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TACIS ACTION PROGRAMME 2004

UKRAINE

Support for institutional, legal and administrative
reform

Annex I: Terms of Reference

Support to good governance: Project against corruption in Ukraine

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Co-funding:	European Commission/Council of Europe
Implementation:	Council of Europe
Project partners:	Ministry of Justice, Council of National Security and Defence, Office of the Prosecutor General, Ministry of Interior and other institutions represented in the Steering Committee
Duration:	36 months (June 2006 – May 2009 proposed)

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1 BACKGROUND INFORMATION

1.1 Beneficiary country

Ukraine.

1.2 Contracting authority

The European Community, represented by the Commission of the European Communities, for and on behalf of the government of Ukraine.

1.3 Implementing organisation

Council of Europe (Technical Cooperation Section, Department of Crime Problems, Directorate General of Legal Affairs).

1.4 Relevant country background

According to recent surveys and studies, corruption is one of the most pressing problems Ukraine is currently faced with and a major threat to democracy, the rule of law and economic progress, as well as a threat to national security.

The majority of people believe that corruption – in the form of bribes, corrupt lobbying, trading in influence, nepotism, abuse of office, and other forms – is a common practice in everyday life, and that decisions from public bodies cannot be obtained without a bribe. In 2005, Ukraine ranked 107 in Transparency International's corruption perception index; an improvement compared to previous years but still among the lowest of the 46 Council of Europe member States.

Corruption and conflicts of interest are reported to be widespread and integrity to be weak in most State and public bodies, including the executive, the judiciary as well as in Parliament and among elected officials at central, regional and local levels.

Ukrainian authorities have been taking measures against corruption for some time (enactment of legislation, establishment of specialised units in the police and the prosecution service, adoption of an anti-corruption programme, the "Concept 1998-2005"), which however seemed to have been insufficient to redress the problem.

Following elections in late 2004, the new President and his Government acknowledged corruption to be a priority issue requiring comprehensive and serious countermeasures. Initial measures are to include:

- An evaluation of previous anti-corruption strategy, in particular of the "Concept of fighting corruption for the period 1998 – 2005"
- The preparation and implementation of a comprehensive anti-corruption strategy
- The improvement of the anti-corruption legislation,
- The strengthening of law enforcement capacities.

The EU / Ukraine Action Plan, adopted in February 2005, contains provisions regarding the need to ensure the effectiveness of the fight against corruption and recommends inter alia a “revision of the national strategy against corruption”, promotion of “transparency and accountability” of public administration and “reform of the civil service based on European standards”.

The TACIS Ukraine Action Programme 2004 of the European Commission – counter-signed by the Ukrainian Government in April 2005 – includes funding in support of good governance and anti-corruption measures which permits substantial European support to Ukraine’s strategy against corruption.

1.5 Current state of affairs in the relevant sector

1.5.1 Relevant international background

In March 2005, the Parliament of Ukraine ratified the Civil Law Convention on corruption of the Council of Europe. Having deposited its instrument of ratification in September 2005, Ukraine became a member of the Group of States against Corruption (GRECO) on 1 January 2006. Thus it is now part of a common European anti-corruption effort.

Ukraine is in the process of acceding to the Criminal Law Convention on Corruption. The Ministry of Justice has elaborated draft law on ratification of the Criminal Law Convention on Corruption and its additional protocol. Relevant drafts have also been prepared for the ratification of the UN Convention on Corruption (signed by Ukraine in December 2003).

Furthermore, Ukraine is a party to the Council of Europe’s mechanisms monitoring compliance with international standards in the field of money laundering MONEYVAL.

1.5.2 National anti-corruption strategies

In April 1997, the President of Ukraine issued a decree establishing the National Programme against corruption which provided for short-term anti-corruption measures.

In 1998, the “Anti-Corruption Concept Paper (1998-2005)” was adopted as the basis for the State anti-corruption policy. It includes an analysis of the dangers of corruption, and its forms and causes. This strategy is based on prevention and repression, priority being given to prevention. Preventive measures are of a political, economic, legal, organisational-managerial and social-psychological nature. Particular attention is paid to improving the anti-corruption legislation and activities of anti-corruption bodies. The paper covers in very general terms measures related to staff management, information and analytical support, research and international cooperation.

Additional decrees and instructions were issued in the following years, and a “Coordinating Committee for the Fight against Corruption and Organised Crime” was established under the President of Ukraine.

Apparently, few activities have actually been implemented, among other things, for the lack of an effective implementation mechanism. In February 2005, the Coordinating Committee was dissolved by the President and its functions were transferred to the Council of National Security and Defence.

The Programme of the Ukrainian government approved by the Parliament in February 2005 contains provisions aimed at reducing corruption (Chapter II “Justice”). In the light of these provisions the Ministry of Justice has been tasked with elaborating a new national Strategy and

Action Plan against corruption. This process was expected to include a review of the “Concept 1998 – 2005”. In parallel the Parliament Committee on combating organised crime and corruption has elaborated its own draft strategy through regional public hearings. Thus the process for shaping the national anti-corruption policy appeared to be fragmented.

According to the Decree of the President of Ukraine n°1865 / 2005 an interagency commission has been created under the National Council for Security and Defence to adopt a comprehensive approach and to make strategic choices in the anti-corruption area. The adoption of the National anti-corruption strategy is one of the most pressing issues to be examined by the Commission.

Subsequently an action plan will need to be prepared.

1.5.3 Legal framework for the prevention and combating of corruption

Currently, the Criminal Code of Ukraine contains in particular the following offences, which may be qualified as corruption: receipt of a bribe by an official (Art. 368), giving a bribe (Art. 369), provocation of a bribe (Art. 370), abuse of power or official position (Art. 364), abuse of power or official position by a military person (Art. 423), but also bringing to criminal responsibility of knowingly innocent person (Art.372), delivery of knowingly unfair sentence, judgement, ruling or order by a judge (judges) (Art.375) and appropriation, embezzlement or seizing of property using official position (Art.191).

A special Law on Combating Corruption was adopted in 1995. This law defines the notions of “corruption” and “corruption acts”. It addresses passive corruption of domestic public officials and members of domestic public assemblies, and foresees administrative (fines) liability for corruption acts. It also contains provisions on prevention of corruption, in particular financial control.

The Council of Europe has provided comments on the compliance of the new Criminal Code with European standards against corruption, organised crime and money laundering.

It also delivered a legal expertise on the draft Law on Combating corruption in 2003. The Council of Europe commented on the revised draft Law on Combating corruption (“draft Law on Basic Principles of Prevention and Counteraction of Corruption”) of 9 June 2004. This draft has received an approval of three relevant parliament committees but was revoked by the new Government. The Ministry of Justice is currently preparing a new draft law to the Cabinet of Ministers.

Adoption of a new Criminal Procedure Code consistent with European standards is one of the commitments of Ukraine before the Council of Europe. Council of Europe experts reviewed the draft Criminal Procedure Code of December 2003, which had passed the first reading. The draft is being reviewed in the light of comments by international experts and will then be submitted for the final reading to Parliament.

A number of other laws contain anti-corruption provisions, including the Constitution of Ukraine (articles 19, 42, 78, 103, 120, 127), Law on Civil Service (Art. 5, 10, 12, 13, 16, 30), Law on service in the authorities of local self-government (8, 12, 13, 20), Law on status of a parliamentarian / people’s deputy of Ukraine (Art.3), Law on Higher Council of Justice (Art. 3), Law on the National Bank of Ukraine (Art.65), Law on Constitutional Court of Ukraine (Art.16), Law on status of judges (Art.5), Law on the Prosecution (Art. 6, 7, 10, 46), Law on Police / Militia (Art.18), Law on entrepreneurship (Art.2), Law on social and legal protection of military servicemen and members of their families (Art.8), Law on audit activity (Art.19), Law on Central Electoral Commission (Art.7), Law on Ombudsperson (Art.8), Customs Code of Ukraine (Art.153) etc. The Civil and Economic Codes (in force from 01.01.2004) also contain anti-corruption provisions. The code of administrative

offences contains anti-corruption provisions, in particular Art.184¹ “Inappropriate use of State property”.

Apart from the Law on combating corruption and the Law on Civil Service the activities of specialised anti-corruption bodies are also regulated by the Law on organisational and legal principles of combating organised crime, the Law on operational search activities and the Law on State secrets. Ukraine has adopted legislation on protection of witnesses and financing of political parties.

The draft “Law on State service in the bodies of executive power” is under consideration by the Cabinet of Ministers of Ukraine. “The code of integrity for persons empowered with execution of functions of State” (currently in the form of a draft law) has been agreed by all relevant national institutions and is going to be submitted to the Cabinet of Ministers of Ukraine. The draft code has been reviewed by two Council of Europe experts.

The Ministry of Justice has elaborated and submitted in June 2005 to the Ministry of Foreign Affairs and then to the Secretariat of the President a package of draft laws related to the ratification of the Council of Europe Criminal Law Convention on Corruption (CETS 173) and its additional Protocol (CETS 191), the UN Convention against Corruption, as well as on corporate criminal liability, on the amendments to the legislation concerning liability for corruption acts and on basic principles of prevention and countering corruption.

1.5.4 Bodies and institutions responsible for preventing and combating corruption

The Law on combating corruption (1995) defined two categories of bodies responsible for fighting corruption:

- The first category includes relevant departments of the Ministry of Interior, prosecution, tax police and Security Service.
- The second group includes “all other departments and units created for combating corruption”. These bodies can detect corruption acts, document them, take measures to bring to responsibility and to prevent such acts but they cannot conduct administrative or criminal investigations.

These bodies, in the scope of their competencies, detect corruption, take measures to prevent corruption acts and open proceedings against perpetrators.

The conditions and the framework for administrative proceedings in cases of corruption offences or corruption related offences are regulated by the Law on combating corruption and the Code of administrative offences.

The division of competencies in the investigation of different types of corruption offences is regulated by Article 112 of the current Criminal Procedure Code.

1.5.4.1 The Public Prosecutor’s Office

Prosecutors, like the courts, are organised into offices at the rayon (district), oblast (regional), and national levels. In addition there are specialised military prosecutors’ offices which are organised at district, oblast and national levels as well. Prosecutors are responsible ultimately to the Prosecutor General, who is appointed by the President upon consent of the Parliament for a 5-year term. Regional and district prosecutors are appointed by the Prosecutor General.

According to Art. 121 of the Constitution the functions of the Prosecution are the following: prosecution in court on behalf of the State, representation of the interests of a citizen or of the State in court in cases determined by law, supervision of the observance of laws by bodies that conduct detective and search activity, inquiry and pre-trial investigation, supervision of the observance of laws in the execution of judicial decisions in criminal cases, and also in the application of other measures of coercion related to the restraint of personal liberty of citizens.

The Law on Combating Corruption of Ukraine stipulates that the Prosecution supervises the observance of legislation related to the fight against corruption (Art.17).

Fulfillment of the function of pre-trial investigation is determined by Paragraph 9 of Transitional Provisions of the Constitution of Ukraine. This function will be exercised until the new system of pre-trial investigation is formed and relevant legislation enacted. Currently there are several concepts of reform of pre-trial investigation. Several draft laws on the National Service of Investigation have been elaborated, including one by the General Prosecutor's Office. Once the NSI established, the functions of the Prosecution will change. The adoption of a new Criminal Procedure Code will also have implications on the role of the Prosecution.

The Department for supervision of observance of laws by bodies combating organised crime and corruption consists of three divisions. The first is deals with supervision at the stage of pre-trial investigation, the second deals with supervision of "operational search" activities (use of special investigative means) and the third supervises the implementation of anti-corruption legislation.

The appointment and dismissal of the staff of the Department of Supervision of Implementation of Anti-Corruption Legislation is approved by the Committee on combating corruption and organised crime of Verkhovna Rada (the Parliament). It contains 18 prosecutors in the General Prosecutor's Office and from 16 to 57 in oblasts (including Kyiv-city and Sebastopol).

As for the investigation of criminal cases related to corruption, the Prosecution investigates in particular cases under articles 191, 364, 368, 369, 370, 372, 375 and 423 of the Criminal Code. The division for investigation of corruption cases has been integrated into the Central investigative Department. Regional divisions operate in the Crimea, all oblasts, Kyiv and Sebastopol and are composed of 4 – 16 Prosecutors.

The Code of Professional Ethics for prosecutors is under preparation.

A draft "Code of professional ethics and conduct" for prosecutors as well as draft Disciplinary regulations have been reviewed by the Council of Europe.

The Academy of the prosecution, located in Kyiv provides continuous and advanced training for prosecutors but could also organise joint training for prosecutors, judges and other law enforcement officials.

1.5.4.2 Ministry of Interior

In the Ministry of Interior the following departments deal with corruption within the scope of their competencies: the Central Department for the Fight against Organised Crime (GUBOZ), The Central Department for Combating Economic Crime, the Department of Internal Security and the Central Investigative Department. In 1998 an anti-corruption division was created within the Central Department for the Fight against Organised Crime (GUBOZ) and relevant territorial divisions (departments for the fight against organised crime). These divisions deal with the coordination of anti-corruption activities.

The Department of Internal Security deals with the prevention of corruption among officials of the bodies of the Ministry of Interior. The Department is composed of 33 *territorial operational / railway / training institutions*' divisions and sections.

The main functions of the Department of Internal Security are to counter corruption and organised crime in the bodies of the Ministry of Interior, to detect corruption and to eliminate the conditions which favour it, to protect officials of the Ministry of Interior and members of their families.

The Ministry of Interior has a centralised register of corruption acts detected by the anti-corruption authorities, which allows controlling all stages of proceedings. The Ministry of Interior has a centralised register of crimes, including those related to abuse of office, detected by the bodies of the Ministry of Interior, Prosecution and Tax police.

The National Central Bureau of Interpol and the Department of public relations are among other structural departments of the Ministry of Interior.

The Ministry of Interior has five higher education institutions and an Institute of management, which provide training (including in-house training) for the staff of the Ministry of Interior bodies on the issues related to the detection and prevention of corruption.

1.5.4.3 State Tax Administration

The Department of combating corruption and security in the bodies of State Tax Administration, as well as its regional branches in the oblasts, Kyiv, Sebastopol and Crimea were created in 2000. The Department deals with prevention of corruption within STA and reports directly to the Head of State Tax Administration.

The State Tax Administration also has law enforcement powers, which it exercises through the tax police.

1.5.4.4 Security Service

The specialised Department for the fight against corruption and organised crime was set up within the Central Department of the Security Service in 1992. It deals with prevention, detection and disclosure of corruption and organised crime in public administration (including law enforcement and State control bodies) and economy. It also works against smuggling and drug trafficking.

1.5.4.5 "National Service of Investigation"

Pursuant Instruction of the President of Ukraine of 15th March 2005 a working group on development of the concept of a National Service of Investigations and organisation of its work was created. A number of proposals, including draft laws, have been prepared. The current thinking is that it will take over investigative functions from the Prosecution, but focus on high-level and complex criminal cases only.

1.5.4.6 Judiciary

Ukraine's judicial system has two major systems: the Constitutional Court, which is responsible for issues concerning the Constitution and courts of general jurisdiction. Among courts of general jurisdiction there are "general" and "specialised" courts. "General" courts deal with criminal and civil

cases. "Specialised" courts can be commercial or administrative. The law does not provide for specialisation on cases on economic crime and corruption, but in practice judges specialise themselves.

1.5.4.7 Chamber of Accounts and Central Control-audit department

The Accounting Chamber is the main audit institution created in compliance with Law on Accounting Chamber 316-96 enacted in 1996. It is an independent body, which reports to the Parliament and controls the use of public resources. It is a member of INTOSAI and EUROSAI.

The Central Control Audit Department is a central authority of executive power, subordinated to the Ministry of Finance. A hot telephone line has been opened recently.

The project "Audit of State finances" (TACIS 2000) with an amount of Euro 2 million was implemented from June 2002 to December 2004 in co-operation with German Technical Assistance Agency (GTZ) with the purpose of improving external audit of collection and use of public resources. The main beneficiary was the Accounting Chamber even if other institutions concerned with audit of public resources were involved, primarily the Central control audit department of the Government.

The Code of ethics of editors was adopted in 1998.

1.5.4.8 Parliament and its Committee on combating organised crime and corruption

According to Art. 23 of the Law on organisational and legal basis of fight against organised crime the Parliament and its Committee on combating organised crime and corruption of the Verkhovna Rada control the implementation of laws and expenditures in the field of combating organised crime and corruption.

The Committee on combating organised crime and corruption deals with:

- Control of implementation of legislation against organised crime and corruption
- Control of activities of specialised units of the Ministry of Interior and Security Service
- Preparation of draft laws related to the fight against corruption and organised crime
- Study of practices of implementation of legislation by specialised anti corruption / organised crime bodies
- Giving agreement for setting up and liquidation of specialised anti-corruption / organised crime bodies and nomination and dismissal of their heads as well as nomination and dismissal of prosecutors carrying out supervision of specialised anti-corruption bodies.

It can request carrying out of checks, bringing to responsibility of public officials, submit to the Prosecutor General proposals (which have to be considered) to open a case, create interagency operational investigative groups, nominate prosecutors for supervising investigation of criminal cases. If the Prosecutor General refuses to open a criminal case on the proposal of the Committee, the last can submit to the plenary of the Parliament the issue of creation of an independent investigative group, nominate an independent prosecutor to supervise the investigation. The Committee checks the legality and grounds for the use of special investigative means.

Every six months, the Prosecutor General, Minister of Interior and the Head of the Security Service report to the Committee.

1.5.4.9 Central Department of Civil Service

The Central Department of Civil Service was set up to implement a consistent State policy for managing the civil service. It has a special status within the executive power and reports to the President of Ukraine. The Department is composed of nine structural units and employs 101 officials. The control-inspection unit has a division for prevention of corruption and a division on control of respect of legislation on civil service. A Centre for support of civil service institutional development was set up in April 2004. It provides assistance to the Department through analytical, information, expert, methodological and organisational support to raise institutional capacities of the civil service and adapt it the standards of the European Union. The acting Law on Civil Service entered into force on 1 January 1994. The Strategy of Civil Service Reform in Ukraine was approved in 2000. In December 2003, the Cabinet of Ministers of Ukraine discussed the results of implementing the Strategy of Civil Service Reform in Ukraine during 2000 – 2003 and determined conceptual principles for further development of civil service. Those principles laid the foundation for adoption of the Concept of Adaptation of Ukraine's Civil Service to the Standards of the European Union, the 2005 – 2010 Civil Service Development Program, and the Concept of Civil Service Law.

On the basis of the Concept of Adaptation of Civil Service of Ukraine to Standards of European Union, the Central Department of Civil Service has developed a Programme (and an action plan) of Development of the Civil Service for 2005 - 2010, which was approved by the Cabinet of Ministers of Ukraine in June 2004.

Corruption cases can be reported by e-mail through a hotline hosted by the website of the Department. Priorities of the Department for 2005 have been established.

In 2003, with the support of the World Bank and the UK Department for International Development (DFID), the assessment review of the Ukrainian civil service system was conducted according to OECD/SIGMA1 baseline indicators applied for annual assessment of civil service in the candidate countries for the European Union accession.

The Cabinet of Ministers of Ukraine took a decision to create territorial agencies of the Central Department of Civil Service from 1 January 2005.

The Decree of the President of Ukraine «On the Concept of Civil Service Law» was approved on 5 January 2005 by the President of Ukraine.

1.5.4.10 State Property Fund of Ukraine

The State Property Fund of Ukraine was created in 1991 to exercise the State policy in the field of privatisation of State property. The regional divisions, committees and municipal property departments were established in 1992. The Fund is a central agency of executive power, which reports to the Parliament (Verkhovna Rada). Its main tasks are: to protect property rights of Ukraine on its territory and abroad; to exercise the rights of state property management during privatisation; to set up joint ventures; to exercise powers relating to privatisation of the property of enterprises belonging to the state ownership; to promote the de-monopolisation of economy and creation of conditions for competition between manufacturers.

1.5.4.11 Anti-monopoly committee of Ukraine

The Anti-monopoly committee was set up in 1993 with the adoption of the Law on Anti-monopoly committee of Ukraine. The main task of the Committee is to ensure the respect of anti-monopoly legislation and promote a fair competition.

1.5.4.12 National Bank of Ukraine (NBU)

An anti-corruption co-ordination Group was set up to counter corruption within the structure of NBU.

1.5.4.13 State Customs Service of Ukraine

The Head of State Customs Service reports directly to the President of Ukraine and the Cabinet of Ministers. The State Customs Service ensures the respect of customs legislation and fights smuggling. The last meeting of EU – Ukraine subcommittee n° 4 held on 15 April 2005 was entirely dedicated to customs co-operation. Appreciation was expressed with regard to reform of the customs service, combating corruption and customs offences. It was agreed that technical assistance would be provided for further reforms and building infrastructure of the customs.

The President of Ukraine has declared that by 1 June 2005 the principle of “one window” should be introduced by the customs and internal procedures will be reviewed to reduce the time of customs clearance of goods.

1.5.4.14 Ministry of Justice

The Ministry of Justice is currently elaborating a new anti-corruption strategy.

It is responsible for:

- drafting proposals for legal reforms;
- elaboration of concept papers for development of domestic legislation (in co-operation with relevant institutions);
- preparation of draft laws and regulations;
- providing expertise of legislation and regulations;
- preparation of plans and co-ordination of legal reforms with purpose of compliance with European (EU and CoE) standards.

It co-operated closely with the Council of Europe for the elaboration of the new Criminal Code, draft Criminal Procedure Code, draft law on Basic principles of fight against corruption. Expert comments on compliance with European standards and best practices have been provided by the Council of Europe to all these documents.

1.5.4.15 Local and regional authorities

The Ukrainian system of public administration still appears to be over-centralised. There is no fully-fledged self-government at the level of communities and there is a lack of capacity to properly implement self-government functions at district and regional levels. As a consequence, the functions of local authorities are basically implemented by local State administrations.

Weak status and financial basis of local and regional authorities, the weak status of mayors, low salaries and the lack of transparency in their activities and of proper mechanisms for interaction with the public contribute to corruption problems.

Ukraine is a Party to the European Charter of Local Self-Government since 1998. Although some steps have been taken to implement this Charter, it lacks implementation. Amendments to the Constitution and other legislative acts are required to enhance compliance.

On 15 April 2002 the Ukrainian Association of local and regional authorities, Association of cities of Ukraine and communities (union of some 400 municipalities), Association of municipal councils of Ukraine and Union of leaders of local and regional authorities have signed a Charter and Statute of the Congress of local and regional authorities of Ukraine. The main objective of the Congress is coordination of efforts and decisions to implement regional policy in Ukraine on the basis of the European Charter of Local Self-Government.

1.5.4.16 Other relevant institutions and bodies

The Ukraine Chapter of Transparency International (TI) is active in the anti-corruption field (public opinion polls / surveys, projects "corruption in the field of education, handbook "parliamentary control about corruption", TI perception index, parliamentary hearing about the issue of freedom of press and combating corruption).

A number of other NGOs have been working in anti-corruption field among them Freedom of Choice Coalition of NGOs, Odessa Information and Analytical Centre for combating organised crime and many others.

The Kharkiv Institute of Applied Humanitarian Research and National Academy of Legal Science were actively involved in anti-corruption research and training. The Kharkiv Institute of Applied Humanitarian Research has carried out an extended analysis of corruption in Ukraine at the request of the Ministry of Justice.

Since the beginning of 2005, progress has been made in the field of freedom of expression and media. The new environment is much more favourable for revealing corruption. Journalists throughout the country are increasingly involved in journalist investigations concerning public persons including high level officials, parliamentarians and members of their families.

1.6 Problems and needs to be addressed

1.6.1 Need for a well coordinated and coherent strategic approach to corruption

1.6.1.1 Need for a national anti-corruption strategy and action plan

Corruption is considered a major problem in Ukraine and most sectors of public life and institutions are believed to be affected. Since the beginning of transition, corruption has become a convenient solution to numerous problems arising from a context of administrative inadequacies, permanent instability and unpredictability of political, social and economic systems for both citizens and public authorities. In most social systems corruption seems to be a rule and not an exception.

Important reforms are now high on the agenda of the Government, including administrative-territorial reform, reforms of the Civil Service, Judiciary, Prosecution and law enforcement system (e.g. creation of the National Service of Investigations). Many other reforms are underway.

All those reforms, if duly implemented, will contribute to substantially decrease corruption. Thus the need for strong anti-corruption measures will need to be taken into account when designing and implementing these reforms. This is only possible if a national policy against corruption is comprehensive and well formulated and coordinated. Such a policy is to take the form of a national anti-corruption strategy which is to be complemented by an action plan. This would also help prioritise actions.

In spring 2005, the Government of Ukraine launched the process of preparing such a strategy. This process was led by the Ministry of Justice which has elaborated a draft strategy. This draft strategy was expected to be approved by the Cabinet of Ministers and subsequently submitted to the President of Ukraine for adoption. In parallel the Parliament Committee on combating organised crime and corruption has elaborated its own draft strategy through regional public hearings. Thus the process for shaping the national anti-corruption policy appeared to be fragmented.

According to the Decree of the President of Ukraine n°1865 / 2005 an interagency commission has been created under the National Council for Security and Defence to adopt a comprehensive approach and to make strategic choices in the anti-corruption area. The adoption of the National anti-corruption strategy is one of the most pressing issues to be examined by the Commission.

1.6.1.2 Need for institutional mechanism for coordination, management and monitoring of the strategy

Experience throughout Europe shows that anti-corruption strategies are more likely to be implemented if they are coordinated, managed and monitored by a particular body. In Ukraine, under the previous strategy, this task had been assigned to the Anti-corruption Coordinating Committee. This Committee has recently been dissolved, and – according to a Decree of the President of 8 January 2005 its functions and staff were transferred to the Council for National Security and Defence. In connection with the preparation of the new strategy, different options need to be reviewed to decide which body would be in charge of coordination, management and monitoring of the strategy and action plan. Once this decision has been made, the body needs to be strengthened to be able to perform its functions.

In order to permit an evaluation of the effectiveness of anti-corruption measures in Ukraine, surveys on perception and attitudes of corruption as well as sector studies need to be carried out at an early stage so that a baseline can be established. Surveys would need to be repeated annually.

1.6.1.3 Need for a preventive body or bodies

Under the United Nations Convention against Corruption, a body or bodies responsible for the prevention of corruption would need to be available or created. Different options need to be reviewed in order to determine the most appropriate solution for Ukraine.

1.6.2 Need to strengthen capacities for the prevention of corruption

Prevention will include a wide range of different measures and the participation of a large number of stakeholders. These measures should reinforce and be coordinated with major reforms under way

in particular those of the public administration and judiciary as well as the administrative-territorial reform.

Given the crucial role of courts, the prosecution and the police in the enforcement of anti-corruption legislation, it is of utmost importance that these institutions make every effort to be free from corruption themselves. Detailed risk analyses should be carried out in these institutions, the systems of audits and internal control should be reviewed and strengthened and codes of conduct implemented.

As corruption in the political process has repercussion on democracy and the rule of law on the whole, particular attention should be paid, among other things, to:

- Ensuring transparency and accountability of the financing of political parties and electoral campaigns
- The declaration of assets and other measures to declare conflicts of interest by elected office holders
- Reviewing the system of immunities for elected office holders
- The creation of a mechanism for a systematic review of draft laws in terms of their impact on corruption (that is whether it creates opportunities for corruption or serves particularistic interests)
- Improving rules on lobbying and trading in influence.

The development and implementation of codes of conduct can be effective tools for the prevention of corruption in particular institutions, in fact such a code can represent a “prevention charter”. Disciplinary measures should be enforced in case of violations. While different institutions in Ukraine are already in the process of elaborating such codes, they should be particularly implemented at the level of the senior civil service. Moreover, in order reach out to the different regions of Ukraine, such codes should be promoted at least at the level of mayors of cities and the chairs of local councils of Ukraine.

1.6.3 Need to strengthen legislation and the enforcement of anti-corruption legislation

In addition to the reform of the criminal legislation (the adoption of the new Criminal Procedure Code is pending) and the finalisation and adoption of the law on “basic principles of preventing and counteracting corruption”, the regulatory framework for effective measures to prevent and repress corruption will need to be completed through a wide range of other laws and by-laws. A prioritised list of laws should be prepared and support to working groups responsible for the elaboration of these laws should be provided.

Such legislation should also allow early ratification of the Council of Europe Criminal Law Convention on Corruption and the United Nations Convention against Corruption.

The capacities of bodies responsible for the investigation, prosecution and adjudication of corruption-related offences will need to be strengthened considerably. This involves:

- The responsibilities of different law enforcement agencies in the investigation of corruption need to be clarified in particular in view of the draft Criminal Procedure Code and the proposed National Service of Investigations
- Training at all levels, such as in the application and interpretation of regulations, in investigative techniques and the collection and use of evidence, in using and protecting witnesses, in international cooperation and the opportunities offered by international treaties

- Improvement of the procedures for the opening, registration, dispensing and management of cases
- The strengthening of specialised units, including the provision of basic IT equipment for improved registration and management of corruption cases
- The strengthening of inter-agency cooperation, for example through joint training
- Measures to enhance the independence and impartiality of police, prosecutors and judges
- Clear guidelines for reporting on corruption to law enforcement.

1.6.4 Need to promote public participation in the anti-corruption effort

In the final analysis, an anti-corruption strategy is successful to the extent that the attitude of people changes and that they become less tolerant to corruption. The anti-corruption strategy action plan should therefore include specific measures aimed at enhancing public awareness and promoting public participation in the anti-corruption effort. However, public awareness and participation will have to be an overall principle of the strategy and action plan, which means that most measures will need to have a public awareness aspect and facilitate public participation. This ranges from the consultation process in the elaboration of the strategy, to public debates on draft laws, and guidelines for the public on how to report suspicions of corruption to law enforcement.

In order to further promote an active role of civil Ukrainian society organisations, it has been proposed to set up a grant programme which is to be managed by the European Commission Delegation. The terms of reference for such a programme still need to be defined. Such a programme may include activities and themes such as:

- TV-broadcasted round tables to discuss the integrity within public administration (recruitment, promotion, assessment, training, protection and salaries, principles of modern management, control, sanctions, professional ethics and conflicts of interests, negative and positive examples, Q&A) and formulate proposals to decrease the risks of corruption (to complement activities under Output 2.1)
- TV-broadcasted round table to discuss the integrity among judges (selection, appointment / dismissal, promotion, judicial ethics and conflicts of interests, liability of judges for corruption, negative and positive examples, Q&A) and formulate proposals to decrease the risks of corruption (to complement activities under Output 2.2)
- Access to information: assessing administrative procedures to which the citizens are confronted on daily basis and formulating proposals for improvement” (to complement activities under Output 2.1, preference to be given to interactive methods, interviews, to be implemented in Kyiv and two cities in the Western and Eastern part of the country)
- The Business community as a potentially efficient vector for countering corruption: assessment of the current situation and proposals for improvement
- Reporting corruption: assessing willingness and obstacles for the public to cooperate (protection for whistle-blowers, current situation and possible scenarios in the future)
- Transparency of public finances (central and regional levels, participation of the public in budgetary process, measures to ensure control and transparency), to complement activities under Outputs 2.1 and 2.6
- Reducing corruption in the political process (building transparent system of political finance, regulation of lobbying, corruption among elected office holders and immunities), to complement activities under Output 2.5.

1.7 Related programmes and other donor activities

Through the ratification of the Civil Law Convention, Ukraine became a member of the Council of Europe's Group of States against Corruption (GRECO) on 1 January 2006. The first GRECO evaluation visit is foreseen for November / December 2006.

An anti-corruption coordination initiative was set up in February 2005 to discuss anti-corruption programmes, identify needs and form partnerships between donors, government agencies and Ukrainian civil society. The ABA – CEELI is running the secretariat of anti-corruption coordination initiative.

The ABA CEELI in co-operation with OSCE will provide anti-corruption legislative assistance to the Ministry of Justice. The ABA CEELI and OECD are planning to provide assistance to Ukraine in respect to the development of a specialised anti-corruption body in Ukraine (study – interagency working group – recommendations to the Government). The Indiana University Parliamentary Development Project (IUPDP) is providing assistance to the Committee of Verkhovna Rada on combating organised crime and corruption in organising a series of public hearings on “Sources of corruption in Ukraine and Ways to overcome it” in regions and Kyiv. IREX and Poland-America-Ukraine Cooperation Initiative (PAUCI) do not have specific anti-corruption programmes, but carry out activities which also aim at reducing corruption.

Ukraine is participating in the Istanbul Anti-Corruption Action Plan of the OECD's Anti-corruption Network.

The Government of the USA is planning to provide technical assistance in the anti-corruption area through USAID. In the past grants were delivered for anti-corruption projects in Ukraine by USAID and CIDA.

The Joint Programme IV (2002 – 2004) for Ukraine of the Council of Europe and the European Commission included, among other things, a number of corruption-related activities:

- October / November 2002: Expertise of the draft anti-corruption law provided on request of the Ministry of Justice of Ukraine
- 3 – 4 March 2003: Seminar “Corruption and Media”, organised in co-operation with the “Freedom of Choice” Coalition of NGOs of Ukraine
- 23 April 2003: Seminar on the Council of Europe anti-corruption conventions and GRECO, organised in co-operation with the Ministry of Justice of Ukraine
- 24 – 25 April 2003: Round-table to discuss the draft anti-corruption law and the expert opinions provided by the Council of Europe, organised in cooperation with the Ministry of Justice of Ukraine
- 14 – 15 May 2003: Seminar on problems related to the practical implementation and improvement of the anti-corruption legislation, organised in co-operation with the Academy of Legal Sciences of Ukraine
- 3 – 6 June 2003: Study visit to Italy aimed at strengthening capacities against trafficking in human beings.
- 1 – 2 July 2003: Seminar “The role of the Public Prosecution in the fight against corruption and organised crime”, organised in cooperation with the General Prosecutor's Office of Ukraine
- 3 – 4 July 2003: Seminar “Anti-Corruption training for judges” and the Round table “Prevention of corruption within the judiciary”, organised in cooperation with the Centre for Judicial Studies (Ministry of Justice of Ukraine)

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- 29 - 30 April 2004 Seminar "Corruption and Media", organised in co-operation with the "Freedom of Choice" Coalition of NGOs of Ukraine
- 20 April – 10 June 2004 Expertise of the draft Code of criminal procedure
- 15 June – 05 July 2004 Expertise on the draft law on basic principles of preventing and combating corruption
- 15 - 16 July 2004 Seminar "Ukrainian Legislation against corruption and organised crime and its application", organised in cooperation with the Ministry of Justice of Ukraine

The Council of Europe – with funding from the European Commission – started on 1 December 2005 the implementation of the Project on International Cooperation in Criminal Matters in Ukraine (UPIC), which has a duration of 36 months. For this project the main counterpart institutions are the Ministry of Justice and the Office of the Prosecutor General.

Project against Money Laundering in Ukraine, Phase 2, also funded by the EC, is expected to start soon (duration 36 months). It will follow up on the Moli-UA carried out from February 2003 to June 2005. The main counterpart institution is the State Committee for Financial Monitoring.

The Swedish SIDA provides support to the Central Department of Civil Service through an "anti-corruption project", which assists in implementation of civil service reform.

The Canadian CIDA is planning a mission at the beginning of December 2005 to formulate the terms of reference of an anti-corruption project. The main partner institution under the future project may be the Ministry of Justice. The new project will be adjusted taking into account the present project. One of the issues under consideration may be further research on corruption.

The USAID is planning to design a project to assist Ukraine in implementation of judicial reform, including its anti-corruption component related to ethics, appointment of judges, responsibility of judges etc. Such a project may start after February 2006.

2 OBJECTIVE, PURPOSES AND EXPECTED RESULTS

2.1 Overall approach and objective

The overall objective of the project against corruption in Ukraine (UPAC) is:

To contribute to the prevention and control of corruption so that it no longer undermines the confidence of the public in the political and judicial system, democracy, the rule of law and economic and social development in Ukraine.

The Ukrainian authorities are committed to counter corruption in a comprehensive manner. A range of measures are underway and a draft strategy has been prepared. At the same time, a number of issues are still open (adoption of the strategy and finalisation of an action plan, responsibilities for management, coordination, monitoring of the strategy, establishment of a preventive body or bodies, responsibilities for the investigation of corruption).

Having discussed different options with Ukrainian authorities, rather than waiting for these issues to be clarified, it has been agreed that the present project be launched as soon as possible in order to support measures which in any event will be included in future anti-corruption strategies, and at the same time to provide advice to Ukrainian authorities regarding the finalisation and implementation of the strategy and action plan as well as the creation of anti-corruption institutions.

Furthermore, given the range of needs, it has been agreed that rather than concentrating project support on one particular beneficiary or field, the project will assist Ukraine's anti-corruption effort in a broad manner. It will thus comprise three components:

1. Support to the creation of the strategic and institutional framework against corruption in Ukraine
2. Strengthening of capacities for the prevention of corruption.
3. Strengthening of the legal framework and the enforcement of anti-corruption legislation

In view of the role of the Ministry of Justice in the preparation of the draft strategy, and in the absence of a specialised anti-corruption body, it has been agreed that the Ministry of Justice provides technical support to the project from the Ukrainian side. This implies that the Ministry of Justice appoints a project coordinator, provides office space for the project team and ensures coordination with stakeholders involved in different activities.

In order to ensure the active participation of all stakeholders in this project, a steering committee is to be established. This steering committee will comprise all institutions involved in the activities of this project, that is, Council for National Security and Defence, Secretariat of the President of Ukraine, Parliament, Cabinet of Ministers, High Council of Justice, Supreme Court, Office of the Prosecutor General, Ministry of Interior, Ministry of Justice, National Service of Investigations [once it has been established], Central Department of Civil Service, Council of Judges of Ukraine, Accounting Chamber and Central Control audit department, national associations of local self-government / Congress of local and regional authorities of Ukraine. In addition, the European Commission and the Council of Europe are members of the steering group. Representatives of civil Ukrainian society groups overseeing executive, public administration and judicial anti-corruption performance may be invited as observers.

The steering group will not only review project progress and approve project workplans but also ensure consistency and coordination of anti-corruption measures supported under this project.

2.2 Purposes

The purpose for the three components of the project are:

- **Purpose 1: To improve the strategic and institutional framework against corruption in Ukraine**

Key counterpart institutions include: Ministry of Justice, Council for National Security and Defence, Secretariat of the President of Ukraine, Cabinet of Ministers, Parliament, an inter-agency entity (to be created / defined) responsible for monitoring, coordination and management of the strategy and action plan

The achievements under this component are to be reflected in terms of:

- the finalisation and adoption of an anti-corruption strategy and action plan, clear definition of the anti-corruption institutional set-up;
- the effective monitoring, coordination and management of the action plan;
- the availability of proposals concerning a preventive body or bodies.

- **Purpose 2: To enhance capacities for the prevention of corruption**

Key counterpart institutions include: High Council of Justice, Supreme Court, Cabinet of Ministers, Office of the Prosecutor General, Ministry of Interior, Ministry, of Justice, Parliament, Central Department of Civil Service, national associations / Congress of local and regional authorities of Ukraine, Ministry of Justice, Central Electoral Commission (CEC), NGOs, media

The achievements under this component are to be reflected in terms of:

- reduced risks of corruption within criminal justice and law enforcement institutions;
- reduced conflicts of interest in the political process;
- the implementation of codes of conduct in the civil service;
- enhanced capacities for the prevention of corruption and the strengthening of public ethics at the level of local and regional authorities;
- stronger public participation in the anti-corruption effort.

- **Purpose 3: To strengthen the anti-corruption legal framework and effective and impartial enforcement of the criminal legislation on corruption**

Key counterpart institutions include: Ministry of Justice, Office of the Prosecutor General, Ministry of Interior, Judiciary, National Service of Investigations (once it has been established), Cabinet of Ministers, Parliament, Accounting Chamber and Central Control-audit department

The achievements under this component are to be reflected in terms of:

- draft laws to improve the prevention and control of different forms of corruption in accordance with international standards;
- improved capacities of the judiciary to adjudicate and law enforcement agencies to investigate and prosecute corruption offences.

3 ASSUMPTIONS AND RISKS

The project is based on the assumption that the President and the Government of Ukraine are committed to counter corruption in a comprehensive manner in line with European and international standards and good practices. It is assumed that this determination will not change after the elections scheduled for March 2006.

The main assumptions and risks under the purpose 1 are the following:

- Once the strategy and action plan are adopted, the main risk is that these documents remain of a declaratory nature.
- Another risk is that the process of elaboration of the strategy and the action plan lacks consultation with relevant stakeholders. In this case the process is isolated from the path of major reforms and future implementation may be seriously undermined.
- It is assumed that the Ukrainian authorities will take a decision in respect of preventive body / bodies to comply with Article 6 of the United Nations Convention against Corruption.
- The Ukrainian authorities will remain committed to establish a centralised operating structure (an entity) for monitoring, coordination and management of the anti-corruption strategy and action plan. Much will depend on the performance of this structure. Continuous high-level political support and screening by media will be required to ensure its creation.

The main assumptions under the purpose 2 are the following:

- The importance of preventive measures is recognised by Ukrainian authorities.
- All relevant stakeholders, including bodies which are independent from Government, such as the judiciary, the Parliament and elected local officials (mayors) but also the CEC and the authorities of local self-government are ready to cooperate under this project and to invest efforts into prevention measures.
- The project partners involvement with the parliamentary elections scheduled for March 2006 will not cause serious delays and disruptions in the project performance.

Assumption and risks under the purpose 3 are the following:

- Elaborated legislative amendments aimed at increased compliance with international anti-corruption standards are most effectively applied
- Responsibilities for the investigation of corruption are undergoing a review at present (and the creation of a National Bureau for Investigation is under consideration). It is assumed that the responsibilities are defined in the course of the present project
- Good relations and co-operation is established among the participants during the implementation of activities involving prosecutors, police officials and judges.

Currently the Ukrainian anti-corruption effort is very fragmented. It is important to overcome this fragmentation. The elaboration and adoption of the action plan is to serve this purpose. Although an anti-corruption strategy and action plan are the top priorities of the national authorities' agenda, their adoption – for reasons beyond the control of this project – may be considerably delayed.

4 SCOPE OF WORK

4.1 Project outputs and activities

The objective	To contribute to the prevention and control of corruption so that it no longer undermines the confidence of the public in the political and judicial system, democracy, the rule of law and economic and social development in Ukraine
Purpose 1	To improve the strategic and institutional framework against corruption in Ukraine
Output 1.1	Anti-corruption strategy and action plan available
Activity 1.1.1	Advice and recommendations on strategic issues related to anti-corruption policy and finalisation of the anti-corruption strategy; technical advice to the high level consultations to coordinate design and implementation of major reforms (<i>including the reforms of the Civil Service, Judiciary, Prosecution and law enforcement system, administrative-territorial reform, economic and social reforms</i>) and to the process of elaboration of the action plan
Activity 1.1.2	Expert assessment of the effectiveness of previous anti-corruption strategies and measures in Ukraine and formulation of lessons for the future
Activity 1.1.3	Expert workshops and public consultations on specific issues related to the elaboration of the anti-corruption action plan (ex. on the prevention of corruption, on the enforcement of anti-corruption legislation, on public awareness...)
Activity 1.1.4	National and regional public baseline surveys (perception, experience) on corruption and “service delivery” in the system of justice (police, prosecution, State notary service, enforcement of civil judgements, judiciary), within public administration in general, among elected officials and officials of local and regional authorities
Activity 1.1.5	Make public through publications and web and if appropriate through audiovisual media the results of national and regional surveys and the results of other activities under output 1.1
Output 1.2	Effective monitoring, coordination and management of anti-corruption measures ensured
Activity 1.2.1	Workshop to review the experience of other countries regarding the mechanisms of monitoring, management and coordination of anti-corruption strategies and action plans
Activity 1.2.2	Support through expert advice the preparation of a proposal for a mechanism dealing with coordination, management and monitoring in Ukraine
Activity 1.2.3	Support through expert advice coordination, management and monitoring of anti-corruption measures in Ukraine
Activity 1.2.4	Support the organisation of up to 2 national anti-corruption conference(s) to review the implementation of anti-corruption measures in Ukraine
Activity 1.2.5	Make public through publications and web and if appropriate through audiovisual media the results of the conferences related to the review the implementation of anti-corruption measures ²
Output 1.3	Proposals available to ensure the implementation of Article 6 of the United Nations Convention against Corruption regarding preventive anti-corruption body or bodies
Activity 1.3.1	Review the experience of other countries regarding preventive bodies (study visits and workshops)
Activity 1.3.2	Support the elaboration of proposals for submission to the authorities concerned

Purpose 2	To enhance capacities for the prevention of corruption
Output 2.1	Anti-corruption concerns incorporated into the process of public administration reform (“anti-corruption mainstreaming”)
Activity 2.1.1	Translation into Ukrainian and dissemination of relevant documents, including the Council of Europe Recommendation (2000)10 on the model code of conduct for public officials
Activity 2.1.2	Support the dissemination (publication, web...) and implementation of the code of conduct for civil servants
Activity 2.1.3	Expertise on the Concept of Reform of Public Administration in Ukraine in the light of the national anti-corruption policy and international anti-corruption standards
Activity 2.1.4	Support the review and implementation of the legislation on the civil service in the light of international standards and best practices
Activity 2.1.5	Expert assistance in the elaboration of the methodology for the assessment of corruption risks
Activity 2.1.6	Expert assistance to the elaboration of guidelines for the prevention of corruption within public administration
Output 2.2	Risks of corruption reduced in the judiciary
Activity 2.2.1	Expert assistance through advice in the elaboration of the methodology for the assessment of corruption risks in the judiciary
Activity 2.2.2	Carry out risk analysis of 3 courts of general jurisdiction (Kyiv and regions)
Activity 2.2.3	Expert assistance through advice in the (elaboration) and implementation of codes of conduct
Activity 2.2.4	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.2, and transmit the results of the activities under output 2.2 to relevant institutions in particular High Council of Justice, Supreme Court, Ministry of Justice, Council for National Security and Defence, Parliament, a body for coordination, management and monitoring of anti-corruption strategy and action plan
Output 2.3	Risks of corruption reduced in the prosecution and the police
Activity 2.3.1	Carry out risks analyses in General Prosecutor’s Office (at least in the Department for investigation of criminal cases) and National Service of Investigations (once established)
Activity 2.3.2	Carry out risks analyses in the Ministry of Interior bodies as much as possible taking into account the requirements of confidentiality and other requirements to restricted information
Activity 2.3.3	Workshop and expert advice to review the systems of internal controls, audits and reporting corruption in the Prosecution and National Service of Investigations (once established) and formulate recommendations for improvement
Activity 2.3.4	Workshop and expert advice to review the systems of internal controls, audits and reporting corruption in the Ministry of Interior and formulate recommendations for improvement
Activity 2.3.5	Workshops and expert advice for (the elaboration) and implementation of codes of conduct in the Prosecution / and the National Service of Investigations
Activity 2.3.6	Workshops and expert advice for (the elaboration) and implementation of codes of conduct in the Ministry of Interior
Activity 2.3.7	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.3; transmit the results of the activities under output 2.3 to relevant institutions in particular Council for National Security and Defence, Cabinet of Ministers, General Prosecutor’s Office, Ministry of Interior, Parliament, Central Department of Civil Service, body for coordination, management and monitoring of anti-

corruption strategy and action plan

Output 2.4 Conflicts of interest reduced in the political process

- Activity 2.4.1 Translation into Ukrainian and printing of the Council of Europe guidelines “Financing political parties and election campaigns”, translation and printing of other relevant documents (ex. GRECO documents) related to immunities, lobbying and corruption of members of national assemblies
- Activity 2.4.2 Workshop and expert review of the legislation, regulations and practices on financing of political parties and electoral campaigns in the light of European standards and good practices
- Activity 2.4.3 2 Study visits and a conference to support disclosure, reporting, monitoring and enforcement of legislation and regulations on financing of political parties and electoral campaigns
- Activity 2.4.4 Support through expert advice and conference / public hearing the elaboration of legislation on lobbying (analysis of national practices, case studies from Europe and USA, elaboration of proposals)
- Activity 2.4.5 Workshop / conference and expert advice to support the implementation of obligations of elected office holders to declare assets and other measures to reduce conflict of interests
- Activity 2.4.6 Workshop / conference and expert review of the system of immunities for parliamentarians and other elected office holders
- Activity 2.4.7 Workshop and expert advice to support the creation of a mechanism for a systematic review of draft legislative acts in terms of their risks to generate corruption ;
- Activity 2.4.8 Publicise through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.4, transmit the results of the activities under output 2.4 to relevant institutions in particular Ministry of Justice, Council for National Security and Defence, Parliament, Cabinet of Ministers, body for coordination, management and monitoring of anti-corruption strategy and action plan

Output 2.5 Capacities enhanced at the level of local and regional authorities for the prevention of corruption and strengthening of integrity

- Activity 2.5.1 Support the drafting of a short manual on ethics in local government based the Public Ethics Handbook, and translation of other relevant documents into Ukrainian
- Activity 2.5.2 Assist in the establishment of a working group on public ethics in local and regional authorities of Ukraine
- Activity 2.5.3 Support the working group on public ethics in the preparation and implementation of corruption prevention plans in at least 5 pilot municipalities (risk analyses and benchmarking, review status of local officials, review effectiveness of internal and external monitoring and control mechanisms, implementation of codes of conduct)
- Activity 2.5.4 Assist the working group on public ethics in carrying out peer reviews to evaluate the experience in pilot municipalities in view of dissemination and replication throughout Ukraine (and possibly the drafting of a national strategy on public ethics in local government)

Output 2.6 Public participation in the anti-corruption effort promoted

- Activity 2.6.1 Develop the terms of reference for a grant programme open to NGOs and other civil society organisations aimed at promoting public involvement in the anti-corruption effort

Purpose 3	To strengthen the anti-corruption legal framework and effective and impartial enforcement of the criminal legislation on corruption
Output 3.1	Draft laws available to improve the prevention and control of corruption in accordance with the Criminal and Civil Law Conventions of the Council of Europe (ETS 173/174), the United Nations Convention against Corruption and other relevant international legal instruments
Activity 3.1.1	Workshop and expert assistance for review of requirements under international anti-corruption legal instruments and the experience of other countries with regard to their implementation under national law
Activity 3.1.2	Expert assistance (max. 4 activities) to the working groups drafting relevant amendments to domestic anti-corruption legislation to comply with international standards
Output 3.2	Judges trained and specialised in adjudication of corruption, law enforcement officials trained in the investigation and prosecution of corruption offences
Activity 3.2.1	Translation of materials of the relevant Council of Europe documents and activities into Ukrainian(Output 3.2)
Activity 3.2.2	Conference on investigation and prosecution of corruption (challenges, national practices and foreign experience, case studies, pro-active and multidisciplinary approach, participation of relevant institutions including the Accounting Chamber).
Activity 3.2.3	Assist in the review of the effectiveness and functions of bodies responsible for the investigation and prosecution of corruption offences in view of enhancing their effectiveness
Activity 3.2.4	2 in-country training activities for prosecutors and investigators from central and regional offices (case studies, pro-active and multidisciplinary approach)
Activity 3.2.5	2 in-country training activities for police officers and other law enforcement officials from central and regional offices (case studies, pro-active and multidisciplinary approach)
Activity 3.2.6	Organise training activities for judges from central and regional courts
Activity 3.2.7	Up to 3 joint study visits for judges, prosecutors, police and other law enforcement officers from central and regional levels
Activity 3.2.8	Support the introduction of case management systems for the Ministry of Interior and Prosecution bodies, in particular of a unique system for registration of corruption acts
Activity 3.2.9	Provide IT equipment to specialised police and prosecution units, and to judges handling corruption cases (in support of the case management system)
Activity 3.2.10	Establish clear guidelines and mechanisms for reporting of suspicions of corruption and make these available to employees of State institutions and the public
Activity 3.2.11	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 3.2 Transmit the results of the activities under output 3.2 to relevant institutions in particular Council for National Security and Defence, Parliament, Cabinet of Ministers, body for coordination, management and monitoring of anti-corruption strategy and action plan, High Council of Justice, Supreme Court, General Prosecutor's Office, Ministry of Interior (National Service of Investigations)

4.2 Target groups and expected impact

Purpose 1	To improve the strategic and institutional framework against corruption in Ukraine
Output 1.1	Anti-corruption strategy and action plan available
Target groups	Direct beneficiaries and recipients: Ministry of Justice, National Council for Security and Defence, Cabinet of Ministers, Secretariat of the President of Ukraine, Parliament Indirect beneficiaries: Ukrainian society in general
Expected impact	Will be in a position to finalise and adopt the national anti-corruption strategy and action plan based on consultations with all relevant stakeholders (to link up with important reforms and ensure future implementation), public attitudes, past lessons, international standards and good practices and will have defined the anti-corruption institutional set up, including ideally the central preventive body
Output 1.2	Effective monitoring, coordination and management of anti-corruption measures ensured
Target groups	Direct beneficiaries and recipients: National Council for Security and Defence, Cabinet of Ministers, Secretariat of the President of Ukraine, Ministry of Justice, Parliament, an body for monitoring, coordination and management of the action plan Indirect beneficiaries: Ukrainian society in general
Expected impact	Will agree on the mechanism dealing with coordination, management and monitoring of the action plan / Will be able to ensure proper coordination, management and monitoring of the action plan; Will be able to regularly update the anti-corruption strategy and action plan
Output 1.3	Proposals available to ensure the implementation of Article 6 of the United Nations Convention against Corruption regarding preventive anti-corruption body or bodies
Target groups	Direct beneficiaries and recipients: Ministry of Justice, National Council for Security and Defence, Cabinet of Ministers, Secretariat of the President of Ukraine Indirect beneficiaries: Ukrainian society in general
Expected impact	Will be able to decide on a preventive body or bodies
Purpose 2	To enhance capacities for the prevention of corruption
Output 2.1	Anti-corruption concerns incorporated into the process of public administration reform (“anti-corruption mainstreaming”)
Target groups	Direct beneficiaries and recipients: Central Department of Civil Service, Ministry of Justice, Council for National Security and Defence Indirect beneficiary: Ukrainian society in general
Expected impact	Will have expertise and tools to enhance prevention of corruption within public administration
Output 2.2	Risks of corruption reduced in the judiciary
Target groups	Direct beneficiaries and recipients: High Council of Justice, Supreme Court, Ministry of Justice Indirect beneficiaries: judges, legal practitioners and Ukrainian society in general
Expected impact	Will have expertise and tools to enhance prevention of corruption in the judiciary
Output 2.3	Risks of corruption reduced in the prosecution and the police
Target groups	Direct beneficiaries and recipients: General Prosecutor’s Office [National Service of Investigations if created], Ministry of Interior, Ministry of Justice Indirect beneficiaries: Ukrainian society in general
Expected impact	Will have expertise and improved capacities to prevent and reduce corruption within their institutions

Output 2.4	Conflicts of interest reduced in the political process
Target groups	Direct beneficiaries and recipients: Ministry of Justice, Central Electoral Commission, Council of National Security and Defence, Parliament and elected authorities, Cabinet of Ministers Indirect beneficiaries: Ukrainian society in general, media
Expected impact	Will have capacities to enhance transparency, improve legal framework and reduce conflicts of interests in the political process
Output 2.5	Capacities enhanced at the level of local and regional authorities for the prevention of corruption and strengthening of integrity
Target groups	Direct beneficiaries and recipients: National associations of local self-government / Congress of local and regional authorities of Ukraine, 5 pilot municipalities, Ministry of Justice Indirect beneficiaries: All local authorities
Expected impact	Will be in a position to develop and implement corruption prevention and public ethics measures for local and regional authorities Prevention and public ethics plans implemented in 5 municipalities. Will be able to replicate approach throughout the country.
Output 2.6	Public participation in the anti-corruption effort promoted
Target groups	Direct beneficiaries and recipients: NGOs and other civil society groups, media Indirect beneficiary: Ukrainian society in general
Expected impact	A terms of reference for a grant programme open to NGOs and other civil society organisations aimed at promoting public involvement in the anti-corruption effort developed
Purpose 3	To strengthen the anti-corruption legal framework and effective and impartial enforcement of the criminal legislation on corruption
Output 3.1	Draft laws available to improve the prevention and control of corruption in accordance with the Criminal and Civil Law Conventions of the Council of Europe (ETS 173/174), the United Nations Convention on Corruption and other relevant international legal instruments
Target groups	Direct beneficiaries and recipients: Ministry of Justice, Cabinet of Ministers, Parliament, relevant working groups Indirect beneficiaries: Ukrainian society in general, foreign - especially European countries – as concerns improved co-operation mechanisms
Expected impact	Will be in a position to prepare and submit to the Parliament for adoption draft laws to comply with the Criminal and Civil Law Conventions on Corruption, United Nations Convention on Corruption and other relevant international legal instruments
Output 3.2	Judges trained and specialised in adjudication of corruption, law enforcement officials trained in the investigation and prosecution of corruption offences
Target groups:	Direct beneficiaries and recipients: Investigators, prosecutors and judges dealing with corruption cases, supreme audit institutions Indirect beneficiaries: Prosecution, National Service of Investigations (once established), Ministry of Interior, Judiciary as a whole and the Ukrainian society in general.
Expected impact	Will be better prepared and equipped to deal with corruption cases both nationally and through direct international cooperation and interact with the public

4.3 Project management

The Department of Crime Problems (Section for Technical Cooperation) of the Directorate General of Legal Affairs of the Council of Europe in Strasbourg will be responsible for the overall management and supervision of the project. An appointed team leader will be based in Kyiv and will be in charge of day-to-day management of the project on behalf of the Council of Europe.

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5 LOGISTICS AND TIMING

5.1 Location

A project office will be established in Kyiv at the Ministry of Justice. Activities will take place in Kyiv and in different Regional administrative divisions. A limited number of study visits and trainings may take place in other European countries.

5.2 Commencement date, inception phase and period of execution

The project is foreseen for duration of 36 months.

It is proposed that the project starts in May 2006.

6 REQUIREMENTS

Several institutions will be beneficiaries and the recipients of this project. Each of this institution will have to appoint contact persons among their senior officials to coordinate the implementation of the project. The Ministry of Justice will provide technical support for the implementation of the project. For this purpose the Ministry of Justice will appoint a senior official to function as the Project Coordinator who will also ensure that activities are carried out and that inputs are provided by the other relevant agencies and institutions as required. Furthermore, the Ministry of Justice will also provide office space for 1 international team leader and 1 local project assistant.

6.1 Personnel

6.1.1 Project team

Overall project management will be ensured by the Technical Cooperation Section (Department of Crime Problems, Directorate General of Legal Affairs) at the Council of Europe in Strasbourg. An assistant will be recruited (based in Strasbourg) under the present project to support the Head of Technical Cooperation in this task.

In Kyiv, an expert will be recruited as the team leader responsible for the day-to-day management of the project and providing technical advice. S/he will be supported by short-term experts as well as 1 project assistant.

1 project team leader (long term, up to 36 work months, Kyiv)

The team leader will:

- ensure the overall management and coherence of the project
- take responsibility for the implementation of the project workplan in conformity with the logical framework
- supervise other project staff including short-term experts
- organise project inputs
- ensure project reporting, including financial reports
- function as technical adviser in particular for purposes 1 and 3 of the project.

Requirements:

- Not less than 8 years of professional experience at national or international levels in criminal justice/law enforcement-related fields, of which at least 3 years in matters related to corruption
- Management experience (including target setting and planning, supervision of staff, administration, finance and reporting)
- Experience in the management of international technical cooperation projects
- Proficiency in English language and, ideally, knowledge of Ukrainian or Russian
- Communication skills
- Ability to work in an international environment
- Proven report writing skills
- University degree in law, political science or similar.

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The team leader will be appointed after consultation with the EC Delegation in Kyiv.

1 national expert for the prevention of corruption (long term, up to 36 work months, Kyiv)

Under the supervision of the team leader, in cooperation with other members of the project team and with the support of short-term experts, the prevention expert will in particular:

- Ensure the organisation of activities under purpose 2 (prevention) of the project accordance with the project workplan and the logical framework
- Ensure reporting on the implementation of project activities as well as substantive reporting related to prevention measures
- Support the preparation of training and public awareness materials.

Requirements:

- Not less than five years of professional experience at national or international levels in fields related to the prevention of corruption
- At least 3 years of experience in the implementation of measures aimed at the prevention of corruption
- Experience in the organisation of training activities, the production of training materials
- Experience in website design and the production of training materials
- Proven report writing skills
- Ukrainian mother tongue and proficiency in English language
- Communication skills
- Ability to work in an international environment
- University degree in law, political science, sociology or similar.

1 project assistant (up to 36 work months, Kyiv)

In support of the team leader and short-term experts and as part of the project team, 1 project assistant will be required with the following skills and experience:

- At least 3 years of professional experience as secretary
- Ukrainian mother tongue, fluency in English (experience in translation/interpretation an advantage)
- Experience in the handling of project accounts and the preparation of financial reports

1 project assistant (up to 36 work months, Strasbourg)

This assistant will support the team based in Kyiv in terms of administration of the project, mobilisation and recruitment of short-term experts and organisation of study visits. The assistant will also follow reporting to the European Commission. Requirements:

- At least 3 years of professional experience as assistant or assistant project manager
- Fluent in English and/or French. Knowledge of Ukrainian or Russian an advantage
- Knowledge of the Council of Europe's administrative and financial rules
- Experience in the preparation of financial reports
- Good writing skills.

6.1.2 Short term advisers and experts

The project team will propose a workplan detailing short-term consultants and experts that will be needed for the implementation of project activities.

The Council of Europe will ensure the active participation of local professional skills where available, and a suitable mix of European and local staff in the project team. All experts are to be independent and free from conflicts of interests.

All experts must be independent and free from conflicts of interest in the responsibilities accorded to them. In particular, civil servants, staff of the beneficiary and recipient agencies and other staff of the public administration of the beneficiary country cannot be recruited as experts or be paid by the project's funds, unless prior written approval has been obtained from the European Commission.

6.2 Training, workshops, conferences, study visits, studies

- Up to 7 national conferences
- Up to 26 expert advice activities
- Up to 5 written expert opinions (expertises)
- Up to 22 workshops, round tables and in-country training activities
- Up to 7 study visits
- Up to 5 surveys
- Up to 7 awareness raising activities (publication / web / media)
- Translations and publications
- Up to 10 risks analyses

6.3 Office accommodation

The Ministry of Justice will provide office for the project team free of charge.

The project will equip this office with furniture, PC, printer, fax, copy machine.

6.4 Equipment

- Furniture, PC, printer, fax and copy machine for the project office
- IT equipment and software for case management by prosecutors and law enforcement (up to 30 sets of PCs and software)

Equipment for beneficiaries and recipients will be procured by the Council of Europe according to its own procurement regulations. A list of equipment and its specifications should be first approved by the project steering committee and endorsed by EC Delegation in Ukraine.

7 REPORTING REQUIREMENTS

The Council of Europe will refer to Article 2 of the General Conditions and is required to present the following formal reports:

An inception report - to be submitted three months after the commencement date of the contract. The inception report will contain a detailed workplan, the name of possible experts for the training, and implementation measures.

Interim progress reports - to be submitted every **six months** during the period of execution of the contract (at the end of month 6, 12, etc.). These reports will list more in detail the activities undertaken, and assess the progress towards achievement of project objectives. This update will stress particularly the achievement of results. **Interim progress reports must be accompanied by a corresponding invoice at six monthly intervals.**

A final progress report – is to be submitted at the end of the period of execution, together with the final invoice. The draft final report must be presented at least one month before the end of the period of execution of the contract. The final report should include an in-depth assessment of the project implementation, results and level of achievement of the objectives.

The inception, interim and final reports will be prepared in English and Ukrainian, and will respect the format approved by the European Commission¹

In addition to the above formal reports, monthly activity reports will be submitted on the first day of each month. These brief reports (one page) will summarise the activities implemented in the preceding month and the activity planned for the next two months.

Furthermore, the Council of Europe shall provide such information on project progress as is reasonably required by the Delegation of the European Commission in Ukraine, and shall regularly inform the EC Delegation of political, economic or institutional developments of relevance to the project. The Council of Europe shall in particular provide the Delegation of the European Commission in Ukraine with electronic and paper copies of:

- training material prepared under this project;
- reports of short-term experts.

Before the end of the contract, the Consultant will provide the Contracting Authority with a CD ROM containing all the documents/report/publications produced during the implementation of the project.

7.2. Submission and approval of progress reports

Reports produced in this project will be submitted by the Council of Europe to:

Delegation of the European Commission in Ukraine	- 2 copies in English and 1 copy in Ukrainian;
The project beneficiaries:	1 copy in English and 1 copy in Ukrainian;
The National Co-ordinating Unit	1 copy in English and 1 copy in Ukrainian;
The TACIS Monitoring Team	1 copy in English and 1 copy in Ukrainian;

¹ http://europa.eu.int/comm/europeaid/tender/practical_guide_2006/annexes_grants_en.htm: E3h_5 - Interim narrative report; E3h_7.2 - Final narrative report; E3h_7 - Financial report; E3h_8 - Expenditure verification

The reports shall be submitted in hard copy and electronic format (in MS Word, MS Excel file formats).

The Project Manager is solely responsible for approving the progress reports. The project beneficiaries will be encouraged to submit comments on the report to the Project Manager.

Reports should be submitted for approval to:

Delegation of the European Commission to Ukraine
10, Kruhlouniversytetska
01024 Kyiv, Ukraine.

8 EU VISIBILITY

All activities will adhere to the European Commission's requirements for visibility on EC funded activities, as described in the published "EU Visibility Guidelines". http://europa.eu.int/comm/europeaid/visibility/index_en.htm This shall include, but not be limited to, press releases and briefings, reports, seminars, workshops, events, publications, websites and any promotional items. When possible, seminars/workshops and events funded under this project will have a European flag prominently displayed that is the same size or larger than any other flags present. All publications produced under this project shall have the EU logo displayed as the same size or larger than any other logos and include the disclaimer: "This publication has been produced with the assistance of the European Union. The content of this publication does not necessarily reflect the views of the European Union."

9 MONITORING AND EVALUATION

The project will be monitored according to standard procedures.

Project monitoring and evaluation will be based on periodic assessment of progress on delivery of specified project results and towards achievement of project objectives.

9.1. Definition of indicators

During the implementation of the contract, suitable objectively quantifiable indicators will be agreed between the European Commission and the Council of Europe. These may be **quantitative**: measures of quantity, including statistical statements; or **qualitative**: judgements and perception derived from subjective analysis. In all cases quantifiable indicators must provide valid, useful, practical and comparable measures of progress towards achieving the expected targets.

10 APPENDIX

10.1 Draft logical framework

(to be completed during the inception period)

Level	Description	Indicators	Sources of verification	Assumptions
Purpose 1	To improve the strategic and institutional framework against corruption in Ukraine	Anti-corruption strategy and action plan available and adopted Strategy and action plan effectively monitored, coordinated and managed	Project reports, GRECO reports, Communications and web-sites of the President of Ukraine and the Cabinet of Ministers of Ukraine ; Media	Commitment of the Ukrainian authorities to counter corruption in coordinated and coherent manner
Output 1.1	Anti-corruption strategy and action plan available	By month 5: Draft strategy and action plan link up with major reforms Report assessing effectiveness of previous measures available Analytical basis for creation of preventive body / bodies available Report(s) evaluating assistance to the elaboration of the action plan available National and regional baseline surveys available Anti-corruption strategy available By month 14: Anti-corruption action plan available	Projects reports, reports and communications of relevant Ukrainian institutions; web-sites of the President of Ukraine and the Cabinet of Ministers of Ukraine, GRECO, media	The relevant Ukrainian authorities have capacities to efficiently link the anti-corruption strategy and action plan with major reforms; to finalise the documents through consultations, make strategic decisions on the institutional set up.
Activity 1.1.1	Advice and recommendations on strategic issues related to			

Level	Description	Indicators	Sources of verification	Assumptions
	anti-corruption policy and finalisation of the anti-corruption strategy; technical advice to the high level consultations to coordinate design and implementation of major reforms (<i>including the reforms of the Civil Service, Judiciary, Prosecution and law enforcement system, administrative-territorial reform, economic and social reforms</i>) and to the process of elaboration of the action plan			
Activity 1.1.2	Expert assessment of the effectiveness of previous anti-corruption strategies and measures in Ukraine and formulation of lessons for the future			
Activity 1.1.3	Expert workshops and public consultations on specific issues related to the elaboration of the anti-corruption action plan (ex. on the prevention of corruption, on the enforcement of anti-corruption legislation, on public awareness...).			
Activity 1.1.4	National and regional public baseline surveys (perception, experience) on corruption and “service delivery” in the system of justice (police, prosecution, State notary service, enforcement of judgements, judiciary), within public administration in general, among elected officials and officials of local and regional authorities			
Activity 1.1.5	Make public through publications and web and if appropriate through audiovisual media the results of national and regional surveys and the results of other activities under output 1.1			
Output 1.2	Effective monitoring, coordination and management of anti-corruption measures ensured	By month 6: Analytical materials on different types of mechanisms for monitoring, coordination and management available Proposal for a mechanism for Ukraine available	Project reports; GRECO reports, web-site and official documents of the Cabinet of Ministers (and of the President of	Continuing commitment of the Ukrainian authorities to establish a centralised mechanism for monitoring, coordination and

Level	Description	Indicators	Sources of verification	Assumptions
		By month 14: Mechanism for coordination, management and monitoring created By month 33: At least 1 annual anti-corruption conference organised to review the anti-corruption strategy and action plan	Ukraine)	management of the anti-corruption strategy and action plan
Activity 1.2.1	Workshop to review the experience of other countries regarding the mechanisms of monitoring, management and coordination of anti-corruption strategies and action plans			
Activity 1.2.2	Support through expert advice the preparation of a proposal for a mechanism dealing with coordination, management and monitoring in Ukraine			
Activity 1.2.3	Support through expert advice coordination, management and monitoring of anti-corruption measures in Ukraine			
Activity 1.2.4	Support the organisation of up to 2 national anti-corruption conference(s) to review the implementation of anti-corruption measures in Ukraine			
Activity 1.2.5	Make public through publications and web and if appropriate through audiovisual media the results of the conferences related to the review the implementation of anti-corruption measures			
Output 1.3	Proposals available to ensure the implementation of Article 6 of the United Nations Convention against Corruption regarding preventive anti-corruption body or bodies	By month 6: Proposals available for implementation by Ukraine of Article 6 of UN Convention against corruption		
Activity 1.3.1	Review the experience of other countries regarding preventive			

Level	Description	Indicators	Sources of verification	Assumptions
	bodies (study visits and workshops)			
Activity 1.3.2	Support the elaboration of proposals for submission to the authorities concerned			
Purpose 2	To enhance capacities for the prevention of corruption	Documents related to the public administration reform amended in the light of anti-corruption standards and best practices Guidelines for risks analysis, prevention of corruption and elaboration / implementation of codes of conduct in the judiciary, public administration (in particular in the Ministry of Interior, Prosecution and NSI (once established) and local and regional authorities available Recommendations and draft laws aimed at reducing conflicts of interests in the political process available	Activity reports; Web-site and documents of the Central Department of Civil Service, High Council of Justice, Ministry of Justice, CEC, Prosecution (NSI once established), Ministry of Interior, National associations / Congress of local and regional authorities of UA,, GRECO, Congress of local and regional authorities (CoE), media	Cooperation of relevant stakeholders
Output 2.1	Anti-corruption concerns incorporated into the process of public administration reform (“anti-corruption mainstreaming”)	By month 12: Amended basic concept and draft laws on administrative reform in the light of anti-corruption standards and best practices Code of conduct for civil servants finalised Methodology for assessment of	Activity reports; Web-site and documents of the Central Department of Civil Service and Ministry of Justice, GRECO, media	Cooperation and commitment of the Central Department of Civil Service

Level	Description	Indicators	Sources of verification	Assumptions
		corruption risks elaborated By month 31: Guidelines for the prevention of corruption within public administration finalised		
Activity 2.1.1	Translation into Ukrainian and dissemination of relevant documents, including the Council of Europe Recommendation (2000)10 on codes of conduct for public officials and Model code of conduct for public officials (Appendix to the Recommendation)			
Activity 2.1.2	Support the dissemination (publication, web...) and implementation of the code of conduct for civil servants			
Activity 2.1.3	Expertise on the Concept of Reform of Public Administration in Ukraine in the light of the national anti-corruption policy and international anti-corruption standards			
Activity 2.1.4	Support the review and implementation of the legislation on the civil service in the light of international standards and best practices			
Activity 2.1.5	Expert assistance in the elaboration of the methodology for the assessment of corruption risks			
Activity 2.1.6	Expert assistance to the elaboration of guidelines for the prevention of corruption within public administration			
Output 2.2	Risks of corruption reduced in the judiciary	By month 15: Codes of conduct finalised and guidelines for implementation available By month 30: Methodology for the assessment of risks of corruption in the	Activity reports; Web-site and documents of the High Council of Justice, Ministry of Justice, GRECO, media	Cooperation of Ukrainian judicial authorities in particular of the High Council of Justice. Cooperation of the Ministry of Justice

Level	Description	Indicators	Sources of verification	Assumptions
		judiciary elaborated Analysis of risks of corruption available (on the basis of assessment of 3 courts of general jurisdiction)		
Activity 2.2.1	Expert assistance through advice in the elaboration of the methodology for the assessment of corruption risks in the judiciary			
Activity 2.2.2	Carry our risk analysis of 3 courts of general jurisdiction (Kyiv and regions)			
Activity 2.2.3	Expert assistance through advice in the (elaboration) and implementation of codes of conduct			
Activity 2.2.4	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.2 Transmit the results of the activities under output 2.2 to relevant institutions in particular High Council of Justice, Supreme Court, Council for National Security and Defence, Parliament, body for coordination, management and monitoring of anti-corruption strategy and action plan			
Output 2.3	Risks of corruption reduced in the prosecution and the police	By month 25: Report on risks of corruption in the Ministry of Interior, Prosecution (and the National Service of Investigations) available; Analytical report and recommendations for improvement of the systems of internal control, audits and reporting corruption in the Ministry	Project reports, GRECO reports, Documents and web-sites of the Ministry of Interior, Prosecution and NSI (once established)	Cooperation of the institutions concerned

Level	Description	Indicators	Sources of verification	Assumptions
		of Interior, Prosecution (and the National Service of Investigations) available ; Guidelines for the implementation of codes of ethics available		
Activity 2.3.1	Carry out risks analyses in General Prosecutor's Office (at least in the Department for investigation of criminal cases) and National Service of Investigations (once established)			
Activity 2.3.2	Carry out risks analyses in the Ministry of Interior bodies as much as possible taking into account the requirements of confidentiality and other requirements to restricted information			
Activity 2.3.3	Workshop and expert advice to review the systems of internal controls, audits and reporting corruption in the Prosecution and National Service of Investigations (once established) and formulate recommendations for improvement			
Activity 2.3.4	Workshop and expert advice to review the systems of internal controls, audits and reporting corruption in the Ministry of Interior and formulate recommendations for improvement			
Activity 2.3.5	Workshops and expert advice for (the elaboration) and implementation of codes conduct in the Prosecution / and the National Service of Investigations			
Activity 2.3.6	Workshops and expert advice for (the elaboration) and implementation of codes conduct in the Ministry of Interior			
Activity 2.3.7	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.3 Transmit the results of the activities under output 2.3 to relevant institutions in particular Council for National Security and Defence, Cabinet of Ministers, General Prosecutor's Office, Ministry of Interior, Parliament, Central Department of			

Level	Description	Indicators	Sources of verification	Assumptions
	Civil Service, body for coordination, management and monitoring of anti-corruption strategy and action plan			
Output 2.4	Conflicts of interest reduced in the political process	<p>By month 5: Best practice survey on political finance available in Ukrainian Recommendations to improve the system of political finance available</p> <p>By month 18: Recommendations to improve the system of political finance updated Recommendations to reduce conflicts of interests among elected office holders available Assessment and recommendations on the systems of immunities available Concept or / and Draft law on systematic review of legislation in terms of risks to generate corruption available</p> <p>By month 25: Concept or / and draft law(s) on lobbying available</p>	Activity reports, BPS, concept and / or draft laws, GRECO reports, documents of Ministry of Justice, Central Electoral Commission and Parliament, media	Cooperation of the Ministry of Justice, Central Electoral Commission and Parliament
Activity 2.4.1	Translation into Ukrainian and printing of the Council of Europe guidelines “Financing political parties and election campaigns”, translation and printing of other relevant documents (ex. GRECO documents) related to immunities, lobbying and corruption of members of national assemblies			
Activity 2.4.2	Workshop and expert review of the legislation, regulations and practices on financing of political parties and electoral			

Level	Description	Indicators	Sources of verification	Assumptions
	campaigns in the light of European standards and good practices			
Activity 2.4.3	2 Study visits and a conference to support disclosure, reporting, monitoring and enforcement of legislation and regulations on financing of political parties and electoral campaigns			
Activity 2.4.4	Support through expert advice and conference / public hearing the elaboration of legislation on lobbying (analysis of national practices, case studies from Europe and USA, elaboration of proposals)			
Activity 2.4.5	Workshop / conference and expert advice to support the implementation of obligations of elected office holders to declare assets and other measures to reduce conflict of interests			
Activity 2.4.6	Workshop / conference and expert review of the system of immunities for parliamentarians and other elected office holders			
Activity 2.4.7	Workshop and expert advice to support the creation of a mechanism for a systematic review of draft legislative acts in terms of their risks to generate corruption ;			
Activity 2.4.8	Publicise through a publication and the web the findings of activities under Output 2.4 Transmit the results of the activities under output 2.4 to relevant institutions in particular Council for National Security and Defence, Parliament, Cabinet of Ministers, body for coordination, management and monitoring of anti-corruption strategy and action plan			
Output 2.5	Capacities enhanced at the level of local and regional authorities for the prevention of corruption and strengthening of	By month 24: Results from 5 corruption	Activity reports, Documents of	Cooperation of national associations of local

Level	Description	Indicators	Sources of verification	Assumptions
	integrity	prevention and public ethics measures in pilot municipalities available for replication throughout the country	national associations / Congress of local and regional authorities (UA) , GRECO reports, DG I - Local Democracy (CoE) reports, reports of Congress of local and regional authorities (CoE) , media	self-government / Congress of local and regional authorities of Ukraine to disseminate results and use them as a basis for a national strategy for corruption prevention and public ethics in local government
Activity 2.5.1	Support the drafting of a short manual on ethics in local government based the Public Ethics Handbook, and translation of other relevant documents into Ukrainian			
Activity 2.5.2	Assist in the establishment of a working group on public ethics in local and regional Authorities of Ukraine			
Activity 2.5.3	Support the working group on public ethics in the preparation and implementation of corruption prevention plans in at least 5 pilot municipalities (risk analyses and benchmarking, review status of local officials, review effectiveness of internal and external monitoring and control mechanisms, implementation of codes of conduct)			
Activity 2.5.4	Assist the working group on public ethics in carrying out peer reviews to evaluate the experience in pilot municipalities in view of dissemination and replication throughout Ukraine (and possibly the drafting of a national strategy on public ethics in local government)			
Output 2.6	Public participation in the anti-corruption effort promoted	By month 6:	Activity report, EC	Cooperation between

Level	Description	Indicators	Sources of verification	Assumptions
		The terms of reference for a grant programme open to NGOs and other civil society organisations aimed at promoting public involvement in the anti-corruption effort developed	sources	the Council of Europe and the European Commission under output 2.6
Activity 2.6.1	Develop the terms of reference for a grant programme open to NGOs and other civil society organisations aimed at promoting public involvement in the anti-corruption effort			
Purpose 3	To strengthen the anti-corruption legal framework and effective and impartial enforcement of the criminal legislation on corruption	Relevant draft amendments in the light of international anti-corruption standards and technical reports on specialisation, training, and multidisciplinary approach of law enforcement and judicial authorities in the fight against corruption	Activity reports, GRECO reports, draft amendments, technical reports, partner institutions documentation	Cooperation of relevant partner institutions
Output 3.1	Draft laws available to improve the prevention and control of corruption in accordance with the Criminal and Civil Law Conventions of the Council of Europe (ETS 173/174), the United Nations Convention against corruption and other relevant international legal instruments	By month 15: Draft amendments available to comply with the Criminal and Civil Law Conventions of the Council of Europe (ETS 173/174), the United Nations Convention on Corruption and other relevant international legal instruments and submitted to the Cabinet of Ministers	Activity reports, GRECO reports, draft amendments, Ministry of Justice and Cabinet of Ministers documents and web-sites	Cooperation of the Ministry of Justice and relevant working groups
Activity 3.1.1	Workshop and expert assistance for review of requirements under international anti-corruption legal instruments and the experience of other countries with regard to their implementation under national law			

Level	Description	Indicators	Sources of verification	Assumptions
Activity 3.1.2	Expert assistance (max. 4 activities) to the working groups drafting relevant amendments to domestic anti-corruption legislation to comply with international standards			
Output 3.2	Judges trained and specialised in adjudication of corruption, law enforcement officials trained in the investigation and prosecution of corruption offences	Review reports, training programmes, training reports, activity reports, internal institutional statistics and reports, documents attesting reception of IT equipment, guidelines for reporting suspicions on corruption	Activity reports, GRECO reports, documents of the Prosecution, NSI (once established), Ministry of Interior, Judiciary, Accounting Chamber	Cooperation of the Prosecution, NSI (once established), Ministry of Interior, Judiciary and supreme audit institutions
Activity 3.2.1	Translation of materials of the relevant Council of Europe documents and activities into Ukrainian(Output 3.2)			
Activity 3.2.2	Conference on investigation and prosecution of corruption (challenges, national practices and foreign experience, case studies, pro-active and multidisciplinary approach, participation of relevant institutions including the Accounting Chamber).			
Activity 3.2.3	Assist in the review of the effectiveness and functions of bodies responsible for the investigation and prosecution of corruption offences in view of enhancing their effectiveness			
Activity 3.2.4	2 in-country training activities for prosecutors and investigators from central and regional offices (case studies, pro-active and multidisciplinary approach)			
Activity 3.2.5	2 in-country training activities for police officers and other law enforcement officials from central and regional offices (case studies, pro-active and multidisciplinary approach)			
Activity 3.2.6	Organise training activities for judges from central and regional courts			
Activity 3.2.7	Up to 3 joint study visits for judges, prosecutors, police and			

Level	Description	Indicators	Sources of verification	Assumptions
	other law enforcement officers from central and regional levels			
Activity 3.2.8	Support the introduction of case management systems for the Ministry of Interior and Prosecution bodies, in particular of a unique system for registration of corruption acts			
Activity 3.2.9	Provide IT equipment to specialised police and prosecution units, and to judges handling corruption cases (in support of the case management system)			
Activity 3.2.10	Establish clear guidelines and mechanisms for reporting of suspicions of corruption and make these available to employees of State institutions and the public			
Activity 3.2.11	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 3.2 Transmit the results of the activities under output 3.2 to relevant institutions in particular Council for National Security and Defence, Parliament, Cabinet of Ministers, body for coordination, management and monitoring of anti-corruption strategy and action plan, High Council of Justice, Supreme Court, General Prosecutor's Office, Ministry of Interior (National Service of Investigations)			

10.2 Workplan and inputs (draft to be completed during inception phase)

Timing	Activity	Description	Responsible institution	Inputs required
Month 1	Inception phase	Recruitment of project staff and establishment of the project office in Kyiv	Ministry of Justice of Ukraine Council of Europe (Strasbourg)	
Month 1	Inception phase	Review and finalisation of the detailed workplan and of the inception report	Ministry of Justice of Ukraine Council of Europe (Strasbourg + local project team)	
Month 1	Activity 2.1.5	Expert assistance in the elaboration of the methodology for the assessment of corruption risks	Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 1	Activity 1.1.4	National and regional public baseline surveys (perception, experience) on corruption and “service delivery” in the system of justice (police, prosecution, State notary service, enforcement of civil judgements, judiciary), within public administration in general, among elected officials and officials of local and regional authorities	Ministry of Justice and external service provider Council of Europe (local project team)	
As from Month 1	Activity 1.1.1	Advice and recommendations on strategic issues related to anti-corruption policy and finalisation of the anti-corruption strategy; technical advice to the high level consultations to coordinate design and implementation of major reforms (<i>including the reforms of the Civil Service, Judiciary, Prosecution and law enforcement system, administrative-territorial reform, economic and social reforms</i>) and to the process of elaboration of the action plan	Council of Europe (Strasbourg + local project team) <i>(Council of National Security and Defence)</i>	
Month 2	Activity 1.1.3	Up to 2 expert workshops and public consultations on specific issues related to the elaboration of the anti-corruption action plan (ex. on the prevention of corruption, on the enforcement of anti-corruption legislation, on public awareness...).	Ministry of Justice, Council for National Security and Defence, Council of Europe (local project team)	
Month 2 - 3	Activity 1.1.2	Expert assessment of the effectiveness of previous anti-corruption strategies and measures in Ukraine and formulation of lessons for the future	Ministry of Justice, Council for National Security and Defence, Council of Europe (local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 2 - 3	Activity 2.4.1	Translation into Ukrainian and printing of the Council of Europe guidelines "Financing political parties and election campaigns", translation and printing of other relevant documents (ex. GRECO documents) related to immunities, lobbying and corruption of members of national assemblies	Council of Europe (local project team)	
Month 3	Activity 1.3.1	Workshop and study visit to review the experience of other countries regarding preventive bodies and elaborate proposals to ensure the implementation of Art 6 of UN Convention against corruption	Ministry of Justice, Council for National Security and Defence, Council of Europe (local project team)	
Month 3	Activity 2.4.2	Workshop and expert review of the legislation, regulations and practices on financing of political parties and electoral campaigns in the light of European standards and good practices	Ministry of Justice Council of Europe (local project team)	
Month 3 - 4	Activity 2.6.1	Develop the terms of reference for a grant programme open to NGOs and other civil society organisations aimed at promoting public involvement in the anti-corruption effort	Council of Europe (Strasbourg + local project team) European Commission	
Month 4	Activity 1.1.3	Expert workshop and public consultations on specific issues related to the elaboration of the anti-corruption action plan (ex. on the prevention of corruption, on the enforcement of anti-corruption legislation, on public awareness...).	Ministry of Justice, Council for National Security and Defence, Council of Europe (local project team)	
Month 4 - 5	Activity 1.2.1	Workshop to review the experience of other countries regarding the mechanisms of monitoring, management and coordination of anti-corruption strategies and action plans	Council for National Security and Defence / Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 4 - 5	Activity 1.1.5	Make public through publications and web and if appropriate through audiovisual media the results of national and regional surveys and the results of other activities under output 1.1	Council for National Security and Defence Council of Europe (local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 5	Activity 1.3.2	Workshop and study visit to review the experience of other countries regarding the creation of preventive bodies and elaborate proposals for the creation of a body or bodies for the prevention of corruption (in accordance with Article 6 of the United Nations Convention against Corruption)	Ministry of Justice, Council for National Security and Defence, Council of Europe (local project team)	
Month 5	Activity 2.5.1	Support the drafting of a short manual on ethics in local government based the Public Ethics Handbook, and translation of other relevant documents into Ukrainian	Relevant working group, national associations of local of local self-government, Ministry of Justice Council of Europe	
Month 5	Activity 1.2.2	Support through expert advice the preparation of a proposal for a mechanism dealing with coordination, management and monitoring in Ukraine	Ministry of Justice, Council for National Security and Defence Council of Europe (Strasbourg + local project team)	
Month 6	Activity 1.2.3	Support through expert advice coordination, management and monitoring of anti-corruption measures in Ukraine	Council for National Security and Defence / Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 6	Activity 3.2.3	Assist in the review of the effectiveness and functions of bodies responsible for the investigation and prosecution of corruption offences in view of enhancing their effectiveness	Council for National Security and Defence / Prosecution / NSI / Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 6	Activity 2.4.3	Study visit to support disclosure, reporting, monitoring and enforcement of legislation and regulations on financing of political parties and electoral campaigns	Ministry of Justice, Central Electoral Commission Council of Europe (Strasbourg + local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 7	Activity 2.4.6	Workshop and expert review of the system of immunities for parliamentarians and other elected office holders	Parliament, Ministry of Justice, Cabinet of Ministers, Council for National Security and Defence Council of Europe (Strasbourg + local project team)	
Month 7	Activity 2.1.3	Expertise on the Concept of Reform of Public Administration in Ukraine in the light of the national anti-corruption policy and international anti-corruption standards	Central Department of Civil Service, Council for National Security and Defence Council of Europe (local project team)	
Month 7	Activity 3.1.2	Expert assistance to the working groups drafting relevant amendments to domestic anti-corruption legislation to comply with international standards	Ministry of Justice Council of Europe (local project team)	
Month 8	Activity 2.5.2	Assist in the establishment of a working group on public ethics in regional and local authorities	National associations of local self-government Council of Europe	
Month 8	Activity 2.1.1	Translation into Ukrainian and dissemination of relevant documents, including the Council of Europe Recommendation (2000)10 on codes of conduct for public officials and Model code of conduct for public officials (Appendix to the Recommendation)	Central Department of Civil Service, Ministry of Justice Council of Europe (local project team)	
Month 8	Activity 2.1.4	Support the review and implementation of the legislation on the civil service in the light of international standards and best practices	Central Department of Civil Service Council of Europe (local project team)	
Month 9	Activity 2.4.5	Workshop / conference and expert advice to support the implementation of obligations of elected office holders to declare assets and other measures to reduce conflict of interests	Parliament, Ministry of Justice Council of Europe (Strasbourg + local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 9	Activity 3.2.2	Conference on investigation and prosecution of corruption (challenges, national practices and foreign experience, case studies, pro-active and multidisciplinary approach, participation of relevant bodies, including supreme audit institutions).	General Prosecutor's Office, NSI (once established), Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 10	Activity 2.4.6	Conference and expert review of the system of immunities for parliamentarians and other elected office holders	Parliament, Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 10	Activity 2.1.2	Support the dissemination (publication, web...) and implementation of the code of conduct for civil servants	Ministry of Justice, Central Department of Civil Service, Council of Europe (local project team)	
Months 10-20	Activity 2.5.3	Support the working group on public ethics in the preparation and implementation of corruption prevention plans in at least 5 pilot municipalities (risk analyses and benchmarking, review status of local officials, review effectiveness of internal and external monitoring and control mechanisms, implementation of codes of conduct)	Working group, National associations of local self-government / Congress of local and regional authorities of Ukraine Council of Europe	
Month 11	Activity 3.1.2	Expert assistance to the working groups drafting relevant amendments to domestic anti-corruption legislation to comply with international standards	Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 12	Activity 3.1.1	Workshop and expert assistance for review of requirements under international anti-corruption legal instruments and the experience of other countries with regard to their implementation under national law	Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 13	Activity 2.2.3	Expert assistance through advice in the (elaboration) and implementation of codes of conduct	High Council of Justice, Ministry of Justice Council of Europe (Strasbourg + local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 14	Activity 1.2.3	Support through expert advice coordination, management and monitoring of anti-corruption measures in Ukraine	Ministry of Justice, Council for National Security and Defence / Council of Europe (Strasbourg + local project team)	
Month 14	Activity 2.2.1	Expert assistance through advice in the elaboration of the methodology for the assessment of corruption risks in the judiciary	High Council of Justice, Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 14 - 15	Activity 3.1.2	Expert assistance to the working groups drafting relevant amendments to domestic anti-corruption legislation to comply with international standards	Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 15	Activity 2.3.1	Carry out risks analyses in General Prosecutor's Office (at least in the Department for investigation of criminal cases) and National Service of Investigations (once established)	General Prosecutor's Office / National Service of Investigations Council of Europe (Strasbourg + local project team)	
Month 15	Activity 2.3.3	Workshop and expert advice to review the systems of internal controls, audits and reporting corruption in the Prosecution and National Service of Investigations (once established) and formulate recommendations for improvement	General Prosecutor's Office / National Service of Investigations Council of Europe (Strasbourg + local project team)	
Month 15	Activity 2.4.3	Study visit support disclosure, reporting, monitoring and enforcement of legislation and regulations on financing of political parties and electoral campaigns	Ministry of Justice, Central Electoral Commission Council of Europe (Strasbourg + local project team)	
Month 16	Activity 2.2.2	Risk analysis of 3 courts of general jurisdiction (Kyiv and regions)	High Council of Justice / Supreme Court Council of Europe (Strasbourg + local project team)	
Month 16	Activity 2.4.7	Workshop and expert advice to support the creation of a mechanism for a systematic review of draft legislative acts in terms of their risks to generate corruption	Ministry of Justice, Parliament Council of Europe (Strasbourg + local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 17	Activity 2.4.3	Conference to support disclosure, reporting, monitoring and enforcement of legislation and regulations on financing of political parties and electoral campaigns	Ministry of Justice, Central Electoral Commission Council of Europe (Strasbourg + local project team)	
Month 18	Activity 2.3.2	Risks analyses in the Ministry of Interior bodies (as much as possible) taking into account the requirements of confidentiality and other requirements to restricted information	Ministry of Interior, Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 18	Activity 2.3.4	Workshop and expert advice to review the systems of internal controls, audits and reporting corruption in the Ministry of Interior and formulate recommendations for improvement	Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 19	Activity 3.2.4	In-country training activity for prosecutors and investigators from central and regional offices (case studies, pro-active and multidisciplinary approach, participation of relevant bodies, including supreme audit institutions)	General Prosecutor's Office / National Service of Investigations Council of Europe (Strasbourg + local project team)	
Month 19	Activity 3.2.9	Provide IT equipment to specialised police and prosecution units, and to judges handling corruption cases (in support of the case management system)	General Prosecutor's Office, National Service of Investigations (once established), Ministry of Interior, High Council of Justice Council of Europe (Strasbourg + local project team)	
Month 20	Activity 3.2.1	Translation of materials of the relevant Council of Europe documents and activities into Ukrainian (Output 3.2)	Prosecution, NSI, Ministry of Interior, High Council of Justice, Ministry of Justice Council of Europe (local project team)	
Month 21	Activity 3.2.8	Support the introduction of case management systems for the Ministry of Interior and Prosecution bodies, in particular of a unique system for registration of corruption acts	Prosecution, NSI, Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 21	Activity 2.3.5	Workshops and expert advice for (the elaboration) and implementation of codes conduct in the Prosecution / and the National Service of Investigations	Prosecution, NSI Council of Europe (local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Months 21-24	Activity 2.5.4	Assist the working group on public ethics in carrying out peer reviews to evaluate the experience in pilot municipalities in view of dissemination and replication throughout Ukraine (and possibly the drafting of a national strategy on public ethics in local government)	Working group, National associations of local self-government / Congress of local and regional authorities of Ukraine Council of Europe	
Month 22	Activity 2.3.6	Workshops and expert advice for (the elaboration) and implementation of codes conduct in the Ministry of Interior	Ministry of Interior, Ministry of Justice Council of Europe (local project team)	
Month 23	Activity 3.2.4	In-country training activity for prosecutors and investigators from central and regional offices (case studies, pro-active and multidisciplinary approach, participation of relevant bodies, including supreme audit institutions)	Prosecution, NSI Council of Europe (local project team)	
Month 23	Activity 3.2.5	In-country training activity for police officers and other law enforcement officials from central and regional offices (case studies, pro-active and multidisciplinary approach, participation of relevant bodies, including supreme audit institutions)	Ministry of Interior Council of Europe (local project team)	
Month 24	Activity 3.2.10	Establish clear guidelines and mechanisms for reporting of suspicions of corruption and make these available to employees of State institutions and the public	Prosecution / NSI, Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 25	Activity 2.4.4	Support through expert advice and conference / public hearing the elaboration of legislation on lobbying (analysis of national practices, case studies from Europe and USA, elaboration of proposals)	Ministry of Justice, Parliament Council of Europe (Strasbourg + local project team)	
Month 25	Activity 2.4.8	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.4 Transmit the results of the activities under output 2.4 to relevant institutions in particular Council for National Security and Defence, Parliament, Cabinet of Ministers, body for coordination, management and monitoring of anti-corruption strategy and action plan	Ministry of Justice, CEC Council of Europe (local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 26	Activity 3.2.6	Organise training activities for judges from central and regional courts	High Council of Justice / Supreme Court Council of Europe (local project team)	
Month 26	Activity 3.2.5	In-country training activity for police officers and other law enforcement officials from central and regional offices (case studies, pro-active and multidisciplinary approach, participation of relevant bodies, including supreme audit institutions)	Prosecution, NSI, Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 26	Activity 3.2.7	Joint study visits for judges, prosecutors, police and other law enforcement officers from central and regional levels, participation of relevant bodies, including supreme audit institutions	Prosecution, NSI, Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 29	Activity 3.2.7	Up to two joint study visits for judges, prosecutors, police and other law enforcement officers from central and regional levels	Prosecution, NSI, Ministry of Interior Council of Europe (Strasbourg + local project team)	
Month 30	Activity 2.2.4	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.2 Transmit the results of the activities under output 2.2 to relevant institutions in particular High Council of Justice, Supreme Court, Council for National Security and Defence, Parliament, body for coordination, management and monitoring of anti-corruption strategy and action plan	High Council of Justice / Supreme Court Council of Europe (local project team)	

Timing	Activity	Description	Responsible institution	Inputs required
Month 30	Activity 3.2.11	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 3.2 Transmit the results of the activities under output 3.2 to relevant institutions in particular Council for National Security and Defence, Parliament, Cabinet of Ministers, body for coordination, management and monitoring of anti-corruption strategy and action plan, High Council of Justice, Supreme Court, General Prosecutor's Office, Ministry of Interior (National Service of Investigations)	Prosecution, NSI, Ministry of Interior Council of Europe (local project team)	
Month 31	Activity 2.1.6	Expert assistance to the elaboration of guidelines for the prevention of corruption within public administration	Central Department of Civil Service, Ministry of Justice Council of Europe (Strasbourg + local project team)	
Month 32	Activity 2.3.7	Make public through a publication and web and if appropriate through audiovisual media the findings of activities under Output 2.3 Transmit the results of the activities under output 2.3 to relevant institutions in particular Council for National Security and Defence, Cabinet of Ministers, General Prosecutor's Office, Ministry of Interior, Parliament, Central Department of Civil Service, body for coordination, management and monitoring of anti-corruption strategy and action plan	Prosecution, NSI, Ministry of Interior Council of Europe (local project team)	
Month 33	Activity 1.2.4	Support to national anti-corruption conference to review the implementation of anti-corruption measures in Ukraine	Council for National Security and Defence, Ministry of Justice Council of Europe (local project team)	
Month 33	Activity 1.2.5	Make public through publications and web and if appropriate through audiovisual media the results of the conference related to the review the implementation of anti-corruption measures	Council for National Security and Defence, Ministry of Justice Council of Europe (local project team)	