be mandated to establish codes and procedures. In particular the issue of sanctions is an area of likely controversy. The approach thus should be to draw on international good practice that emphasises the pervasiveness of codes and their relationship to perceptions of trust in the institution concerned.

Anticipated work to be undertaken

Work has already commenced on developing a draft discussion paper, with annexes, that draws on the work of the Council of Higher Education and possible areas of cooperation with the Council of Ethics.

The Council of Higher Education is a central body that oversees the universities and the scope of the Code could be extended via this institution.

Use of STEs

Given the sensitivities of such discussions, this component will use both national and international STEs.

Risk factors and risk mitigation

The clear risk is that the members of the academia are reluctant to participate because there is a concern over external interference or because institutions reject the idea of codes and associated procedures, including sanctions.

Mitigation: the initial report will provide the context in terms of how far most countries have already adopted ethics codes.

Timetable

Workshops will be conducted in the first half of 2013.
A discussion paper will be available by the first half of 2013.
Ethics Commissions will be on duty and trained by 2014.

Activity 5

Recommendations of the Research Studies (TYEC 1) in institutions previously involved are implemented.

Activity 5 has a number of sub-activities as follows:

▪ Activity 5.1	▪ Provision of workshops to discuss research findings
▪ Activity 5.2	▪ Develop action plans for ministries to implement respective research findings

Introduction

The TYEC 1 commissioned 10 research studies, organised their publication and dissemination, and supported the Council of Ethics in the organisation of public workshops on the results of the 10 studies below:

- Conflict of Interest
- Law Enforcement and Ethics
- Title / Land Registry and Ethics
- Planning in the Local Administrations and Ethics
- Public Bidding and Ethics

Ethics and Customs Services

The Ethical Approaches, Codes of Conduct, Implementations and Internalization Level of the Public Professional Associations In Turkey

The Shadow Economy

Ethical Conduct in Health Services

Ethics, Culture and Society

Objectives

The TYEC 1 was finalised in 2009 and the TYEC 2 will review the progress made. The research studies had been conducted with the participation of the Ministries and the action plans would be reviewed and, if necessary, developed further in partnership with the stakeholders.

Approach taken

There will be two phases of this activity: first phase will aim at reviewing the progress made with regard to the first 5 topics/research studies (of total of 10), while the other 5 topics would reviewed in the second phase.

Anticipated work to be undertaken

Council of Ethics will have a lead role alongside those Ministries that were involved in the research. Work is already underway to consolidate the results and organise workshops to prepare action plans.

Use of STEs

A number of experienced Turkish academics have conducted the research. Most of the STEs which will be contracted would be the same people who undertook the original research.

Risk factors and risk mitigation

The main risk is that the researchers of the first project might be unable to conduct the second round. The PMT has already contacted many of them and most of them are available.

Timetable

Workshops will be conducted in the first half of 2013.

Action plans will be ready by the first half of 2013.

Activity 6

Ethics Commissions are supported in devising and delivering the training strategy and monitoring its implementation.

Activity 6 has a number of sub-activities as follows:

Activity 6.1	▪ Organise workshops with Ethics Commissions to devise training strategy
Activity 6.2	▪ Organise workshops with trainers to adapt training events to specify

	ministry contexts
Activity 6.3	<ul style="list-style-type: none"> ▪ Monitor and evaluate training events that take place during the course of the project implementation

Introduction

Public organisations which are responsible for establishing an institutional Ethics Commission are mentioned in article 2 of the By-Law. There are now about six thousand public officials in the country who are in charge of approximately two thousand Ethics Commissions.

Commissions were set up in order to establish and develop an ethical culture, to advise and direct the problems that public servants face concerning principles of ethical conduct and to evaluate ethical practices in public organisations. The highest administrator determines for how long the members of the Commission will work and other related matters.

Objectives

Reviewing and devising any effective ethics training strategy requires the active involvement of the principal stakeholders and likely institutional owners of the delivery and sustainability of the strategy. Ethics Commissions will be the owner of the strategy at the Ministries.

Anticipated work to be undertaken

The TYEC 1 has published the first training materials. These materials will be reviewed, updated and disseminated through the Ethics Commissions.

The capacity of Ethics Commissions and their trainers to manage for training needs to be increased. This will be achieved by concentrating on the training strategy of the Ethics Commissions and ethics trainers.

Each Ministry would have the opportunity to create its own case studies to reflect its own specific needs and issues.

Use of STEs

National STEs will be appointed with experience in the development of training materials and with experience in the development of case studies and other illustrative material to be included in the package.

STEs will also have an opportunity to work directly with some institutions for defining their specific needs, especially for developing their own code of ethics and training materials.

Risk factors and risk mitigation

Members of the Ethics Commissions are usually high level officials of the public administration. They might not be able to attend the whole training. The secretariats of the Commissions would also be available to replace them.

Timetable

Workshops will be conducted in the first half of 2013.

Developing case studies will be in line with activity 1.

Activity 7

The training strategy is implemented on ethics and materials for its application at governorate and local government levels.

Activity 7 has a number of sub-activities as follows:

Activity 7.1	<ul style="list-style-type: none">Train 25 Trainers who will be able to train others on implementation aspects of the training strategy
Activity 7.2	<ul style="list-style-type: none">Adapt the training material on implementation aspects of the training strategy
Activity 7.3	<ul style="list-style-type: none">Support the training unit within the Council in adoption of the Ethical Leadership Training Programme (as a deliverable of the previous project) for implementation at local level

Introduction

To support the ethics training package at the local level, the project would select and then train trainers from governorates, special provincial administrations and greater municipalities and support the trainers in the delivery of initial training activities.

Given that there are 16 greater municipalities in Turkey, the project would be training 2 trainers per city, with a total of 32 local trainers.

Objectives

Council of Ethics as the leading organisation in ethics and ethics training is likely to take on a substantive training function to expand ethics training and awareness. In order to achieve this objective a training capacity, including the local administrations, needs to be developed.

Approach taken

To achieve this objective, the project will use the training material which will be developed under activity 1. This will be developed as a facilitation pack for training of trainers and integrated into the module pack.

Anticipated work to be undertaken

The prepared generic trainer of trainers pack will be used for the training of trainers. It will also be sufficiently flexible and accessible so that the 32 trainers can use the material for training further trainers within their own institutions.

The Council of Ethics will consult with Ethics Commissions to identify suitable personnel for training.

A training programme for the trainers will be undertaken. The programme will involve both how to deliver ethics training and how to train further trainers.

The trained trainers, with the support of the Council of Ethics and the PMT, will provide a series of face-to-face training events across Turkey, using major and regional centres for delivery.

Use of STEs

There are a number of Turkish universities, research institutes and other agencies suitable for providing training of trainer programmes. The PMT proposes that a small list of suitable national training of training providers is drawn up and a quick tender procedure is followed to begin the development and delivery of the programme.

Risk factors and risk mitigation

The main risk lies in the identification of existing personnel with both experience of training and of ethics. A supplementary risk is that the pool of trained trainers diminishes before they are able to cascade the training component to other personnel.

Timetable

The trainers will be selected by February 2013
The trainings are scheduled for first half of 2013.

Activity 8

The General Directorate of the Land Registry is supported as an 'Island of Integrity' in terms of the effectiveness of a comprehensive ethical environment as the basis for the development of a wider cross-public sector on which future prevention strategies may be based.

Activity 8 has a number of sub-activities as follows:

Activity 8.1	▪ Carry out ethics training across the organisation
Activity 8.2	▪ Develop approaches and measures to support and sustain the training
Activity 8.3	▪ Develop "ethics audits" of key mechanisms for regulating ethical standards and conduct within the organisation
Activity 8.4	▪ Develop means to measure systemic improvements to the ethical culture or environment through staff and customer surveys; staff conduct and performance setting and monitoring; customer services standards setting and monitoring

Introduction

Different types of corruption and unethical conduct in various subsectors of the Turkish public sector (e.g. public bidding, planning at local level, law enforcement, health services, title/land registry, customs services) have come to be regarded as ordinary by the public. This is in spite of measures recently taken by political and administrative authorities and relative improvement in public perception

of corruption and unethical conduct and in the number of corruption cases as a consequence of these measures.

The TYEC 1 has conducted research on the General Directorate of Title and Land Registry. It is recommended in the Research Study that “regarding the fact that erosion in such basic societal values of honesty and straightness contributes to a great extent to increase in corruption and other non-ethical behaviours, an ethical consciousness campaign is needed for the society as a whole not only for public servants. Even, an effective ethics education in various levels of national education system, perhaps beginning with primary schools must be provided in order to make citizens more conscious about ethics issues and to prevent some problems in service provision resulting from citizens.”

Objectives

The Land Registry has some 17.000 staff; there are 60 Inspection Board staff and 4 Internal Audit staff (IA). In 2009 the Land Registry set up its Ethics Commission in the General Directorate, for which terms of reference are being drafted. It is proposed that each of the 22 regional offices will also have an Ethics Commission, with supervisory responsibility resting with the General Directorate. The 22 Ethics Commissions will define the issues they will address and how they will be addressed (regional variations in terms of respect, nepotism and gift-giving are already noted), as well as undertake training. It will give consideration to its role in terms of the implementation of the Council of Ethics for the Public Service Regulation, for those public officials who fall outside the Council’s remit. The Land Registry Ethics Commission has already adapted the training material. It has also decided to use its IA staff to undertake ethics assessments, focusing in systems and transparency.

Anticipated work to be undertaken

Certain ministries with wide responsibilities for ethical training (such as the Ministry of Interior and the Land Registry) which have already begun work on ethics training and the development of ethical environments should be supported in so doing. The Ministry of Interior, for example can be given support in developing the Ethical Training Strategy and materials for application at governorate and local government levels and the Land Registry to develop as an ‘Island of Integrity’ in terms of developing a comprehensive ethical environment. These initiatives would serve as the basis for the development of a wider cross-public sector on which future prevention strategies may be based.

Use of STEs

National and international STEs will be appointed with experience in the development of internal codes of ethics, training materials and with experience in the development of ethics audits.

STEs will work directly with the Ethics Commission in the Land Registry, ethics trainers of the Land Registry and with the senior management of the institution.

Risk factors and risk mitigation

Members of the Ethics Commissions are usually high level officials of the public administration. They might not be available for the whole process. The secretariat of the Commission in the Land Registry would also be involved and ready to replace them when needed.

A longer-term risk is that the project does not provide the rationale for public sector institutions and the Council of Ethics to work more closely together to raise ethics awareness across the public sector.

Timetable

The trainers will be selected by November 2012.

The trainings are scheduled for 2013.

Workshops on sustainability, ethics audits, service standards and monitoring are planned for 2014.

Activity 9

Awareness campaigns are developed for prevention of corruption in ministries, schools and universities, and the general public through dissemination of audio-visual materials and networking relations with media and NGOs are established.

Activity 9 has a number of sub-activities as follows:

Activity 9.1	▪ Support the capacity of the Council of Ethics for Public Service in planning and delivering awareness campaigns through advise and recommendations on how to conceptualise, plan and deliver awareness campaign.
Activity 9.2	▪ Organise workshops with media representatives
Activity 9.3	▪ Organise workshops with NGOs
Activity 9.4	▪ Develop public awareness materials to promote ethics
Activity 9.5	▪ Support the capacity of Ethics Commissions in planning and delivering internal awareness campaigns
Activity 9.6	▪ Support the capacity of NGOs in planning and delivering internal awareness campaigns though advice and recommendations on how to conceptualise, plan and deliver awareness campaign
Activity 9.7	▪ Develop the Ministry of Education in Planning and delivering awareness campaigns in secondary and schools and universities
Activity 9.8	▪ Conduct two surveys to assess the attitudes of the public and of public officials

Introduction

A key aspect of the fight against corruption is, of course, not only enacting anticorruption legislation, but also the enforcement of legal provisions and the continuous monitoring of activities of all public officials in the light of this legislation. In spite of improvements which were recently made in the legal and institutional infrastructure, most of the legal-administrative institutions and mechanisms cannot be properly operated in practice.

In addition to the fragmented ethical structure (i.e. many legal documents and control institutions), enforcement is one of the most serious obstacles to establishing an ethical administration in Turkey. This obstacle stems mainly from “cultural factors”, “socio-political traditions” (e.g. collectivist culture based on solidarity and traditional spoils-taking culture), “administrative traditions” (e.g. patronage in entering public service, gift-giving and receiving, and maintaining of business relations with government departments after retirement), etc.

The CEPS call for both hard and soft measures of ethics management. Although sanction policy is considered an indispensable part of its mission to combat unethical conduct, its mission of cultural change (i.e. ethical awareness and training functions) is also highly important. Therefore, raising public awareness is a crucial task.

Objectives

The objective of the Ethics Leadership Programme is to raise awareness and understanding of the provisions of the “Regulation on the Principles of Ethical Behaviour of the Public Officials” and its implications for the role and conduct of public officials in the fulfilment of their duties. Its purpose is to change the ethical culture of the organisations. In order for this to be sustainable, a public awareness raising component is crucial.

Anticipated work to be undertaken

Public awareness campaign will be managed together with the CEPS, Ethics Commissions, Ministry of National Education, NGOs and media. The project will pay special attention in pursuing cooperation with NGOs and media in developing the awareness campaign. In particular, the foreseen workshops will be used to create and/or strengthen the NGOs networking and cooperation. Moreover, the project will aim at strengthening the capacities of NGOs and media to conduct awareness campaigns also through analysing their experience and good practice in similar actions. It is planned that media and NGOs representatives/experts are directly involved in preparation of the training curricula and delivery of these trainings. The selection of the trainers/experts will be take into account their experience and expertise in media/awareness campaigns and knowledge of topics related to ethics and anti-corruption.

Workshops will be conducted to support the Council of Ethics on mass media management and then materials will be produced accordingly.

With the framework of the global objective mentioned above, 2 research projects with the following specific objectives will be commissioned:

- To assess the institutional hindrances and problems of the ethical framework;
- To analyse the gaps in the ethics legislation and problems experienced during implementation processes that are relevant to the tasks of Commissions;
- To re-evaluate the tasks given or expected to be assigned to institutions;
- To establish the attitudes and expectations of public officials and the public in general.

Use of STEs

National and international STEs will be appointed with experience in the development of awareness raising materials, campaign management including development of spot films, posters, etc.

The research will be conducted by experienced STEs.

STEs will also work directly with Ministry of National Education in managing an essay competition.

Risk factors and risk mitigation

Key stakeholders might be reluctant to participate in the work of the project insofar as it relates to this sub-component. Leverage could be applied through working with their Ethics Commissions.

Timetable

The first research will be finalised by October 2012, the second one in February 2014.

The materials will be produced by February 2013.

Workshops with stakeholders will take place during all process.

Project Management and Methodology

This section describes the delivery and management arrangements that will underpin the implementation of the Workplan discussed above.

5.1 Delivery Activities

The review of the Workplan included an assessment of the various modes of delivery proposed in the project proposal. These have been confirmed and are outlined

Expert advice

This will be provided by the Long-Term Advisor (LTA) within his competence/experience or, as necessary, by short-term experts (STEs) selected according to their specific field of competence, through direct conversation with individual officials or groups of officials on the issues specified in the Workplan and wherever necessary. National STEs will provide informed expertise on current issues within Turkey; this will be enhanced by a number of international STEs who will provide the opportunity to transfer good practice experience and knowledge. Both will provide support to the Project Management Team (PMT) in specialised areas.

Expert opinions

These will be provided in writing, as necessary, to comment on the pieces of legislation or their drafts or other documents, by independent experts from the Council of Europe Member States via the CoE Secretariat.

Roundtables and seminars

The role of roundtables and seminars is to invite stakeholders/professional groups and individuals to look at ways to enhance the work of the project, to offer perspectives from their own areas of expertise and, to propose areas in which their own policies can be reformed. They will also be used to contribute specialist knowledge to a broader debate on a given issue.

Workshops

These are intended to be smaller and more operational in their focus than roundtables and seminars to allow a particular task to be undertaken involving multiple co-operating parties, especially practitioners and officials.

Training courses

These are a central part of the delivery of the project and allow participants to acquire new knowledge and/or professional skills through interaction with a qualified trainer. Elements of self-education can be included.

Research

The proposal for research studies will provide a comprehensive overview of a given issue to serve a basis for further analysis.

Publication and dissemination

The project intends a comprehensive publication of texts and/or audiovisual CD-ROMs to ensure that expertise or knowledge is made available to the widest possible audience.

5.2 Project Management

To deliver the project, a management team (PMT) has been set up in the Council of Europe Headquarters in Strasbourg and in the Project Office in Ankara.

In Strasbourg, the Economic Crime Unit is in charge to monitor on daily basis the project implementation and report on behalf of the Council of Europe on the implementation and delivery of the project's objectives. The Project Manager Mr Lado Lalicic, will be dealing with every day management of project activities. He will be assisted by a project assistant, Ms. Tanja Naumoski-Egerton.

In Ankara, the setting-up of the project implementation team has been now finalised where Mr Serhan Alemdar (former Local Project Officer for TYEC 1 Project) was recruited for the position of TYEC 2 Local Project Officer (LPO). The Long-Term Advisor position is now filled with is Mr Gary Hickey, PhD and expert on ethics and anti-corruption. The nomination was previously approved by the main counterpart institution (the Council of Ethics for the Public Service). Ms. Gulden Serbest will be the local financial assistant in the daily implementation.

In addition to the members of the PMT, the Ethics Council has nominated Ms Seda Kartal Yanganarikan to be the National Project Director and who will liaise on daily basis with the project management team from the side of the Council of Europe and other counterpart institutions. All the above constitutes the project implementation team which will be supported by the project management team in Strasbourg in accordance to the terms as indicated in the project contract and its fiche.

The PMT will be in part located in the premises of the Council of Ethics in the Public Service. In accordance with the project document, the office space for the project has been allocated by the Ethics Council and satisfies the needs of the CoE local team, it also provides the infrastructure to implement certain project activities (conference room and other facilities in the building). In addition, the project implementation team will also be located in the Council of Europe office to ensure on-line access and finance system access as well as providing a meeting room with translation booths. The project will also undertake to ensure the translation of all relevant documentation and publications so that important texts and information are accessible in the national language and can be used as a tool in training activities and seminars.

6 Workplan

Inception	Activity Description	Specific Inputs/Means
Activity 0.1	Start up activities/workshops/Meetings with the counterparts to review and finalise the workplan of activities in line with the project logframe and update of information/needs	2-3 meetings/workshops/ Local Project Officer and Project Manager
Activity 0.2	Preparation of Detailed Workplan and Inception Report	6 W/Days of Long-term Advisor
Activity 0.3	Organisation of the Start up Conference	1 day, in Ankara, approx. 100 people from different institutions and NGO's Lunch for 100 people
Activity 1	The staff of the Council of Ethics is trained and have the necessary working tools and procedures to manage, oversee and measure the dissemination and implementation of the Training Strategy	
Activity 1.1	Revise and update the existing training module and develop new materials where necessary	Long-term Advisor Up to 4 work days of STE (int) Up to 4 days of STE (local) Cost of 2 workshops (1 day each) (15 participants for each event)
Activity 1.2	Train the training staff of the Secretariat in Training of Trainers programmes	Long-Term Advisor Up to 28 workdays of STE (local) Cost of 2 training seminars (1 day each) (15 participants for each event) Cost of travel and accommodation
Activity 1.3	Strengthen the communication and IT skills of the Secretariat through specially tailored trainings (language, communication and computer skills)	Long-term Advisor Cost of 2 training seminars (3x2=6 days) (15 participants for each event) Up to 8 workdays of STE (local)
Activity 1.4	Train the training staff of the Secretariat in e-based learning	Long-term Advisor Cost of 2 training seminars (1 day each) (15 participants for each event) Up to 4 work days of STE (local)
Activity 1.5	Train the training staff of the Secretariat in supporting the Ethics Commissions in developing and adapting the training strategy	Long-term Advisor Up to 4 workdays of STE (int) Cost of 2 training workshops (1 day each) (15 participants for each event) Translation/interpretation of training materials and sessions

Activity 1.6	Train the training staff of the Secretariat in monitoring and measuring the delivery and impact of training events	Long-term Advisor Cost of 2 workshops (1 day each) (15 participants for each event) Up to 4 work days of STE (local) Translation/interpretation of materials and sessions
Activity 1.7	Train the training staff of the Secretariat in developing a Continuous Professional Development programme for existing trainers	Long-Term Advisor Cost of 2 training seminars (1 day each) (15 participants for each event) Up to 4 work days of STE (int) Up to 4 days of STE (local)
Activity 2	At least 100 trainers from central and local government are trained and able to deliver ethics training	
Activity 2.1	Select 100 trainers from central and local government in conjunction with Ethics Commissions (with specific allocations for the Ministry of Interior, the Land Registry and the internal auditors)	Cost of Long-Term Advisor
Activity 2.2	Training of these Trainers on the application of the Training Package	Long-Term Advisor Cost of 4 training seminars 4 training seminars (4x10=40 days) 25 Participants for each training event, in total 100 participants Up to 70 workdays of short-term consultants (local) Cost of travel and accommodation
Activity 2.3	Training of these Trainers on tools and methodology of adult training techniques	Long-Term Advisor Cost of 4 training seminars 10 days x 4 seminars, in total 40 days training seminars 25 Participants for each event, in total 100 participants Up to 70 days of short-term consultants (local) Cost of travel and accommodation
Activity 3	Council of Ethics for Public Service is supported to coordinate measures to promote ethics and the Training Strategy in Turkey through establishing a Platform for Ethics	
Activity 3.1	Prepare a draft terms of reference for the new established Platform for Ethics and support the organisation of regular meetings of the Platform	Long Term-Advisor

Activity 3.2	Develop proposals and policy advice when required as input to overall national policies concerning ethics and the Training Strategy in Turkey.	Long-Term Advisor Up to 10 workdays of STE (int) Cost of a workshop (1 day) (60 participants) Cost of travel and accommodation
Activity 3.3	Support the development of a web-based information and awareness portal for public officials	Long-Term Advisor Up to 10 workdays of STE (local)
Activity 3.4	Support the development of a public website in both English and Turkish	Long Term-Advisor Up to 10 workdays of STE (local)
Activity 3.5	Development of cross-sector advisories and monitoring mechanisms	Long-Term Advisor Up to 10 workdays of STE (int) Cost of a workshop (1 day) (60 participants) Cost of travel and accommodation
Activity 4	The development of code of conduct for state universities and professional associations is supported and the capacity of their ethics commissions is improved to train in the Code	
Activity 4.1	Organise seminars on developing codes of conduct for universities and professional organisations to identify the possibilities for development of such codes.	Long-Term Advisor Up to 5 work days of short-term consultants (local) Cost of 2 seminars (1 day each) 40 participants for each training event, in total 80 participants
Activity 4.2	Support the development of such codes through workshops and advice	Long-Term Advisor Up to 10 work days of STE (local) Cost of 2 workshops x 40 participants – (1 day each)
Activity 4.3	Train Ethics Commissions on implementation of code and training for staff and/or members	Long Term Advisor Cost of 2 seminars (5 days each; in total 10 days training) 25 participants for each training event, in total 50 participants
Activity 5	Recommendations of the Research Studies (TYEC 1) in institutions previously involved are implemented	
Activity 5.1	Provision of workshops to discuss research findings	Long Term Advisor Up to 10 workdays of STE (local) Cost of 10 workshops (1 workshop for each study) (40 participants for each; 400 in total)
Activity 5.2	Develop action plans for ministries to	Long Term Advisor

	implement respective research findings	Up to 9 workdays of STE (local) for each study- total 90 workdays
Activity 6	Ethics Commissions are supported in devising and delivering the training strategy and monitoring its implementation	
Activity 6.1	Organise workshops with Ethics Commissions to devise training strategy	Long-Term Advisor Cost of 10 workshops (2 days each; 20 days total) (40 participants for each)
Activity 6.2	Organise workshops with trainers to adapt training events to specify ministry contexts	Long Term Advisor Cost of 10 Workshops (2 days each; 20 days total) (40 participants for each)
Activity 6.3	Monitor and evaluate training events that take place during the course of the project implementation	Long-Term Advisor Cost of interpretation and translation
Activity 7	The training strategy is implemented on ethics and materials for its application at governorate and local government levels	
Activity 7.1	Train 25 Trainers who will be able to train others on implementation aspects of the training strategy	Long Term-Advisor Cost of a training seminar (15 days) (25 participants) Up to 60 workdays of STE Cost of travel and accommodation
Activity 7.2	Adapt the training material on implementation aspects of the training strategy	Long Term Advisor
Activity 7.3	Support the training unit within the Council in adoption of the Ethical Leadership Training Programme (as a deliverable of the previous project) for implementation at local level	Long Term Advisor Up to 20 workdays of STE (local)
Activity 8	The General Directorate of the Land Registry is supported as an 'Island of Integrity' in terms of the effectiveness of a comprehensive ethical environment as the basis for the development of a wider cross-public sector on which future prevention strategies may be based.	
Activity 8.1	Carry out ethics training across the organisation	Long-Term Advisor Cost of 50 training seminars (1 day each) 25 participants each Up to 60 workdays of STE (local) Cost of travel/accommodation
Activity 8.2	Develop approaches and measures to support and sustain the training	Long-Term Advisor

		Cost of a workshop (2 days) 25 participants Up to 20 workdays of STE (int)
Activity 8.3	Develop “ethics audits” of key mechanisms for regulating ethical standards and conduct within the organisation	Long-Term Advisor Cost of a workshop (2 days) 25 participants Up to 20 workdays of STE (int)
Activity 8.4	Develop means to measure systemic improvements to the ethical culture or environment through staff and customer surveys; staff conduct and performance setting and monitoring; customer services standards setting and monitoring	Long Term-Advisor Cost of a workshop (2 days) 25 participants Up to 20 workdays of STE (int)
Activity 9	Awareness campaigns are developed for prevention of corruption in ministries, schools and universities, and the general public through dissemination of audio-visual materials and networking relations with media and NGOs are established	
Activity 9.1	Support the capacity of the Council of Ethics for Public Service in planning and delivering awareness campaigns through advise and recommendations on how to conceptualise, plan and deliver awareness campaign.	Long-Term Advisor Cost of 2 x 1 day Workshops Up to 8 participants Up to 5 work days of STE (local)
Activity 9.2	Organise workshops with media representatives	Cost of 2 workshops (1 day each) 25 participants for each Up to 6 workdays of STE (local)
Activity 9.3	Organise workshops with NGOs	Cost of 3 workshops (1 day each) 25 participants for each Up to 9 workdays of STE (local)
Activity 9.4	Develop public awareness materials to promote ethics	Long Term Advisor Up to 85 workdays of STE (local)
Activity 9.5	Support the capacity of Ethics Commissions in planning and delivering internal awareness campaigns	Cost of 4 workshops (1 day each) 40 participants for each Up to 15 workdays of STE (int.) Up to 25 work days of STE (local)
Activity 9.6	Support the capacity of NGOs in planning and	Long Term Advisor

	delivering internal awareness campaigns through advice and recommendations on how to conceptualise, plan and deliver awareness campaign	Cost of 2 x 1 day Workshops Up to 5 workdays of STE (local)
Activity 9.7	Develop the Ministry of Education in Planning and delivering awareness campaigns in secondary and schools and universities	Long Term Advisor Up to 10 workdays of short-term consultants (local) Cost for campaign materials
Activity 9.8	Conduct two surveys to assess the attitudes of the public and of public officials	Long-Term Advisor Up to 100 workdays of contractors under service– equivalent of 100 workdays of local short-term consultants

PLAN OF OPERATIONS FOR PERIOD July – December 2012

Project title: Consolidating Ethics in the Public Sector in Turkey		Contract No: TR2009/0136.05-01/001		Country: Turkey		Page: 1	
Planning period: 1 July 2012 – 31 December 2012		Prepared on : July 2012		Contractor: Council of Europe			
Activity No 1	The staff of the Council of Ethics is trained and have the necessary working tools and procedures to manage, oversee and measure the dissemination and implementation of the Training Strategy	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Revise and update the existing training module and develop new materials where necessary			1 Workshop	2 TP		
2.	Train the training staff of the Secretariat in Training of Trainers programmes				1 Training		
3.	Strengthen the communication and IT skills of the Secretariat through specially tailored trainings (language, communication and computer skills)			2 Training-ini	2 Training-cont	3 Training-cont	2 Training-cont
4.	Train the training staff of the Secretariat in e-based learning					1 TP	1 Training
5.	Train the training staff of the Secretariat in supporting the Ethics Commissions in developing and adapting the training strategy					1 Training	
6.	Train the training staff of the Secretariat in monitoring and measuring the delivery and impact of training events						1 TP 1 Training
7.	Train the training staff of the Secretariat in developing a Continuous Professional Development programme for existing trainers						

Activity No 2	At least 100 trainers from central and local government are trained and able to deliver ethics training	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Select 100 trainers from central and local government in conjunction with Ethics Commissions (with specific allocations for the Ministry of Interior, the Land Registry and the internal auditors)				TSP	TSP	TSP
2.	Training of these Trainers on the application of the Training Package					1 TP	
3.	Training of these Trainers on tools and methodology of adult training techniques					1 TP	
Project title: Consolidating Ethics in the Public Sector in Turkey		Contract No: TR2009/0136.05-01/001			Country: Turkey		Page: 2
Planning period: 1 July 2012 – 31 December 2012		Prepared on : July 2012			Contractor: Council of Europe		
Activity No 3	Council of Ethics for Public Service is supported to coordinate measures to promote ethics and the Training Strategy in Turkey through establishing a Platform for Ethics	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Prepare a draft terms of reference for the new established Platform for Ethics and support the organisation of regular meetings of the Platform				1 TP		
2.	Develop proposals and policy advice when required as input to overall national policies concerning ethics and the Training Strategy in Turkey.						1 TP
3.	Support the development of a web-based information and awareness portal for public officials					1 TP	
4.	Support the development of a public website in both English and Turkish					1 TP	

5.	Development of cross-sector advisories and monitoring mechanisms					1 Workshop	1 TP
Activity No 4	The development of code of conduct for state universities and professional associations is supported and the capacity of their ethics commissions is improved to train in the Code	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Organise seminars on developing codes of conduct for universities and professional organisations to identify the possibilities for development of such codes.						
2.	Support the development of such codes through workshops and advice						
3.	Train Ethics Commissions on implementation of code and training for staff and/or members						

Project title: Consolidating Ethics in the Public Sector in Turkey		Contract No: TR2009/0136.05-01/001			Country: Turkey		Page: 3
Planning period: 1 July 2012 – 31 December 2012		Prepared on : July 2012			Contractor: Council of Europe		
Activity No 5	Recommendations of the Research Studies (TYEC 1) in institutions previously involved are implemented	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Provision of workshops to discuss research findings						
2.	Develop action plans for ministries to implement respective research findings						

Activity No 6	Ethics Commissions are supported in devising and delivering the training strategy and monitoring its implementation	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Organise workshops with Ethics Commissions to devise training strategy						
2.	Organise workshops with trainers to adapt training events to specify ministry contexts						
3.	Monitor and evaluate training events that take place during the course of the project implementation						

Project title: Consolidating Ethics in the Public Sector in Turkey		Contract No: TR2009/0136.05-01/001			Country: Turkey		Page: 4
Planning period: 1 July 2012 – 31 December 2012		Prepared on : July 2012			Contractor: Council of Europe		
Activity No 7	The training strategy is implemented on ethics and materials for its application at governorate and local government levels	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Train 25 Trainers who will be able to train others on implementation aspects of the training strategy						
2.	Adapt the training material on implementation aspects of the training strategy						
3.	Support the training unit within the Council in adoption of the Ethical Leadership Training Programme (as a deliverable of the previous project) for implementation at local level						

Activity No 8	The General Directorate of the Land Registry is supported as an 'Island of Integrity' in terms of the effectiveness of a comprehensive ethical environment as the basis for the development of a wider cross-public sector on which future prevention strategies may be based	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Carry out ethics training across the organisation						
2.	Develop approaches and measures to support and sustain the training						
3.	Develop "ethics audits" of key mechanisms for regulating ethical standards and conduct within the organisation						
4.	Develop means to measure systemic improvements to the ethical culture or environment through staff and customer surveys; staff conduct and performance setting and monitoring; customer services standards setting and monitoring						

Project title: Consolidating Ethics in the Public Sector in Turkey		Contract No: TR2009/0136.05-01/001		Country: Turkey		Page: 5	
Planning period: 1 July 2012 – 31 December 2012		Prepared on : July 2012		Contractor: Council of Europe			
Activity No 9	Awareness campaigns are developed for prevention of corruption in ministries, schools and universities, and the general public through dissemination of audio-visual materials and networking relations with media and NGOs are established	TIME FRAME					
		Year 2012					
ID	Task name	Jul	Aug	Sep	Oct	Nov	Dec
1.	Support the capacity of the Council of Ethics for Public Service in planning and delivering awareness campaigns through advise and recommendations on how to conceptualise, plan and deliver awareness campaign.					1 TP 1 Workshop	

2.	Organise workshops with media representatives						
3.	Organise workshops with NGOs						
4.	Develop public awareness materials to promote ethics						3-TP
5.	Support the capacity of Ethics Commissions in planning and delivering internal awareness campaigns						
6.	Support the capacity of NGOs in planning and delivering internal awareness campaigns through advice and recommendations on how to conceptualise, plan and deliver awareness campaign						
7.	Develop the Ministry of Education in Planning and delivering awareness campaigns in secondary and schools and universities						
8.	Conduct two surveys to assess the attitudes of the public and of public officials				1 TP		

ID	Task name	TIME FRAME					
		Year 2012					
		Jul	Aug	Sep	Oct	Nov	Dec
1.	Opening Event and Steering Committee Meeting			1 Conference			

Note: TP – Technical Paper (expert opinion, policy advice, etc.)
TSP – Trainers selection process

7 Calendar

(Note: confirmed calendar of activities is in red)

Description		Months / 1 st Year												Months / 2nd Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
Opening Event																									
Steering Committee Meeting																									
Activity 1	The staff of the Council of Ethics will be trained and have the necessary working tools and skills to better exercise their mandate																								
Sub-Activities:	Revise and update the existing training module and develop new materials where necessary																								
	Train the training staff of the Secretariat in Training of Trainers programmes																								
	Strengthen the communication and IT skills of the Secretariat through specially tailored trainings (language, communication and computer skills)																								
	Train the training staff of the Secretariat in e-based learning																								
	Train the training staff of the Secretariat in supporting the Ethics Com. in developing and adapting the training strategy																								
	Train the training staff of the Secretariat in monitoring and measuring the delivery and impact of training events																								

	Description	Months / 1 st Year												Months / 2 nd Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
	Train the training staff of the Secretariat in developing a Continuous Professional Development programme for existing trainers																								
Activity 2	At least 100 trainers from central and local government will have been trained and able to deliver ethics training																								
Sub-Activities:	Select 100 trainers from central and local government in conjunction with Ethics Commissions																								
	Training of these Trainers on the application of the Training Package																								
	Training of these Trainers on tools and methodology of adult training techniques																								
Activity 3	Council of Ethics for Public Service is supported to coordinate measures to promote ethics and the Training Strategy in Turkey through establishing a Platform for Ethics																								
Sub-Activities:	Prepare a draft terms of reference for the new established Platform for Ethics and support the organisation of regular meetings of the Platform																								
	Develop proposals and policy advice when required as input to overall national policies concerning ethics and the Training Strategy																								

	Description	Months / 1 st Year												Months / 2nd Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
	Support the development of a web-based information and awareness portal for public officials .																								
	Support the development of a public website in both English and Turkish																								
	Development of cross-sector advisories and monitoring mechanisms																								
Activity 4	The development of codes of conduct for state universities and professional associations will have been supported and the capacity of their ethics commissions to train in the Code will increase																								
Sub-Activities:	Organise seminars on developing codes of conduct for universities and professional organisations to identify the possibilities for development of such codes.																								
	Support the development of such codes through workshops and advice																								
	Train Ethics Commissions on implementation of code and training for staff and/or members																								
Activity 5	Recommendations of the Research Studies (TYEC 1) in all institutions previously involved will turn into action plans																								
Sub-Activities:	Provision of workshops to discuss research findings. Develop action plans for ministries to implement respective research findings.																								

	Description	Months / 1 st Year												Months / 2nd Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
	Support the development of the ministry action plans to implement respective research findings																								
Activity 6	Ethics Commissions will have been supported in devising and delivering the training strategies and monitoring their implementation plans																								
Sub-Activities:	Organise workshops with Ethics Commissions to devise training strategy																								
	Organise workshops with trainers to adapt training events to specify ministry contexts																								
	Monitor and evaluate training events that take place during the course of the project implementation																								
Activity 7	The Ethics Training Strategy will have been implemented at governorate and local government levels																								
Sub-Activities:	Adapt the training material on implementation aspects of the training strategy																								
	Train 25 Trainers who will be able to train others on implementation aspects of the training strategy																								
	Support the unit in adoption of the Ethical Leadership Training Programme (as a deliverable of the previous project) for implementation at local level																								

	Description	Months / 1 st Year												Months / 2nd Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
Activity 8	The civil servants working at the General Directorate of the Land Registry will have been trained in the application of the code of ethics																								
Sub-Activities:	Carry out ethics training across the organisation																								
	Develop approaches and measures to support and sustain the training																								
	Develop “ethics audits” of key mechanisms for regulating ethical standards and conduct within the organisation																								
	Develop means to measure systemic improvements to the ethical culture or environment through staff and customer surveys; staff conduct and performance setting and monitoring; customer services standards setting and monitoring																								
Activity 9	Anti-corruption awareness campaigns and materials in ministries, schools and universities, and the general public will have been produced and networking relations with media and NGOs will have been established																								
Sub-Activities:	Support the capacity of the Council of Ethics for Public Service in planning and delivering awareness campaigns																								
	Organise workshops with media representatives																								
	Organise workshops with NGOs																								

	Description	Months / 1 st Year												Months / 2nd Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
	Develop public awareness materials to promote ethics																								
	Support the capacity of Ethics Commissions in planning and delivering internal awareness campaigns																								
	Support the capacity of NGOs in planning and delivering internal awareness campaigns																								
	Develop the Ministry of Education in planning and delivering awareness campaigns in secondary and schools and universities																								
	Conduct two surveys to assess the attitudes of the public and of public officials																								
	Wrap up – Closing Activity and Final Reporting Phase																								

8 Monitoring, Reporting and Evaluation of the Project

8.1 Monitoring

The daily monitoring of the implementation and reporting of specific activities carried out by the PMT of the TYEC2 project will be monitored by the Economic Crime Unit at the Directorate General of Human Rights and Rule of Law at the Council of Europe in Strasbourg.

8.2 Reporting

The PMT, specifically the Council of Europe shall submit directly all reports to the counterparts in Ankara, the Council of Ethics, the EUD and the CFCU.

Report	Type	Timelines
Inception Report English and Turkish Versions	The inception report will contain a detailed work plan and the names of possible consultants. In its elaboration, the Logical Framework Approach shall be followed linking the project objectives to expected results and the activities needed in order to achieve the results. The inception report outlines the management structure of the project clearly describing the responsibilities of the main players as well as the decision-making process and information flow between the project participants.	Within 3 months of the Beginning of the Contract (3 months after the project commencement) Submitted to: CEPS CFCU EUD
Quarterly Reports English and Turkish Versions	These reports will list more in detail the activities undertaken and assess the progress toward achievement of project objectives. The update will stress particularly the achievement of results and identify also potential risks during the forehead implementation period.	To be submitted every three months Submitted to: CFCU EU Delegation
Final Report English and Turkish Versions	The final report should follow the inception report format and include an in-depth assessment of project implementation results and the level of achievement of the objectives. The final report will be complemented by an evaluation of the impact of the project aimed at identifying the impact and the achievements of the project at the end of it. The Final Report and the Evaluation Report will contain recommendations to be followed up by the beneficiary.	It will be submitted after two months of the end of the project period. Submitted to: CEPS CFCU EUD

In addition to the above formal reports, the Project Team shall regularly inform the donors of political, economic or institutional developments of relevance to the project. In particular the PMT and Turkish counterparts will meet monthly with representatives of the European Commission and the CFCU.

8.3 Evaluation

Three months before the end of the project implementation period, an Evaluation of the achievements of the objectives, impact and results against the indicators of the logical framework will be carry out by two external independent evaluators. One Evaluator is to be proposed by the EU Delegation and one by the Council of Europe.

Prior to the evaluation, the project management in consultation with the Project Director will prepare a detailed progress report which will be made available to the evaluators. Briefing and debriefing meetings prior to and after the evaluation shall be held between the evaluators and the Council of Europe in order to discuss details and provide information as needed. The evaluators will receive early information on the strategy, and indicators which will be identified in a coherent way and shall establish the way of the monitoring/evaluation.

9 Sustainability

9.1 Participation and ownership by the beneficiary institution

The project has been devised to enhance the sustainability of ethics training within ministries. It is intended that ethics training will become a core function of Ethics Commissions, and that the Council of ethics will encourage this training through its monitoring role.

The role of the Council of Ethics for the Public Service will further promulgate ethics within the target groups by updating available training materials and acting as a training resource; providing professional trainers to ensure a systematic training programme for public bodies, and supporting Ethics Commission to develop training strategies. This Training will be monitored and quality assured by the Council of Ethics. Last of all, the Council of Europe will endeavour to raise public awareness of ethics and increase understanding of the citizen-public official relationship.

The project will impact on those bodies directly involved in the project. The “pilot” institutions will benefit in that they will receive training and application of new ethical standards. The capacities of the Ethics Council’s secretariat will continue to be increased via training materials, newly developed codes and awareness raising tools.

The project will also have impact beyond the immediate beneficiaries. The Council of Ethics seeks to ensure the widest possible participation of stakeholder institutions. As the project develops it is intended to consolidate the engagement of stakeholder institutions. The ethics training programme is expected to have a “domino” effect so that newly trained trainers, joining the already established Ethics Trainers’ pool, will widen the base of available trainers and so provide training to a wider group of people than in TYEC1. In addition, awareness raising and peer to peer reviews of certain standards and guidelines will provide further impact and help ensure sustainability.

The Council of Ethics for the Public Service will work closely with Ethics Commissions and the ministries and ensure that they have joint ownership of the project and so ensure sustainability.

The project also provides for regular formal meetings with the EUD and CFCU, as well as regular reporting arrangements.

9.2 Appropriate technology

As an integral part of the training delivery the project is committed, as part of the sustainability, to ensure that training materials and training of trainers material is accessible, adaptable and useable beyond the duration of the project. For this, the project is committed to use of low-cost media, such as CD-ROMs and PC-useable material, so that any institution can access, use and adapt the material for their own purposes. The project will also ensure that the material and its use are not so complex and prescriptive that there would be excessive costs (for example, translation) and technological requirements to sustain its use beyond the duration of the project. CD-ROMs and web-based technology will also be used to facilitate inexpensive and non-paper based dissemination.

9.3 Environmental protection

One of the areas to be addressed directly and indirectly by the project is the environmental impact of corruption, ranging from despoliation of forests to the illegal conversion of land for developmental use. Such themes have been raised at the TYEC1. It is intended that a number of the research studies should study the issues associated with such areas, including the planning process and the work of the Registry. These will directly provide the Council of Ethics with information on how its work and the project may provide specific responses.

In developing the work of the Council of Ethics and the preparation of a significant training programme that involves not only national institutions but also regional and local institutions, it is expected that one of the longer-term and indirect benefits will be a more public-focussed and ethical public service.

9.4 Socio-cultural issues

One of the main themes addressed during the inception phase have been to ensure that the project remains focussed on local perceptions of needs and ways of addressing them. While the project allows for the collection and collation of international best practice, the intention is to work toward devising and developing a Turkish response.

Given that most of the training provided by the Council to national and local audiences, the project is highly geared to using local STEs to devise and develop relevant training material thus ensuring that the balance of the project focus and input will reflect local socio-cultural norms and attitudes.

9.5 Gender equality

Women are not heavily represented in national and local public administration. The project will take what measures are available to ensure that its activities and outputs will meet the needs of both women and men, and will encourage equitable access to women to public administration careers. Each project activity will aim at ensuring the equal participation of men and women. In view of that proper reporting will be prepared on exact percentage of women participation in each activity.

9.6 Institutional and management capacity

The PMT have been competitively selected or appointed for their practitioner experience on project management and ethics as well as local knowledge. Together with its counterpart in the Council of Ethics, the project has a grounded and experienced team; further training will be provided within the Council itself to strengthen its internal capacity.

The project implementation team will be in part located in the premises of the Council of Ethics for the Public Service. In accordance with the project document, the office space for the project has been allocated by the Ethics Council and satisfies the needs of the local project team, it also provides the infrastructure to implement certain project activities (conference room and other facilities in the building). In addition, the project team will also be located in the Council of Europe Project Office to ensure on-line access and finance system access as well as providing a meeting room with translation booths.

9.7 Economic and financial viability

The project will certainly justify the cost involved, not only in terms of the outputs of the project but also the longer-term objectives. The costing for the project are robust, as are the reporting arrangements, and requires no further financial input by the beneficiary institution, stakeholders, the UC or the Turkish government.

On the wider assessment of a financial value of the objectives of the project it would be unwise to indicate at this stage any numeric value or a quantitative justification without any credible economic modelling as to the overall financial gains from a more ethical and impartial public service or growth in GDP. On the other hand, such linkages are well-established in the practitioner literature and there is no doubt that the cost of the project will be justified in economic and financial terms if it achieves its objectives.

10 Visibility and Identity

10.1 TYEC 2 Website

The project news will be reported on the Council of Europe website. Moreover, a section of this website is exclusively dedicated to the TYEC 2 project: www.coe.int/tyec2

The creation of this new website aims at reporting in detail on all Project activities and ongoing public events and will be frequently updated

10.2 Council of Ethics Website

The Council of Ethics for the Public Service, which is the counterpart and beneficiary institution, has designated a special section for the Project within its website: www.etik.gov.tr The project developments can also be followed in Turkish through that website.

10.3 Visibility Plan

The visibility plan is attached to this report.

10.4 Publications

The Implementing authority will produce reports to update and inform the Contracting authority on their findings and progress.

During the project, booklets, leaflets, brochures, and training kits will be used. The training kits will be compiled of training materials and samples of good practices which will be integrated into the Turkish model. In addition, ten research studies will be conducted and the results will be published in both, Turkish and English.

All publications will acknowledge the financial contribution of the EU, and will contain a disclaimer. They will also be made available for the public.

11 Conclusions

11.1 Context

The project proposal has been translated into a detailed and timetabled Workplan.
The engagement and commitment has been achieved with the beneficiary institution.
The interest and involvement of a number of stakeholder institutions has been achieved.
The project has the expressed support of the Government.
The project has appropriate management and monitoring arrangements

11.2 Content

The Workplan intends to draw on national and international expertise and existing good practice to devise and develop training materials, to ensure that the training material is Turkish-specific.

11.3 Delivery and Sustainability

The Workplan is costed and appropriate cost review arrangements are proposed.
The Workplan training and the development of material will seek to ensure that the objectives of the project are sustainable.

11.4 Coverage and Visibility

The Workplan will use accessible technology, including CD-Roms, websites, conferences and workshops to ensure the widest awareness of the objectives and work of the project.

11.5 Risk Assessment

The individual sub-components have been assessed and proposals are made to mitigate them.

12 Annexes

Visibility Strategy
Report on Start up meetings held on 14-15 June 2012

