**Eastern Partnership Project on
"Good Governance and Fight against Corruption"**

Pilot Activity 3.2: Azerbaijan

Technical Paper

Assessment of the Draft
"Action Plan 2012 of the Republic of Azerbaijan on Increasing Transparency and Combating Corruption"

prepared by

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Contents

1   SUMMARY

By the end of 2011, Azerbaijan started drafting an anti-corruption policy for the years 2012 onwards. On invitation of the authorities of Azerbaijan, this Technical Paper assesses the draft **Action Plan 2012**.

The draft Action Plan is an example of good practices in several aspects:

- It is a practical **one-document** policy that can easily be used by all stakeholders, including civil society.

- The draft Action Plan builds on **four** different **pillars** (prevention, repression, public participation/awareness and international cooperation).

- Furthermore, the draft Action Plan addresses **sector-specific** measures (educational, health, etc.); this approach allows for tailoring measures to institution-specific needs.

- The draft Action Plan addresses several reform needs that have been identified by assessment exercises of international organisations (GRECO, OECD, etc.) or NGOs (Transparency International, etc.) and its implementation will thus help bring Azerbaijan's integrity system into line with **international standards**.

Observations/recommendations with regard to the structure of the Action Plan:

- An **introduction** should give some background information, above all, on the status of implementation of the previous strategy (possibly by making reference to the future evaluation report).

- A **table of content**/headings would be useful to grasp the structure of the Action Plan at one glance.

- The description of **actions** is sometimes rather vague (for example "*Increasing access to electronic services for citizens*"), i.e. it should often be more specific; without additional **progress indicators** it remains unclear what would be measured as success. It will be more instructive to the agencies responsible and make a substantial difference to the public, whether, for example, a certain number of contact points for citizens are set up for use of e-services, or whether trainings are offered to citizens on e-services, or whether awareness of citizens on availability of e-services is raised, or whether e-service platforms are made more accessible, or all of these measures.

- **Timelines** and **responsible** bodies should be in place for each action ("measure") separately.

- Several activities seem to require **additional funding**, such as the opinion polls and studies. It is important that there will be dedicated funds available, if only as a result of the annual budget process in the years following the adoption of the action plan.

- Notwithstanding the Parliament's representation in the Commission on Combating Corruption, the body responsible for coordinating and monitoring the implementation of the Action Plan (one third of its members are appointed by the Parliament), a broader inclusion of the **Parliament** – such as a resolution on the adoption of the Action Plan – could enhance the political commitment to the document and strengthen Parliament's role in the fight against corruption.

As for the **implementation** of the Action Plan, the Commission on Combating Corruption is the responsible body according to Chapter 2, 2.2 of the Action Plan and the Statute of the Commission. It is strongly recommended to make **reports** on the implementation of measures

foreseen in the Action Plan by responsible bodies available to the **public**, so civil society and NGOs can participate in the monitoring, and the reforms can enjoy credibility.

Recommendations with regard to the **objectives** of the Action Plan:

- **Political finance**: The draft Action Plan lacks any reference to recent recommendations by the OECD (2ⁿᵈ Round), and more specifically, GRECO (3ʳᵈ Round). It appears necessary, at least on the level of implementation, to further strengthen the ongoing reforms in this field.

- **Immunities** (Chapter 2, Action 1.3): The draft Action Plan foresees only drafting of proposals for limiting immunities in terms of search measures; however, recommendations by OECD and GRECO go much further. There are Council of Europe member states where only the head of state would enjoy immunity from prosecution, not even members of parliament. At the same time, only a minority of member states would grant immunities in the judicial sector.

- **Asset declaration** (Chapter 3, Action 9): Since 2004, public officials are obliged to file asset declarations. However, until today, public officials have not submitted asset declarations and a functioning system including verification is not yet operational. Measures in this field should include setting up of a fully operational system, including a verification/audit system, publicity of submitted information, and should follow a close timeline, in order to gain credibility.

- **False complaints**: Chapter 1, Measure 7.4. "Drafting of proposals determining liability for false complaints". Intentional false accusations as well as intentional and negligent false testimony are criminal offences in Azerbaijan (Article 290 of the Criminal Code "Attraction of obviously innocent to a criminal liability") as is the case anywhere else in Europe. Such criminal offences would seem a sufficient deterrent. Any further liability would seem an undesired counter-incentive for reporting corruption.

- Proactive **investigations**: The high level of bribery in the public service suggested by international surveys seems to call for more proactive measures than simple enhancement of reporting and prosecution. Integrity testing (covert testing of integrity in typical corruption situations by a special law enforcement team) has proved to be successful in some environments with weak integrity (for example New York police in the past) and would be recommended for sectors with a reported high level of bribery. So far, targeted videotaping of policemen collecting money from motorists has only been done by the media, however, with success.[1]

- **Civil society** involvement: Azerbaijan should consider granting NGOs at least observer status at the sessions of the Commission on Combating Corruption, as this would round up many other measures on civil society participation as foreseen in Chapter 1 of the draft Action Plan.

It is worthwhile stressing that successful anti-corruption reforms depend on **political leadership** and the quality of **implementation**, for which no policy document can be a substitute, may it be as detailed and well planned as possible.

It is obvious that the draft Action Plan is not addressing – and realistically probably cannot - **all possible needs** for anti-corruption measures and will not meet the expectations of all observers

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[1] Radio Liberty, "Baku's Busy Traffic Police", 10 January 2012, www.rferl.org/content/azerbaijan_traffic_police_corruption/24446553.html, leading to investigations of the policemen shown in the video.

in this process. It has to be kept in mind that it seems as if a **concise document** with a simple description of realistically doable actions is often more promising than an excessively sophisticated document drafted by international experts, which tries to be (over) comprehensive, and for which there is often no capacity in state institutions or civil society to handle it.

2   BACKGROUND

2.1   Anti-corruption policies in Azerbaijan

Title	Time span	Adopted
State Program on Fighting Corruption	2004-2006	09/2004
National Strategy on Increasing Transparency and Combating Corruption	2007-2011	07/2007
Action Plan for the Implementation of the National Strategy on Increasing Transparency and Combating Corruption	2007-2011	2007

Azerbaijan adopted its first Anti-corruption strategy in 2004. It was followed, in 2007, by a second Strategy for the years 2007-2011, which was complemented by an Action Plan. A previous Council of Europe Project "Support to the anti-corruption strategy of Azerbaijan (AZPAC)"[2] provided technical assistance on the implementation of the Strategy, and in particular on reporting the progress of implementation of the Action Plan.[3]

2.2   Scope of assignment

On invitation of the Secretariat of the Commission on Combating Corruption of Azerbaijan, this Technical Paper assesses the draft Action Plan 2012 (draft of 24 February 2012). The assessment looks at two aspects:

- The draft Action Plan as a management tool (formal aspect);
- The objectives and actions chosen to fight corruption (substance aspect).

This Technical Paper cannot – given the resources and time[4] available – build on an assessment of the current state of corruption and counter-measures in Azerbaijan. Any observation on the substance of the draft Action Plan is mainly based on material available through desk review (reports by GRECO, OECD, NGOs, etc.).

A preliminary draft of this Paper was discussed with the Secretariat of the Commission on Combating Corruption and its findings were presented at a Roundtable organised in the framework of this Project on 2 March 2012 in Baku with the aim to have a public discussion of the draft Action Plan. Representatives of state agencies, NGOs, and international bodies such as GIZ, OSCE, USAID, or the US Embassy, actively participated in the discussion. Following the Roundtable, a timeline of 14 days was given for submission of further observations to the Secretariat of the Commission.

Many of the questions raised below have been clarified in the meantime, and the Project has provided further support in improving the draft Action Plan. Among others, the Project submitted proposals for a more concrete wording in the Action Plan to the Secretariat of the Commission.

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[2] http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/azpac/azpac_en.asp.

[3] http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/AZPAC/951-AZPAC-TP-CCC-Template%20for%20reporting-Reed.pdf.

[4] The translation of the draft Action Plan was received on 24 February 2012, and the first draft of this Paper was put together by 29 February.

3   FORMAL ASPECTS

3.1   Structure

Anti-corruption policies are often divided into two subsequent documents: A strategy and an action plan. Strategies usually define the objectives, whereas action plans break the strategic objectives down into concrete measures. With the draft Action Plan 2012, Azerbaijan opted for a **one-document policy** containing objectives and respective measures (by maintaining the general strategic objectives of the Strategy 2007-2011). In Eastern Partnership countries, a similar practice is also found in Belarus.[5] There are clear advantages of such consolidated policies:

- They are easier to use by the stakeholders and the public than two documents that need to be consulted in reference to each other.

- Consultations and adoption of two consecutive documents can consume more time and produce overlaps in discussions of objectives and respective actions.

3.2   Introduction to Action Plan

An introduction to the Action Plan should provide the reader with an answer to at least the following question: What is the status of implementation of the previous policy? Here, a **reference** to the evaluation report on the previous Strategy could be made.

A **table of content**/headings would be useful to grasp the structure of the Action Plan at a glance.

In this context, it should be noted that several readers have been confused with the parallel **numbering** of the two sections in Chapter 3. It is recommended to use one ascending row of numbers for the whole Chapter.

3.3   Objectives

The objectives of the Action Plan are contained in the description of the "actions", for example Chapter 1, Action 2 "Facilitation of access to information". In anti-corruption policies, such headings would probably rather be called "objectives" than "actions"[6], but the different wording chosen by the draft Action Plan would not appear to be an essential point.

3.4   Actions

In policy documents, actions need to be defined normally in very **concrete** and **simple** wording, telling the responsible agencies what to do. Not all actions fulfil this requirement. This is even more so the case, since the actions (in the draft Action Plan called "measures") are not complemented by separate indicators of progress, which could provide some clarifying details on what the respective action is aimed at. A few examples of Chapter 1:

- 2.1 "Conduct comprehensive trainings to civil servants for ensuring of freedom of information" – Who is being trained? Heads and deputies of all agencies, and all freedom of information officers?

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[5] State program for fighting crime and corruption 2010-2012, www.prokuratura.gov.by/sm.aspx?guid=10789.

[6] See e.g. Tilman Hoppe, "Designing and Implementing Anti-corruption Policies – a Handbook", chapter 4.2.3, to be published in 2012.

- 5.2 "Carrying out measures for prevention of conflict of interests in the activities of state bodies." – Would this be a review of existing measures, or trainings, regulatory amendments, or organisational changes?
- 8.6. "Carrying out measures to increase the access of citizens to online services in regions" – Does this mean training of citizens, or enhancing the web-platforms, or provision of hardware for public use?

Chapter 2:

- 6.2 "Punishing of employees who let shortcomings take place in executing [...] court decisions" – What is the added value of this measure? If criminal or disciplinary measures are available by law, their enforcement normally goes without saying.
- 4.1 "Broader application of operative search activities in disclosing of corruption crimes" – What is meant by this?

Chapter 3, section 2:

- 3.1 "Continue measures for application of International Standards in the area of independent audit" – This would seem to go without saying and not provide any additional output/impact.
- 12.2 "Increasing the efficiency of complaint reviewing at higher educational institutions" – What is meant by this – faster decisions, reducing backlogs, electronic service, central handling, etc.?

It would be helpful if the actions gave more instruction on what would be expected as a minimum, or what the basic direction for implementation is. This seems also important as not all **stakeholders** will have the capacity to immediately develop a strategic vision out of the broad wording of actions. The same or similar problem concerns the absence of indicators (see below at 3.7).

3.5 Timelines

In Eastern Partnership countries, timelines are either chosen **schematically** by yearly timelines for each action, or by concrete dates in the course of the year. Either approach is fine, and schematic timelines appear to be fully sufficient as in many cases a more detailed date would appear not necessary or somewhat artificial. In any case, timelines would be necessary for each measure/indicator, as the measures/indicators of each "action" differ.

3.6 Responsibility

The Action Plan should define a responsible body for each measure.

3.7 Indicators for measuring success

Indicators are the pivotal point of action plans: they allow for monitoring the progress of implementation by official monitoring body as well as by civil society and NGOs. Without indicators, action plans are declarations of intent without much (visible) commitment.

Output indicators (sometimes also called "progress" indicators) refer to the completion of actions, such as drafting of laws, training of staff, etc. They allow for monitoring the implementation process by demonstrating that proposed activities or measures are taking place along the planned timeline. For example:

"Implementation and monitoring of Electronic Asset Declaration System" (Action)
"Asset declarations of public officials are filled out, submitted electronically, and checked." *(Progress indicator)*

Impact indicators (sometimes also called "outcome" indicators) refer to whether particular actions bring about substantive change. For example:

"Easier service procedure for obtaining licences set up" (Output)
"Average time of procedures reduced by 40 %" (Impact indicator)

The draft Action Plan does not foresee indicators in addition to the "measures" foreseen in the plan, but equals the implementation of the foreseen "measures" with indicators of success. This approach is appropriate for some actions, such as Action 1.1 of Chapter 2: "Draft law on criminal liability of legal persons submitted to Parliament" – an indicator of success corresponding to this action would most likely repeat the action (Indicator of success: "Draft law available and submitted to Parliament").

However, many actions are rather **vague** and need:
-   Either a more concrete wording which would make the indicator of progress implied in the measure more obvious;
-   Or additional progress indicators.

Otherwise, it remains unclear what would be measured as success. For example:
-   Chapter 1, Action 8.6: "*Increasing access to electronic services for citizens*" – It will be a huge difference whether contact points for citizens for use of electronic services are set up (numbers?), or whether trainings are offered to citizens, or whether awareness of citizens on availability of e-services is raised, or whether e-service platforms are made more accessible.

-   Chapter 2, Action 2.5: "*enhance staff and technical resources of Secretariat of Anti-corruption Commission*" – only a progress indicator could show what would be success: training of staff, or hiring new staff, how many? What is lacking technically - computers, office space?

-   Chapter 2, Action 6.2 "*Punishing of employees who let shortcomings take place in executing the court decisions*" – It will make a substantial difference to the public to see, for example, the number of employees disciplined or punished, and the sanctions applied, also over the course of time.

Often, such indicators could use **quantitative** data, for example, Chapter 1, Action 9.2: "Organisation of special broadcasts and debates on television and radio on anti-corruption measures carried out by state bodies" – It does make a substantial difference, whether an indicator states

"one event on anti-corruption covered by the media per line-ministry per half-year"

or whether an indicator states

"one annual public debate by government representatives broadcasted by media", etc.

Progress indicators could also give additional guidance to the bodies responsible for implementation. For example Chapter 1, Action 9.4 "Carry out measures in higher and secondary educational institutions for forming of the culture of intolerance to corruption". As this activity is rather general, a possible progress indicator could be: "All relevant ethics regulations, as well as

redress and complaints mechanisms are displayed publicly; possible anti-corruption measures are discussed at a public event".

3.8 Financing

Several activities of the Action Plan seem to require **additional funding**, such as the opinion polls[7] and studies. It is important that the necessary funds are secured. In this context, it is worth mentioning that submission of the Action Plan to Parliament for adoption could ensure also later budget support.

4 CIVIL SOCIETY INVOLVEMENT

NGOs were reportedly consulted for drafting the Anti-corruption Strategy in early 2012. A public roundtable took place on 2 March 2012 with support of this Eastern Partnership Project.

A follow-up public discussion is reportedly planned for 2013 to review the first results and possible amendments to the draft Action Plan.

5 IMPLEMENTATION ASPECTS

5.1 Coordination of implementation

The Commission on Combating Corruption is the body coordinating the implementation of the Action Plan between different agencies. Under its Statute[8], it meets at least every three months and consists of 15 members. The President of the Republic of Azerbaijan, the Milli Mejlis (Parliament) and the Court of the Republic of Azerbaijan Each appoint 5 members.

It seems worthwhile to consider inviting members of respective NGOs to Commission meetings at least as guests on a regular basis. It is also recommended to make a reference to the supervising body either in the Action Plan or in the Statute of the Commission, so that the general public is aware of this coordination mechanism.

5.2 Monitoring mechanism

The Commission on Combating Corruption is also the body monitoring the implementation of the Action Plan (according to Chapter 2, 2.2 of the Action Plan, and according to the Statute of the Commission). It is recommended to include answers to the following questions in the Action Plan or the accompanying presidential decree:

- How often do stakeholders have to report on progress?
- Are reports public – which is highly recommended – so civil society and NGOs can participate in monitoring?
- Are reporting templates available?

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[7] According to the Compliance Report of GRECO (1st & 2nd Round) the (unpublished) public survey in Azerbaijan carried out by a contractor in 2007 cost €15.000.

[8] www.commission-anticorruption.gov.az/view.php?lang=en&menu=23.

5.3 Parliamentary commitment

Five members of Parliament are represented in the Commission on Combating Corruption, which adopts the draft Action Plan before it is submitted to the President for final adoption. Notwithstanding the Parliament's representation in the Commission, a broader inclusion of the Parliament might enhance the political commitment to the document, but is – of all Eastern Partnership states – only the case in the Republic of Moldova.[9]

5.4 Sustainability

An Action Plan cannot anticipate all issues concerning the quality and timeliness of implementation. In other words, the Action Plan cannot define implementation so narrowly as to fully ensure its quality upfront. The actual value of the draft Action Plan 2012 thus will depend on the eventual quality of implementation and can only be fully evaluated in retrospect.

The draft Action Plan foresees the "strengthening of material technical base and expansion of structure of the Secretariat of the Commission on Combating Corruption" (Chapter 2, 2.5), which might support sustainability.

5.5 Updating of Action Plan

The Action Plan is a long-term commitment usually covering a time span of several years. Obviously, this document will have to be revised and adapted over the course of time, depending on the monitoring results. An explicit update mechanism is not compelling, as the Commission's chairman, who is the Head of Administration of the President of the Republic of Azerbaijan, could probably easily initiate an update anytime by another Presidential decree if need be. However, it would be a more structured and transparent process if a regular review of the Action Plan were already inscribed into the document.

6 RELEVANCE OF PLANNED ACTIVITIES

The objectives and measures chosen show several strengths:

The draft Action Plan builds on **four** different **pillars** (prevention, repression, public awareness and international co-operation).

Furthermore, the draft Action Plan addresses **sector specific** measures (educational, health, etc.); this approach allows for tailoring measures to institution specific needs.

The draft Action Plan addresses several reform needs that have been identified by assessment exercises of international organisations (GRECO[10], OECD[11], CoE[12], EU[13], etc.) or NGOs

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[9] www.rai-see.org/moldova/index.php?option=com_docman&task=doc_download&gid=55&Itemid=61&ei=YHdGT6DbHo_usgafz7ydCw&usg=AFQjCNH4USDherclMApnIc8ZlCSRRTEmLg&cad=rja.

[10] www.coe.int/t/dghl/monitoring/greco/evaluations/index_en.asp.

[11] www.oecd.org/dataoecd/8/11/44996103.pdf.

[12] http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/ENPI_Bridge/EaP-Bridge%20Report-revised-FINAug%202011.pdf.

[13] http://ec.europa.eu/world/enp/pdf/progress2011/sec_11_640_en.pd.

(Transparency International[14], etc.) and its implementation will thus help to bring Azerbaijan's integrity system in line with **international standards**.

The following areas would benefit from additional attention:

Conflict of interest (Chapter 2, Action 6.2): Conflicts of interest are a constant part of real life in any administration; the notion that conflicts of interest are by itself corruption seems wrong, however. The focus should not be (only) on "preventing" conflict of interest, but on "managing" them (or to prevent "performing a public function despite conflict of interest").[15]

Political finance: The draft Action Plan lacks any reference to recent recommendations by OECD (2nd Round)[16], and more specifically, GRECO (3rd Round)[17]. It appears necessary, at least on the level of implementation, to further strengthen the ongoing reforms in this field.

Immunities (Chapter 2, Action 1.3): The draft Action Plan foresees only drafting of proposals for limiting immunities in terms of search measures; however, recommendations by OECD and GRECO go much further. There are Council of Europe member states where only the head of state would enjoy immunity from prosecution, not even members of parliament (Bosnia and Herzegovina, Netherlands). At the same time, only a minority of member states would grant immunities in the judicial sector, and only one in Western Europe (Italy, with immunities having been struck down by the Constitutional Court on several occasions).[18]

Asset declaration (Chapter 3, Action 9): Since 2004, public officials are obliged to file asset declarations. However, until today, public officials have not submitted asset declarations, and a functioning system including verification is not yet operational. Measures in this field should include the setting up of a fully operational system, including a verification/audit system, publicity of submitted information, and should follow a close timeline in order to gain credibility.

Civil society involvement: Azerbaijan is the only country in the Eastern Partnership (except Belarus) where representatives of NGOs are not members of the body coordinating/monitoring the implementation of the anti-corruption policy. They take part in the working groups of the Commission on Combating Corruption, but not in the Commission itself. It is recommended to consider granting NGOs at least observer status at the Commission's sessions. However, this would only be a comparatively small building stone, as the essential part of involving civil society is done through participatory processes as described in Chapter 1 of the Action Plan.

False complaints: Chapter 1, Measure 7.4. states: "Drafting of proposals determining liability for false complaints". It is unclear what the added value of this measure is. Intentional false accusations as well as intentional and negligent false testimony are criminal offences in Azerbaijan (Article 290 Criminal Code "Attraction of obviously innocent to a criminal liability") as is the case anywhere else in Europe. Such criminal offences would seem to provide for a sufficient deterrent. Any further liability would seem an undesired counter-incentive for reporting corruption.

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[14] www.transparency.az/transpfiles/ENP_TI_Azerbaijan.pdf.

[15] Quentin Reed, Regulating conflicts of interest in challenging environments: The case of Azerbaijan, U4 ISSUE 2010:2, www.u4.no/publications/regulating-conflicts-of-interest-in-challenging-environments-the-case-of-azerbaijan/downloadasset/184.

[16] www.oecd.org/dataoecd/8/11/44996103.pdf.

[17] www.coe.int/t/dghl/monitoring/greco/evaluations/round3/ReportsRound3_en.asp.

[18] Tilman Hoppe, "Public Corruption: Limiting Criminal Immunity of Legislative, Executive and Judicial Officials in Europe", 5 *Vienna Journal on International Constitutional Law* 2011, 538, http://tilman-hoppe.de/ICL_Journal_5_4_11.pdf.

Proactive **investigations**: A high level of bribery in public service in Azerbaijan is not only suggested by perception-based surveys, but also by experience-based surveys, such as the "Life in Transition Survey" (LiTS) by the European Bank for Reconstruction and Development[19] (see below).

Perception versus experience of corruption

% of respondents

■ Average experience ● Average perception
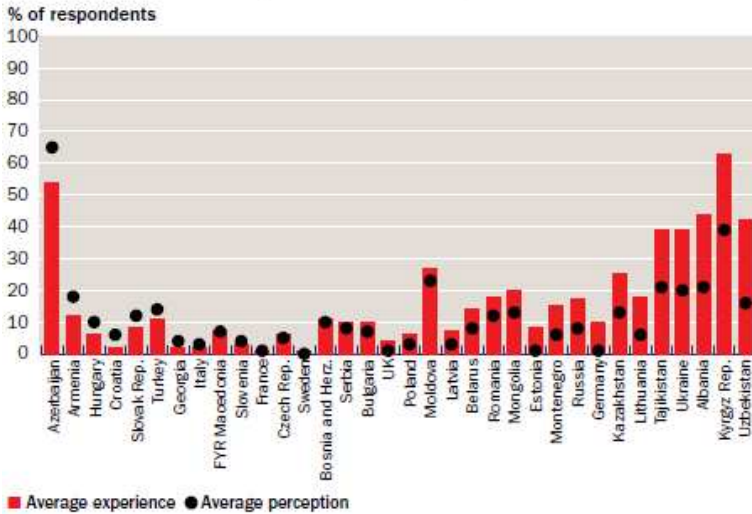
Source: LiTS II (2010).
Note: "Average perception" refers to the proportion of respondents who say people like themselves usually or always have to make unofficial payments or gifts averaged across all public services covered by the survey. "Average experience" refers to the proportion of respondents who say they or a member of their household have made an unofficial payments or a gift in the past 12 months averaged across all public services covered by the survey.

Average level of perceived necessity of unofficial payments or gifts for public services, by country

% of respondents

■ 2006 ■ 2010
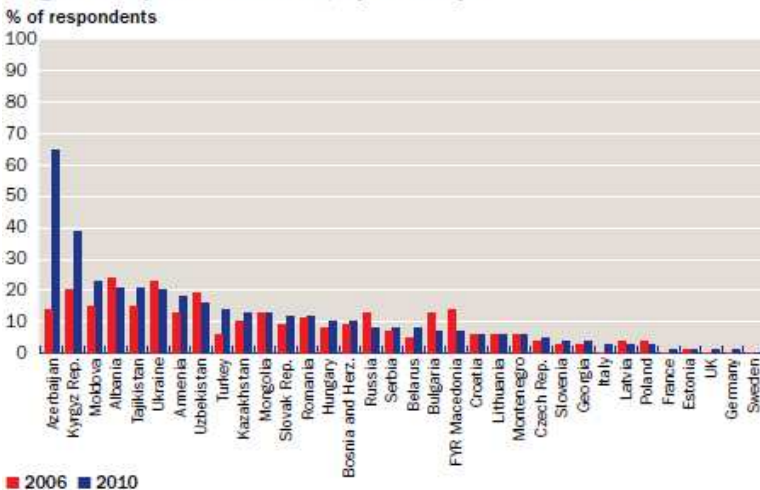
Source: LiTS I (2006), LiTS II (2010).
Note: "Perception of unofficial payments" refers to the proportion of respondents who say people like themselves usually or always have to make unofficial payments or gifts averaged across all public services covered by the survey.

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[19] European Bank for Reconstruction and Development, "Life in Transition Survey" (2010), p. 39, www.ebrd.com/downloads/research/surveys/LiTS2e_web.pdf.

The high level of bribery in public service suggested by international surveys seems to call for more proactive measures than simple enhancement of reporting and prosecution. Integrity testing (**covert testing of integrity** in corruption-prone environments by a special law enforcement team) has proved to be successful in some environments with weak integrity (for example, New York police in the past) and would be recommended for sectors with a reported high level of bribery.[20] So far, covert videotaping of policemen collecting money from motorists has only been done by the media, with remarkable success, though.[21]

It is obvious that the draft Action Plan is not addressing **all possible needs** for anti-corruption measures and will not meet the expectations of all observers in this process. It has to be kept in mind that it seems as if a concise document with a simple description of realistically doable actions is often more promising than an excessively sophisticated document drafted by international experts, which tries to be (overly) comprehensive, and for which there is often no capacity in state institutions or civil society to handle it.

It is also worthwhile stressing that successful anti-corruption reforms obviously depend on **political leadership** and the quality of **implementation**, for which no policy document can be a substitute, may it be as detailed and well planned as possible.

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[20] See: OSCE, Best practices in combating corruption, 2004 (English, Russian and Azerbaijani), p. 141 (English version), www.osce.org/eea/13738.

[21] Radio Liberty, "Baku's Busy Traffic Police", 10 January 2012, www.rferl.org/content/azerbaijan_traffic_police_corruption/24446553.html, leading to investigations of the policemen shown in the video.