Horizontal Facility for Western Balkans and Turkey

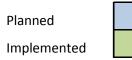
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Funded by the European Union and the Council of Europe



Implemented by the Council of Europe

Montenegro Workplan for Theme II: Fighting Co	orruption,	Economic Crime and Organised Crime				Total cost		20	16					2017							2018	}				2019
Implemented by: Economic Crime and Coopera	tion Divis	ion - DG I					5 6	7 8	9 10) 11 12	2 1	2 3	4	5 6	7 8	9 1	0 11	12 1	2 3	3 4	5 6	7 8	9 10	11 12	1 2	2 3
Overall Objective To prevent and fight economic crime in Montenegro	Level of framewo recomm Number	vely Verifiable indicators OVI(s) f compliance of legislation and institutional work with CoE standards and nendations of CoE evaluations; r of guidelines/recommendations and good es produced by the Action and implemented norities.		Assumptions Continued political will to implement necessary reforms in economic crime area; Sufficient absorption capacities of beneficiary institutions.		650,000 EUR																				
Sector Objective No. 8	Objectiv	vely Verifiable indicators OVI(s)	Sources of verification	Assump	tions	Cost																				
SO 1 (TR 8) – Improve legal framework to prevent corruption	formally Number publicat Guidelir for elect	r of draft laws/amendments developed and y introduced into the legislative process; r of public awareness campaign outputs: tions, media outputs, etc.; nes on use and misuse of public resources ctoral purposes are available; r of persons trained.	GRECO evaluation and compliance reports; EU Progress Report; Official reports of relevant institutions; Action progress reports and final report.	Commitment of beneficiary in expected result; Ability of beneficiary institution assistance; Constructive interagency par engagement in development	ons to absorb action ticipation and																					
Expected results	Inputs/A	Actions	Deliverables	Beneficiary Institutions	Target groups	Means	5 6	7 8	9 10) 11 12	2 1	2 3	4	5 6	7 8	9 1	0 11	12 1	2 3	3 4	5 6	7 8	9 10	11 12	1 2	2 3
	1.1.1	Design and implement strategies to raise public awareness in the areas of political party financing, conflict of interest, asset declarations and whistleblowing of i) the obligations of public officials and entities established by the Law on Prevention of Corruption (LPC) and other related legislation; ii) the rights of citizens established by the LPC and other related legislation.	– Up to 4 workshops/seminars	Agency for Prevention of Corruptio (APC)	on APC, NGOs, general public	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 4 technical papers Cost of up to 4 workshops/seminars Translation/interpretation 				S											f					
Enhance the capacities of the authorities to mplement legislation on prevention of	1.1.2	Conduct a campaign to raise public awareness of the Law on Prevention of Corruption and institutional obligations	 Awareness raising campaing 	APC, NGOs, general public	APC, NGOs, general public					s										f						
corruption and political party financing is raised through awareness raising and capacity building	1.1.3	Prepare guidelines for political parties, relevant ministries, prosecutors, judges and MPs on obligations relating to mis/use of public resources in and out of electoral periods contained in the LPC, in the Law on financing of political entitties and election campaigns and other legal provisions	 Guidelines for political parties, relevant ministries, prosecutors, judges and MPs Up to 3 workshops/seminars Publications 	APC, line ministries, prosecutors, judges, MPs, political parties	APC, line ministries, prosecutors, judges, MPs, political parties	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 5 technical papers Cost of up to 3 workshops/seminars Cost of publications Translation/interpretation 				s	5							f								
	1.1.4	Provide two rounds of training on implementation of the relevant legal provisions to the APC, relevant ministries, prosecutors and judges	 Training material 2 rounds of trainings 	APC, line ministries, prosecutors, judges	APC, line ministries, prosecutors, judges	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 4 technical papers Cost of up to 6 trainings Translation/interpretation 												s								f



Postponed Cancelled



Start Activity S Finalise Activity f

Version of 1November 2017

Sector Objective No. 9	Objective	ely Verifiable indicators OVI(s)	Sources of verification	Assump	tions	Cost		i I I																
SO 2 (TR 9-13) – Enhance capacities of Agency for Prevention of Corruption (APC) to prevent corruption/ Enhance institutional capacities to prevent corruption	adopted Track re Number Number authorit Statistic parties	with legal obligations; verification by APC financial reports; enforcement procedures		Commitment of beneficiary in expected result; Ability of beneficiary institution assistance; Sufficient human resources a provided to the Agency for Pr	ons to absorb action and political support are																			
2.1 Expected results	Inputs/A	ctions	Deliverables	Beneficiary Institutions	Target groups	Means	5 6	7 8	9 10	11 12	1 2	3 4	5 6	7 8 9	0 10 11	12 1	2	3 4	5 6	7 8	9 10	11 12	1 2	3 4 5
	2.1.1	Review and strengthen a system to monitor compliance of obliged entities by the APC	 Track record system 1 workshop/seminar 	APC, obliged entities	APC, obliged entities	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 1 technical paper/study Cost of 1 workshop/seminar Translation/interpretation 						s			f	f								
	2.1.2	Provide training to the APC (and other relevant institutions as necessary) on implementation of the system		APC, obliged entities	APC, obliged entities	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 1 technical paper Cost of up to 2 trainings Translation/interpretation 									s	s						f		
The track record system for political party and election campaign funding compliance and oversight/enforcement is reviewed and strengthened	2.1.3	Provide an analysis of lessons of implementation of relevant provisions of the LPC based on existing analyses of the Tivat municipal elections and October 2016 parliamentary elections, and recommendations for changes in rules and procedures	 Recommendations for changes in rules and procedures 	APC	APC, political partieis, civi society	 I – Project team – STC (incl. int. travel and per-diems) – STC (local) – Up to 1 technical paper/study – Cost of 1 seminar/workshop – Translation/interpretation 				S			f											
	2.1.4	Develop risk assessment methodology for improvement of the plan of control of electoral campaigns financing	- Risk assessment methodology - 1 seminar	APC	APC	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 1 technical paper/study Cost of 1 seminar/workshop Translation/interpretation 								s			f							
	2.1.5	Training for political parties on reporting during electoral campaign	- Guidelines for reporting on finances during electoral campaign - Up to 2 trainings	APC	APC, political partieis, civi society	I – Project team – STC (incl. int. travel and per-diems) – STC (local) – Up to 1 technical paper – Cost of 2 trainings – Translation/interpretation								s			f							
2.2 Expected results	Inputs/A		Deliverables	Beneficiary Institutions	Target groups	Means	56	7 8	9 10	11 12	1 2	3 4	5 6	7 8 9	0 10 11	12 1	2	3 4	56	78	9 10	11 12	1 2	3 4 5
	2.2.1	Provide guidelines/manual on oversight of asse declarations, including on communication/awareness-raising, preliminary audit of asset declarations, methods of selection of officials for in-depth audit (including assessment of resources/time required for full audit, and risk assessment criteria for selection of officials) and techniques of in-depth audit	– 1 workshop/seminar	APC	APC	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/manual Cost of 1 workshop/seminar Cost of pubication Translation/interpretation 				S			f			f								
The capacities of the Agency for Prevention of Corruption to implement and enforce legal provisions on asset declarations and conflict of		Provide training to APC on the guidelines/manual referred to in action 2.2.1	– 2 trainings for APC staff	APC	APC	 Project team STC (incl. int. travel and per-diems) STC (local) Cost of up to 2 trainings Translation/interpretation 							S			s	f f							
interest are enhanced	2.2.3	Provide practical guidelines for the APC on its role in the implementation and enforcement of conflict of interest obligations, including: definition/examples of conflict of interest, gifts etc.	 Practical guidelines 1 worskhop/seminar 	APC	APC	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/guidelines Cost of 1 workshop/seminar Translation/interpretation 						S		5 f		f								
	2.2.4	Provide training to APC on the guidelines referred to in 2.2.3	– 2 trainings for APC staff	APC	APC	 Project team STC (incl. int. travel and per-diems) STC (local) Cost of up to 2 trainings Translation/interpretation 									S		S			f				

Expected results	nputs/Actions	Deliverables	Beneficiary Institutions			5	6 7	89	10 11 12	1 2	3	4 5 6	78	9 1	0 11	12 1	2	3 4	5 6	78	9 10	11 12	1 2	3 4
	.3.1 Conduct assessment of adequacy, fu and effectiveness of mechanisms for information from other institutions and for the purposes of audit of asset dec determinations of conflict of interest, investigations by APC of alleged viola recommendations for their improvem	access to improvement d databases – Up to 2 workshops/seminars clarations, and ations, and	APC	APC, prosecution, police, tax administration, real estate agency	 Project team STC (incl. int. travel and per-diems) STC (local) Study/Technical Paper Cost of up to 2 workshops/seminars Cost of publication Translation/interpretation 								S							f				
APC has effective information exchange	.3.2 Conduct assessment and mechanism provision by APC of information to ot institutions, and recommendations fo improvement	her improvement	APC	APC, prosecution, police, tax administration, real estate agency	 Project team STC (incl. int. travel and per-diems) STC (local) Study/Technical Paper Cost of up to 2 workshops/seminars Cost of publication Translation/interpretation 								S							f				
frameworks with competent authorities to undertake its control functions	.3.3 Provide mentoring/training of APC of on real-life scenarios (e.g. actual ass declaration audits, whistleblowing car other notifications of suspected corru	set – Up to 2 trainings ses and	APC	APC officials	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/training material Cost of up to 2 trainings Translation/interpretation 																S		f	
	.3.4. Provide coordination training for SAI conducting audit/control of financial r political entities		Jp APC, SAI	APC, SAI	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/training material Cost of up to 2 trainings Translation/interpretation 									s		f								
Expected results	nputs/Actions	Deliverables	Beneficiary Institutions	Target groups	Means	5	6 7	89	10 11 12	1 2	3	4 5 6	7 8	9 1	0 11	12 1	2	3 4	5 6	7 8	9 10	11 12	1 2	3 4
Awareness and capacity of MPs, judges, prosecutors and police to comply with and implement/enforce legal provisions on ethics	.4.1 Provide practical guidelines to MPs a councilors, judges, prosecutors and p legal provisions on ethics and conflic interest, based on real-life examples	police on – Up to 2 workshops/seminars tts of	APC, MPs, judges, prosecutors and police	MPs, judges, prosecutors and police	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 4 technical papers/guidelies Cost of up to 2 workshops/seminars Cost of publications Translation/interpretation 				S		f													
and prevention of conflict of interest enhanced	.4.2 Conduct seminars/training for MPs, jupplice on compliance with ethics and interest provisions		APC, MPs, judges, prosecutors and police	MPs, judges, prosecutors and police	 Project team STC (incl. int. travel and per-diems) STC (local) Technical Paper/Training curriculum Cost of up to 6 trainings Translation/interpretation 					s						f								
Expected results	nputs/Actions	Deliverables	Beneficiary Institutions	Target groups	Means	5	6 7	89	10 11 12	1 2	3	4 5 6	7 8	9 1	0 11	12 1	2	3 4	5 6	78	9 10	11 12	1 2	3 4
	•	hings to civil – Guidelines on whistleblowing blice on their – Up to 4 trainings -	APC, civil servants, judges, prosecutors and police	APC, civil servants, judges, prosecutors and police	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 4 technical papers/guidelines Cost of up to 4 trainings Cost of publications Translation/interpretation 					s									f					

Sector Objective No. 14-15	Objectively Verifiable indicators OVI(s)	Means of verification	Assumptions		Cost							I						i				
enforcement authorities (LEA), prosecution and judiciary in economic crime	Number of manuals/guidelines prepared and adopted by authorities base on Action input; Number of persons trained in investigations and asset recovery issues.	GRECO evaluation and compliance reports; EU Progress Report; Official reports and statistics of relevant authorities; Action progress reports and final report.	Ability of beneficiary institution assistance; Active interagency participation designing of methodologies.																			
Expected results	Inputs/Actions	Deliverables	Beneficiary Institutions	Target groups	Means	56	78	9 10 1	1 12 1	2 3	4 5	6 7	89	10 1	1 12	1 2 3	4 5	6 7	8 9 10	11 12	1 2	3 4
Capacities and skills of the LEA/prosecution and judiciary in investigating, prosecuting and	3.1.1 Prepare a Manual on good practices and guidelines for investigations of corruption based on state audit reports	 Manual on good practices and guidelines for investigations of corruption cases, including financial investigations. Up to 2 workshops/seminars 	LEA, prosecution, judiciary, State Audit	LEA, prosecution, judiciary, State Audit	 Project team STC (incl. int. travel and per-diems) STC (local) Technical Paper/Manaul Cost of up to 2 workshops/seminars Cost of publication Translation/interpretation 					s		s			f							
adjudicating corruption/ML/FT cases are enhanced	3.1.2 Carry out "Mock trial" exercise for all those involved in investigation, prosecution and adjudication of corruption/ML/TF cases	– "Mock trial" exercise materials; – Training	FIU, LEA, prosecution and judiciary	FIU, LEA, prosecution and judiciary	 Project team STC (incl. int. travel and per-diems) STC (local) Technical Paper Cost of 1 training Translation/interpretation 											6					f	
Expected results	Inputs/Ac	Deliverables	Beneficiary Institutions	Target groups	Means	56	78	9 10 11	12 1 2	3	4 5	6 7	89	10 11	12 1	2 3	4 5	6 7 8	9 10	11 12	1 2	3 4
	3.21 Develop guidelines/good practices for asst tracing/identification by using the available data and information	– Guidelines/good practices – 1 workshop/seminar	LEA, prosecution,	LEA, prosecution	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/guidelines Cost of 1 workshop/seminar Translation/interpretation 							s				f						
The regime of seized and confiscated corruption related assets is improved	3.2.2 Provide training for LEA/prosecutors on pro- actively conducting asset tracing/identification and conducting financial investigations in all proceeds generating criminal offences	– Training material – Up to 2 trainings	LEA, prosecution	LEA, prosecution	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/guidelines Cost of publication Cost of up to 2 trainings Translation/interpretation 											s						f
Sector Objective No. 16-21	Objectively Verifiable indicators OVI(s)	Means of verification	Assumptions		Cost							1						i i				
strategic planning and analysis mechanisms, and strengthen capacities of	Progress in implementation of relevant MONEYVAL recommendations of the FIU, supervisory functions and level of compliance by the financial and DNFBF sectors.	(follow-up) reports;	Commitment of beneficiary ins expected result; Constructive interagency partic engagement in development of Sufficient absorption capacities supervisory authorities.	cipation and f national strategy;																		
Expected results	Inputs/Actions	Deliverables	Beneficiary Institutions	Target groups	Means	56	78	9 10 1	1 12 1	2 3	4 5	6 7	89	10 1	1 12	1 2 3	4 5	6 7	8 9 10	11 12	1 2	3 4
The internal procedures and methodology for		 Reviewed and optimised internal methodologies of the FIU 	\$ FIU	FIU	 Project team STC (incl. int. travel and per-diems) STC (local) Up to 3Technical Papers Cost of up to 2 workshops Translation/interpretation 											5		f				
the analytical process of the FIU are upgraded	4.1.2 Development of the Rules on placing of natural and legal entities to the list of assets freeze targets, in accordance with the Law on International Restrictive Measures	- Rules on placing of natural and legal entities to the list of assets freeze targets	FIU, Supreme State Prosecution, Central Bank of Montenegro, Ministry of Justice, Ministry of Foreign Affairs, Ministry of Finances	FIU	 Project team STC (incl. int. travel and per- diems) Up to 1 Technical Paper - Up to 2 trainings Translation/interpretation 							s		f								
Expected results	Inputs/Actions	Deliverables	Beneficiary Institutions	Target groups	Means	56	78	9 10 1	1 12 1	2 3	4 5	6 7	89	10 1	1 12	1 2 3	4 5	6 7	8 9 10	11 12	1 2	3 4
	4.2.1 Provide training/study visit for the FIO's analysts		FIU	FIU analysts	– Project team							I						i				
FIU's emloyees analytical skills are enhanced	on the new analytical methodology and on the international good practices	– Up to 2 trainings/study visits			 STC (incl. int. travel and per-diems) STC (local) Technical Paper/training material Cost of up to 2 trainings/study visits Translation/interpretation 									s						f		
Expected results	Inputs/Actions	Deliverables	Beneficiary Institutions	Target groups	Means	56	78	9 10 1	1 12 1	2 3	4 5	6 7	89	10 1	1 12	1 2 3	4 5	6 7	8 9 10	11 12	1 2	3 4
AML/CFT supervisory authorities implement a	4.3.1 Develop and deliver risk-based guidelines and training for supervisory authorities responsible for oversight ad monitoring of MVTS and DNFBF sectors	 Risk-based guidelines 1 workshop/roundtable to discuss and finalise guidelines Up to 2 trainings 	FIU, supervisory authorities for oversight and monitoring of MVTS and DNFBP sectors	Supervisory authorities responsible for oversight and monitoring of MVTS and DNFBP sectors	 Project team STC (incl. int. travel and per-diems) STC (local) Technical paper/guidelines Cost of up to 3 trainings/workshops Translation/interpretation 											5			f			

	and DNFBP sectors	4.3.2	Develop procedures for supervision of financial sanctions	-Procedure for supervision of financial sanctions - Up to 2 trainings	FIU, Supreme State Prosecution, Central Bank of Montenegro, Ministry of Justice, Ministry of Foreign Affairs, Ministry of Finances	FIU	 Project team STC (incl. int. travel and per- diems) Technical paper Cost of up to 3 trainings/workshops Translation/interpretation 							S			f											
4.4	Expected results	Inputs//	Actions	Deliverables	Beneficiary Institutions	Target groups	Means	5	6 7	8	9 10 11 12 1 2	3 4	4 5	6	7 8	9	10	11 12	1 2	3	4 5	6 7	89	10 1	1 12	1	2 3 4	5
	Capacities of reporting entities to identify and monitor high-risk relationships are enhanced	4.4.1	Develop guidelines for reporting entities to identify and manage high-risk business relationships and products, including politically exposed persons, new technologies, as well as identification and classification of unusual transactions	 Guidelines for reporting entities Up to 2 workshops/seminars 	FIU, reporting entities	FIU, reporting entities	 Project team STC (incl. int. travel and per-diems) STC (local) Technical Paper/guidelines Cost of up to 2 workshops/seminars Translation/interpretation 										S							f				

5 Expected results	Inputs/A	Actions	Deliverables	Beneficiary Institutions	Target groups	Means	5	6 7	8	9 10 1	1 12	1 2	3 4	4 5	6 7	8 9	10	11 12	1 2	2 3	4 5	6 7	8 9	10 1 ⁴	1 12	1 2	3 4
AML/CFT capacities of the DNFBP sector are enhanced	4.5.1	Deliver awareness-raising seminars on AML/CFT obligations/typologies and STR indicators to lawyers, notaries, casinos, real estate and other relevant sectors	 Guidelines for effective and timely processing of MLA requestes 1 workshop to discuss and finalise guidelines 	f DNFBPs	DNFBP sector	 Project team STC (incl. int. travel and per-diems) STC (local) Technical Paper/study Cost of 1 workshop Cost of 1 publication Translation/interpretation 																		S			f
6 Expected results	Inputs/A	Actions	Deliverables	Beneficiary Institutions	Target groups	Means	5	6 7	8	9 10 1	1 12	1 2	3 4	4 5	6 7	8 9	10	11 12	1 2	2 3	4 5	6 7	89	10 1 ⁴	1 12	1 2	3 4
AML/CFT National Risk Assessment (NRA) reviewed and upgraded	4.6.1	Review NRA based on CoE methodology	 – NRA reviewed based on CoE methodology – Up to 2 workshops 	FIU, Central Bank, MoF, LEA, prosecution, private sector	FIU, Central Bank, MoF, LEA, prosecution, private sector	 Project team STC (incl. int. travel and per-diems) STC (local) Technical Paper/study Cost of up to 2 workshops Cost of 1 publication Translation/interpretation 																S					f
							5	6 7	8	9 10 1	1 12	1 2	3 4	4 5	6 7	8 9	10	11 12	1 2	2 3	4 5	6 7	89	10 1 [.]	1 12	1 2	3 4
						SC Meetings		i																			
						Start-Up Conference																					
						Inception Report	+	[i	+ +		+				<u> </u>		+								+	_	+ + + +
						Annual Progress Report Evaluation Process/Report	+				+				<u>i</u>												+ + + +
						Final Conference and Reporting																					