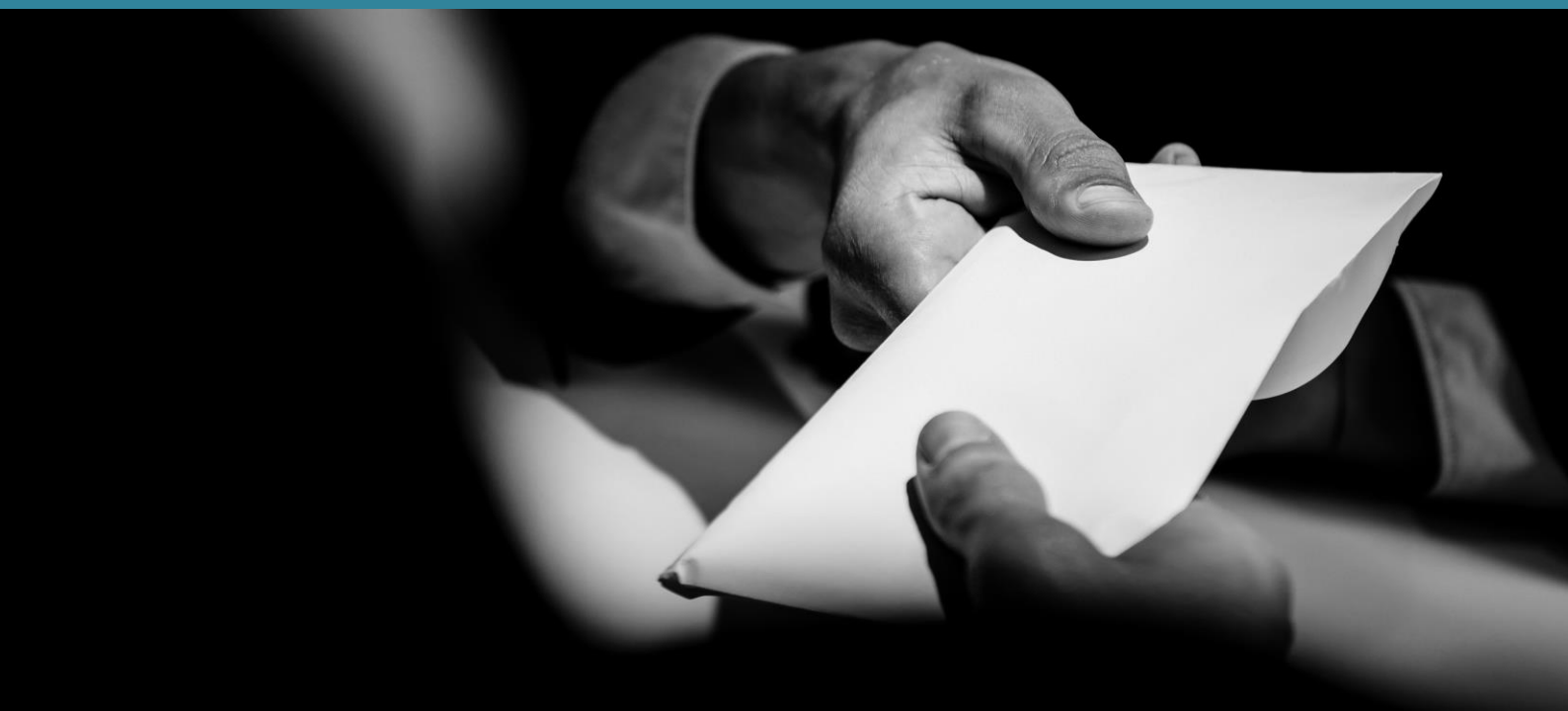


EVALUATION OF THE COUNCIL OF EUROPE SUPPORT IN THE FIGHT AGAINST CORRUPTION



EVALUATION REPORT

2018

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

EVALUATION OF THE COUNCIL OF EUROPE'S SUPPORT IN THE FIGHT AGAINST CORRUPTION

FINAL EVALUATION REPORT

Directorate of Internal Oversight

Evaluation Division

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This report was prepared by the Directorate of Internal Oversight (DIO) on the basis of a concept note established after an exchange of views with the reference group for the evaluation. The report reflects the views of the DIO, which are not necessarily those of the Council of Europe. The evaluation team expresses its gratitude to all the persons interviewed during the conduct of this evaluation.

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List of Acronyms

CDCJ	European Committee on Legal Co-operation
CDPC	European Committee on Crime Problems
CDMSI	Steering Committee on Media and Information Society
CM	Committee of Ministers
CoE	Council of Europe
Congress	Congress of Local and Regional Authorities of the Council of Europe
DER	Directorate of External Relations
DGI	Directorate General Human Rights and Rule of Law
DIO	Directorate of Internal Oversight
DISAC	Information Society and Action against Crime Directorate
DPA	Directorate of Political Affairs
ECCD	Economic Crime and Cooperation Division
EPAS	Enlarged Partial Agreement on Sport
ETINED	Platform on Ethics, Transparency and Integrity in Education
EU	European Union
FEDE	Federation for EDucation in Europe
GMC	Multidisciplinary Group on Corruption
GRECO	Group of States against Corruption
G7	Group of Seven [States]
G20	Group of 20 [States]
HQ	Headquarters
IMF	International Monetary Fund
IRG	Implementation Review Group [of the UNCAC]
(I)NGO	(International) Non-Governmental Organisation
MIGD	Media and Internet Governance Division
OAS	Organisation of American States
ODGP	Office of the Directorate General of Programmes
OECD	Organisation for Economic Co-operation and Development
PACA	Project against Corruption in Albania
PACE	Parliamentary Assembly of the Council of Europe
PGG	Good Governance Programme
PMM	Project Management Methodology
PRECOP	Protection of the Rights of Entrepreneurs in the Russian Federation from Corrupt Practices
UN	United Nations
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UniDem	Universities for Democracy
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development
WGB	OECD Working Group on Bribery

Executive Summary

The Council of Europe (CoE) recognises that corruption presents a threat to human rights, the rule of law and democracy in Europe. It supports states in their fight against corruption through the full dynamic triangle of standard setting, monitoring and co-operation, as well as political dialogue. The objective of the Council of Europe's support is to contribute to strengthened national anti-corruption systems, including improved anti-corruption legislation, policies and institutions.

The Directorate of Internal Oversight (DIO) conducted this evaluation in order to identify ways of optimising the organisation's interventions in the anti-corruption field. The implementation of recommendations is expected to enhance the coherence of the interventions as well as to strengthen the added value of the Council of Europe.

The evaluation examined the support provided to countries in general, with a specific focus on anti-corruption work in the judiciary as well as the financing of political parties and election campaigns. The evaluation assessed the Council of Europe's interventions in the area of the fight against corruption, against the evaluation criteria of relevance, effectiveness, efficiency and added value. The evaluation team used a mixed methods approach based on a document review, semi-structured and structured interviews, seven case studies (country visits) and observation. A total of 245 persons have been interviewed in the framework of this evaluation.

The evaluation found that the Council of Europe's support to states in the fight against corruption is highly relevant. Corruption is a significant problem in European societies and a serious threat to citizens' access to human rights as well as democracy and the rule of law.

The organisation addresses sectors that are of key concern in the fight against corruption.

The Council of Europe is valued as a trustworthy and unbiased international player that offers great expertise and provides the unique added value of its dynamic triangle of anti-corruption standards, monitoring and co-operation. However, technical expertise alone is usually not enough for making progress in the fight against corruption. Implementing anti-corruption measures requires strong political will. Council of Europe recommendations have a much better chance of being implemented where an enabling environment exists.

The Council of Europe already successfully co-operates with other international organisations such as the United Nations (UN), Organisation for Economic Co-operation and Development (OECD), European Union (EU) and the International Monetary Fund (IMF) on anti-corruption matters in order to benefit from their respective "sticks and carrots". That said, the organisation could be more present at high-level international anti-corruption forums in order to further improve its leverage. Its reputation as an expert organisation could be further strengthened by a stronger focus on innovation and greater production and dissemination of conceptual work as a contribution to the development of international norms and public debates on anti-corruption matters. This would also ensure that the organisation and its staff remain at the cutting edge of new developments in the field and possibly contribute to the production of relevant new standards that would enhance the core added value of the organisation. In this context a reinforcement of the organisation's standard setting capacity in respect of anti-corruption should be considered.

In general, the Council of Europe would benefit a lot from more visibility of its work. The more widely known and understood (including by ordinary citizens) the organisation's

recommendations and advice are, the more seriously they will be taken by politicians and decision-makers. Targeted co-operation with other actors such as civil society and media can help the organisation increase the visibility of its work beyond expert circles, thus enabling more stakeholders, including possibly the larger society, to understand the relevance of the Council of Europe's work and to hold their government accountable for acting in accordance with it.

In this regard the Council of Europe has a comparative advantage vis-à-vis other international actors in that it has access to many different elements of a country's society such as governments, local authorities, parliamentarians, the judiciary, media and civil society. Moreover, the fight against corruption is integrated as a transversal issue into various areas of work of the organisation. Therefore, the Council of Europe has several entry doors into the national anti-corruption system. Strengthening internal co-operation and co-ordination between different Council of Europe entities does not only allow the organisation to avoid inconsistencies in its support but also to mobilise a whole range of different elements of society in a strategic way with the purpose of actively strengthening the political will to fight against corruption.

In light of the findings and conclusions of this evaluation, the DIO makes the following key recommendations in order to help further improve the Council of Europe's support in the area of the fight against corruption:

1. Invest more resources into the active dissemination and promotion of Group of States against Corruption (GRECO) monitoring results at national level and make them more accessible to a wider public.
2. Strengthen the Council of Europe's role in the development of anti-corruption norms and shaping debates on anti-corruption matters at international level.
3. Strengthen co-ordination of anti-corruption support across the organisation.
4. Capitalise more on the Council of Europe's ability to mobilise many different elements of European societies in the fight against corruption.

1. Evaluation Approach

1.1. Background

The Council of Europe recognises that corruption presents a threat to human rights, the rule of law and democracy in Europe. It supports states in their fight against corruption through the full dynamic triangle of standard setting, monitoring and co-operation, as well as political dialogue. The objective of the Council of Europe's support is to contribute to strengthened national anti-corruption systems, including improved anti-corruption legislation, policies and institutions.

The normative basis for the Council of Europe's work in this area is represented by the Criminal Law Convention on Corruption, the Civil Law Convention on Corruption as well as several soft law instruments. The implementation of the standards is monitored by GRECO. To assist states in combating corruption, the Council of Europe through its Economic Crime and Cooperation Division (ECCD) also offers technical assistance to countries in the form of legal advice and capacity building. Furthermore, the fight against corruption is treated as a transversal issue by various Council of Europe institutions and structures, which work on anti-corruption matters among other work priorities.¹

1.2. Evaluation Rationale and Purpose

The evaluation of the Council of Europe's support in the fight against corruption was

¹ In addition to GRECO and the Economic Crime and Cooperation Division, this evaluation also covers the work of the Venice Commission, the Parliamentary Assembly of the Council of Europe (PACE), the Congress of Local and Regional Authorities, the Justice and Legal Co-operation Department, the

conducted by the DIO. It was included in the DIO's work programme² for 2017 due to the strategic relevance of the subject. Corruption in Europe is mentioned among the Secretary General's concerns described in the 2015, 2016 and 2017 reports on the State of Democracy, Human Rights and the Rule of Law as well as the Priorities in the Programme and Budget for 2016-17 and 2018-19.

The evaluation of the Council of Europe's support in the area of the fight against corruption aims at helping to optimise the organisation's interventions in this field. The implementation of recommendations is expected to enhance the coherence of the action as well as to strengthen the added value of the Council of Europe.

1.3. Evaluation Scope

Reflecting the transversality of the anti-corruption work, the evaluation covers relevant support provided by all Council of Europe institutions and structures involved in that field. It assesses the different types of support provided - standard setting, monitoring, and technical co-operation as well as political dialogue - in order to demonstrate the specific added value of the dynamic triangle.

The evaluation examines the support provided to countries in general (mostly provided by GRECO and the ECCD), with a specific focus on anti-corruption work in two sectors: (i) the

Human Rights Policy and Co-operation Department, and the Democratic Governance Department.

² Directorate of Internal Oversight (2017), *Work Programme 2017 of the Directorate of Internal Oversight*, GR-PBA(2017)³.

judiciary³ and (ii) the financing of political parties and election campaigns⁴. The work of the Council of Europe's entities other than GRECO and the ECCD (where corruption is usually treated as a transversal issue) is also a subject of this evaluation if it aims at fighting corruption within these two sectors. Anti-corruption support provided by entities other than GRECO and the ECCD in sectors other than the judiciary and the financing of political parties and election campaigns are not systematically assessed but fed into the evaluation in the form of good practice examples whenever such examples are identified by the evaluation team during their field missions.

The geographic coverage of the evaluation includes Council of Europe member states, GRECO member states⁵, as well as other states and entities which benefited from technical co-operation activities of the Council of Europe in the field of anti-corruption. With regard to monitoring activities, the evaluation covers GRECO's third and fourth evaluation rounds. The assessment of co-operation activities focuses on the time period 2012-2017 as the main implementer of anti-corruption projects, the ECCD, considers five years to be a reasonable timeframe for identifying the impact of anti-corruption interventions. Projects were included in the sample if the entire implementation period or parts thereof fall within this timeframe.

1.4. Evaluation Objectives and Criteria

The evaluation's objectives are to evaluate the degree to which the Council of Europe effectively and sustainably achieves its objectives in the fight against corruption (i.e. contributing to strengthened national anti-corruption systems), the coherence and co-ordination of the different types of intervention of the organisation and the added value of the Council of Europe's interventions in comparison with those of other actors in the field.

The evaluation assesses the Council of Europe's support in the area of the fight against corruption against the evaluation criteria of relevance, effectiveness, efficiency and added value.

The evaluation matrix in Appendix 3 specifies the evaluation questions as well as related sub-questions and measures for these, and provides details on the data collection methods that were used to answer them. The evaluation questions were developed in consultation with the reference group (see section 1.5.3).

³ Anti-corruption measures in the judiciary are of special importance because a corruption-free judiciary is the backbone of any national anti-corruption system. Corruption among judges was covered by the fourth GRECO evaluation round launched in January 2012.

⁴ The integrity of political parties is crucial for citizens' confidence in democracy and the political

system and therefore important for fighting populism, which is a current priority of the Council of Europe. The financing of political parties and election campaigns was assessed by GRECO in its third evaluation round launched in January 2007.

⁵ GRECO members include the 47 member states of the CoE as well as Belarus and the United States of America.

1.5. Evaluation Methodology

The evaluation is conducted in accordance with the DIO's Evaluation Guidelines⁶ and applies a gender-sensitive methodology⁷. Due to the complexity of the evaluation subject, it uses a mixed-methods approach to answer the evaluation questions. The assessment of the effectiveness question was theory-based: a theory of change was reconstructed for the corruption support provided by the Council of Europe and validated and refined by analysing the data collected in the framework of the evaluation. The following sections describe the different data collection methods used.

1.5.1. Data Collection and Analysis

Document Review

A document review was carried out at the beginning of the evaluation in order to obtain an initial understanding of the Council of Europe's work in the area of the fight against corruption, to develop some hypotheses about its effectiveness as well as to identify issues that require a more in-depth assessment. At a later stage of the evaluation, documents were reviewed to be triangulated with interview data. The following types of documents were reviewed:

- anti-corruption standards;
- GRECO reports;
- documents related to co-operation projects, including project descriptions, implementation reports, evaluation reports and other documents;

- reports and other documents issued by Council of Europe entities working in the field of anti-corruption;
- documents providing the historical context of the Council of Europe's work on anti-corruption;
- media articles related to latest anti-corruption developments in states;
- relevant documents issued by other organisations working in the anti-corruption field.

Semi-Structured Interviews

Semi-structured interviews were conducted with a total of 245 persons (140 men and 105 women) with the aim of obtaining interviewees' views on the evaluation questions as well as constructive criticism and ideas for improvement. Table 1 below summarises the interviews by stakeholder category and country. The full list of interviewees is available in Appendix 6.

Interviews were conducted in person or on the phone/by Skype. Many took place in the framework of case studies (see section below). All interviews followed interview guidelines that were adapted as appropriate to each stakeholder group. The interview guidelines were structured in a way that minimised the risk of confirmation bias. The evaluation team took notes at each interview and analysed the data systematically with the help of an analytical grid.

⁶ DIO (2014), Evaluation Guidelines of the Directorate of Internal Oversight, DD(2014)238 Final.

⁷ This includes an assessment of the extent to which the Council of Europe mainstreams gender in its anti-corruption work as well as the contribution this makes to gender equality.

Table 1: Number of Interviewees by Category and Location

	HQ and Other	Albania	Armenia	Austria	Czech Republic	Morocco	Serbia	Ukraine	Total
Council of Europe Staff	40	3	5	1	0	0	0	7	56
Government Representatives	0	16	12	8	8	14	7	9	74
Representatives of the Judiciary	0	3	8	3	3	0	6	10	33
Elected Officials	0	3	1	0	1	0	1	1	7
Civil Society	0	6	9	3	5	7	8	6	44
International Organisations	0	4	2	2	0	3	5	6	22
Other	2	1	1	1	1	0	2	1	9
Total	42	36	38	18	18	24	29	40	245

Source: Own statistics.

Case Studies

The evaluation team conducted field visits in order to assess the anti-corruption work in seven beneficiary countries in detail. During these field visits semi-structured interviews were conducted with relevant Council of Europe staff, representatives of partner institutions (national authorities and civil society), as well as representatives from other organisations working in the anti-corruption field (see section above).

A purposive⁸ sampling strategy was used to identify the seven countries that were visited with a view to maximize diversity. The case study sample includes Albania, Armenia, Austria, the Czech Republic, Morocco, Serbia, and Ukraine. Appendix 4 provides further

details regarding the sampling criteria used as well as a summary of reasons why each of these countries was included in the sample.

Case studies were extensively (though not exclusively) used to answer the effectiveness question by applying an approach based on a theory of change and contribution analysis. The evaluation team considered evidence sufficiently strong when:

- a triangulation of interview data and documents and/or findings from online research provided the same results;
- a reasonable number of interviewees had convergent views;

⁸ Purposive sampling is often applied for qualitative research. It is used in order to select information-rich examples that help understand the issues of

relevance for the evaluation better than random sampling would. Random sampling is mostly applied for quantitative research.

- the evaluation team considered the data source(s) as authoritative/credible and without potential conflict of interest;
- the chronology of the events described was consistent.

Structured Interviews (Survey)

The interview guide for representatives of partner institutions in beneficiary states also contained a few structured closed-ended questions at the end to facilitate the collection of quantitative data among this stakeholder group regarding the relevance, effectiveness and added value of the Council of Europe's anti-corruption support. This data was analysed using frequency statistics.

Observation

The evaluation team observed relevant events related to the Council of Europe's anti-corruption work, such as GRECO plenary sessions and a meeting of GRECO's Statutory Committee.

1.5.2. Limitations

Some difficulties were faced during data collection. For the case studies of Serbia and Ukraine, relevant project documents and contact persons were not obtained in time to allow for an optimal preparation of the field visit. Furthermore, in some of the case study countries it was not possible to interview all of the project partners because individuals have changed their jobs, for example as a result of elections, and/or the evaluation team was unable to obtain the relevant contact details. Despite these constraints and due to significant online research by the evaluation team, the volume and quality of interview data in the concerned countries was nevertheless sufficient for a rigorous assessment.

Comparatively few members of the Parliamentary Assembly of the Council of Europe (PACE) and other parliamentarians as well as members of the Congress of Local and Regional Authorities of the Council of Europe (Congress) responded to the evaluation team's request for an interview. The evaluation team was therefore only able to provide a limited assessment of the work of the PACE concerning the fight against corruption in member states and no assessment of the work of the Congress. It is recalled that this evaluation does not concern the corruption cases within PACE, for which an independent external body was set up.

The quantitative data collected through the structured interviews is (like the qualitative data) not representative of all Council of Europe member states since it covers only the case study countries. More precisely, it includes data for six out of seven case study countries since questions were slightly amended after the pilot field visit to Albania. However, this is not problematic since the survey data was consistent with the qualitative data collected.

1.5.3. Quality Assurance

The evaluation was conducted by two Evaluators of the Evaluation Division under the supervision of the Director of DIO. An external consultant with subject matter expertise in the area of the fight against corruption quality assured the evaluation process by commenting on the draft concept note and the draft evaluation report. Whenever possible, local anti-corruption experts were recruited for the field missions in order to provide first-hand knowledge about the country's (anti-) corruption context and developments. These experts were carefully selected with a view to avoid a conflict of interest regarding the evaluation.

The evaluation process was guided by a reference group consisting of representatives of the main entities concerned by the evaluation. The reference group commented on the draft concept note that determined the evaluation approach, scope and methodology, as well as on the draft evaluation report in order to eliminate any factual errors and to ensure the feasibility and appropriateness of the recommendations.

2. Findings

Evaluation findings are structured by the evaluation criteria of relevance, effectiveness, efficiency and added value. These general findings relate to the entirety of the Council of Europe's support in the fight against corruption. Specific findings that concern individual Council of Europe entities and institutions (whether relating to their relevance, effectiveness, efficiency or added value) are presented in dedicated sections under the chapter of effectiveness.

2.1 Relevance

EVALUATION QUESTION 1

To what extent is the CoE's anti-corruption support relevant?

2.1.1 Relevance for Beneficiary States

FINDING 1

Corruption in European societies is a serious problem that negatively affects human rights, the rule of law and democracy.

Documents and interviews as well as secondary data⁹ indicate that corruption is a serious problem in European societies. The evaluation team analysed statistics on perceived levels of corruption that were collected by Transparency International. These show that Europeans are concerned by corruption to the extent that in eight Council of Europe member states more than 50% of the surveyed population believes that "corruption/bribery" is one of the three biggest problems facing their country.¹⁰

⁹ Secondary data is data collected by a third party and with a purpose other than contributing to this evaluation.

Corruption has obvious negative effects on the economy. More importantly for the Council of Europe, interviews have illustrated how corruption negatively impacts human rights, the rule of law and democracy. A corrupt judiciary, for example, violates a person's right to a fair trial (Article 6 of the European Convention on Human Rights), while a purchased university degree in medicine represents a threat to an individual's right to the protection of health (Article 11 of the European Social Charter). Furthermore, corruption in political party and election campaign financing threatens democratic systems and feeds populism in Europe.

2.1.2 Focus of the Council of Europe's Approach

FINDING 2

The Council of Europe's support in fighting corruption is multidisciplinary and broad in scope. Addressing corruption in a transversal manner is a valid approach and the fight against high-level corruption is particularly important.

The basis for fighting corruption in the Council of Europe is broad as its regulatory framework is multidisciplinary, including criminal law, civil law, public law aspects, preventive measures, and ethical norms. The main focus of the anti-corruption support provided by GRECO and co-operation activities has also been broad in its scope, covering repressive matters (incrimination) as well as longterm preventive measures.

Corruption is transversal and affects many layers of society. Therefore, the Council of Europe's approach of treating corruption as a

¹⁰ The statistics are available in Appendix 2. They are taken from Transparency International (2016), *People and Corruption: Europe and Central Asia 2016*.

transversal issue is valid. The involvement of various Council of Europe institutions and structures in the provision of anti-corruption support offers the organisation a wide range of entry doors into European societies.

To a large extent, the Council of Europe's anti-corruption support is targeted towards corruption at the centres of power within a state: the legislative, judiciary and executive branches of government. Although a few interviewees argued that addressing petty corruption had a more direct influence on people's lives, others noted that fighting petty corruption was ineffective in the long-term without fighting high-level corruption. One interviewee claimed:

"It is absolutely ineffective to design a policy for [fighting] small corruption because small corruption is governed also by top-level corruption through the political system and system of state presence."

"State capture" is an issue in societies affected by corruption and the Council of Europe as an intergovernmental organisation with its dynamic triangle of standard setting, monitoring and co-operation is well-placed in comparison with other actors to fight high-level corruption (see also section 2.4).

FINDING 3

The Council of Europe addresses sectors that are of key concern in the fight against corruption. Other additional sectors would also be worth covering.

The focus of the Council of Europe's anti-corruption support has been on sectors that are particularly vulnerable to corruption. The themes selected by GRECO are much in line with the areas perceived as highly affected by corruption, according to Transparency International's Corruption Barometer. In particular, GRECO's third round on political party and election campaign financing was important because it addresses the sector perceived as most vulnerable to corruption within Council of Europe member states (see Figure 1), followed by corruption among parliamentarians, in the judiciary (both covered

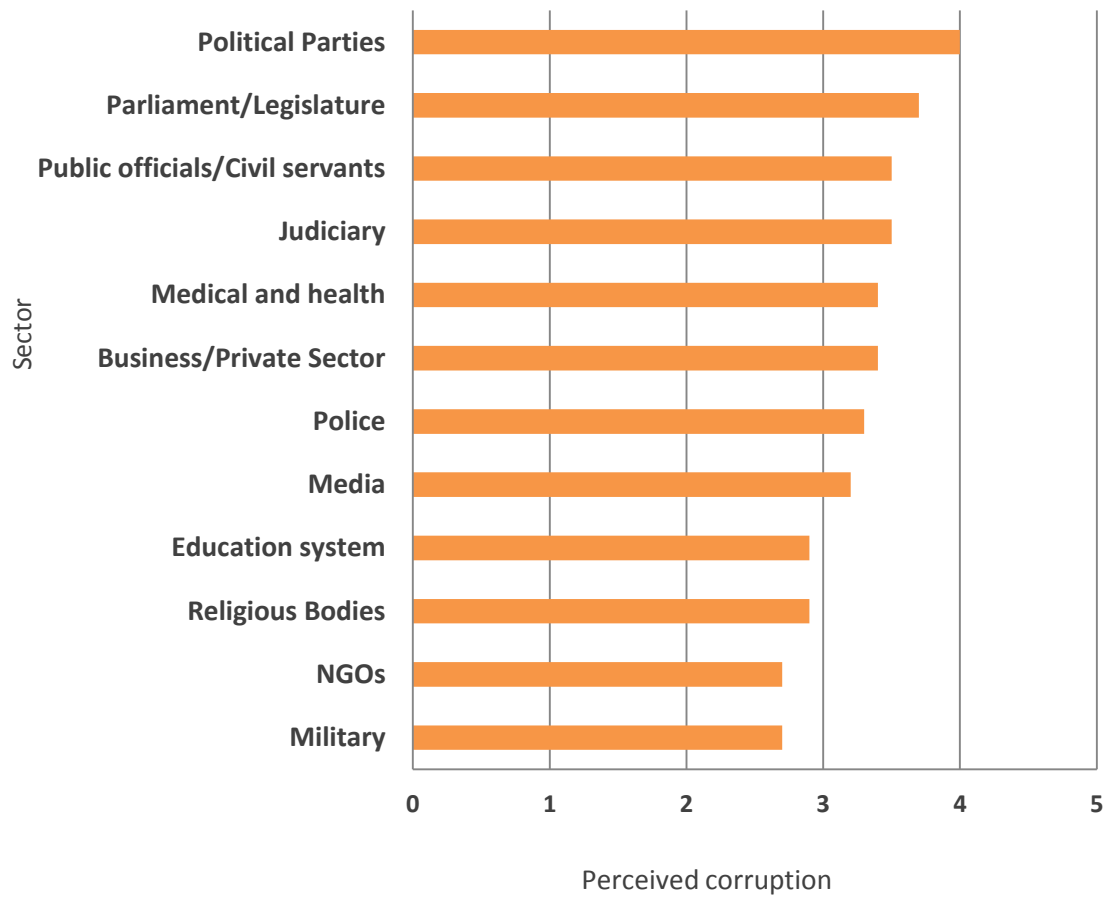
by GRECO's fourth round), and among public officials (generally covered by GRECO's second round and for the top executive functions covered by GRECO's fifth round). Most of the anti-corruption projects implemented by the ECCD also cover the sectors, in which GRECO recommendations exist.

The perceived prevalence of corruption in the education sector figures rather low in comparison with other sectors among Council of Europe member states. Nevertheless, the recently established Council of Europe Platform on Ethics, Transparency and Integrity in Education (ETINED) in combination with related anti-corruption projects in the education sector are highly relevant because the visibility of corruption in that sector can be expected to have a particularly strong influence on the acceptance of corruption by new generations.

Media is another sector that would be worth looking into more closely although it is rated comparatively low on the Corruption Barometer (see also section 2.2.2). Media are powerful in influencing public opinion and corruption in media is often linked to corruption in other centres of power within a state. An interviewee stated that in his opinion:

"Corruption in media is serious because it is sandwiched between business and politics: two corrupt things – you cannot be clean yourself. Addressing corruption in media is very tricky because they have a very good mask. Touching them would be seen as attacking freedom of expression."

Figure 1: Perceived corruption by sector in Council of Europe member states on a score scale from 1 to 5, where 1 means not at all corrupt and 5 means extremely corrupt



Source: Calculation based on Transparency International's 2013 Global Corruption Barometer.¹¹ See Table 6 in Appendix 2 for further details on each country.

¹¹ These figures might differ slightly from the 2017 Global Corruption Barometer. The 2017 Global Corruption Barometer was not available when data was analysed for this report. It provides data on fewer sectors.

2.2 Effectiveness

EVALUATION QUESTION 2

To what extent is the CoE's anti-corruption support effective?

2.2.1 Council of Europe Entities

Standard Setting Structures

FINDING 4

Since the fight against corruption requires a multi-disciplinary approach, several different structures have developed relevant Council of Europe standards. Recently, new standards have been produced to reflect emerging issues in a changing world but there are still areas that would benefit from additional standards.

In the Council of Europe, there is no single dedicated structure that has developed all anti-corruption standards. The Criminal Law Convention on Corruption and its Additional Protocol, as well as the Civil Law Convention on Corruption and the soft law instruments were elaborated by the Multidisciplinary Group on Corruption (GMC), an ad hoc committee established for this purpose under the responsibility of the European Committee on Crime Problems (CDPC) and the European Committee on Legal Co-operation (CDCJ). On the other hand, the recent Convention on the Manipulation of Sports Competitions was developed by the Enlarged Partial Agreement on Sport (EPAS).

Interviewees identified a few additional areas where new standards would be required in the anti-corruption field. These include the

phenomenon of "state capture", the link between upholding human rights and preventing corruption, as well as asset declarations, beneficial ownership, integrity testing, the international co-operation on tax matters, and issues related to data protection. Another sector for which it might be worth considering developing further standards is the fight against corruption in and through media. While some standards have been created recently,¹² the development of new standards is challenging due to the lack of a dedicated committee in charge.

GRECO

FINDING 5

GRECO works like a well-oiled machine in producing high-quality monitoring reports due to its strong procedures.

GRECO is able to produce a steady flow of high-quality monitoring reports due to its clear procedures and transparent work plans. The evaluation process of GRECO has been referred to by many interviewees as the most comprehensive peer review (comparable only to the one of the OECD Working Group on Bribery (WGB)) - with a structured and detailed questionnaire, on-site visits, including a significant number of interviews and followed by conclusions and specific recommendations. GRECO's usage of a variety of monitoring methods was also highlighted as a strength by a comparative assessment of anti-corruption monitoring mechanisms in 2008.¹³ GRECO treats countries equally and is therefore seen as fair.

¹² The Convention on the Manipulation of Sports Competitions (2014) and CM/Rec(2017)2 on the Legal Regulation of Lobbying Activities in the Context of Public Decision Making.

¹³ Chêne M. and Dell G. (2008), "Comparative assessment of anti-corruption conventions' review mechanisms", U4 Expert Answer, U4 Anti-Corruption Resource Centre, Transparency International, Chr. Michelsen Institute.

One can further attribute the reason for the quality of reports to procedures related to discussions and adoptions of reports in plenary. Interviewees highlighted that in GRECO, countries do not have veto rights relating to their reports. Moreover, Jongen (2017) finds that:

"GRECO is perceived as better able to generate valuable output (...) practically feasible recommendations, accurate review reports) and to fairly and consistently apply the rules (proceduralism) than the WGB. (...) This is surprising, as the two peer reviews follow comparable procedures and have a rather similar design."¹⁴

Box 1: GRECO's Working Methods

"It is appreciated that GRECO found a balance, due to very capable chairmanships, between being an international forum but still being a forum that usually talks openly, factually, dares, if necessary, to go for majority votes and addresses issues straightforwardly without overdoing diplomatic protocol and without over-accepting sensitivities and political strings attached, all of this while staying on a high technical level."

Interviewee from Austria

Through interviews and direct observation it was possible to identify some of GRECO's success factors. They include the fact that the Secretariat¹⁵ provides strong support to the GRECO evaluation team¹⁶. Moreover, plenary sessions are managed efficiently through pre-discussions on controversial parts of reports. Finally, a strong chairman and bureau can move things forward and enable GRECO to reach consensus in plenaries.

FINDING 6

GRECO has an excellent reputation among experts but is not well known by others. It is working on strengthening its presence in international media and anti-corruption forums.

GRECO is a technical expert body, seen as professional and non-political by interviewees. It is very well respected among experts. According to Jongen (2017), in comparison to the OECD WGB and the Implementation Review Group of the United Nations Convention against corruption (IRG), "GRECO maintains the highest degree of peer review

¹⁴ Jongen H. (2017), "Combating corruption the soft way: The authority of peer reviews in the global fight against graft", Datawyse, Universitaire Pers Maastricht.

¹⁵ This fact was also highlighted by Chêne M. and Dell G. (2008), "Comparative assessment of anti-corruption conventions' review mechanisms", U4

Expert Answer, U4 Anti-Corruption Resource Centre, Transparency International, Chr. Michelsen Institute.

¹⁶ The GRECO evaluation team is composed of experts from different member states, assisted by a member of the Secretariat.

authority” among relevant stakeholders involved in the peer reviews.¹⁷

On the other hand, case studies reveal that GRECO is not so well known by anybody else apart from anti-corruption experts so that general visibility is low. In 2012, the External Auditor already recommended GRECO to improve its visibility.¹⁸ Since then, a lot of efforts have been made in this regard. GRECO is on Twitter and recently it launched a new webpage (including an anti-corruption video). In the past years, media coverage of GRECO’s work has also increased significantly thanks to efforts by its Secretariat and the Directorate of Communications. It remains to be seen whether this will help raise general awareness about the importance of GRECO recommendations in the long-term. Until now, media coverage is still suffering from the fact that GRECO reports are not yet systematically translated into national languages (although this is specifically requested in every GRECO report) as well as the technical complexity of GRECO’s work. In this respect, one staff member of the GRECO Secretariat stated that:

“I talked to a journalist and he said that he had looked through our press release and report. He asked: ‘Could you maybe write an article in a normal language?’”

On a different note, according to interviews, the monitoring body does not seem to have a similar presence in high-level international anti-corruption forums as other organisations like the World Bank and the OECD. It did not, for example, participate in the Anti-Corruption

Summit that was held in London in 2016. However, GRECO’s current Executive Secretary is mindful to promote international visibility and the monitoring body’s 2017 contributions to the Group of Seven (G7) Workshop on Corruption-Measurement and the Group of 20 (G20) Anti-Corruption Working Group are positive developments. Furthermore, GRECO has recently started to produce more conceptual work that can be of interest to stakeholders other than anti-corruption experts of specific member states. These include a paper on the link between corruption and human rights, the conference on lessons learned from GRECO’s fourth round held in September 2017 in Prague, as well as the most recent annual report, which is more analytical than previous editions by providing a horizontal overview of anti-corruption trends across the 49 GRECO member states.

FINDING 7

GRECO’s compliance procedure is crucial for promoting the implementation of recommendations, while in general its enforcement mechanism depends on its own or other actors’ political pressure.

Jongen (2017) finds that GRECO is better able to exert pressure than the IRG (because it benefits from the legitimacy of an expert body, while the latter one consists of diplomats) but less successful than the OECD WGB (in which the US delegation engages in advocacy work)

¹⁷ Jongen H. (2017), “Combating corruption the soft way: The authority of peer reviews in the global fight against graft”, Datawyse, Universitaire Pers Maastricht. This conclusion was drawn from assessments of the peer reviews’ perceived legitimacy and of state compliance with the peer reviews’ social norms based on an online survey and

interviews with relevant stakeholders directly involved in the peer reviews.

¹⁸ External Auditor to the Council of Europe (2012), “Report of the External Auditor on the Consolidated Financial Statements for the Year ended 31 December 2011”, CM(2012)100.

in motivating states to implement reforms.¹⁹ By the end of 2016, 68% of GRECO's third round recommendations and 22% of its fourth round recommendations had been implemented.²⁰

Case studies confirmed that GRECO's compliance procedure is an important reminder for GRECO countries to act upon recommendations as it keeps anti-corruption issues on the political agenda. However, the compliance reports have one weakness: they are prepared mostly on the basis of a situation report from the counterpart(s) in evaluated countries.

¹⁹ Jongen H. (2017), "Combating corruption the soft way: The authority of peer reviews in the global fight against graft", Datawyse, Universitaire Pers Maastricht.

²⁰ GRECO (2017), "Seventeenth general activity report of the GRECO: Anti-corruption trends, challenges and good practices in Europe & the United States of America", GRECO(2017)3, Council of Europe.

Apart from legislative measures taken and reporting by Non-Governmental Organisations (NGOs) and the media, there are few means of verification of the correctness of the information provided and case studies revealed that critical details which are reported by other national actors may be filtered out before submission by the main counterpart. While GRECO resources are not sufficient to integrate field visits into the compliance procedures, the monitoring body could actively encourage NGOs to send their contributions to the compliance procedures.

The measures taken by GRECO in case of a country's non-compliance with its recommendations are crucial. Visits of high-level GRECO delegations to member states have been successfully used to raise the importance of GRECO's recommendations in respect of political party financing. This has helped to boost political commitment in order to ensure progress in implementation. This is crucial because the fact that GRECO is mostly known to technical experts who are directly involved in its work potentially limits the body's impact since technical experts who would like to comply with GRECO recommendations usually do not have the required political decision-making power to do so. Several interviewees met in the framework of the case studies noted that even parliamentarians, who are expected to pass laws in order to implement GRECO recommendations, hardly know the monitoring body and do not necessarily consider its recommendations important. On the other hand, GRECO reports also benefit from various forms of political dialogue and peer pressure of the

Council of Europe, such as the discussions (including on the implementation of country action plans) in the rapporteur groups of the Committee of Ministers (CM) as well as the execution of corruption-related Court rulings.

The implementation of GRECO recommendations is significantly facilitated if other actors promote them to maintain pressure. These can be NGOs, which use them to give legitimacy to their proposals, or international organisations, such as the EU, which may condition their support upon complying with the recommendations issued by GRECO (see also section 2.2.2). Anagnostou et al. (2017) find that a country's compliance with GRECO recommendations depends on (i) the conformity of its national tradition and existing legal framework, (ii) its political will, and (iii) its position in the international power structure.²¹

FINDING 8

GRECO's working methods allow for an in-depth assessment of a specific corruption theme, while still providing the flexibility for emergency interventions on other matters. One should nevertheless recognize that, despite the in-depth assessment, no GRECO report can be expected to comprehensively address all existing corruption risks related to the theme(s) covered by the respective round in a country.

Following thematic rounds means that GRECO can go into depth on each anti-corruption topic covered. While this has the consequence that the work programme is pre-determined for several years, the newly established ad hoc procedure ("Rule 34") allows GRECO to also do emergency assessments of any other important

²¹ Anagnostou D. et al. (2017), "Monitoring anti-corruption legislation and enforcement in Europe", ANTICORRP consortium and European Commission.

issues that may arise in member states outside the scope of the ordinary evaluation rounds. This procedure is currently being applied with regard to the judicial reforms in Poland and Romania.

Nevertheless, despite GRECO's in-depth focus on a specific theme, case studies have shown that the monitoring body's recommendations are not sufficient for fully addressing an issue as illustrated, for example, by the topic of political party financing. In Armenia and Serbia the transparency of political party financing was still considered an issue by interviewees despite a 100% implementation rate of GRECO's third round recommendations. In Albania, a Horizontal Facility-funded anti-corruption project is still working in the area of political party and election campaign financing although all relevant GRECO recommendations have long been implemented. The laws that were adopted in response to the recommendations were not implementable without further by-laws and the Central Election Commission that is mandated with overseeing political party financing required some capacity building. Similar issues also existed in other countries: while in response to GRECO recommendations anti-corruption bodies have been established in several member states, some of them do not have the required resources, staff and independence to be fully effective.

These cases illustrate the difficulty of making progress in the fight against corruption and the long-term approach that is required. According to a GRECO staff member, other international actors face similar challenges, even if they have been working on the same subject for many years.

These cases also demonstrate the importance of insisting on the highest possible level of implementation of GRECO recommendations

as well as the significance of anti-corruption projects.

ECCD

FINDING 9

The anti-corruption projects implemented by the ECCD are generally relevant in that they address the needs of beneficiary countries. They often support countries in implementing GRECO recommendations. However, restricting projects to address only issues covered by GRECO could limit the interventions' relevance.

Government authorities and civil society representatives interviewed in the framework of the case studies mostly consider Council of Europe anti-corruption projects relevant. According to staff of the ECCD, the team is particularly careful to implement only projects that are relevant and can be expected to achieve results. The Division had, for example, after the third anti-corruption project in Serbia, not opted to apply for additional funding for further co-operation activities in that country in order to give authorities the time and opportunity to implement existing recommendations and advice.

The ECCD usually bases its project proposals on onsite needs assessment missions. Furthermore, the relevance of Council of Europe anti-corruption projects is often ensured by the fact that they help states implement GRECO recommendations. However, if focusing exclusively on GRECO recommendations, Council of Europe projects might actually not address the most important issues in a country because GRECO follows thematic rounds that might not be aligned with all the priority sectors of that specific country. Interviewees mentioned that in Albania, for example, corruption in the health sector has so far not been addressed in depth by the Council

of Europe although it is an area of significant importance.

FINDING 10

The effectiveness of an anti-corruption project is highly dependent on its ability to provide quick support and to adapt to new developments, especially in contexts where many international actors are involved. The Council of Europe needs to show greater agility in some areas in order to keep up with a fast pace.

Case studies have demonstrated that the Council of Europe can be at the centre of reforms in countries where there are few other international actors engaged in the fight against corruption. However, the Organisation has less chance to succeed in contexts where there are already many established actors with a greater volume of projects and possibly more well developed and streamlined procedures. The Project against Corruption in Albania (PACA), which was implemented from 2009 to 2012, was a quite holistic intervention that put the fight against corruption on the country's agenda. The Good Governance Programme (PGG) that started in Ukraine in 2015, on the other hand, lost much of its potential added value when a large-scale EU-funded twinning project was launched. Where many actors are involved, like in Ukraine, the anti-corruption sector becomes quite dynamic. The Council of Europe has internal and external constraints in implementing projects, which affect the pace and capacity of adaptation to changing circumstances. Several of these were identified through interviews.

- In some cases agreements with donors are not as flexible as they could be. Donors often ask for long-term plans, although conditions in beneficiary countries change constantly. There are EU-funded projects, in which communication and decisions need

to go from the Council of Europe field office to Strasbourg, to Brussels and then back to the EU Delegation in the country concerned. On the other hand, the Office of the Directorate General of Programs (ODGP) does not report any cases, in which donor resistance prevented a justified change to a project. Moreover, the increasing proportion of soft and non-earmarked contributions further increases flexibility.

- In the ECCD, staff posted in the field do not in all cases have the autonomy to take decisions but are rather expected to get clearances for every step made. After staff have proven to have a certain level of expertise and integrity, the decision-making is gradually entrusted to them.
- Project managers in the field do not always have an assistant and are consequently expected to do administrative work themselves. In some cases they consider staffing levels to be disproportionate to the volume of work.
- In some countries, and in particular those benefiting from neighbourhood co-operation, the Council of Europe does not have a presence on the ground and is unable to closely follow developments.
- Some project managers consider Council of Europe procedures to be too bureaucratic (similar to those of some other international organisations). According to interviewees, the organisation's procurement rules, for example, are not conducive for project work. In particular staff in the field would welcome more rapid procedures and the application of more standardised processes across the different entities in Headquarters (HQ).

- The Council of Europe sometimes has difficulties to engage good experts because other international organisations tend to pay higher rates.
- Co-ordination of the supervisory roles of the operational service in Strasbourg (responsible for content management) and the heads of the field offices (responsible for financial management) is sometimes challenging.
- Knowledge management of the ECCD could be improved. Whenever resources allow, the Division organises annual week-long staff meetings to provide training to and exchange experience between staff in Headquarters and the field. It also publishes completed deliverables on its project webpages and maintains a shared folder. However, interviewees mentioned a few situations, where they felt that the “wheel has been reinvented”, for example when a training course or draft law was newly developed instead of being based on an existing one that had been produced for another project. For sustainability purposes and to improve knowledge management, a proposal was made for more systematically including training manuals as requested deliverables into contracts with trainers so that similar trainings can be conducted by other trainers afterwards using (or building on) such manuals.

FINDING 11

The quality of the products produced by the ECCD is good. The Division does not, however, consider itself to be an anti-corruption expert body, which entails certain risks.

Case studies have demonstrated that partners generally appreciate the quality of the work produced by the anti-corruption projects managed by the ECCD. The legal advice provided is considered to be a strength of the organisation. The evaluation team also received positive feedback on the capacity building components of the anti-corruption projects. The training content is seen as quite strong. Courses also increasingly apply latest training methodology (e.g. clearly defined training objectives, interactiveness through case studies and role plays, etc.), although this is an area that could still be improved further. Interviewees also mentioned delays in finalizing and publishing toolkits and training materials.

Authorities praised the ECCD in particular for the quality of its experts and its staff's willingness for co-operation. The Division does not consider itself to be an anti-corruption expert body. It operates in a way, in which administrators (who have institutional knowledge and political awareness) manage experts, who implement the technical work. This arrangement can be considered reasonable for implementing a large volume of anti-corruption projects. On the other hand, this approach also entails certain risks.

Firstly, there has been criticism from individual interviewees that some project activities were overlapping and that some tools promoted by the Council of Europe (such as the work related to corruption typologies) were no longer considered up-to-date in the anti-corruption community. The design of anti-corruption

projects would benefit from staff constantly updating their technical expertise.

Secondly, there is a risk that innovation becomes difficult. This issue was also mentioned as a result of a rather limited pool of experts. The recent updating of the expert database and especially the roundtable, which brought together representatives from academia, the policy community and practitioners to generate input relevant for prioritizing the Division's future anti-corruption work, are positive developments. Furthermore, it should be mentioned that the Division has shown some innovativeness in its "Protection of the Rights of Entrepreneurs in the Russian Federation from Corrupt Practices" (PRECOP) project, for which neither Council of Europe soft law standards nor monitoring recommendations exist.

Thirdly, the ECCD limits its opportunities to maximise visibility, reputation and leverage if it does not contribute to the international knowledge base on anti-corruption. Whatever innovation takes place in project work is not visible unless it is produced in a sharable format. Contributing to the anti-corruption knowledge base could entail more regular publishing of existing capacity building materials on the Division's webpage and also more systematic learning of lessons, for example through a thematic analysis of technical papers produced for different countries on specific topics.

Box 2: Example of Impact - Constitutional Amendments in Albania

In 2012, the Albanian constitution was amended to reduce the immunities of elected officials. This achievement can primarily be attributed to the PACA project which made an assessment of the regulatory environment concerning immunities, drafted the constitutional amendments and did political lobbying for these. The issue was also the subject of a GRECO recommendation and received political support from the US.

Venice Commission

FINDING 12

The Venice Commission is highly respected in member states and its legal opinions may contribute to solving political struggles over amendments to constitutional and other law. In some cases its reports face a risk of being instrumentalised in political fights.

In the area of justice reform (such as in Albania, Armenia and Ukraine), the Venice Commission has been a key player. It often plays the role of assessing the limits of the fight against corruption, in particular by upholding the standards related to the independence of the judiciary. Through some of its opinions it has removed doubts about the compatibility of anti-corruption measures with legal standards, making it more difficult to obstruct such measures.

Interviews confirm that the Venice Commission is generally viewed as an icon: a very influential and authoritative body. Most interviewees commended the institution for its impartiality, although a few had concerns regarding perceived political influence by the Commission's national members and/or the EU. According to the Venice Commission's rules, neither the national members nor the EU may be involved in the preparation of opinions and cannot vote on them.

Furthermore, several interviewees mentioned that there had been cases where a Venice Commission opinion had been formulated in a rather vague way that left some room for interpretation. The Venice Commission Secretariat explained that their opinions are sometimes inevitably vague because they are the product of a collective body and as such express a collective position. Furthermore, the Secretariat mentioned that on certain issues the Venice Commission needs to be careful not

to be too precise in order to avoid being quoted by countries in other contexts where such opinions can be misleading. Naturally, the level of precision also further decreases when an opinion is translated into a national language.

Box 3: Example of Impact - Anti-Corruption Court in Ukraine

Discussions about the establishment of a Higher Specialized Anti-Corruption Court in Ukraine have been ongoing for several years and were negatively influenced by disagreements between different donors and international organisations involved (which did not include the Council of Europe). Recently, a top-level Ukrainian official who tried to avoid the establishment of an Anti-Corruption Court by proposing the alternative of an Anti-Corruption Chamber, was forced to change his policy following an opinion of the Venice Commission.

In some countries such as Albania, the Venice Commission opinions have been selectively quoted and conveniently interpreted by different political sides during political fights. In this context, the Commission's position was portrayed by interested parties as inconsistent in two opinions that were issued at different moments of the constitutional reform process.

In addition to issuing its opinions, the Venice Commission also implements co-operation projects, such as Universities for Democracy (UniDem) in the Southern-Mediterranean neighbourhood, which included a regional anti-corruption seminar. This training activity does not seem to have been sufficiently co-ordinated with other anti-corruption interventions of the Council of Europe, which

reduces its potential to significantly contribute to larger reforms.

PACE

FINDING 13

PACE contributes to the fight against corruption in national parliaments and produces investigative reports on anti-corruption issues in member states.

It should be noted that this evaluation is concerned only with the Council of Europe's support to states in fighting corruption, not with the corruption cases within PACE, for which an independent external body was set up. Within this context, PACE runs an anti-corruption platform - a series of conferences and workshops - with the purpose of raising parliamentarians' and national parliaments' awareness on anti-corruption matters. According to a member of the PACE Secretariat, a positive example of success was the adoption of a code of conduct for parliamentarians in Italy that was supported by a PACE awareness raising seminar. Furthermore, it seems that PACE has made some positive impact in the fight against corruption through one of its investigative reports. Another member of the PACE Secretariat claimed that the PACE report²² on the case of the whistle-blower Sergei Magnitsky had contributed to several countries issuing sanctions such as visa bans and asset freezes against perpetrators involved and was used as evidence in the United States Senate and American Courts.

2.2.2 Effectiveness of Mechanisms to Strengthen Anti-Corruption Systems

FINDING 14

Through its interventions and instruments, the Council of Europe has mostly contributed to a

strengthening of anti-corruption legislation. It is important to focus future efforts on their implementation.

The Council of Europe has achieved its most significant impact in the area of anti-corruption legislation. 60% of government and civil society representatives who responded to the survey believe that one of two areas in which the Council of Europe has been most effective in their country is the strengthening of anti-corruption legislation and regulations. Case studies provide evidence that Council of Europe legislative support has contributed to the improvement of legislation mostly in the areas of political party financing (six out of seven case study countries), the judiciary (three countries), anti-corruption bodies (two countries) and whistle-blower protection (two countries). Changes in legislation can be attributed to the combined effects of the production of monitoring reports, legal opinions and advice, as well as the sharing of guidelines and good practices that promote the Council of Europe standards.

Box 4: Example of Impact – Criminal Procedure Code in Ukraine

²² PACE (2013), "Refusing impunity for the killers of Sergei Magnitsky", Doc. 13356.

The Council of Europe was strongly involved in the development of a new Criminal Procedure Code that was adopted in 2012 as part of Ukraine's commitments to the Council of Europe. Support to the Criminal Justice Reform in Ukraine project provided advice on draft laws related to the code's implementation. Through legal opinions, the Council of Europe was able to prevent harmful amendments that were later proposed to the progressive Code in order to bring it back to how it was in the past.

The evaluation finds that, while laws are an important basis for everything else, at this stage poor anti-corruption legislation is no longer the main issue. According to survey respondents, legislation is the smallest obstacle to fighting corruption with only 11% considering it to be one of the two most important problems their country is facing (see Figure 3 in Appendix 2). Case studies have demonstrated that anti-corruption laws are often in place but not implemented and several interviewees asked for GRECO to look more closely into the implementation of legislation.²³ In the Czech Republic, several interviewees perceived the existing anti-corruption legislation as too complex to be implemented, while in Serbia legislative changes were perceived as too fast-paced for allowing

²³ Other studies have not been able to provide consistent evidence for the causal claim that improved anti-corruption legislation reduces corruption (see Johnsen J. et al. (2012), "Mapping evidence gaps in anti-corruption – Assessing the state of the operationally relevant evidence on donors' actions and approaches to reducing corruption", U4 Issue 2012:7, Chr. Michelsen Institute). Furthermore, GRECO has already in 2008

authorities to keep track of their implementation. GRECO is aware of the need to focus on the implementation of anti-corruption legislation, and many of its more recent recommendations aim at ensuring effectiveness in practice.

In addition to legislative support, the Council of Europe also provides capacity building to institutions that play a role in the fight against corruption in member states. While general feedback received from beneficiaries was positive, it was difficult to identify concrete effects of capacity building activities through the case studies. Nevertheless, capacity building activities can be considered important for contributing to long-term mentality changes as well as a provision of short-term incentives for general co-operation with the Council of Europe.

The theory of change presented in Appendix 1 illustrates how the Council of Europe supports states in the fight against corruption.

FINDING 15

Internal or external pressure is often necessary to generate the political will essential for achieving results in fighting corruption.

The Council of Europe mostly provides expertise and ensures that authorities are aware of good practices in the fight against corruption as well as have the capacity to implement them. However, fighting corruption

been "criticized for its excessive emphasis on formal and legal provisions as opposed to impact assessment" (Chêne M. and Dell G. (2008), "Comparative assessment of anti-corruption conventions' review mechanisms", U4 Expert Answer, U4 Anti-Corruption Resource Centre, Transparency International, Chr. Michelsen Institute).

first and foremost requires the political will to reform. 53% of survey respondents believe that “insufficient motivation on the part of the national authorities to implement good anti-corruption practices” is one of two main obstacles in fighting corruption (see Figure 3 in Appendix 2). The motivation for fighting corruption can be intrinsic or be triggered by external factors.

Box 5: Example of Impact – Parliamentarians’ Immunities in Austria

“Austria had an article 74 in the Criminal Code which stated the definition of a public official and you had to be a good lawyer to recognise that in previous language the parliamentarians were de facto excluded from liability. GRECO reports were smart enough to recognise and name it. Then the Austrian legislator gave in to this but international pressure played a role in changing this important paragraph. The parliamentarians tried to extend the frameworks of immunity and impunity for parliamentarians. They even brought a draft law on this to extend immunities in a way larger than any other country in Europe. But a huge public outcry followed and straightforward comments from experts of international organisations. So this

In most cases, where significant anti-corruption reforms were implemented in case study countries, authorities' motivation was triggered by external pressure. Often the readiness for reform correlates with the level of incentives that can be provided by the EU or other international actors, for example if anti-corruption reforms are used as conditions for EU accession agreements.

Even if there is no direct international pressure on a state, the fear of getting a bad international reputation and thereby limiting the country's economic growth potential is a factor that plays a motivating role for authorities. According to some interviewees, in Morocco and Armenia, for example, authorities were particularly concerned with their country's

public image. Moreover, in addition to and/or instead of the international community, a country's civil or larger society can exercise pressure on its government to implement anti-corruption reforms. This was the case in Austria (see Box 6), the Czech Republic (see Box 7), Morocco (with the Arab Spring / 20 February Movement) and Ukraine (with the Revolution of 2014) but less so in Albania and Serbia where civil society engagement against corruption is considered by interviewees to be rather weak. In Armenia, media and investigative journalism played an important role in highlighting corruption scandals and making larger society aware of the dangers of corruption (i.e. portraying it as a national security threat causing deaths of soldiers due to lack of ammunition, equipment, etc.).

Box 6 : Example of Impact - Political Party Financing in the Czech Republic

In the Czech Republic, the anti-corruption reform on political party financing was among the most significant ones in recent years. The topic was clearly put on the political agenda through GRECO's third evaluation round in 2010. The fact that GRECO continued to raise the issue in the framework of its compliance procedure helped keeping the topic on the agenda throughout two changes of government in the following years and the third draft law was finally adopted in 2016. The fact that the law finally went through parliament can partially be attributed to the Reconstruction of the State, an initiative created by the NGO Frank Bold in cooperation with other civil society actors working on the fight against corruption. The civil society platform was able to bring anti-corruption issues into the media and mobilize citizen volunteers. The movement directly lobbied with candidates standing for the parliamentary elections to sign a declaration that they would vote in favor of nine anti-corruption bills once elected. 165 out of 200 elected members of parliament had signed such declarations. The Reconstruction of the State movement later monitored and reported on these parliamentarians' voting. As a result of this initiative, five of the nine anti-corruption bills were passed in parliament, including the one on political party and election campaign

FINDING 16

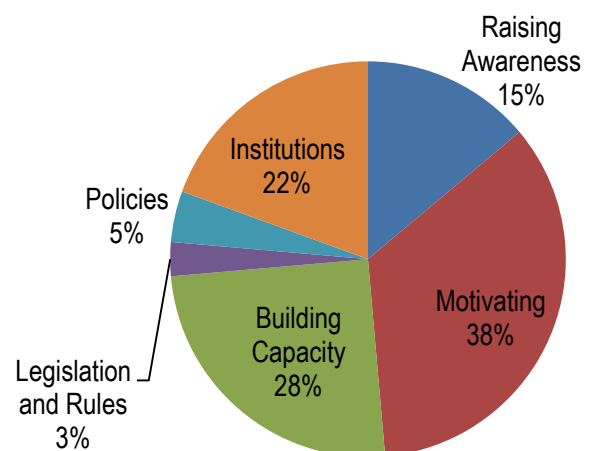
In Council of Europe interventions, political will is often considered a necessary precondition or assumption that is beyond the organisation's control. Active attempts to motivate authorities to implement anti-corruption reforms are, however, promising and should be strengthened and extended.

To some extent the Council of Europe is able to feed into authorities' intrinsic motivation to work on anti-corruption reforms by raising awareness about good practices through monitoring reports, expert advice and capacity building. 25% of survey respondents identified "Motivating the national authorities to implement good anti-corruption practices" as one of two areas, in which the Council of Europe has been most effective in their country (see Figure 5 in Appendix 2). However, 38% of survey respondents nevertheless believe that the motivation of authorities is the single most important gap in Council of Europe support (see Figure 2 below).

The Council of Europe can seek to generate political will directly and indirectly. Political dialogue can be considered a way to directly motivate authorities to implement anti-corruption measures. The evaluation found evidence that this approach works, for example with regard to GRECO's high-level missions that are part of the monitoring bodies' procedures which apply in case of a country's non-compliance with GRECO recommendations. Moreover, in the case of Albania a direct intervention from the hierarchy of the Action against Crime Department in the framework of the PACA project resulted in important constitutional amendments that limit the immunities of parliamentarians. However, such interventions remain rather an

exception since the Council of Europe usually plays the role of a neutral provider of technical expertise. When developments in a member state risk going into the wrong direction, many international organisations and bilateral actors present in that country immediately speak out, whereas the heads of the Council of Europe field offices do not have the mandate to make political (or even technical) statements. While it is considered crucial for the Council of Europe to remain being seen as neutral, many interviewees, especially but not only Council of Europe staff and civil society representatives, regret the Council of Europe's cautious stance in this regard. Other staff, on the other hand, consider the strict separation of project implementation and field offices from political dialogue to be a comparative advantage of the organisation. Within the Council of Europe, political pressure is exerted in the form of peer pressure in the CM (e.g. when the implementation of country Action Plans and Court rulings are discussed).

Figure 2: In your view, the main gap in Council of Europe's support is in the area of (select one):



Source: Own survey.

An indirect way of creating political will for anti-corruption reforms lies in the active utilization of pressure created by civil and/or larger society. Currently, the Council of Europe does so to a very small extent. Mechanisms include:

- Strengthening the capacity of civil society to play its watchdog function in the fight against corruption. This is, for example, currently done with regard to the monitoring of election campaign financing in the framework of the Reform of the Electoral Practice in Ukraine project that is implemented by the Democratic Governance Department. During interviews for the case studies for this evaluation, many civil society representatives particularly requested more support from the Council of Europe in strengthening their role and capacity.
- Strengthening the role of media and investigative journalism. According to the White Paper on Transnational Organised Crime, "Media and public support for the fight against corruption and organised crime is crucial." Two CM recommendations aim at the protection of journalism²⁴ as well as editorial independence of the media²⁵. Furthermore, a PACE resolution²⁶ recommends parliamentary co-operation with investigative media. Moreover, the Council of Europe administers an online platform, on which journalists' and freedom of expression organisations provide information on serious concerns with regard to the media freedom and safety of

journalists. The Steering Committee on Media and Information Society (CDMSI) also conducts studies on threats to journalists²⁷.

- Corruption awareness campaigns similar to those that have been organised in the framework of several projects implemented by the ECCD.
- Contributing to an anti-corruption culture through education. Two PACE resolutions and one recommendation ask for stepping up efforts on integrity education to break the vicious cycle of corruption. Currently, the projects implemented by the Education Department focus on fighting corruption in education rather than through education. GRECO has recently entered into co-operation with the NGO Federation for Education in Europe (FEDE) with the objective of providing at least one hour of integrity education in every school in Europe.

The theory of change presented in Appendix 1, which illustrates how the Council of Europe achieves results in the fight against corruption, also highlights the mechanisms that should be strengthened in order to further improve effectiveness. This could be done directly by the Council of Europe or indirectly through strategic partnering with other actors.

FINDING 17

Anti-corruption support may have a negative impact if it is not provided in a strategic and coordinated way and if it does not take a long-term approach.

²⁴ CM/Rec(2016)4 on the protection of journalism and safety of journalists and other media actors, for which the CDMSI has developed an implementation strategy.

²⁵ CM/Rec(2018)1 on media pluralism and transparency of media ownership.

²⁶ PACE/Res 2171(2017) on parliamentary scrutiny over corruption: parliamentary cooperation with the investigative media.

²⁷ Clark, M. and Grech, A. (2017), "Journalists under pressure - Unwarranted interference, fear and self-censorship in Europe", Council of Europe and Council of Europe (2015), "Journalism at risk".

It is important that anti-corruption support is provided in a strategic way that involves the coordination of the efforts of all different actors and that takes a long-term approach. An uncoordinated short-term project-based approach does not only risk being ineffective (since quick wins cannot be expected in the fight against corruption) but may actually have a negative impact. Interviewees mentioned that small and isolated interventions cannot achieve any measurable and sustainable results, but rather provide corrupt authorities with a clean slate by allowing them to demonstrate their “commitment” to fighting corruption without having to fear any negative consequences. Moreover, not achieving tangible results, for example in the form of criminal convictions, gives the message to perpetrators and society that corruption is acceptable and no sanctions follow, leading to trivialization of corruption. According to interviewees, in some societies, being able to “navigate” the system through one’s connections may even become close to a status symbol.

1.5.4. The Gender Dimension in (Anti-) Corruption

FINDING 18

The extent to which Council of Europe entities take the gender dimension into account in their anti-corruption work varies between entities. Overall the trend is positive.

GRECO was among the first monitoring bodies in the Council of Europe to appoint a gender equality rapporteur and has looked into the gender dimension of corruption for several years, including during a dedicated conference in 2013, followed by exchanges of views, and discussions during its plenary meetings. Furthermore, the 5th round evaluation questionnaire asks for gender-disaggregated data regarding senior officials that will allow GRECO to comment on compliance with Council of Europe standards in this respect²⁸. GRECO has recently issued its first gender-based recommendation.

The ECCD has been collecting and reporting gender-disaggregated data regarding the participation in their capacity building activities since 2013. Efforts are also being made to develop staff members' skills in gender mainstreaming in project design and implementation. It seems still too early to see any concrete effects on this in the co-operation activities.

FINDING 19

By providing support to countries on fighting corruption, the Council of Europe contributes to gender equality because women tend to be more negatively affected by corruption than men.

A literature review suggests that women suffer disproportionately more from corruption than men because they often have fewer resources available. In European societies like elsewhere, women's incomes are on average lower than those of men.²⁹ If a candidate needs to pay a significant amount of money to obtain a job or be promoted, this can be more easily done by men than by women. Therefore, corruption is an obstacle to women obtaining high-level positions of influence and participating in public life at an equal level as men.

Moreover, according to the World Bank, poor people pay a particularly high price for corruption because they are forced to spend a higher share of their incomes on bribes. The poor are also indirectly affected because they heavily depend on public services, while corruption negatively impacts the quality of these services.³⁰ Given that a disproportionate percentage of poor people are women, one can argue that corruption affects women more than men. In particular poor women cannot afford to pay bribes to access the services they need. Furthermore, women are disproportionately affected by specific forms of corruption such as sexual extortion.³¹

²⁸ CM Rec(2003)3 on balanced participation of women and men in political and public decision making.

²⁹ European Commission (n.d.), Eurostat Statistics Explained, "Gender pay gap statistics", available at https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics.

³⁰ The World Bank (n.d.), PovertyNet – Empowering the Poor to Fight Corruption, available at

<http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/EXTPOVERTY/EXTEMPOWERMENT/0,,contentMDK:20312308~menuPK:543262~pagePK:148956~piPK:216618~theSitePK:486411~isCURL:Y,00.html>.

³¹ See Boehm F. and Sierra E. (2015), "The gendered impact of corruption: Who suffers more – men or women?", U4 Issue 2015:9, Chr. Michelsen Institute,

For these reasons, women particularly benefit from fighting corruption and anti-corruption support itself can already be considered as indirectly contributing to gender equality.

and Transparency International (2014), "Gender, Equality and Corruption: What are the linkages?", Policy Brief #01/2014.

2.3 Efficiency

EVALUATION QUESTION 3

To what extent is the CoE's anti-corruption support efficient?

FINDING 20

Monitoring and co-operation activities generally benefit from synergies.

Interviews and case studies provide evidence that GRECO benefits from the existence of co-operation activities and vice versa. Most importantly, co-operation projects help countries implement monitoring recommendations (as well as Venice Commission opinions). In some cases GRECO Secretariat members even participate in conferences organised in the context of a project to promote monitoring recommendations (e.g. Moldova). Furthermore, where projects deliver assessments and recommendations, GRECO reports may benefit from their analysis as was the case of the PACA project in Albania among others. Moreover, a project implemented by the ECCD, including an assessment based on GRECO methodology, contributed to Tunisia applying for GRECO accession (although the application is still pending).

Similarly, anti-corruption projects benefit from the existence of monitoring. GRECO reports play a strong role in the needs assessment for a project and can also serve as a tool for measuring its impact. Furthermore, the monitoring body gives leverage to co-

operation activities by (i) helping to create political will for participation in projects as well as (ii) being a source of highly respected experts that can be used by projects. Based on interviews, anti-corruption projects in Council of Europe member states are more likely to have positive impact than in non-member states due to GRECO's leverage. This was confirmed by the Morocco case study. However, there were also situations, in which GRECO's existence made project work more difficult.

In Albania, for example, it was difficult to convince the authorities that further work was required in the area of political party financing after the country had complied with GRECO's third round recommendations.

FINDING 21

Examples of good collaboration between different Council of Europe entities and institutions working in the fight against corruption exist but there is still room for further improving co-operation.

There are examples of good cooperation in the Council of Europe. These take the form of joint legal opinions and joint conferences organised by different entities.³² Furthermore, the co-operation between GRECO and the ECCD is enhanced by the fact that their offices are located in the same corridor. Finally, internal co-operation in the form of GRECO assessing the code of conduct of the PACE, the International Non-Governmental Organisation (INGO) Conference and the Congress may help

Armenia, as well as a joint conference on political party financing in Ukraine that included GRECO, the Economic Crime and Cooperation Division, the Venice Commission, and the Democratic Governance Department.

³² These include a joint legal opinion between the Economic Crime and Cooperation Division and the Human Rights Policy and Co-operation Department on the National Anti-Corruption Bureau in Ukraine, a joint opinion of the Venice Commission and the Directorate of Human Rights and Rule of Law on

prevent corruption inside the organisation itself.

Nevertheless, interviews reveal that the overall atmosphere is less cooperative than one might expect for reasons such as some entities worrying about losing control over project funds, experts and materials produced. More collaboration should lead to more effective impact if entities which work on the fight against corruption as a transversal issue consult colleagues who have expertise in this area of work.

Furthermore, for the effectiveness of the Council of Europe machinery it is important that its different structures and entities are all seen as part of one single organisation. The functioning of the dynamic triangle and the visibility of all of its elements may be further improved by ensuring that relevant members of the Council of Europe Secretariat, including those from the co-operation sector, have free access to sessions of other Council of Europe bodies.

FINDING 22

In some areas there are risks of inconsistency between different Council of Europe standards and their interpretation by concerned entities.

The fact that different Council of Europe entities and institutions (the Venice Commission, GRECO, and the ECCD) conduct legal assessments bears the risk of different opinions and even contradictions. Furthermore, in some situations it is difficult to draw a balance between different Council of Europe standards and policy advice, for example with regard to well-established standards related to the independence of the judiciary and the use of integrity testing as a practice to clean up a corrupt judicial system. In Moldova, for example, the Venice Commission issued an

opinion on the integrity testing of judges that contradicted advice provided by the ECCD. It requires good co-ordination and very careful tactical manoeuvring by the Council of Europe in order to avoid being pulled into the national politics of member states. For example, becoming involved in the operational part of a vetting process for judges in a member state could be problematic as judges affected may well invoke human rights standards and ultimately file cases before the European Court of Human Rights.

2.4 Added Value

EVALUATION QUESTION 4

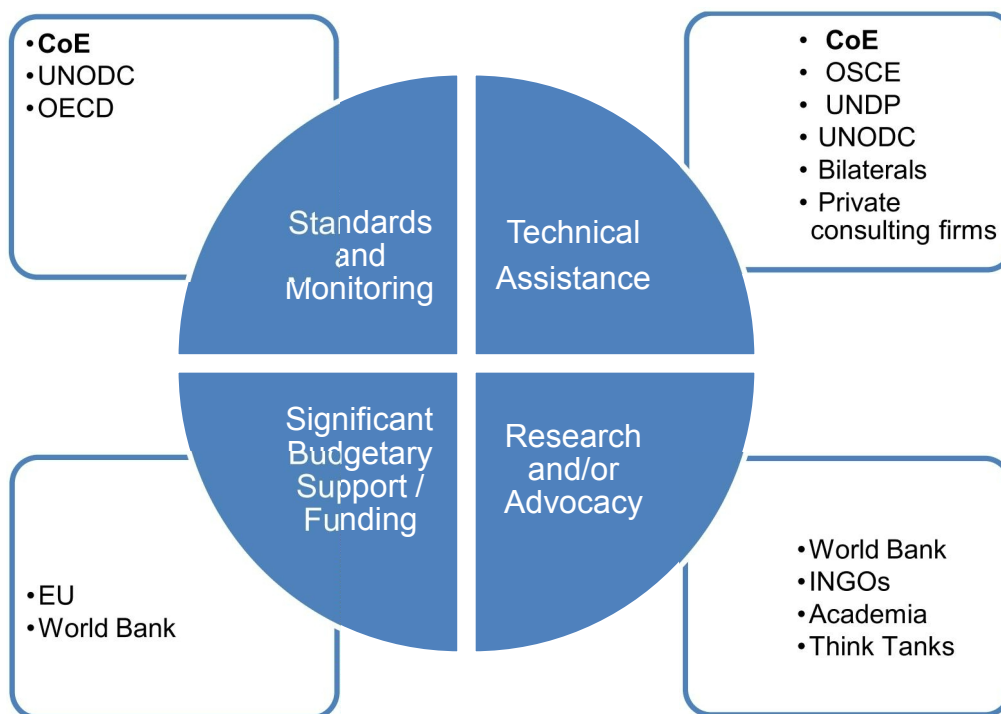
To what extent does the CoE's anti-corruption support add value?

FINDING 23

Due to its specific organisational positioning, the Council of Europe plays a significant role in the fight against corruption in its member states.

The document review, interviews and case studies have demonstrated that the anti-corruption field is quite crowded with international players, including intergovernmental organisations, financial institutions, bilateral development actors, INGOs and other civil society actor. Figure 2 provides an overview of the key actors and their main focus of work (without claiming to be exhaustive).

Figure 2: Key actors in the anti-corruption field and their main focus of work (not exhaustive)



Source: Own conceptualization.

In the European context, in addition to the Council of Europe (through GRECO), the United Nations Office on Drugs and Crime (UNODC) and the OECD are the only two international organisations, which are monitoring countries' compliance against internationally binding standards, namely the United Nations Convention against Corruption (UNCAC) and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The UNCAC has a broad scope similar to the Council of Europe's anti-corruption conventions but the related monitoring procedures are not comparable to those of GRECO. The OECD's monitoring procedures are, on the other hand, similar to those of GRECO, while the scope of the OECD Convention is limited to bribery of foreign

public officials in international business transactions.

The other sector, in which the Council of Europe plays a role, the technical assistance field, is an area, in which many international actors are engaged. The Council of Europe neither offers direct budgetary support nor does it play a significant role in anti-corruption research nor advocacy³³.

Among all the different international actors involved in the fight against corruption, the Council of Europe has been described as a key player by interviewees. This is due to the specific features of the Council of Europe as an organisation and its working methods. Table 2 below summarises the advantages and disadvantages that the Council of Europe has in

³³ While the figure includes research and advocacy in one area, it should be noted that these often serve different purposes.

comparison with other actors according to the interviewees.

Table 2: Advantages and Disadvantages of the Council of Europe in comparison with other actors

Advantages	Disadvantages
<ul style="list-style-type: none"> • Custodian of important international norms: legitimacy and authority • Dynamic triangle of standard setting, monitoring, co-operation • Strong expertise • Beneficiary countries are usually members and consider themselves among peers • “Relational infrastructure”: soft power, collaborative approach, good team player, avoiding paternalistic approach • Impartial, credible, integer, professional, respected, technical and fair actor who can work on sensitive issues • Comparative approach providing guidance on good practices from all member states • Geographic experience working in countries concerned • Potential to work on the political dimension through political dialogue 	<ul style="list-style-type: none"> • Limited financial resources • Limited enforcement mechanisms in the form of incentives and sanctions (“carrots and sticks”) • Limited ability to adapt quickly to evolving situations • Limited visibility • Unless there is a field office with specialised staff, lack of local presence on the ground • Limited presence at anti-corruption debates within the international community

Source: Interviews.

FINDING 24

Co-operation, co-ordination and speaking with one voice with other international actors is crucial in order to benefit from synergies and avoid duplication of efforts as well as poor results of interventions.

Interviews and case studies demonstrate that the Council of Europe generally co-operates and co-ordinates well with other organisations. This can relate to the organisation of joint conferences or capacity building events, the co-ordination of monitoring visits to minimise the burden on concerned countries or discussions to avoid overlaps in technical co-operation activities. Moreover, different actors play complementary roles so that their co-operation is necessary for achieving results. Transparency International and other civil society actors, for example, provide their inputs

into monitoring visits and use GRECO recommendations for their advocacy work. Similarly, the EU use GRECO reports and information on technical co-operation provided by the Council of Europe (within a formalised framework of annual Council of Europe/European Commission meetings) as a source of information for the EU accession negotiations. Bilateral actors refer to the Council of Europe’s conventions, the case law of the Court and Venice Commission opinions when advising on solutions to identified problems.

Box 7: Example of Co-ordination of International Actors

In Ukraine, major results with regard to anti-corruption legislation were achieved in 2014 and 2015 in response to the 2014 Maidan Revolution of Dignity. Ukraine's strong civil society and the international community used the momentum to push for policy suggestions that had been developed earlier. The EU promised the liberalisation of the visa regime for Ukrainians and the IMF a grant in exchange for concrete anti-corruption measures. Other actors involved in lobbying included the United States Embassy and United States Agency for International Development (USAID), the OECD, and UNDP. The CoE did not contribute to the political dialogue related to the fight against corruption. Neither did it produce relevant statements that could be used by civil society during their campaigns. The CoE's role was to provide expertise and the EU and IMF based their conditions

GRECO, the IRG and the OECD WGB (as well as the Organisation of American States (OAS)) are currently working on the establishment of an enhanced inter-secretariat process to strengthen synergies and effectiveness, and to avoid unnecessary duplications between their monitoring mechanisms. On a different note, GRECO's Statute allows for participation of the EU in GRECO's work. The modalities for such participation is subject to discussion between the two organisations. Several interviewees highlighted the importance of an EU participation in GRECO for improved co-ordination and cooperation.

Interviewees also reported cases where a lack of co-ordination or a disagreement on priorities among different international actors has compromised the outcomes of anti-corruption interventions, such as in the cases of the constitutional amendments related to parliamentarians' immunities in Albania and the establishment of an anti-corruption court in Ukraine. When international actors were aligned, however, crucial steps in the fight against corruption could be made, like for example in Albania's justice reform.

3. Conclusions and Recommendations

Corruption is a significant problem in European societies and a serious threat to the core values of the Council of Europe: human rights, democracy and the rule of law. Is the Council of Europe able to effectively support member states in the fight against corruption?

The organisation's anti-corruption interventions are highly relevant. The organisation is valued as a trustworthy and unbiased international player that offers great expertise and provides the unique added value of its dynamic triangle of anti-corruption standards, monitoring and co-operation.

Technical expertise alone is however usually not enough for making progress in the fight against corruption. Implementing anti-corruption measures requires strong political will. Council of Europe recommendations have a much better chance of being implemented if an enabling environment exists. If authorities do not have an intrinsic motivation to fight corruption, political will can be the result of a fear of negative consequences, for example in the form of a poor international reputation resulting in a difficult economic environment, sanctions from the international community, or pressure from civil or larger society. The Council of Europe already successfully co-operates with other international organisations such as the EU and the IMF on anti-corruption matters in order to benefit from their respective "sticks and carrots". However, the organisation could be more present at high-level international anti-corruption forums in order to further improve its political leverage. Its reputation as an expert organisation could be further strengthened by a stronger focus on innovation and the production and dissemination of conceptual work as a

contribution to the development of international norms and public debates on anti-corruption matters. This would also ensure that the organisation and its staff remain at the cutting edge of new developments in the field and possibly contribute to the production of relevant new standards that would enhance the core added value of the organisation. In this context it would appear advisable to reinforce the organisation's standard setting capacity in respect of anti-corruption.

In general, the Council of Europe would benefit a lot from more visibility of its work. The more widely known and understood (including by ordinary citizens) the organisation's recommendations and advice are, the more seriously they will be taken by politicians and decision-makers. Targeted co-operation with other actors such as civil society and media can help the organisation increase the visibility of its work beyond expert circles, thus enabling more stakeholders, including possibly the larger society, to understand the relevance of the Council of Europe's work and to hold their government accountable for acting in accordance with it.

In this regard the Council of Europe has a comparative advantage vis-à-vis other international actors in that it has access to many different elements of a country's society such as central governments, local authorities, parliamentarians, the judiciary, media and civil society. Moreover, the fight against corruption is integrated as a transversal issue into various areas of work of the organisation. Therefore, the Council of Europe has several entry doors into the national anti-corruption system. Strengthening internal co-operation and co-ordination between different Council of Europe entities does not only allow the organisation to avoid inconsistencies in its support but also to mobilise a whole range of different elements of

society in a strategic way with the purpose of actively strengthening the political will to fight against corruption. In order to be able to fully

capitalize on the benefits of the dynamic triangle, it is important that the Council of Europe is seen as one single organisation.

In light of the findings and conclusions of this evaluation, the DIO makes the following recommendations (in order of priority) in order to help further improve the Council of Europe's

support in the area of the fight against corruption (see Table 3). Table 4 below summarizes which findings are underlying the conclusions and recommendations.

Table 3: Recommendations

#	Recommendations	Operational Suggestions	Responsible
Improve the visibility and leverage of the Council of Europe's anti-corruption support			
1.	Invest more resources into the active dissemination and promotion of GRECO monitoring results at national level and make them more accessible to a wider public.	<ul style="list-style-type: none"> • Explore ways to better integrate the compliance procedure (follow-up) into the evaluation procedure, in order to provide more continuity. • Further increase co-operation with civil society, for example through a more systematic outreach (during evaluation missions and through a dedicated section on the GRECO webpage) and more systematic inclusion in the compliance reporting procedures. • Encourage national GRECO delegations, ombudspersons and/or Council of Europe field offices to organise national dissemination events when GRECO reports are issued. • Further encourage national GRECO delegations to translate GRECO reports into their national language(s). • Amend the GRECO statute in a way that allows for the immediate publication of adopted evaluation and compliance reports. • Provide user-friendly information to relevant journalists who would be in a position to raise awareness about GRECO recommendations, for example through press releases (as already done). • Introduce summary indicators that are standardized, easily understood and 	GRECO Secretariat

#	Recommendations	Operational Suggestions	Responsible
		can be used to score countries' performance in a comparable way in order to ensure consistency across countries.	

#	Recommendations	Operational Suggestions	Responsible
2.	Strengthen the Council of Europe's role in the development of anti-corruption norms and shaping the public debates on anti-corruption matters at international level.	<ul style="list-style-type: none"> Explore the feasibility of establishing a(n) (ad hoc) multi-disciplinary committee/working group that is tasked with the development of new standards on emerging anti-corruption issues to which GRECO and the ECCD may provide input. 	CDPC, CDCJ and/or an ad hoc multidisciplinary committee
		<ul style="list-style-type: none"> Focus more on contributing to the work of high-level forums and international networks of the international anti-corruption community. Improve and systematize the intra-Secretariat co-ordination of participation so that a single participant can represent the different entities of the Council of Europe. Step up the work on lessons learned through similar activities as, for example (i) the Prague Conference on lessons learned of the 4th GRECO round (for GRECO) or (ii) drafting analytical summary documents on all technical papers produced on a specific topic (for the ECCD). Regularly organise an anti-corruption forum on (a) contemporary issue(s) and trends for all GRECO, Action against Crime, and relevant other Council of Europe staff in headquarters and the field, inviting representatives from other international organisations as well as academia and think tanks doing research on the subject. Partner with academia in order to benefit from PhD and master theses on specific anti-corruption themes of interest to the Council of Europe. Publish articles in specialised anti-corruption journals. 	DISAC
		<ul style="list-style-type: none"> Systematically inform DISAC and its appropriate structures about international high-level events that have anti-corruption components. 	DER
		<ul style="list-style-type: none"> Consider more systematically publishing capacity development tools produced in the framework of co-operation projects on the Department's 	ECCD

#	Recommendations	Operational Suggestions	Responsible
		webpage in a timely manner and downloadable format.	

#	Recommendations	Operational Suggestions	Responsible
Improve co-operation and co-ordination among different Council of Europe entities involved in anti-corruption support			
3.	Strengthen co-ordination of anti-corruption support across the Organisation.	<ul style="list-style-type: none"> Establish quarterly co-ordination meetings involving all concerned actors working in the anti-corruption field. Ensure that the entire Council of Europe Secretariat working on anti-corruption matters is seen as one entity, including at relevant meetings. This refers to sessions of GRECO, the CDPC, the CDCJ, as well as external conferences (see operational suggestion under recommendation 2). One single seating area should be reserved for the "Council of Europe Secretariat", including members of the CDPC Secretariat, the CDCJ Secretariat, the GRECO Secretariat, the ECCD and relevant others. Invite ECCD staff to attend training of evaluators at the beginning of each round. 	DISAC DISAC, CDCJ Secretariat GRECO Secretariat
4.	Capitalise more on the Council of Europe's ability to mobilise many different elements of European societies in the fight against corruption.	<ul style="list-style-type: none"> Continue to give support to strengthening investigative journalism which is playing an important watchdog function in the fight against corruption. Take a more active role in enabling civil society to contribute to national debates and reforms in the fight against corruption. 	MIGD ECCD
Optimise working methods to maximise the effectiveness and efficiency of anti-corruption support			
5.	Strengthen GRECO reports and recommendations to cover the most important anti-corruption issues in any given country by complementing the thematic and ad hoc approach procedures with one also	<ul style="list-style-type: none"> Explore possibilities of complementing GRECO's thematic and adhoc approach procedures with one also based on specific issues that are relevant in a given country. 	GRECO Secretariat

#	Recommendations	Operational Suggestions	Responsible
	addressing country-specific priorities.		

#	Recommendations	Operational Suggestions	Responsible
6.	Take measures to improve the effectiveness and efficiency of project management in line with the Project Management Methodology.	<ul style="list-style-type: none"> • Discuss decision-making processes, visa routes, staffing structures, and supervisory functions within the team in order to (i) identify any possible improvements (taking into account the context of the existing regulatory framework but also the current encouragement to experiment within that framework) and (ii) clarify the reasons why certain procedures are considered necessary (with the purpose of avoiding frustration). • Ensure that all staff involved in the management of anti-corruption projects receive a training of trainers training. • Improve knowledge management within the team and encourage exchanges of knowledge, experience and expertise among staff in headquarters and the field. • Mainstream gender in anti-corruption projects in line with the Toolkit on Gender Mainstreaming in Cooperation. 	ECCD
7.	Pay more attention to considerations on how Venice Commission opinions will be used by strengthening stakeholders' understanding through possible follow-up activities.	<ul style="list-style-type: none"> • Make more use of existing mechanisms (e.g. follow-up opinions upon request, interviews, conferences, etc.) to provide clarifications on adopted opinions when needed. 	Venice Commission Secretariat

Findings	Conclusions	Recommendations
<p>15. Internal or external pressure is often necessary to generate the political will essential for achieving results in fighting corruption.</p> <p>16. In the CoE, political will is often considered beyond the organisation's control. Attempts to motivate authorities are promising and need strengthening.</p> <p>6. GRECO has an excellent reputation among experts but is not well known by others.</p> <p>4. Additional standards would be beneficial to address emerging issues.</p> <p>11. The quality of the products produced by the ECCD is good. The Division's reluctance to consider itself as an anti-corruption expert body entails certain risks.</p>	<p>Improve the visibility and leverage of the Council of Europe's anti-corruption support.</p>	<p>1. Invest more resources into the active dissemination and promotion of GRECO monitoring results at national level and make them more accessible to a wider public.</p> <p>2. Strengthen the Council of Europe's role in the development of anti-corruption norms and shaping the public debates on anti-corruption matters at international level.</p>
<p>23. Due to its specific organisational positioning, the CoE plays a significant role in fighting corruption.</p> <p>17. Anti-corruption support that is not strategic may have a negative impact.</p> <p>7. GRECO's compliance procedure is crucial, while in general its enforcement mechanism depends on its own or other actors' political pressure.</p> <p>22. There are risks of inconsistency between different Council of Europe standards and their interpretation by concerned entities.</p> <p>21. There is room for further improving co-operation between different CoE entities.</p>	<p>Improve co-operation and co-ordination among different Council of Europe entities involved in anti-corruption support.</p>	<p>3. Strengthen co-ordination of anti-corruption support across the Organisation.</p> <p>4. Capitalise more on the Council of Europe's ability to mobilise many different elements of European societies in the fight against corruption.</p>

<p>12. The Venice Commission is highly respected in member states. Its reports face a risk of being instrumentalised in political fights.</p> <p>10. The effectiveness of a project depends on its ability to provide quick support. The CoE needs to show greater agility in order to keep up with a fast pace.</p> <p>18. CoE entities take gender into account to various degrees.</p>	<p>Optimise working methods to maximise the effectiveness and efficiency of anti-corruption support.</p>	<p>5. Strengthen GRECO reports and recommendations to cover the most important anti-corruption issues in any given country by complementing the thematic and ad hoc approach procedures with one also addressing country-specific priorities.</p> <p>6. Take measures to improve the effectiveness and efficiency of project management in line with the PMM.</p> <p>7. Pay more attention to considerations on how Venice Commission opinions will be used by stakeholders by strengthening their understanding through possible follow-up activities.</p>
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Table 4: Rationale for Recommendations

4. Lessons Learned

The following section contains lessons learned and good practices that are applicable beyond the anti-corruption sector and relevant for the organisation as a whole. They were identified by the evaluation team based on the findings of this evaluation. Lessons include the following:

- Monitoring mechanisms, if they follow thematic rounds that are prioritized at European level, do not necessarily cover the most relevant issue in a single country. In such cases, co-operation activities and other interventions should be free to address areas that are not targeted by monitoring recommendations.
- Monitoring rounds cannot be expected to cover all issues with their recommendations that exist in a country in relation to the theme of the round. Several monitoring rounds on the same theme would be required for that. If these limitations are not clearly communicated and understood by all stakeholders, it makes co-operation work more complicated to justify. States who have implemented all monitoring recommendations may claim that there were no issues left which require further technical assistance even though many problems still persist.
- The strength of the Council of Europe is technical expertise. However, technical advice that is against the interest of the authorities is often not implemented unless ignoring it has negative consequences. External pressure can be created through co-operation and co-ordination with other international actors as well as through making use of the dynamics of civil and larger society. A stronger focus on political dialogue as

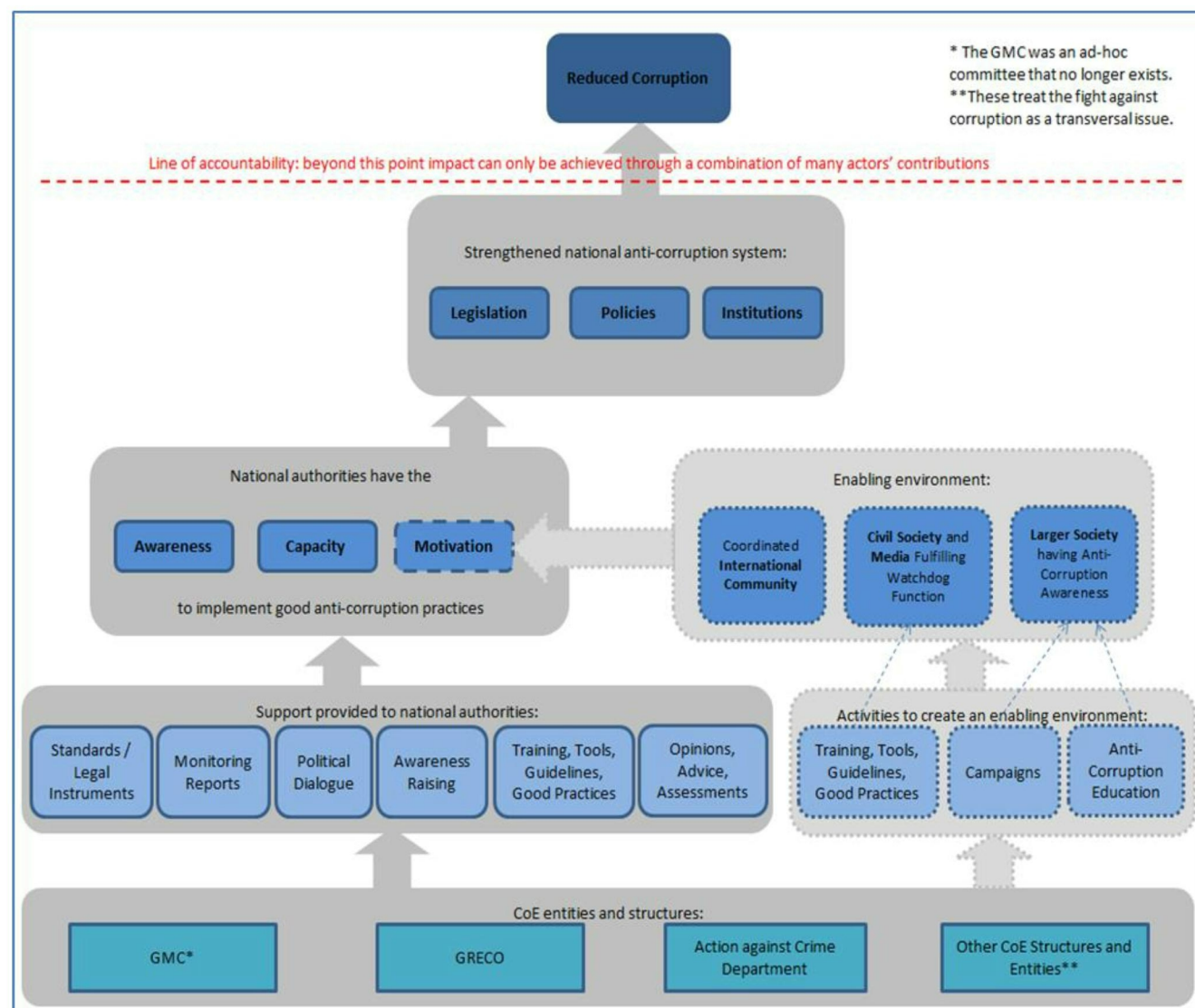
well as an improved visibility of the Council of Europe beyond the expert circle and among ordinary citizens can strengthen the leverage of the organisation's technical recommendations and advice.

- For transversal or multidisciplinary areas of work that require a broad range of specific skills and expertise, an ad hoc expert body that is established specifically for this purpose is in a better position to develop standards than the existing Council of Europe steering committees.
- Success factors for monitoring bodies include solid procedures, a strong chair, bureau as well as secretariat, the equal treatment of all countries, effective compliance procedures, and the possibility of adhoc interventions to address crucial issues that can emerge in member states at any moment and unrelated to the theme of the ongoing monitoring round.
- Civil society can play an important role for monitoring bodies by providing input into monitoring and compliance reports and promoting the implementation of recommendations.
- The effectiveness of co-operation projects is highly dependent on their capacity to quickly provide relevant support. Decentralized decision-making in the field and flexible agreements with donors are crucial in this regard.
- Council of Europe interventions in (member) states can have negative effects if they are not planned strategically nor linked with political enforcement mechanisms in case of non-compliance in that they give unco-operative authorities the possibility to uphold an image of co-operation.

- Gender mainstreaming can improve the effectiveness and efficiency of the Council of Europe's work even in sectors where one would not immediately expect the gender dimension to play a role.

Appendix 1: Theory of Change

The theory of change illustrates how the Council of Europe contributes to the fight against corruption through its work (grey areas) and what it could do additionally to increase its effectiveness (light grey areas with dotted lines). The effectiveness of the mechanisms described in the grey areas has been demonstrated by evidence collected through the case studies. However, this effectiveness always depends on the presence of an enabling environment. The Council of Europe has done little work to actively generate the enabling environment (light grey areas with dotted lines) and this evaluation argues that more should be done in this regard, either directly or through strategic co-operation with other actors.



Appendix 2: Statistics

Table 5: % saying "corruption/bribery" is one of three biggest problems facing their country

Council of Europe member	%
Moldova	67
Spain	66
Slovenia	59
Ukraine	56
Bosnia and Herzegovina	55
Lithuania	54
Croatia	51
Portugal	51
Cyprus	49
Romania	49
Czech Republic	41
Serbia	39
Russia	39
Slovakia	38
Armenia	37
Bulgaria	36

Council of Europe member	%
Latvia	35
Albania	34
"The former Yugoslav Republic of Macedonia"	34
Montenegro	31
Hungary	28
Italy	28
Estonia	25
Greece	24
France	23
Turkey	22
Azerbaijan	21
Netherlands	17
Belgium	17
United Kingdom	16
Poland	15
Georgia	12
Switzerland	10
Sweden	6
Germany	2
Median	34

Source: Transparency International (2016), *People and Corruption: Europe and Central Asia 2016*. The following Council of Europe member states were not included in the study: Andorra, Austria, Denmark, Finland, Iceland, Ireland, Liechtenstein, Luxembourg, Malta, Monaco, Norway, San Marino.

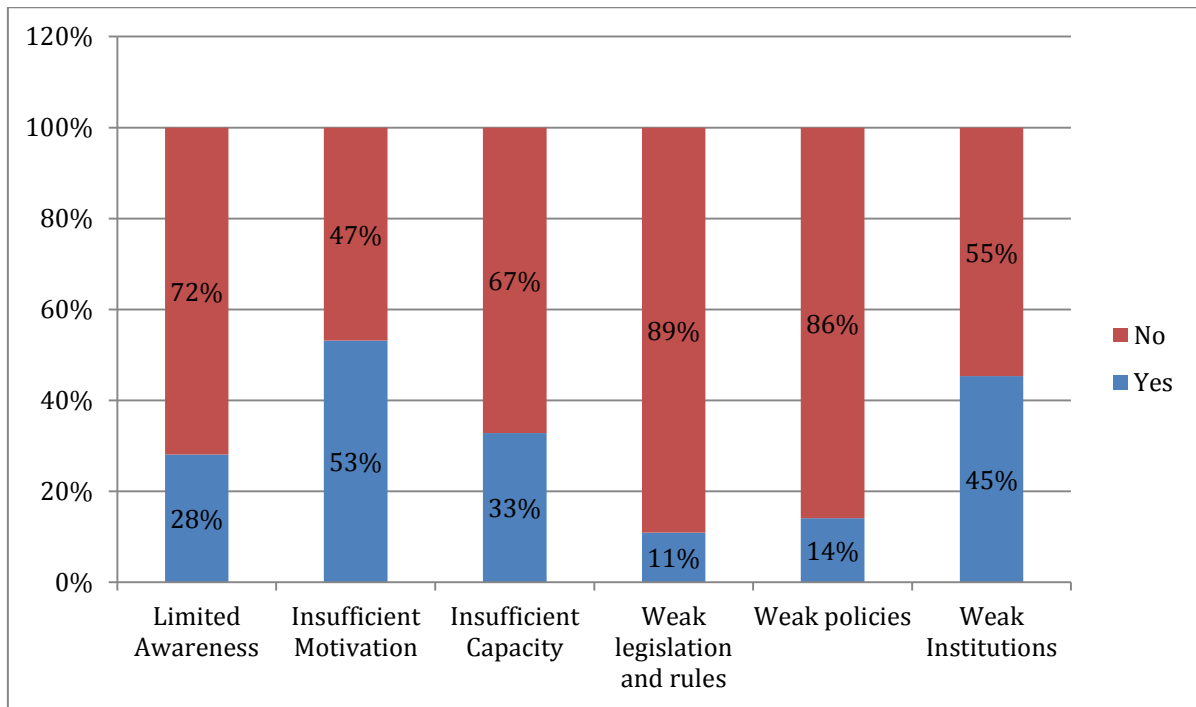
Table 6: Perceptions of corruption by institution: Score scale 1-5, where 1 means not at all corrupt and 5 means extremely corrupt

Council of Europe member	Political Parties	Parliament/ Legislature	Military	NGOs	Media	Religious Bodies	Business/ Private Sector	Education system	Judiciary	Medicine and health	Police	Public officials / Civil servants
Albania	4,1	3,9	2,9	2,3	2,9	1,8	2,7	4,0	4,3	4,3	3,7	3,5
Armenia	3,7	3,7	3,2	2,8	3,0	2,9	3,5	3,7	4,0	4,0	3,9	4,0
Azerbaijan	2,5	2,5	2,5	2,5	2,5	2,3	2,8	2,8	3,1	3,1	2,9	2,8
Belgium	3,9	3,5	3,0	2,7	3,2	3,6	3,3	2,5	3,3	2,7	3,2	3,5
Bosnia and Herzegovina	4,2	4,0	2,7	2,6	3,4	2,9	3,6	3,9	3,8	4,1	3,8	3,9
Bulgaria	4,2	4,0	2,9	3,2	3,5	3,5	3,8	3,4	4,4	4,2	3,9	3,9
Croatia	4,0	3,8	2,6	2,8	3,4	2,8	3,5	3,5	4,0	3,8	3,5	3,9
Cyprus	4,4	4,0	3,6	2,6	3,9	3,3	3,2	2,9	3,1	3,6	4,1	3,7
Czech Republic	4,1	3,8	3,4	2,5	2,9	2,4	3,4	3,0	3,5	3,3	3,6	4,0
Denmark	2,9	2,4	2,3	2,4	2,9	3,1	3,0	2,0	1,7	2,2	2,0	2,2
Estonia	3,7	3,1	2,0	2,4	2,6	2,1	3,3	2,3	2,8	2,7	2,6	3,2
“The former Yugoslav Republic of Macedonia”	4,0	3,5	2,3	3,0	3,5	2,8	3,1	3,3	3,9	3,5	3,5	3,6
Finland	3,4	2,9	1,9	2,4	3,1	2,3	3,3	2,1	2,0	2,4	1,8	2,8
France	4,0	3,5	2,5	2,8	3,6	2,8	3,7	2,3	3,0	2,8	3,3	3,4
Georgia	2,9	3,0	1,9	2,0	3,2	1,6	2,8	2,4	3,4	2,8	2,5	2,6
Germany	3,8	3,4	2,9	3,0	3,6	3,1	3,7	2,7	2,6	3,4	2,7	3,4
Greece	4,6	4,3	2,9	3,1	4,4	3,4	3,8	3,3	3,9	4,1	3,6	3,9
Hungary	3,9	3,6	2,5	2,7	3,5	2,4	3,8	2,6	3,1	3,2	3,2	3,1

Council of Europe member	Political Parties	Parliament/ Legislature	Military	NGOs	Media	Religious Bodies	Business/ Private Sector	Education system	Judiciary	Medical and health	Police	Public officials / Civil servants
Italy	4,5	4,1	2,8	2,8	3,4	3,2	3,6	3,0	3,4	3,6	2,9	3,8
Latvia	4,0	3,7	2,3	2,4	3,0	2,1	3,4	2,5	3,5	3,4	3,5	3,8
Lithuania	4,2	4,3	2,4	2,6	3,3	2,5	3,6	3,2	4,3	4,1	3,9	3,9
Luxembourg	3,6	3,1	2,7	2,6	3,2	3,3	3,4	2,6	2,7	2,6	2,9	3,2
Moldova	4,1	4,2	3,2	2,9	3,0	2,3	3,6	3,7	4,3	4,0	4,2	3,9
Norway	3,3	2,6	2,4	2,9	3,2	3,2	3,3	2,4	2,0	3,0	2,4	2,9
Portugal	4,1	3,9	3,9	3,2	3,2	3,0	3,5	3,1	3,9	3,0	3,2	3,4
Romania	4,2	4,0	2,5	2,7	3,1	2,5	3,5	2,9	3,7	3,6	3,5	3,4
Russia	4,2	4,3	4,0	3,3	3,7	3,1	3,6	4,0	4,4	4,1	4,5	4,6
Serbia	4,3	4,0	3,0	3,7	4,0	2,8	3,6	4,0	4,3	4,3	4,0	4,3
Slovakia	3,9	3,7	3,0	2,7	3,2	2,9	3,4	3,2	4,0	3,8	3,8	3,9
Slovenia	4,2	3,9	2,7	2,8	3,4	3,2	3,3	2,8	3,6	3,3	3,2	3,5
Spain	4,4	3,9	2,6	2,4	3,2	3,1	3,3	2,1	3,5	2,3	3,1	3,3
Switzerland	3,3	2,8	2,6	2,5	3,1	2,7	3,1	2,2	2,2	2,6	2,3	2,7
Turkey	3,9	3,5	2,7	2,9	3,6	3,1	3,4	3,2	3,1	3,2	3,0	3,2
Ukraine	4,1	4,2	3,5	3,2	3,4	3,0	3,9	4,0	4,5	4,2	4,4	4,3
United Kingdom	3,9	3,6	2,5	2,6	3,9	3,0	3,5	2,6	2,7	2,6	3,0	3,3
Median	4	3,7	2,7	2,7	3,2	2,9	3,4	2,9	3,5	3,4	3,3	3,5

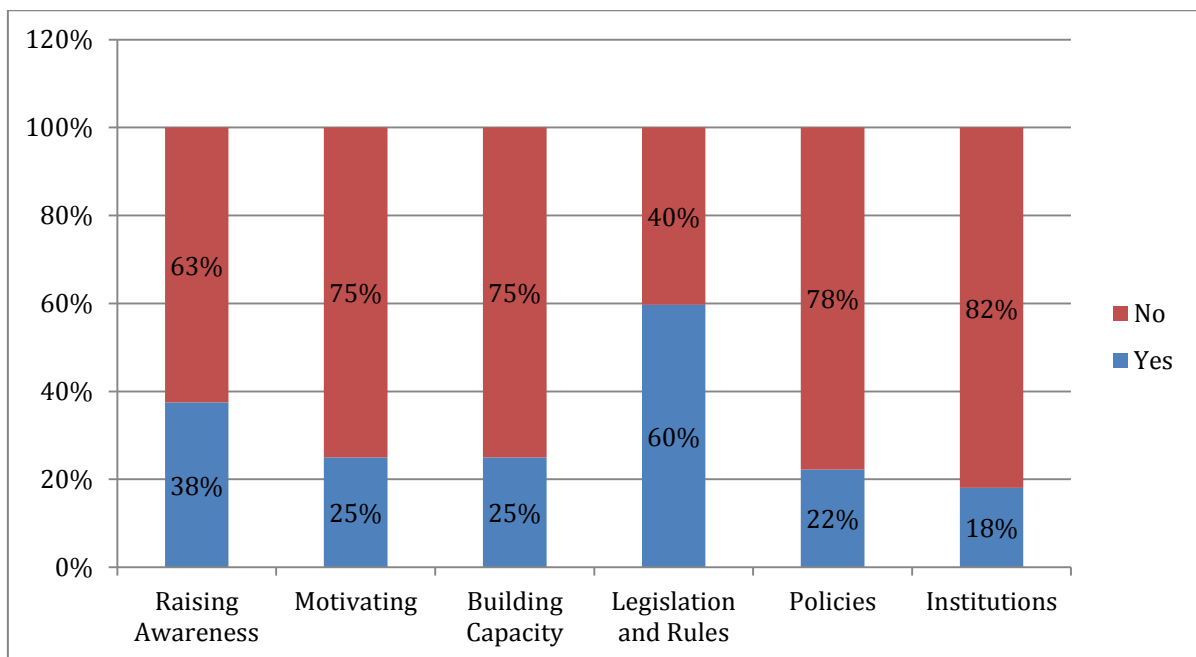
Source: Transparency International (2013): The Global Corruption Barometer. The following Council of Europe member states were not included in the study: Andorra, Austria, Iceland, Ireland, Liechtenstein, Malta, Monaco, Montenegro, Netherlands, Poland, San Marino, Sweden.

Figure 3: In your view, the main obstacles in fighting and preventing corruption in your country lie in (select two):



Source: Own survey.

Figure 4: In your view, the Council of Europe in your country has been most effective in (select two):



Source: Own survey.

Appendix 3: Evaluation Matrix

Evaluation Questions	Sub-Questions	Measures / Indicators	Document Review		Semi-Structured Interviews				Structured Interviews
			Council of Europe Documents	External Documents	Council of Europe Secretariat	GRECO Members	Beneficiary States	Other Organisations	
To what extent is the Council of Europe's anti-corruption support relevant?	To what extent is the Council of Europe's strategic and thematic approach towards anti-corruption support comprehensive? Are there any gaps in the support?	<ul style="list-style-type: none"> Extent of application of different anti-corruption approaches by Council of Europe support Alignment of Council of Europe anti-corruption support with Council of Europe expertise Alignment of sectors addressed by Council of Europe support with high risk sectors as identified in relevant literature (in particular corruption barometers) 	X	X	X	X	X	X	X
	To what extent is the Council of Europe's anti-corruption support in line with the needs and priorities of beneficiary states?	<ul style="list-style-type: none"> Level of satisfaction of national partners 	X	X	X	X			X

<p>To what extent is the Council of Europe's anti-corruption support effective?</p>	<p>To what extent and through which mechanisms has the Council of Europe's anti-corruption support resulted in strengthened anti-corruption systems and behavioural changes?</p>	<p>Based on grand theory of change:</p> <ul style="list-style-type: none"> • Improved awareness • Improved knowledge/expertise/capacity • Improved motivation • Changes in legislation and regulations (in line with relevant intervention objectives) • Policy changes (in line with relevant intervention objectives) • Improved institutional capacities (in line with relevant intervention objectives) 	X	X	X	X	X	X
<p>What are external factors that have contributed to and hindered achievements?</p>	<ul style="list-style-type: none"> • Relevance and completeness of assumptions in grand theory of change • Stakeholders' consensus on best practices, successes and/or failures and the reasons for these 	X	X	X	X	X		
<p>In what way have gender issues positively or negatively influenced the effectiveness of the Council of Europe's anti-corruption support?</p>	<ul style="list-style-type: none"> • Stakeholder perceptions 		X	X	X	X	X	

<p>To what extent is the Council of Europe's anti-corruption support efficient?</p>	<p>To what extent are synergies achieved by the different Council of Europe entities which provide anti-corruption support? What are strengths and weaknesses in their cooperation?</p>	<ul style="list-style-type: none"> • Links between monitoring and co-operation • Stronger political leverage • Utilisation of expertise • Information flows • Bottlenecks 	X	X		
	<p>Which (internal) factors support and hinder the effectiveness and efficiency of the anti-corruption support?</p>	<ul style="list-style-type: none"> • Utilisation of experts • Adequacy of resources • Appropriateness of organisational setup • Embeddedness of anti-corruption support in Council of Europe operations (strategic plans, CM) • Gender mainstreaming • Cooperation with other organisations 	X	X	X	X

<p>To what extent does the Council of Europe's anti-corruption support add value?</p>	<p>To what extent does the work of the Council of Europe complement and/or duplicate the work of other organisations? What are the comparative advantages and disadvantages of the Council of Europe in comparison with other organisations?</p>	<p>Comparison of different organizations' approaches, strengths and weaknesses</p> <p>Complementarity and duplication</p> <p>Synergies achieved through cooperation</p>	X	X	X	X	X	X	X
<p>To what extent are Council of Europe outputs used by other organisations?</p>	<p>Usage of</p> <ul style="list-style-type: none"> • Standards • GRECO reports • Other assessments • Venice Commission opinions 	X	X	X					

Appendix 4: Case Study Sampling

The sampling criteria for selecting countries for case studies include the following:

- Volume of anti-corruption interventions in the sector of financing political parties and election campaigns;
- Volume of anti-corruption interventions in the judiciary sector;
- Volume of other anti-corruption interventions;
- Recentness of anti-corruption interventions;
- Geographic diversity of countries;
- Diversity of socio-political contexts;
- Specific developments in the anti-corruption field in recent years; and
- Size of the countries.

The following countries have been sampled for field visits:

- **Albania** because the ECCD implemented two projects there, including one with elements on political party financing. The Venice Commission has been involved significantly regarding corruption in the judiciary. Albania made relevant amendments to its constitution during the timeframe covered by this evaluation.
- **Armenia** because there have been two regional projects implemented by the ECCD, including with elements on political party financing, and one implemented by the Justice and Legal Co-operation Department.
- **Austria** because it is an EU member state and a country, in which GRECO has intervened but there were no co-operation activities. It has been facing some challenges in the field of political party financing. As a neighbouring country to the Czech Republic it was covered through a combined mission to economise resources.
- **Czech Republic** because it is an EU member state where an anti-corruption co-operation project was implemented. Five compliance reports were issued following GRECO's evaluation report of the third round on political party financing.
- **Morocco** as a country from the neighbourhood which has benefited from anti-corruption co-operation, while not being a GRECO member. The Economic Crime and Co-operation Division implemented two projects including elements on political party financing.
- **Serbia** as a member state in which significant co-operation work has been done in the past, allowing for an assessment of the Council of Europe's long-term impact.
- **Ukraine** as a large country of strategic importance with a substantial involvement of various anti-corruption actors. The ECCD implemented one bilateral and one regional project in Ukraine, including with elements on political party financing. There have also been four projects focusing on the judiciary and significant involvement of the Venice Commission regarding corruption in this field.

Appendix 5: Interview Guide

Interview Guide for Partners – Anti-Corruption Evaluation

Date:	
Name(s) and function(s) of interviewee(s):	
Location:	
Evaluation phase:	
In-person/phone interview:	
Interview by:	
In confidence/quotable:	

Introduction

- Thank you very much for your time.
- My name is Rica Terbeck and I work as evaluator in the Council of Europe’s Directorate of Internal Oversight.
- This year the Directorate’s work plan includes an evaluation of the Council of Europe’s support to states in the fight against corruption.
- The purpose of the evaluation is to help the organization optimize its interventions and working methods in this area in order to provide better support.
- Since you are a key partner of the Council of Europe, your views and input will be highly relevant for this evaluation.
- I would like to hear your thoughts and opinions on the topic, including constructive criticism and ideas for innovation.
- Whatever we discuss during this meeting will be treated confidentially. I will not quote you by name in the report.

Effectiveness

Since 2012, what were in your view the three most significant developments in the fight against corruption in your country?

- Legislation and regulations,
- Policies,
- Strengthened institutions,
- Changes in general attitude.

Could you rank these factors by order of importance?

Why do you think these developments occurred? What main factors had a positive / negative influence on these developments?

Could you rank these factors by order of importance?

Did the Council of Europe play any role in these developments? In which way?

- Awareness of good practices/standards,
- Motivation,
- Capacity.

Which element(s) of the Council of Europe's work actually contributed to these developments?

Have you noticed that gender issues play any role in corruption and the fight against it? Is the gender dimension of corruption discussed among policy makers?

Relevance

Is the Council of Europe's providing the right type of anti-corruption support? What are strengths and weaknesses?

Should the Council of Europe do other things? Should the organisation take a different approach?

Added Value

How do you see the Council of Europe in comparison with other international organisations that work in the field of anti-corruption? What are strengths and weaknesses in comparison with other organisations?

Are there any synergies or duplication in international cooperation?

Structured Questions

1. In your view, the main obstacles in fighting and preventing corruption in your country lie in (select two):

Limited awareness of good anti-corruption practices	
Insufficient motivation on the part of the national authorities to implement good anti-corruption practices	
Insufficient capacity to implement good anti-corruption practices	
Weak anti-corruption legislation and regulations	
Weak anti-corruption policies	
Weak institutions	

2. In your view, the main player in the field of anti-corruption in your country is: _____.

The main strength of this player lies in: _____.

3. In your view, the Council of Europe in your country has been most effective in (select two):

Raising awareness of good anti-corruption practices	
Motivating the national authorities to implement good anti-corruption practices	
Building capacity to implement good anti-corruption practices	
Strengthening anti-corruption legislation and regulations	
Strengthening anti-corruption policies	
Strengthening institutions	

4. In your view, the main gap in Council of Europe's support is in the area of (select one):

Raising awareness of good anti-corruption practices	
Motivating the national authorities to implement good anti-corruption practices	
Building capacity to implement good anti-corruption practices	
Strengthening anti-corruption legislation and regulations	
Strengthening anti-corruption policies	
Strengthening institutions	

Appendix 6: List of Interviewees

Name	Title	Entity/Department	Organization
Headquarters Strasbourg			
Abdiu, Ardita	Head of ECCD	Action against Crime Department (DGI)	Council of Europe
Arzilli, Silvia	Committee on Political Affairs and Democracy	Secretariat of the PACE	Council of Europe
Atanasova, Vesna	Bilateral and Regional Co-operation and Capacity Building	Directorate of Democratic Citizenship and Participation - Education Department (DGII)	Council of Europe
Boillat, Philippe	Former Director General of Human Rights and Rule of Law	Directorate General Human Rights and Rule of Law (DGI)	Council of Europe
Chlapak, Roman	GRECO Secretariat	Information Society and Action against Crime Directorate (DGI)	Council of Europe
Clamer, Valerie	Head of Secretariat (Committee on Rules of Procedure, Immunities and Institutional Affairs)	Secretariat of the PACE	Council of Europe
Ms Lejla Dervisagic	Head of Media Co-operation Unit	Information Society Department (DGI)	Council of Europe
Dolgova-Dreyer, Katia	Bilateral and Regional Co-operation and Capacity Building	Directorate of Democratic Citizenship and Participation - Education Department (DGII)	Council of Europe
Dunga, Edmond	Unit II, ECCD	Action against Crime Department (DGI)	Council of Europe
Esposito, Gianluca	Executive Secretary of GRECO	Information Society and Action against	Council of Europe

		Crime Directorate (DGI)	
Fasino, Roberto	Head of Culture, Social and Sustainable Development Department/Head of Committee on Culture, Science, Education and Media Secretariat	Secretariat of the PACE	Council of Europe
Ferati, Mustafa	Head of Unit I, ECCD	Action against Crime Department (DGI)	Council of Europe
Freyman, Delphine	Committee on the Honouring of Obligations and Commitments by member States of the Council of Europe (Monitoring Committee)	Secretariat of the PACE	Council of Europe
Friederich, François	Head of Electoral Assistance Division	Democratic Governance Department (DGII)	Council of Europe
Frossard, Stanislas	Executive Secretary of Enlarged Partial Agreement on Sport (EPAS)	Children's Rights and Sport Values Department (DGII)	Council of Europe
Gayevska, Kateryna	Committee on Rules of Procedure, Immunities and Institutional Affairs	Secretariat of the PACE	Council of Europe
Grundman, Silvia	Head of Media and Internet Governance Division	Information Society Department (DGI)	Council of Europe
Gutzkow, Jutta	Head of Good Governance Division	Democratic Governance Department (DGII)	Council of Europe
Hoppe, Tilman	Anti-Corruption Expert	N/A	N/A
Hristov, Hristo	Neighbourhood Co-operation	VENICE Commission (DGI)	Council of Europe
Janson, Bjorn	Deputy Executive Secretary of GRECO	Information Society and Action against	Council of Europe

		Crime Directorate (DGI)	
Jolic, Jelena	Former project manager	Action against Crime Department (DGI)	Council of Europe
Juncher, Hanne	Head of Justice and Legal Co-operation Department	Human Rights Directorate (DGI)	Council of Europe
Karapetyan, Tigran	Head of Eastern Partnership & Russian Federation Unit	Human Rights National Implementation Division (DGI)	Council of Europe
Kleijssen, Johanness	Director of Information Society and Action against Crime	Information Society and Action against crime Directorate (DGI)	Council of Europe
Kloth, Matthias	Head of MONEYVAL Division and Executive Secretary	Action against Crime Department (DGI)	Council of Europe
Koedjikov, Ivan	Head of Action against Crime Department and Anti-terrorism Co-ordinator	Action against Crime Department (DGI)	Council of Europe
Kruger, Stefania	Steering Committee for Educational Policy and Practice (CDPPE)/ Standing Conference of European Ministers of Education/Equal Opportunities and Quality Education	Directorate of Democratic Citizenship and Participation - Education Department (DGII)	Council of Europe
Lalicic, Lado	Unit 1 MONEYVAL	Action against Crime Department (DGI)	Council of Europe
Lisney, Tim	Deputy Secretary of the Chamber of Local Authorities/Secretary of the Governance Committee	Secretariat of the Congress of Local and Regional Authorities of the Council of Europe	Council of Europe
Lukovic, Teodora	Unit I, ECCD	Action against Crime Department (DGI)	Council of Europe
Malinowski, Jan	Secretariat of the Co-operation Group to Combat Drug Abuse and Illicit Trafficking in	Information Society and Action against	Council of Europe

	Drugs (Pompidou Group)	Crime Directorate (DGI)	
Mamulashvili, Maia	ECCD	Action against Crime Department (DGI)	Council of Europe
Markert, Thomas	Secretary of the Venice Commission	Venice Commission (DGI)	Council of Europe
Meudal-Leenders, Sophie	GRECO Secretariat	Information Society and Action against Crime Directorate (DGI)	Council of Europe
Mezei, Geza	Head of Parliamentary Projects Support Division	Secretariat of the PACE	Council of Europe
Moras, Marité	Head of Co-operation Activities Unit	Secretariat of the Congress of Local and Regional Authorities	Council of Europe
Nebyvaev, Igor	Head of Unit II, ECCD	Action against Crime Department (DGI)	Council of Europe
Qiriazhi, Villano	Head of Education Policy Division/Secretary of the Standing Conference of European Ministers of Education	Directorate of Democratic Citizenship and Participation - Education Department (DGII)	Council of Europe
Rakusic-Hadzic, Tanja	Head of Criminal Law Cooperation Unit	Action against Crime Department (DGI)	Council of Europe
Schirmer, Guenter	Head of Legal Affairs and Human Rights Department	Secretariat of the PACE	Council of Europe
Speckbacher, Christophe	GRECO Secretariat	Information Society and Action against Crime Directorate (DGI)	Council of Europe
Albania			
Bako, Edlira	Chief of Judicial and Prosecutorial Inspection	Ministry of Justice	Ministry of Justice
Ballauri, Fjorida	Chief of Staff	Prosecution General	Prosecution General

Bashari, Evgjeni	Chief of Cabinet	High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (HIDAACI)	High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (HIDAACI)
Bernhard, Agnes	Team Leader	Euralius Consolidation of the Justice System in Albania	EU
Bufi, Majlinda	Mayor of Roskovec	Roskovec City	Roskovec City
Dapi, Zhanina	Director General for Development Policies, Strategic Planning and Integration	Ministry of Interior	Ministry of Interior
Dautaj, Astrit		Institute for Development of Education	Institute for Development of Education
Dekovi, Olsi	Deputy Head of Office	Council of Europe Office in Albania	Council of Europe
Dhëmbo, Elona	Lecturer	University of Tirana	University of Tirana
Gjini, Zamira	Director of the Department for Pre-University Education	Ministry of Education and Sport of Albania	Ministry of Education and Sport
Gjokuta, Arlind	General Director	Albanian Financial Intelligence Unit, General Directorate for the Prevention of Money Laundering	Albanian Financial Intelligence Unit
Haxhimihali, Enio	Head of the Cabinet	People's Advocate Institution (Ombudsperson)	People's Advocate (Ombudsman)
Ibrahimi, Gent	Director	Institute for Policy and Legal Studies	Institute for Policy and Legal Studies
Islami, Enfrid	National Project Officer Governance in Economic and Environmental Issues Department	Organization for Security and Cooperation in Europe (OSCE) Presence in Albania	OSCE
Kaci, Arber	Adviser to the Minister	Ministry of Justice	Ministry of Justice
Kaci, Liljana	Senior Project Officer	Action against Crime Department	Council of Europe

Karaj, Florian	Inspector	High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (HIDAACI)	High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (HIDAACI)
Koleka, Ador	Head of Foreign Relations	School of Magistrates	School of Magistrates
Kraja, Arben	Prosecutor	Prosecution General	Prosecution General
Lani, Remzi	Executive Director	Albanian Media Institute	Albanian Media Institute
Lubonja, Tetis	Head of Department, EU Integration Department	Ministry of Justice	Ministry of Justice
Manjani, Ylli		Socialist Movement for Integration Party	Socialist Movement for Integration Party
Merkaj, Eduart	Chief of Sector	Sector of Corruption Investigation, Directorate on the Investigation of Economic and Financial Crime, General Directorate on the Investigation of Organized and Serious Crimes, Directorate of Albanian State Police	Ministry of Interior
Muratej, Andi		Albanian Helsinki Committee	Albanian Helsinki Committee
Narazani, Jonida	National Project Officer Governance, Economic and Environment Department	Organization for Security and Cooperation in Europe (OSCE) Presence in Albania	OSCE
Neukirch, Claus	Head of Office	Council of Europe Office in Albania	Council of Europe
Pasko, Deshira	Head of Legal Department	Central Election Commission	Central Election Commission
Plaku, Saimir	Member of the Regional Council of Berat	Berat City	Berat City

Prifta, Emilda	Advisor to the Minister	Ministry of Justice of Albania	Ministry of Justice
Seferaj, Klodjan	Program Manager, Program for EU integration and Good Governance	Open Society Foundation For Albania	Open Society Foundation For Albania
Smibert, Jon	Resident Legal Advisor	Office of Overseas Prosecutorial Development Assistance and Training (OPDAT) , Embassy of the United States of America	Embassy of the United States of America
Totozani, Igli	Ombudsman	People's Advocate (Ombudsman)	People's Advocate (Ombudsman)
Vanwymelbeke, Annelies	Programme Manager - EU Policies Justice and Home Affairs	Delegation of the EU to Albania	EU
Veizaj (Hajnaj), Aida	Chief of Sector of Money Laundering Investigation	Ministry of Internal Affairs Directorate of Albanian State Police	Ministry of Internal Affairs
Xhaferllari, Marsida	Chief Inspector	High Council of Justice	High Council of Justice
Yzeiraj, Ermal	Head of Legal Department	State Supreme Audit	State Supreme Audit
Armenia			
Ambaryan, Tigran	Head of Department for Combatting Corruption and Economic Crime	Prosecutor General's Office of RA	Prosecutor General's Office of RA
Amirbekyan, Liana	Senior Project Officer "Strengthening Integrity and Combatting Corruption in Higher Education" Project	Council of Europe Office in Yerevan	Council of Europe
Anapiosyan, Arevik	Executive Director	Institute of Public Policy	Institute of Public Policy

Arakelyan, Sergey	Rector Doctor of Legal Sciences, Professor	Academy of Justice	Academy of Justice
Asatryan, Kamo	Head of Anti- Corruption Monitoring Department	Government of RA	Government of RA
Aslanyan, Hayk	Deputy Prosecutor	Prosecutor General's Office of RA	Prosecutor General's Office of RA
Avetisyan, Serjik	Chairman of the Chamber on Cases Doctor of Law, Professor	Court of Cassation of RA	Court of Cassation of RA
Baghdasaryan, Edik	Editor in Chief	"HETQ" Investigative Journalists	"HETQ" Investigative Journalists
Bailey, Laura	Country Manager for Armenia	World Bank Group	World Bank Group
Behaj, Shannon	Justice Program Director	International Narcotics and Law Enforcement (INL) Section	Embassy of the United States of America
Biyagov, Victor	Head of Department	National Assembly of RA Permanent Secretariat	National Assembly of RA
Danielyan, Ani	Head of Department of International Cooperation	Court of Cassation of RA	Court of Cassation of RA
Drmeyan, Mamikon	Head	Judicial Evaluation Committee	Armenian Bar Association
Gasparyan, Gayane	Rector	Yerevan BRUSOV State University of Languages and Social Sciences	Yerevan BRUSOV State University of Languages and Social Sciences
Gasparyan, Narine	Senior Project Officer (Justice Project)	Council of Europe Office in Yerevan	Council of Europe
Harutyunyan, Karine	Deputy Minister	Ministry of Education and Science of RA	Ministry of Education and Science of RA
Hovhannisyan, Arpine	Vice President	National Assembly of RA	National Assembly of RA
Ishkhanyan, Avetik	Chairman	Armenian Helsinki Committee	Armenian Helsinki Committee

Khachatryan, Mikayel	Head of International Cooperation Department	The Human Rights Defender's Office	Human Right's Defender of RA
Khachatryan, Tatevik	National expert	Open Society Foundation	Open Society Foundation
Krmoyan, Suren	Deputy Minister	Ministry of Justice	Ministry of Justice
Martirosyan, Mnatsakan	Chairman Judge	Judicial Ethics and Disciplinary Committee of the General Assembly of Judges of RA; Court of General Jurisdiction of Kentron and Nork-Marash Administrative Districts of Yerevan	Court of General Jurisdiction of Kentron and Nork-Marash Administrative Districts of Yerevan
Movsisyan, Hayk	Deputy Head	Prosecutor General's Office of RA	Prosecutor General's Office of RA
Mukuchyan, Tigran	Chairman	Central Electoral Commission	Central Electoral Commission
Pirumyan, Nina	Adviser to the Human Rights Defender	Human Rights Defender's Office	Human Right's Defender of RA
Saghatelyan, Ara	Chief of Staff	National Assembly of RA	National Assembly of RA
Sahakyan, Anna	Office Assistant	Council of Europe Office in Yerevan	Council of Europe
Sakunts, Artur	Chairman	Helsinki Citizens' Assembly-Vanadzor	Helsinki Citizens' Assembly-Vanadzor
Sargsyan, Lusine	Research & education center	Human Rights Defender's Office	Human Rights Defender's of RA
Sarukhanyan, Tatevik	Leading Specialist Anti-Corruption policy developing division	Ministry of Justice	Ministry of Justice
Shimshiryan, Karine	Delegation Secretary	National Assembly of RA Permanent Secretariat	National Assembly of RA
Simonyan, Aram	Rector	Yerevan State University	Yerevan State University
Tatoyan, Arman	Ombudsman	Ombudsman	Human Rights Defender's of RA

Tigranyan, Heriknaz	Legal Advisor	Transparency International Anticorruption Center	Transparency International
Ulbricht, Carl	International expert	"Communication to Constructive Dialogue" Project	EU
Vardapetyan, Anna	First Deputy Head	Judicial Department of RA	Judicial Department of RA
Voiu, Loreta	Deputy Head of Office	Council of Europe Office in Yerevan	Council of Europe
Voutova, Natalia	Head of Office	Council of Europe Office in Yerevan	Council of Europe
Austria			
Babayev, Kurban	Associate Anti-corruption Officer	OSCE	OSCE
Boeheimer, Markus	Head of Unit, Legal Affairs	Austrian Court of Audit	Austrian Court of Audit
Breitschopf, Marion	Meine Abgeordneten	Meine Abgeordneten	Meine Abgeordneten
Dojnik, Evelyn	Federal Bureau of Anti-Corruption	Ministry of Interior	Ministry of Interior

Fuchs-Robertin, Michael	Judge	Association of Judges	Association of Judges
Gradel, Thomas	Head of office and project management	Transparency International	Transparency International
Koger, Martina	Federal Bureau of Anti-Corruption	Ministry of Interior	Ministry of Interior
Kreutner, Martin	Dean and Executive Secretary	IACA (International Anti-Corruption Academy)	IACA (International Anti-Corruption Academy)
Kubesch, Erwin	Head of Council of Europe Office, Vienna	Council of Europe	Council of Europe
Manquet, Christian	Head of Department IV (Substantial Criminal Law), Head of GRECO delegation	Department IV (Substantial Criminal Law)	Ministry of Justice
Sickinger, Hubert	Expert	N/A	N/A
Thaller, Silvia	Senior Public Prosecutor	Wirtschafts- und Anti-Korruptionsstaatsanwaltschaft	Wirtschafts- und Anti-Korruptionsstaatsanwaltschaft
Uljanov, Dasha	Public Prosecutor	Ministry of Justice	Ministry of Justice
Wenda, Gregor	Deputy Head of Department for Electoral Affairs	Ministry of Interior	Ministry of Interior
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