Ethics for the Prevention of Corruption in Turkey

Contract Ref No: TR0601.08/001

<u>Final Report</u>

1 December 2007 to 30 November 2009

THE ETHICAL WAY

This project is funded by the European Union and implemented by the Council of Europe with the cooperation of the Council of Ethics for Public Service

Contribution Data Summary
Final Report to the European Commission

Assisted Country: Turkey

Assisted Programme: Judiciary and Fundamental Rights

Title of Action: Ethics for the Prevention of Corruption in Turkey

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Final Report Date: 15 February 2010

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CFCU	Central Finance and Contracts Unit
CoE	Council of Europe
EC	European Commission
EU	European Union
MOI	Ministry of Interior
MOJ	Ministry of Justice
MOU	Memorandum of Understanding
NGO	Non-Governmental Organizations
OECD	Organization for Economic Co-operation and Development
PCA	Project Cooperation Agreement
TOR	Terms of Reference
TOT	Training of Trainers

1. INTRODUCTION

1.1   Title of Project
Ethics for the Prevention of Corruption in Turkey

1.2   Location of Action
Turkey

1.3   Contract Ref. Number
TR0601.08/001

1.4   Total Value of the Grant
1.350.000 Euro

1.5   Start and End date of the Reporting Period
1 December 2007 – 30 November 2009

1.6   Name of Grant and Programme Beneficiary

Grant Beneficiary - Council of Europe
Main Programme Beneficiary- Council of Ethics for the Public Service

Contact 1	**Contact 2**
Corruption and Fraud Unit	Council of Ethics for the Public Service
Economic Crime Division	Başbakanlık Yeni Bina (DPT Binası)
Directorate of Co-operation (DGHL)	Necatibey Caddesi No:108 Kat:1
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www.coe.int/tyec	www.kamuetik.gov.tr

1.7   **Name of Partner(s) in the Action**
Council of Ethics for the Public Service

1.8   **Target Groups**
Public institutions responsible for applying Regulation on the Principles of Ethical Behaviour of Public Officials (13 April 2005) including the ethic commissions of central institutions as well as governors and deputy governors

1.9   **Final beneficiaries**
All public institutions and the public at large

1.10   **Contracting Authority**
Central Finance and Contracts Unit (CFCU)

1.11   **Implementing Organisation**
Council of Europe, the Economic Crime Division of the Directorate of Cooperation of the Directorate General of Human Rights and Legal Affairs

1.12   **Project Objective**
Overall objective: To contribute to the prevention of corruption in Turkey in accordance with European and other international standards

Specific objective: To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials

2. DESCRIPTION OF ACTION

2.1   Project Context

2.2.1   Corruption in Turkey

The project was intended to contribute to the prevention of corruption in Turkey in accordance with European and other international standards through the implementation and extension of the code of conduct (the Regulation of the Council of Ethics for Public Service), and the development of anti-corruption measures. The project context was one of a perceived worsening of levels of corruption in Turkey and the recommendations of various international agencies on what could be done to improve the situation. There was, and is, no doubt that corruption is a continuing and pervasive presence, with little evidence that it is diminishing. Indeed, what evidence there is - of any consistency in terms of perceptions of corruption, domestically and internationally - suggest that corruption continues to be embedded in the political and administrative structures. In 2008, and in previous years, the report from the European Commission essentially summarised the internal and external perceptions on corruption in Turkey in stating that 'the overall assessment was that there had been limited progress in the area of anti-corruption with corruption remaining a widespread issue'.[1]

2.2.2   Reviewing the Literature

One of the early activities of the project was a thorough review of the quantitative surveys, the practitioner reports and academic studies. The review – the Background Review to the Corruption Report – noted that many of the surveys, reviews, and evaluations, usually involving external agencies, only have a basic understanding of the laws, institutions and reform process in Turkey. The question of detailed local knowledge, and a lack of understanding of the workings of Turkish political and administrative institutions, laws and procedures and how they work raise issues about the credibility and relevance of authority of some of the reviews' conclusions and recommendations. The Background Review and the Systems Study sought to counter this by undertaking a thorough review of laws, institutions and procedures – both through desk work and by interviews – so that the Corruption Report was fully conversant with them. Both the Study and the Report were thus able to make recommendations relevant to the emerging approach to the new Anti-corruption Strategy.

Nevertheless, the reviews themselves, and work of the Background Review, helped the project by identifying a number of themes.

2.2.3 Themes

The first theme was that the various reviews often shared the same concerns over areas requiring reform, including parliamentary immunity, asset disclosure, party funding, poor coordination and cooperation of internal controls and audit functions, low citizen awareness and a political and public sector which do not reflect transparency and accountability. Generally they noted the slow or non-existent reform progress and the continuing problem with governmental corruption, political influence, nepotism and clientalist politics.

The second was that there was no doubt that corruption is a continuing issue. Further, the combination of the political penetration of the public sector, the nature of the state, the collectivist traditions within the public sector, the expectations of, and relationships between, the public and both politicians and public officials within a gradual shift from particularistic to universal values is extending and growing the presence of corruption. While this is not unexpected during such developmental trajectories, it comes at a time when there is significant external pressure for an organised, coherent and comprehensive response.

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[1] Commission Staff Working Document. (2008). *Turkey 2008 Progress Report Accompanying the Communication from the Commission to the European Parliament and the Council: Enlargement Strategy and Main Challenges 2008-2009 {COM(2008) 674}.* Commission of the European Communities.

Third, much of the material, from both academic and external agencies' reviews, noted that Turkey has substantial legal and institutional means to address corruption. Part of the reason that they do not appear to have significantly impacted on corruption may be, as noted above, the countervailing influences of enduring cultural traditions within the public sector, the nature of the developmental trajectory, the competing demands on and priorities of government, and the question of ownership of the reform process. Here a number of the reviews note the absence of an overall strategy and what a number of articles and reviews describe as the coordination, communication and connectedness between existing institutions involved in whole or in part in addressing corruption.

Fourth was the issue of how this should be addressed. The material does reflect some clear divergences as to whether, firstly, there was a question of culture to be addressed and, secondly, whether the focus should be on better working between institutions, the introduction of new institutions, or a permutation of these. There are, as the first theme noted, a number of areas where current procedures and/or institutions are not working, or where developing areas (such as party funding) require a response that goes beyond existing arrangements. The divergences become apparent – and problematic – when they move toward a template approach rather than acknowledge the roles or potential of existing institutions or consider how they may be enhanced or reconfigured. The project, on the other hand, sought to identify current strengths, weaknesses or absences in the institutional landscape and make practical and relevant recommendations under Output 7 and 8 to address the work of the project.

The project response was to take cognisance of this issue from the start, realising that the two areas – culture and institutions – had to be addressed together. The question of culture was on the one hand a new issue but with cross-public sector implications. Its response was to provide both a general framework – the ethical environment – and specific approach – the ethics training – under Output 3. This was then developed within the Council of Ethics for Public Service as a central source and disseminated across ministries (Outputs 2, 4 and 5). The need for joined-up work between the Council and the ministries was also part of the approach to the second question. The project sought to identify current strengths, weaknesses or absences in the institutional landscape and make practical and relevant recommendations under Output 7 and 8 to address the wider anti-corruption approach.

2.2 Project Proposal

2.2.1 The Project

The project was funded by the EU. The primary beneficiary institution of the project was the Council of Ethics for Public Service. The Council of Europe was responsible for the implementation of the project and the use of the project funds from the European Commission. Within the Secretariat of the Council of Europe in Strasbourg, the Economic Crime Division (Directorate of Human Rights and Legal Affairs) was responsible for the overall administrative project management and supervision. Within the overall project objective, the project proposal (see Annex 1) identified9 outputs:

1. The staff of the Council of Ethics for Public Service is trained and have the necessary working tools and procedures to better exercise their mandate
2. A training package/module is available to support the application of the code of ethics for public officials
3. Train the trainers programme is available at least 10 trainers have been trained and are able to deliver ethics training.
4. The governors, deputy governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials
5. Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials
6. At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public
7. The development of codes of conduct for elected office holders and the judiciary will have been supported
8. The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available
9. Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured

The project proposal also identified 3 over-arching assumptions and 12 risks:

2.2.2 Key Assumptions

The project derived from a number of recommendations, some specific, to address corruption from the preventative perspective ranging from ethic training to progressing a national anti-corruption strategy. There were three assumptions in the project specification:

1. To deliver the project objective of embedding the code of ethics across the public, the Council of Ethics will require both, strategic and operational independence as well as appropriate staffing and resourcing to ensure sustainable capacity-building;
2. Within the requirements outlined above, the role of ethics commissions integrated with that of the Council of Ethics, and the development of a cross-public sector training capacity, as well as the implementation of intra-institution cascade training will require intensive work and negotiation during the time-frame of the project;
3. The progression and development of a national anti-corruption strategy will require the involvement of a range of stakeholders and the support of the government to ensure that the work to date is translated into an effective, on-going strategy with clear milestones, realistic outputs and agreed performance measures.

2.2.3 Key Risks

The project Inception report identified a number of risks associated with the activities and outputs as follows:

The Council of Ethics for Public Service [Output 1]

1. The major risk is that the Government does not provide the necessary resources, including staffing, with the consequence that the Council of Ethics for Public Service fails to address a raising work load and attracts

adverse criticism. A secondary concern is that any trained Secretariat staff leave the Council of Ethics for Public Service in a short period, diluting the capacity of the Council of Ethics for Public Service and the transfer of knowledge and expertise.

Training Materials [Output 2]

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

Training [Outputs 3-5]

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

4. One risk noted above is that not all the identified public officials will attend the programme. An equally important risk is that senior managers do not take on the responsibility of ensuring at a number of their staff are trained as ethics trainers to cascade the training within their organisations and do not incorporate ethics training into induction programmes for new recruits or into continuing staff development programmes. A longer-term risk is that the project does not provide the rationale for public sector institutions and the Council of Ethics for Public Service to work more closely together to raise ethics awareness across the public sector.

Research [Output 6]

5. there are insufficient bids of applied quality for the totality of the studies proposed;

6. the studies are not submitted on time to be of use to the work of the project; and,

7. the quality of the submitted work is of insufficient standard to be of use to the work of the project.

Codes for the Legislature and Judiciary [Output 7]

8. The clear risk is that the Legislature and senior members of the judiciary are reluctant to participate because there is a concern over external interference or because neither or both institutions reject the idea of codes and associated procedures, including sanctions.

Measures in Support of an Anti-Corruption Strategy [Outputs 8-9]

9. The government is reluctant to accept the need for a new review and a further strategy over and above the work completed in 2000-2.

10. The risk is that the technical commission will be reluctant to accept the involvement of the project in its work and will retain sole ownership for the development of a strategy tom itself.

11. Key stakeholders will be reluctant to participate in the work of the project insofar as it relates to this sub-component.

12. The meetings are too far apart to allow effective progress within the life of the project and that the meetings are formal rather than substantive.

The implications of the assumptions, and the management of risk, during the project and how they were addressed are reported on in Section 5.

2.3   Revising the Workplan

Progress on the project implementation, as well as addressing the initial assumptions and risks, resulted in a number of revisions to the original Workplan (see Annex 2) on the following grounds:

- Council of Ethics for Public Service (Output 1): the number of staff and the process of inquiries into breaches of the Regulation did not justify all the outputs under Activity 1.2 and Activity 1.3. Consequently one conference and one training session were deleted from the project delivery;

- Training (Output 2): the international STE proposed that the training programme be undertaken within the context of a training strategy for public sector institutions and the development of an ethical environment. He also proposed that more trainers be trained. Output was itself expanded and a new Activity was added – the development of a training strategy and an ethical environment (provided by the Implementation Guide)

- Training (Output 3); the international STE recommended that, given the scale of the public sector, more trainers should be trained, and the training should be assessed through a training exercise. This was introduced under Activity 3.1 and 3.3.

- Training Delivery (Outputs 4 and 5): to maximise use of resources and clarify the target audience for the training, the number of venues was coordinated to 10 and the audience were proposed as senior public officials in central ministries, governors and deputy governors, and members of Ethics Commissions.

- Anti-corruption strategies (Outputs 8 and 9): initial work under Activity 8.1 quickly established that neither the Technical Commission nor the Inter-ministerial Commission existed (nor had they been in existence since 2004). The work relating to the Output – Activity 9.2: Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey - was proposed to be undertaken during the work for Output 8.

The original and revised workplan are shown as follows, with the main changes highlighted:

ORIGINAL WORKPLAN			REVISED WORKPLAN	
Output 1:	The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate		**Output 1:**	The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate
Activity 1.1	Review of the working procedures of the Council of Ethics of Public Officials and its secretariat: Submission of proposals and recommendations for the improvement.		**Activity 1.1**	Review of the working procedures of the Council of Ethics of Public Officials and its secretariat: Submission of proposals and recommendations for the improvement.
Activity 1.2	Training of the secretariat of the Ethics Council on the management of complaints received and implementation of Ethics Principles in line with international standards		**Activity 1.2**	Training of the secretariat of the Ethics Council on the management of complaints received and implementation of Ethics Principles in line with international standards
Activity 1.3	Train the staff of the Ethics Council in the investigation of complaints		**Activity 1.3**	Train the staff of the Ethics Council in the investigation of complaints

Activity 1.4	Study visits of members and the staff of the Ethics Council to study the experience of similar bodies in other European Union countries		**Activity 1.4**	Study visits of members and the staff of the Ethics Council to study the experience of similar bodies in other European Union countries
Output 2:	A training package is available to support the application of the code of ethics for public officials		**Output 2:**	A training strategy is developed through consultations with ministries to sustain and consolidate the implementation of the training package and embed its use beyond the work of the project A training package is available to support the application of the code of ethics for public officials
Activity 2.1	Provision and dissemination of materials on training for ethics and on international standards and tools on enhancement of ethics from other countries		**Activity 2.1**	Provision and dissemination of materials on training for ethics and on international standards and tools on enhancement of ethics from other countries
Activity 2.2	Develop a coherent training package and curriculum for ethics training based on the provisions of the Code of Ethics		**Activity 2.2**	Develop a coherent training package and curriculum for ethics training based on the provisions of the Code of Ethics
Activity 2.3	Finalise the training package and make it available to different institutions for in-service training		**Activity 2.3**	Undertake training strategy
Activity 2.4	Make available a CD suitable for computer-based training		**Activity 2.4**	Make available a CD suitable for computer-based training
Output 3:	At least 10 trainers have been trained and are able to deliver ethics training		**Output 3:**	At least 110 trainers have been trained and are able to deliver ethics training
Activity 3.1	Select 10 to 15 trainers from training institutions of the public administration		**Activity 3.1**	Select up to 110 trainers from training institutions of the public administration
Activity 3.2	Train the trainers in the application of the training package of the "Code of Ethics"		**Activity 3.2**	Train the trainers in the application of the training package of the "Code of Ethics"
Activity 3.3	Trainers Initiate the preparation for the delivery of the initial training activities (under outputs 4 and 5)		**Activity 3.3**	Trainer of trainers pilot exercise
			Activity 3.4	Trainers Initiate the preparation for the delivery of the initial training activities (under outputs 4 and 5)
Output 4:	The governors, deputy governors, district governors and members of ethics commissions of the 81 provinces		**Output 4:**	The governors, deputy governors, district governors and members of Ethics Commissions of the 81

	have been trained in the application of the code of ethics for public officials			provinces have been trained in the application of the code of ethics for public officials
Activity 4.1	Organise up to 10 training events for **governors, deputy governors,** and **district governors,** on the application of the Code of Ethics and implementation aspects of complaining procedures.		**Activity 4.1**	Organise up to 10 training events for **governors, deputy governors,** and **district governors,** on the application of the Code of Ethics and implementation aspects of complaining procedures.
Activity 4.2	Organise up to 15 training events for members of **ethics commissions** in <u>provinces</u> and <u>municipalities</u> on the application of the Code of Ethics and implementation aspects of complaining procedures		**Activity 4.2**	Organise up to 10 training events for members of **Ethics Commissions** in <u>provinces</u> and <u>municipalities</u> on the application of the Code of Ethics and implementation aspects of complaining procedures
Output 5:	Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials		**Output 5:**	Officials of central institutions and organisations responsible for ethics (members of the Ethics Commissions and senior managers) have been trained in the application of the code of ethics for public officials
Activity 5.1	Organise up to 6 training events for **members of ethics commissions** and officials <u>responsible for in-service training in different institutions</u> of the public administration		**Activity 5.1**	Organise up to 6 training events for **members of Ethics Commissions** ~~and officials responsible for in-service training in different institutions~~ of the public administration
Activity 5.2	Organise up to 4 training events for **senior officials of central level institutions** of the public administration (<u>under secretary, general director, president, general secretary and deputy general secretary levels</u>)		**Activity 5.2**	Organise up to 4 training events for **senior officials of central level institutions** of the public administration (<u>under secretary, general director, president, general secretary and deputy general secretary levels</u>)
Output 6:	At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public		**Output 6:**	At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public
Activity 6.1	Initiate the identification of subject matter preparation and of the TORs for at least 10 research studies on <u>ethics issues and corruption</u> in general.		**Activity 6.1**	Initiate the identification of subject matter preparation and of the TORs for at least 10 research studies on <u>ethics issues and corruption</u> in general.
Activity 6.2	Organise the publication of the results of these studies		**Activity 6.2**	Organise the publication of the results of these studies
Activity 6.3	Support the Ethics Council in the organisation of up to 2 public workshops on the results of these studies		**Activity 6.3**	Support the Ethics Council in the organisation of up to 2 public workshops on the results of these studies

Output 7:	The development of codes of conduct for elected office holders and the judiciary will have been supported		Output 7:	The development of codes of conduct for elected office holders and the judiciary will have been supported
Activity 7.1	Organise **workshops on codes of conduct** for <u>elected office holders</u> and the <u>judiciary</u> to identify possibilities for the development of such codes		Activity 7.1	Organise **workshops on codes of conduct** for <u>elected office holders</u> and the <u>judiciary</u> to identify possibilities for the development of such codes
Activity 7.2	Support the review and drafting sessions of identified Codes of Conduct for elected office holders through workshops and direct technical advice		Activity 7.2	Support the review and drafting sessions of identified Codes of Conduct for elected office holders through workshops and direct technical advice
Output 8:	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available		Output 8:	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available and Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured.
Activity 8.1	Carry out system studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics		Activity 8.1	Carry out system studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics
Activity 8.2	Submission of Proposals on specific Anti-corruption measures based on the Study Outcomes		Activity 8.2	Submission of Proposals on specific Anti-corruption measures based on the Study Outcomes
Activity 8.3	Organise up to 2 national conferences on the prevention of corruption in Turkey		Activity 8.3	Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey
			Activity 8.4	Organise up to 2 national conferences on the prevention of corruption in Turkey
Output 9:	Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured		~~Output 9:~~	~~Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured~~ (merged with output 8)
Activity 9.1	Support the organisation of regular meetings (once every six months) with the technical commission assisting the Inter-ministerial Anti-corruption Commission		~~Activity 9.1~~	~~Support the organisation of regular meetings (once every six months) with the technical commission assisting the Inter-ministerial Anti-corruption Commission~~
Activity 9.2	Develop proposals for improved management, coordination and		~~Activity 9.2~~	~~Develop proposals for improved management, coordination and~~

	monitoring of anti-corruption strategies in Turkey			monitoring of anti-corruption strategies in Turkey

The revisions were approved in June 2008 by the Steering Committee. Subsequently, a further revision was made to include more training of trainers within Output 3. The revised Workplan – see Annex II – was then implemented; the results are discussed in the next Section.

3. IMPLEMENTING THE PROJECT: ACTIVITIES, INDICATORS AND ACTIVITY INTERVENTIONS /OUTCOMES

In terms of project delivery, nearly every Activity and Output was achieved as follows:

3.1   Inception and Start-Up Engagement

The Inception phase involved the establishment of the project team, and the reporting and management arrangements. A project initiation mission was undertaken in December 2007 to discuss the project outputs and activities.

Three start-up workshops were held on 21, 23 and 24 January 2008 with participants from central and local institutions, civil society and professional organisations, and media and academics working on ethics.

The project's launching conference was organized on 7 February 2008 with over 100 representatives of line Ministries, different groups of civil society, media, international organizations and Embassies. The conference addressed the final draft of the workplan which was adopted by all participants.

The Long Term Advisor began work on 1 March 2008. Reporting arrangements and a project implementation timetable were agreed. In addition a section within the Council of Europe/Economic Crime Division website is exclusively dedicated to the TYEC Project: www.coe.int/tyec. The beneficiary institution Council of Ethics for the Public Service designated a special section for the project within its website: www.kamuetik.gov.tr.

3.2   Outputs/Activities

Output 1 - The staff of the Council of Ethics is trained and has the necessary working tools and procedures to better exercise their mandate

Activity 1.1	Review the working procedures of the Council of Ethics for the Public Service and its secretariat and make and implement proposals for improvement

Stated and Achieved Indicators and Activity Interventions

- Round Table Discussion No. 1 on reviewing issues of concern and current status of the working procedures of the Ethics Council.
- Round Table Discussion No. 2 on the Technical Paper on Recommendations and Proposals on the improvement of the working procedures of the Ethics Council.

On 13 March 2008 Round Table discussion no. 1 was held on reviewing issues of concern and current status of the working procedures of the Council of Ethics for Public Service, with the participation of Board Members, Secretariat and academicians. The participants agreed that there should be a strategic planning paper for the Council of Ethics for Public Service and that the role between disciplinary boards, inspection boards and Ethics Commissions (a 3-person committee set up in each ministry at the request of the Council of Ethics for Public Service under the Regulation governing its work) should be defined.

Later, the Long Term Advisor prepared 2 further Technical Papers - on the future work of the Council of Ethics for Public Service and a Review of the Code [*Technical paper: options for the council of ethics for public service as the national prevention of corruption council; Technical paper: Revising the code and institutional responsibilities*].

On 13 May 2008 Round Table Discussion no. 2 was held, where an international STE presented his report to the Council of Ethics for Public Service, based on the options outlined in the preceding 2 Technical Papers [*Working paper: institutional capacity review and plan*].

Activity 1.2	Train the staff of the secretariat in the management of the Ethics Council on the management of complaints received and implementation of Ethics Principles in line with international standards.

Stated and Achieved Indicators and Activity Interventions

- Training Conference on the "International Standards on the Principles of Ethics" for Ethics Council and Government authorities

At the onset of the project, it was quickly established that the Council of Ethics for Public Service had limited investigative capability (its existing work focussed more on fact-finding) and had a small number of staff (all of whom were secondees and unlikely to remain with the Council of Ethics for Public Service for any significant period of time). Thus, while a limited amount of guidance on investigations (as opposed to training in investigations) was given – see Activity 1.3 – it was decided to use the output of this Activity – an international conference – to assess current deficiencies within the Turkish ethical framework and to present some other European approaches.

On 27 May 2008 the international conference was held and was addressed by a State Minister and Deputy Prime Minister. The conference included:

Ms. Sumru Noyan, Ambassadress at Large and former Deputy Executive Director UNODC Office in Vienna, on the UN Convention against Corruption;
Mr. Timo Moilanen, University of Helsinki, Finland, on his report for the Finnish Ministry of Finance on the ethics framework in EU member states;
Mr. Gary Hickey, Research and Policy Manager, Standards Board for England (which is responsible for a code of conduct at local level), on the work of his agency implementing ethics in practice;
Ms. Diana Kurpniece, Head of Public Relations and Education Division, Corruption Prevention and Combating Bureau (KNAB), Latvia, on delivering its three areas of responsibility (investigation, prevention and awareness).

Activity 1.3	Train the staff of Ethics Council in the investigation of complaints

Stated and Achieved Indicators and Activity Interventions

- Training Session No. 1 on "Investigation of Complaints" for the secretariat of the Ethics Council—Certificate of Training
- Training Session No. 2 on "Investigation of Complaints" for the secretariat of the Ethics Council—Certificate of Training

As noted above, the Council of Ethics for Public Service had limited investigative capability. In April 2008, the Long Term Advisor prepared a manual on the receipt and management of complaints - *Working paper: Complaints - guide to possible inquiry procedures*. On 5 June 2008, the Long Term Advisor held a seminar for members of the secretariat on the manual and the procedures that should be followed by the Council of Ethics for Public Service when receiving a complaint and undertaking an inquiry.

Stated and Achieved Indicators and Activity Interventions – Not Delivered

Training Session No 2 was not delivered because of lack of capacity and staff numbers within Council and no certificates were issued on the grounds that no practitioner training took place.

Activity 1.4	Support and organise 2 study visits of staff of the Council of Ethics to study the experience of similar bodies in other European Union countries (i.e., Ireland and the Netherlands)

Stated and Achieved Indicators and Activity Interventions

- Five Days Study Visit No. 1 to an EU counterpart institution (10 Persons) Five Days Study Visit No. 2 to an EU counterpart institution (10 Persons)
- Five Days Study Visit No. 2 to an EU counterpart institution (10 Persons)

The first study visit of the project took place in Dublin between 9 and 13 June 2008. Within the context of a review of the working procedures of the Council of Ethics for Public Service, the possible focus of the Council's work and the relationship with the Ethics Commissions, it was felt that four EU institutions - the UK Audit Commission, the UK Committee on Standards in Public Life, the Standards Board for England and the Irish Government's Standards in Public Office Commission – could potentially offer the Council of Ethics for Public Service perspectives that would help determine future directions or improve its work. For ease of organization, the visit was located in Dublin and the UK institutions were invited there. The presentations during the week discussed the range of issues, from monitoring to investigations, and how some incorporated an ethical dimension within their other work (for example, audit work).

The study visit took place in the Netherlands between 28 September and 2 October 2009. The purpose of the second study tour was to take forward issues from the first study visit by focusing less on investigation and more on prevention, the ethical environment and the possible roles of Ethics Commissions within ministries and other public organisations. The Dutch National Integrity Office (NIO), an agency of the Ministry for the Interior and Kingdom Relations, which coordinates and promotes integrity for the public sector in the Netherlands, was identified as a relevant institution in this context. The NIO was set up to help government organisations improve integrity policies. The main aim of the NIO Office is to improve the learning skills of organisations so as to enable them to shape their own ethics and integrity policies. To do this, the NIO fulfils three tasks: the promotion and support of ethics and integrity policies; the collection, dissemination and exchange of knowledge; and the development of integrity instruments.

In this second study visit, the development of the public ethics in the Netherlands was evaluated in terms of the focus on the public official and the role of the range of agencies with responsibility for ethics issues. In addition the role of the State Audit and the Ombudsman, the coordinating role of the NIO, as a small institution, with the Ministries and other public institutions, the use of dilemma training and how ministries and municipalities received the formation of the ethical environment in practice were evaluated. Overall, the study visit especially highlighted how to develop the relations between Council of Ethics for Public Service and Ethics Commissions.

Availability of funding allowed up to 20 persons to attend each visit, which therefore included members of the Council, members of the Secretariat and, for the second visit, staff from ministries.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 1 were as follows:

INDICATORS	DELIVERY
▪ Number of meetings held by the Council of Ethics	▪ The Council continued to hold its regular meetings, participate in the training events under Outputs 4 and 5, and participate in the Study Visits. 2 meetings were held with the Council to discuss the project; regular meetings were held with the Chair of the Council
▪ Number of complaints treated and investigations completed	▪ The number of complaints has approximately doubled from around 70 a year and 5 decisions have been published in 2009 (none had been published since the establishment of the Council in 2004). 20 more are

	under consideration
▪ Quality of work plan ▪ Development of procedures manual ▪ Quality of reports prepared by the Council of Ethics	▪ The project workplan was successfully revised ▪ A procedures manual was prepared ▪ The quality of Council reports was improved by the use of seconded Inspectors

Output 2 - A training package/module is available to support the application of the Code of Ethics for Public Officials

Activity 2.1	Translate and review materials on ethics training available in other countries on training for ethics and on international standards and tools on enhancement of ethics

Stated and Achieved Indicators and Activity Interventions

- Review, Translation of models and good practices that exist in other European countries on training for ethics and on international standards and tools on enhancement of ethics
- Dissemination and Introduction of the materials for the Ethics Committees

The collection, collation and review of ethic training material and Training of Trainers material, including material from Canada, OECD, Australia, United Kingdom, UNPAN, and USA were carried out. The comprehensive package approach of the Public Standards Commission of the State of Victoria, Australia (with CD-Rom based guidance to managers, participants and Trainers, the use of practitioner case studies) was considered as the most suitable approach to emulate. Permission was obtained from the Commissioner to adapt the material for the Turkish context. An international STE developed training materials and a training strategy; a national STE prepared new materials and assisted in adapting the training materials for the Turkish context. The material was then prepared for use for training.

Activity 2.2	Develop a coherent training package/curriculum for ethics training based on the provisions of the Code of Ethics

Stated and Achieved Indicators and Activity Interventions

- Working and Consulting Sessions between the Ethics Council/ Secretariat and Experts on assessment and drafting of the training package and of the curriculum for ethics training based on the Code of Ethics and for the public officials, including professional editing of translated material.

Working and consulting sessions between the Council of Ethics for Public Service and domestic and international experts on assessment and drafting of the training package and of the curriculum for ethics training based on the Code of Ethics and for the public officials, including specially-designed case studies and the professional editing of translated material took place continuously during 2008 and 2009.

During the process of developing training materials, an international STE identified a number of key issues relating to the planned delivery of the project. Some concerned the need to redesign work under Activities 2.2 and 2.3. Others related to the need to develop a coordinated and coherent training strategy to embed the training within ministries and to ensure the sustainability of the training beyond the life of the project. He developed a report - The Training Strategy – which was intended to encourage ministries, through their ethics commissions, to cascade the ethics training and to develop other procedures and activities that sustain the purpose of the training.

The document was translated into Turkish and circulated to the proposed trainers and ethics commissions in September 2008.

The international STE's report and its recommendations were submitted to the Steering Committee meeting in June 2008. It proposed changes to the training schedule (including pilot training), visits in October by the international expert to a number of ministries to meet with their ethics commissions and personnel departments to discuss the implementation of the strategy, an ethics training conference in early November 2008 to launch the training, and the possibility of extending the training programme to ensure that a larger pool of trainers were available both for the work of the Council of Ethics for Public Service and to support cascade training within ministries.

| Activity 2.3 | Undertake training strategy |

Stated and Achieved Indicators and Activity Interventions

- Report on training strategy

The Training Strategy was included in the Implementation Guide. This provides guidance to public sector organisations on how to prepare their organisation for the Ethics Training Programme by ensuring that it connects directly with, and highlights the key ethical issues faced by organisation. Most importantly it also includes recommendations on how to consolidate ethical principles and conduct within the organisation following the training event (this is discussed in more detail in Section 5).

Stated and Achieved Indicators and Activity Interventions – Not Delivered

Under the revised Workplan, Activity 2.3 also included a proposal for a Training Conference on the "Training Strategy and Training Package". This was not delivered because of the lack of time during the availability of the international STE and the need to focus on completion of training material and case studies. This was replaced by an Ethics Training Day on 17 December, 2008 (see Activity 3.4 below).

| Activity 2.4 | Finalise the training package and make it available to different institutions for in-service training |

Stated and Achieved Indicators and Activity Interventions

- Following a testing of the training package (under Output 3.3)—hold a consulting table on the lesson learned and issues of concern coming out of the testing of package and trainings and conduct the last revisions to the Training Package

After the training activities and visits to ministries in October 2008, a revised Training Strategy report was submitted. As part of the revised training strategy, on 6 November 2008, a meeting was held with the first group of trainers to review and evaluate material, followed by, under Activity 3.3 (below), a pilot training exercise with an audience from training and personnel departments (12-13 November 2008). The purpose was to review the training material after use in practice. A further meeting was held with the Turkish short-term expert to re-consider the case studies and set out a final review which was completed by April 2009. At this time, the final product was confirmed as follows:

- **The Trainer's Guide:** which provides all the information a Trainer will need to know to run a training event on ethics within a public service organisation in Turkey. The step-by-step Guide covers background reading on ethics and decision-making, general information on the facilitation of learning and training, practical information on planning, administering, delivering and following a training event. It also contains a number of case studies or case studies illustrating the ethical dilemmas that any Turkish public official

might face, advice on how to apply the values and principles of the law and regulations on ethics when making professional decisions and speaker notes for direct use at the training event.

- **The Training Event:** all materials, including training administration, training delivery, case studies, guidance notes, and PPT presentation, were packaged around the Event which focuses on the different viewpoints that may exist within any decision made by a public official: the decision-maker, the recipient of the decision and the decision-maker's organisation. This multi-perspective approach is set up to directly challenge the premise that every decision is a straightforward choice between "black and white". This approach views different decisions as occupying points on a "grey scale", with no single one totally right or wrong, black or white, when judged from different perspectives. This allows participants to understand that people can view the same situation differently depending on their perspective. They thus gain a greater understanding of how others may view their actions but also how to see a situation from another's perspective. It also gives them experience in distinguishing between personal and organisational values and when each applies in decision making. This develops their skills in making ethical decisions by considering all relevant information and any existing legislation and rules.

- **The Implementation Guide** (see above, Activity 2.3)

- **An Ethics Reminder:** a booklet providing key facts and tips on the ethical values and principles of the Turkish public service and practical tips on everyday activities that can guide conduct.

The training material was both adapted from the material used with permission by the Victoria State, Australia, Public Standards Commissioner and developed from new by local short-term experts.

Activity 2.5	Make available a CD suitable for computer-based training

Stated and Achieved Indicators and Activity Interventions

- Hard copies of Implementation Guide and Trainers Guide, and CD-Rom completed and disseminated.

The 2 Guides are now available in hard copy; all the material, including the Guides, are available on CD-Rom. They have been disseminated.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 2 were as follows:

INDICATORS	DELIVERY
▪ The draft training package is available by month 6	▪ The draft training package was available by month 12 (because of the complexities in developing and reviewing the material)
▪ A training strategy is developed and is available by month 10	▪ A training strategy is developed and is available by month 12
▪ The final training package is available by month 10 and the training CD by month 12	▪ The final training package is available by month 12 and the training CD by month 20
▪ Training conference to launch strategy and training package held in month 10	▪ The Training conference was not held (see above)
▪ Quality of the training package	▪ The training package was reviewed by both international and national consultants with experience in adult training; the package was also reviewed after comments from the first group of trained trainers. It is based on material already recognised for its quality and adaptability
▪ Project reports	▪ Project reports were issued

Output 3 - Train the trainers programme is available (at least 75 trainers have been trained and are able to deliver ethics training)

Activity 3.1   Select up to 110* trainers from training institutions of the public administration

(*the original figure was amended upward from 10/15 to 75, 85 and finally to 110)

Stated and Achieved Indicators and Activity Interventions

- Conduct consulting and information sessions with the relevant public administration training institutions to identify and assess 85 potential trainers. Initiate a protocol or MOU with respective institutions prior to the selection and training of the trainers (85 was the figure agreed by the Steering Committee; availability of funds and demand for training toward the end of the project added a further 25 trainers trained).

A description of the requirements for the first set of potential trainers (those to be involved in delivering Outputs 4 and 5) was developed and circulated by the Council of Ethics for Public Service in April 2008 to some 25 central government ministries and a further 15 public bodies. Applications were returned by the end of May 2008 and have been assessed.

A circular calling for the first set of trainers from ministries was sent out in June 2008. The Council of Ethics for Public Service reviewed the applications and selected 14 candidates to be trained (in addition to 5 from the Council secretariat). A further 6 were later added. Same procedures were applied for the second and third round trainers' selection.

Activity 3.2   Train the trainers in the application of the training package of the "Code of Ethics"

Stated and Achieved Indicators and Activity Interventions

- Train the Trainers Workshops1 on "Application of Code of Ethics" for 85 trainers

The first set of selected trainers for training were called to a meeting on 25 August 2008, where the training programme and timetable were discussed. In a post-meeting circular, trainers were informed that the training is a major part of the ethics project with the Council of Europe and is intended to:

- support the Council of Ethics for Public Service training programme for senior national, regional and local public officials between November 2008 and October 2009;
- use the trainers to work with their ministry ethics commission to set up a training strategy;
- assist the Council of Ethics deliver a national training programme;

For the first set of 25 trainers (who would be responsible for delivering Outputs 4 and 5) a training programme had been carried out as follows:

- 24 September 2008– meeting to receive training and ethics material
- 20-24 October 2008 – training of trainers
- 27-28 October 2008 – training with ethics material
- 30-31 October 2008 – test pilot training exercise
- 29 October/4-5 November 2008 – optional review of materials with trainers
- 12-13 November 2008- pilot training exercise with participants from training and personnel departments.

The training, as with subsequent training, was delivered by a team from the University of Ankara specialising in adult learning, led by Professor Inayet Aydın, who was also responsible for drafting material for the Training Programme under Output 2.

An additional 60 trainers were identified after ministries were contacted by the Council for Ethics in Public service in December 2008 and January 2009. 2 training programmes were devised for February, March and April 2009 as follows:

- 1-3 April 2009– training of 30 new trainers
- 6-10 April 2009– training of 30 new trainers
- 20-21 April 2009– practice training events for 60 new trainers

Following requests from ministries and offices outside Ankara during the delivery of Output 4, the proposal that the original 25 trainers be trained in training trainers themselves was replaced by one further training programme:

- 5-9 October 2009 – training of 25 new trainers

In total, under Activity 3.2 a number of 110 trainers have been trained.

Activity 3.3   Trainer of trainers pilot exercise

Stated and Achieved Indicators and Activity Interventions

- Training Exercises and evaluation of trainers and participants and revisions to training material

To ensure that the first set of trainers were familiar both with the material and with the techniques to be used, a training exercise was undertaken on 12-13 November 2008 in which various trainers worked together to deliver parts of training event and then received a commentary throughout the two days on the delivery techniques and use of materials. Apart from the importance of practice in delivery methods, the main theme was to be more familiar with the main concepts and issues underpinning ethics. This was covered by a further training day (see Activity 3.4 below)

Activity 3.4   Trainers initiate the preparation for the delivery of the initial training activities (under Outputs 4 and 5)

Stated and Achieved Indicators and Activity Interventions

- Consulting and drafting sessions in support the newly trained trainers in the preparation and design of the initial training, curricula and training methodology and tools prior to actions that are planned to be taken under Output 4 and Output 5. (Trainers involved in delivery of Output 4 and Output 5).

The first set of 25 trainers identified as those to deliver the training under Outputs 4 and 5 were involved in the review of the training and training material (see Activity 3.3 above). At their request, an additional training day on the concept of public ethics was delivered on 17 December 2008. The programme was as follows:

The Changing Ethical Context in Turkey and Issues Relating to Corruption- Prof. Dr. Umit Berkman (Bilkent University);

The Law and Procedures and Why Ethical Issues Emerge – Doc. Dr. Ugur Omurgonulsen (Hacettepe University);

The Role and Purpose of Public Ethics- Prof. Dr. Omer Faruk Genckaya (Bilkent University);

Public Ethics in Practice- Prof. Dr Inayet Aydin (Ankara University);

The Differences between Public and Private Sector Ethics and What the Public Sector May Learn From the Private Sector- Doc. Dr.Semra Ascigil (Middle East Technical University)

The presentations – paper, PPT and a video of the proceedings – were included in the Training CD-Rom. As well as being involved in practice delivery exercises, the trainers were debriefed after the first training events under Output 5 to ensure that they were involved in assessing and reviewing issues relating to delivery.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 3 were as follows:

INDICATORS	DELIVERY
▪ Quantity and quality of training activities carried out by trainers	▪ All proposed training events were delivered – see Outputs 4 and 5 –The initial training event evaluations reported high level of satisfaction with the training provided
▪ Project reports	▪ Project reports were issued
▪ Study on the effectiveness of the Code of Ethics	▪ A Study on the effectiveness of the Code of Ethics was conducted under Outputs 1 and 7
• Trainers will remain available for training activities	▪ The original group of trainers, together with trainers from the Council of Ethics for Public Service, were available for all the training events under Outputs 4 and 5

Output 4 – The governors, deputy governors, district governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials

The revised workplan agreed 10 training events under Output 4 to maximise the availability of trainers and facilitate the organisation of the events. In order to ensure the availability of the original set of trainers and to manage the delivery of training events, the dates for the delivery of Output 4 and Output 5 were reversed; the training, primarily in Ankara, under Output 5 was delivered first.

Activity 4.1	Organise up to 10 training events for governors, deputy governors, and district governors, on the application of the Code of Ethics and implementation aspects of complaining procedures

Stated and Achieved Indicators and Activity Interventions

- 10 training events held

The events under this Output around the country were delivered as follows:

Date (2009)	Location	Number of Governors, Deputy Governors and District Governors	Number of Ethics Commission members
12-13 May	Istanbul	----	35
14-15 May	Istanbul	36	---
1-2 June	Samsun	---	23
3-4 June	Samsun	27	---
22-23 June	Van	---	19
24-25 June	Van	20	---
13-14 July	Erzurum	---	19
15-16 July	Erzurum	21	---
27-28 July	Trabzon	---	21

29-30 July	Trabzon	20	---
17-18 August	Kayseri	24	---
19-20 August	Kayseri	---	27
13-14 October	Diyarbakır	---	24
15-16 October	Diyarbakır	21	---
20-21 October	Antalya	---	26
22-23 October	Antalya	25	---
10-11 November	Izmir	29	---
12-13 November	Izmir	---	31
17-18 November	Gaziantep	27	---
19-20 November	Gaziantep	---	20
Total		**250**	**245**

Activity 4.2   Organise up to 10 training events for members of Ethics Commissions in <u>provinces</u> and <u>municipalities</u> on the application of the Code of Ethics and implementation aspects of complaining procedures

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Stated and Achieved Indicators and Activity Interventions

- 10 training events held

The events were held in the same week as those for governors noted under Activity 4.1.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 4 were as follows:

INDICATORS	DELIVERY
▪ Number of training activities carried out ▪ Follow up activities by provincial officials ▪ Number of complaints received and investigated ▪ Project reports ▪ Study on the effectiveness of the Code of Ethics	▪ 10 training events were carried out ▪ The training events did not finish until November 2009; there were thus no follow up activities by provincial officials ▪ Complaints to the Council of Ethics for Public Service increased (Ethics Commissions have no legal responsibility to investigate complaints) ▪ Project reports were issued ▪ A Study on the effectiveness of the Code of Ethics was undertaken under Outputs 1 and 7

Output 5 - Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the Code of Ethics for Public Officials

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Activity 5.1   Organise up to 6 training events for members of Ethics Commissions

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Stated and Achieved Indicators and Activity Interventions

- 6 training events held

The total number of events held (all in Ankara), and the number of those receiving training, under Activity 5.1 were as follows:

- 8 January 2009 - Chairs of Ethics Commissions, Chairs of Public Bodies, Members of Ethics Commissions (20 chairs, 10 members);
- 9 January 2009 - Chairs of Ethics Commissions, Chairs of Public Bodies, Members of Ethics Commissions (21 chairs, 5 members);
- 12-13 January 2009 - Chairs and Members of Ethics Commissions (1 chair, 24 members);
- 14-15 January 2009 - Members of Ethics Commissions (28 members);
- 19-20 January 2009 - Members of Ethics Commissions (24 members);
- 21-22 January 2009 - Chairs of Ethics Commissions and Members of Public Bodies (1 chair and 12 members);
- 23 January 2009 - Chairs of Ethics Commissions and Members of Public Bodies (10 chairs and 2 members);
- 26-27 January 2009 - Members of Ethics Commissions (22 members).

Under this Activity a total number of 53 Chairs of Ethics Commissions and 107 Members of Ethics Commissions were trained.

| **Activity 5.2** | Organise up to 4 training events for senior officials of central level institutions of the public administration |

Stated and Achieved Indicators and Activity Interventions

- 4 training events held.

The training under Activity 5.2 took place in Ankara as follows:

17 March 2009 – training for senior officials (29 participants)
18 March 2009 – training for senior officials (19 participants)
19 March 2009– training for senior officials (39 participants)
20 March 2009 – training for senior officials (31 participants)

Under this Activity a total number of 118 senior public officials were trained.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 5 were as follows:

INDICATORS	DELIVERY
▪ Number of training activities carried out	▪ 10 training events were carried out
▪ Follow up activities by Ethics Commissions and senior managers	▪ The training events did not finish until November 2009; there were thus no follow up activities by provincial officials
▪ Number of complaints received and investigated	▪ Complaints to the Council of Ethics for Public Service increased (Ethics Commissions have no legal responsibility to investigate complaints)
▪ Project reports	▪ Project reports were issued
▪ Study on the effectiveness of the Code of Ethics	▪ A Study on the effectiveness of the Code of Ethics was undertaken in Outputs 1 and 7
▪ Officials from different institutions make use of the skills acquired and follow up with ethics activities in their respective institutions	▪ A number of institutions have begun to implement ethics training – see Final Corruption Report

Output 6 - At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public

Activity 6.1	Initiate the identification of subject matter preparation and of the ToRs for at least 10 research studies on ethics issues and corruption in general

Stated and Achieved Indicators and Activity Interventions

- Working Table with the Ethics Council on the Identification of the 10 Research Studies Themes and expected outcomes
- Drafting of the TORs for 10 Research Studies
- Tender Procedures for commissioning of 10 research studies to different institutions (consultancies/NGOs/Academia)

On 14 March 2008 a workshop was held on identification of the 10 research studies themes and expected outcomes. This involved the participation of Board Members of the Council of Ethics for Public Service, the secretariat and senior officials from selected public institutions. The research areas were identified as follows:

1. Conflict of Interest in Public Administration
2. Public Bidding and Ethics
3. Planning at Local Level
4. Ethical Conduct in Law Enforcement
5. Ethical Conduct in the Health Services
6. Ethical Standards and the Title/Land Registry
7. The Shadow Economy
8. Professional Associations and Ethics
9. Ethics and the Customs Services
10. Ethics, Culture, and Society

In May 2008 the Call for expressions of Interest was advertised on the Project website. On 25 July 2008 a committee considered applications for first 6 research studies. The studies which were recommended for award were as follows:

- Research Study 1: Conflict of Interest
- Research Study 3: Planning
- Research Study 4: Law Enforcement
- Research Study 6: Land Registry

28 August 2008 a meeting was held with the successful research teams and representatives of the participating ministries to discuss methodologies and timetables.

In September 2008 the remaining 6 studies were advertised in Turkish and English on the Council of Europe and the Council of Ethics for Public Service websites. In November 2008 the committee recommended 5 more research studies for award:

- Research Study 2. Public Bidding and Ethics
- Research Study 7. The Shadow Economy
- Research Study 8. Professional Associations and Ethics
- Research Study 9. Ethics and the Customs Service
- Research Study 10. Ethics, Culture, and Society

The proposed award of Research Study 5 (Health) was declined by the successful team after further discussion over the preferred methodologies proposed by the Chair of the Council of Ethics for Public Service. Discussions

on how to proceed were held in December 2008 and a suitable academic with a medical background was approached; he accepted the offer of the research study.

Activity 6.2   Organise the publication of the results of these studies

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Stated and Achieved Indicators and Activity Interventions

- Commissioning of publication and carrying of dissemination of 10 Research Studies achieved

The first four research studies were submitted, reviewed, edited and resubmitted during the first 3 months of 2009 as follows:

- Conflict of Interest - Prof. Dr. Ömer Faruk Gençkaya
- Law Enforcement and Ethics - Prof. Dr. İbrahim Cerrah
- Title / Land Registry and Ethics - Assoc. Prof. Hamza Ateş
- Planning in the Local Administrations and Ethics - Assoc. Prof. Gökçen Kilinç

The second six research studies were submitted, reviewed, edited and resubmitted between July and October 2009 as follows:

- Public Bidding and Ethic- Assoc. Prof. Arif Köktaş
- Ethics and Customs Services- Assoc. Prof. Dr. Hamza Ateş
- The Ethical Approaches, Codes of Conduct, Implementations and Internalization Level of the Public Professional Associations In Turkey - Assoc. Prof. Dr. Refika Bakoğlu Deliorman
- The Shadow Economy - Prof. Dr. Coşkun Can Aktan
- Ethical Conduct in Health Services - Prof. Dr. Haydar Sur
- Ethics, Culture and Society - Prof. Dr. Kemal Görmez

At this point they were agreed to be suitable for publication in both Turkish and English, on both the TYEC website and the Council of Ethics for Public Service website and in hard copy (2 volumes, issued in November 2009). In addition, dissemination was also achieved through two workshops – see Activity 6.3

Activity 6.3   Support the Ethics Council in the organisation of up to 2 public workshops on the results of these studies

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Stated and Achieved Indicators and Activity Interventions

- Public Workshop No 1 on the Results of the 4/10 Research Studies
- Public Workshop No 2 on the Results of other 6/10 Research Studies

On 27 May 2009 a seminar was held to discuss the findings from the first 4 research studies. The discussion was focused on why corruption, conflict of interest and other issues arise, including questions of culture, bureaucracy, and means of compliance. In the afternoon, the participants were broke into working groups to discuss the reports in more detail. Each workshop reported back on the main areas for debate.

On 8 October 2009 a second seminar was held to discuss the findings from the second 6 research studies. Again, the practitioner findings of the research were discussed in detail, with a number making relevant proposals for reform, including the role of the Council of Ethics for Public service, and with a number of studies noting the

importance of ensuring ethics is addressed from an early age, with family and education playing a significant role in setting the standards. Each workshop reported back on the main areas for debate.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 6 were as follows:

INDICATORS	DELIVERY
▪ Quantity and quality of research studies	▪ 10 research studies were completed; all were edited and revised by the LTA
▪ Number of public workshops and feedback received	▪ 2 workshops were held and feedback received
▪ Project reports	▪ Project reports were issued
▪ Contribution of the relevant authorities to the research studies and active participation into workshops;	▪ Where relevant, all ministries were involved in the research, invited to comment on the drafts and participated in both research study progress and review meetings, as well as the workshops
▪ Usage of the results of the research studies/outcomes in designing specific anti-corruption measures	▪ The results of the research studies were used in the Final Corruption Report

Output 7 - The development of codes of conduct for elected office holders and the judiciary will have been supported

Activity 7.1	Organise workshops on the needs and possibilities for developing codes of conduct for elected office holders and the judiciary: Introduction and brainstorming sessions with recommendations to what extend and scope these codes shall be developed

Stated and Achieved Indicators and Activity Interventions

- Workshop No. 1 on Code of Conducts for Elected Office Holders
- Workshop No. 2 on Code of Conducts for Judiciary members

The remit of the Council of Ethics for Public Service does not include members of the Legislature and the judiciary and nor is there any proposal that the Council of Ethics for Public Service's remit should be extended. The Output is intended to raise the issue and to support the work of those institutions in relation to their developing their own codes of conduct.

The workshops (and a conference under Activity 8.3 allocated to this Output) were held in February 2009 with relevant practitioners from the institutions concerned as follows:

16 February 2009 – Workshop on Legislative Ethics
17 February 2009 – Workshop on Judicial Ethics
18 February 2009 – Conference on Legislative and Judicial Ethics

Three international experts were contracted to prepare papers and make presentations to the workshops and conference as follows:

The workshops and conference were held on 16-18 February 2009 with the following presentations:

Workshop on Legislative Ethics, 16 February 2009, Turkish Grand National Assembly

Moderator: Prof. Dr. Burhan Kuzu, Chair, TGNA Constitution Commission
Assoc. Prof. Ömer Faruk Gençkaya - "Comparative Legislative Ethics"

John Williams, CEO, GOPAC - "International Experience on Legislative Ethics"
Stuart Gilman, Deputy Director, STAR Initiative, UNODC and World Bank - "UN Work on Legislative Ethics"
Güldal Akşit, Deputy Chair, TGNA Constitution Commission - "Legislative Ethics in Turkey"
Dr. Cüneyt Yüksel, MP - "Legislative Ethics on EU Accession Process"

Workshop on Judicial Ethics, 17 February 2009, Ambassador Hotel

Moderator: Selçuk Hondu, Board Member, Council of Ethics for the Public Service
Assoc. Prof. Muhammet Özekes, Dokuz Eylül University Faculty of Law - "Theoretic Framework of Judicial Ethics and Reflections to Practice"
Nihal Jayawickrama, Coordinator, Judicial Integrity Group - "UN Work on Judicial Ethics"
Manfred Buric, Council of Europe, Judge (Austria) - "European Judges and Judicial Ethics"
Prof. Dr. Aydın Gülan, İstanbul University Faculty of Law - "Latest Developments on Judicial Ethics"
İbrahim Okur, Deputy Undersecretary, Ministry of Justice - "Judicial Ethics in Turkey"

Conference on Legislative and Judicial Ethics, 18 February 2009, Sheraton hotel

Opening Speeches

Prof. Alan Doig, Resident Advisor, Council of Europe
HE Marc Pierini, Head of the European Commission Delegation to Turkey
Prof. Dr. Bilal Eryilmaz, Chair, Council of Ethics for the Public Service
HE Mehmet Ali Şahin, Minister of Justice
HE Nevzat Pakdil, Vice-President of the Turkish Grand National Assembly

Latest Developments on Prevention of Corruption and Ethics

Ömer Atalar, Council of Ethics for the Public Service
Yüksel Yilmaz, Prime Ministry Inspection Board

Legislative Ethics

Assoc. Prof. Ömer Faruk Gençkaya - "Comparative Legislative Ethics"
John Williams, CEO, GOPAC - "International Experience on Legislative Ethics"
Stuart Gilman, Deputy Director, STAR Initiative, UNODC and World Bank – "UN Work on Legislative Ethics"
Dr. Cüneyt Yüksel, MP - "Legislative Ethics in Turkey"

Judicial Ethics

Assoc. Prof. Muhammet Özekes, Dokuz Eylül University Faculty of Law - "Theoretic Framework of Judicial Ethics and Reflections to Practice"
Nihal Jayawickrama, Coordinator, Judicial Integrity Group - "International Experience on Judicial Ethics"
İbrahim Okur, Deputy Undersecretary, Ministry of Justice - "Judicial Ethics in Turkey"

The PPT presentations of the speakers are available on the Project's website www.coe.int/tyec and the Council of Ethics for Public Service website.

Activity 7.2	Support the review and drafting sessions of identified Codes of Conduct for elected office holders through workshops and direct technical advice

Stated and Achieved Indicators and Activity Interventions – Achieved in Part

- Review and Drafting Workshop/Sessions No.1

- Review and Drafting workshop/Sessions No. 2

At the start of the project the Resident Advisor prepared 2 Working Papers:

Working paper on a judicial code of code;
Working paper on a code for the legislature.

These provided the background in terms of international and European Standards to the roles and procedures relating to ethical standards and codes of conduct for Legislatures and the judiciary.

After the workshops and conferences the project offered to support further work in drafting or reviewing any proposals. In summary, the progress toward a Code, and the likelihood of further project support, was reviewed and summarised as follows:

The Constitutional Commission of the Assembly had established a Political Ethics Sub-committee in 2006 to draft a Code. The Code has been drafted but its progress was delayed by the 2007 elections. It is currently waiting parliamentary time for discussion and implementation. The Code provides guidance rather than a functioning internal ethics regime – and there are issues over its complementarity with other legislation, the current requirements on disclosure of assets, investigation of complaints, the immunities of MPs, and sanctions. The presentations from the international experts acknowledged the difficulties of self-regulation but also the importance of public accountability, as well as the nature and implementation of a code. It was recommended that, if requested by the Constitutional Commission of the Assembly, the project fund a further visit by John Williams of GOPAC to help review and revise the current Code in line with international standards. No request for support has been forthcoming to date.

In the case of judicial ethics, the ministry had noted that the Bangalore Principles had been accepted by the Ministry of Justice but that there were no plans to convert that acceptance into a published Code (although parts had been adapted for the disciplinary procedures). While there was a discussion on the importance of providing a framework to address the practical issues facing judges and those involved in the criminal justice process, and while the international experts draw attention both to the background to the Principles and the role of a Code to support judicial independence and impartiality, there was no indication at that time of any further work on the development of a Judicial Code of Ethics at the request of the Ministry.

While actual review and drafting workshops did not take place because there were no Codes developed to the point that review and drafting could take place, the project provided material and offers of support, thus supporting the process.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 7 were as follows:

INDICATORS	DELIVERY
▪ Availability of proposals for codes of conduct for elected officials and the judiciary	▪ The project issued a report on proposals for codes of conduct for elected officials and the judiciary
▪ Number of workshops held;	▪ A workshop was held for elected officials and the judiciary
▪ Studies on the effectiveness of anti-corruption measures	▪ A Study on the effectiveness of anti-corruption measures was undertaken during Output 7 and 8
▪ Project reports;	▪ Project reports were issued
▪ Adoption of proposed code of conducts	▪ Adoption of proposed code of conducts has yet taken place

Output 8 - The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available and coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured

Activity 8.1	Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics

Stated and Achieved Indicators and Activity Interventions

- Delivery of Systems Study report

In June 2009 the Turkish short-term expert completed and submitted a report that reviewed the effectiveness of key measures implemented in recent years, such as the reforms of the Code of Ethics (issued by the Council of Ethics for the Public Service), the Public Information Act (i.e. the Law about the Right to Access to Information) and Criminal Legislation (i.e. the new Penal Code). The Report covered the landscape of current legislation (rules and procedures) and institutions with a direct and indirect involvement in corruption and unethical conducts and the prevention of corruption. It then reviewed four specific areas: criminal law, access to information, disciplinary measures and the Regulation (code of conduct). The study followed the same methodology for each area. The legal and institutional landscape or infrastructure of ethical administration (e.g. existing laws, by-laws, regulations, codes, institutions, strategies, procedures and mechanisms concerning with corruption and public service ethics) was mapped. Interviews were undertaken with related parties in the areas concerned. Finally, the effectiveness of the various means to address or prevent corruption and unethical conducts were evaluated, together with recommendations aimed at improving the management, coordination and monitoring of anti-corruption strategies were made. Its findings and recommendations were also incorporated into the Corruption Report and are discussed in more detail below.

Activity 8.2	Submission of Proposals on specific Anti-corruption measures based on the Study Outcomes

Stated and Achieved Indicators and Activity Interventions

- Report on specific Anti-corruption measures based on the Study Outcomes

In November 2009, a Background Review and a Corruption report were completed. The Background Review was produced to provide the context for the Corruption report by considering various academic, practitioner and media (English-language) sources, including work for this project, on corruption in Turkey before assessing past and current initiatives to address corruption. The Background Review was structured as follows:

- Corruption: Perceptions and Surveys
- Civil Society
- Academic Reviews
- External Reviews
- Turkey – Anti-Corruption Initiatives

Its findings are discussed in Section 4 and 5.

The Corruption report was intended to provide an overall picture of corruption in Turkey and make relevant proposals for the management, coordination and monitoring of anti-corruption strategies. Since the Prime Ministry

Inspection Board had prepared a national strategy, the Corruption report sought to comment on and also facilitate its progress and implementation. The Corruption report covered:

- Corruption: Findings From The Background Review
- Previous And Current Anti-Corruption Initiatives: Contents And Assessment
- Setting The Context For Anti-Corruption Strategies
- Developing The Ethical Environment For Anti-Corruption Strategies
- Recommendations For Future Prevention Strategies And Improved Management, Coordination And Monitoring Of Anti-Corruption Strategies

Its findings are discussed in Section 6 and 7.

Activity 8.3   Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey

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Stated and Achieved Indicators and Activity Interventions

- Submit proposals/recommendations on: Management; Coordination; Monitoring Tools of Anti-corruption Strategies in Turkey

The Corruption Report discussed in relation to Activity 8.2 contained a detailed discussion on proposed arrangements for the management, coordination and monitoring of anti-corruption strategy proposed for Turkey. Its findings are discussed in Section 6 and 7.

Activity 8.4   Organise up to 2 national conferences on the prevention of corruption in Turkey

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Stated and Achieved Indicators and Activity Interventions

- National Conference No. 1 on Prevention of Corruption
- National Conference No. 2 on Proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey

The two conferences were held under the auspices of Output 7 (see above) and Output 8. The second conference was held on 25 November and addressed by the Chair, the Council of Ethics for Public Service project director and the LTA, reviewing the work of Council of Ethics for Public Service, the project, the training and the proposed anti-corruption strategy.

Overall, the Indicators and Activity Interventions/Outcomes for the Output 8 were as follows:

INDICATORS	DELIVERY
▪ First study available by month 12	▪ A draft first study was available by month 12
	▪ Further studies were available by month 22
▪ Further studies available by month 22	▪ The LTA reviewed the quality of studies/ recommendations
▪ Quality of studies/ recommendations	▪ Project reports were issued
	▪ The results of the research studies have been provided to ministries and were included in the Final Corruption Report
▪ Project reports	
▪ The results of the research studies will be followed up and feed into improved corruption prevention	▪ Proposals for improved coordination were included in the Final Corruption Report

strategies ▪ Availability of proposals for improved coordination ▪ Project reports ▪ GRECO reports ▪ EU/EC reports	▪ Project reports were issued ▪ GRECO reports were issued, and noted the establishment of the project; the reports were commented on in the Corruption Report. ▪ EU/EC reports have been issued but have not reported on the project

4. ASSESSMENT OF THE RESULTS OF THE ACTION

4.1 Project Achievements by Outputs

In terms of the Outputs, the project has delivered the following:

- Staff of the Council of Ethics for Public Service have been trained and have the necessary working tools and materials (see Output 2) to better exercise their mandate in relation to the promotion of the Code and the prevention of corruption through public ethics training. The work of the Council of Ethics for Public Service has been reviewed – achieved (Output 1)

- A training strategy is developed and a training package made available to support the application of the code of ethics for public officials – achieved (Output 2)

- Train the trainers programme is available. At least 110 trainers have been trained and are able to deliver ethics training – achieved (Output 3)

- The governors, deputy governors, district governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials. 10 training events have been held, with a total of 495 participants – achieved (Output 4)

- Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials. 4 training events for senior officials and 6 training events for chairs and members of the ethics commissions have been held, with a total number of 278 participants – achieved (Output 5)

- 10 studies have been completed. Two workshops have been held and the studies have been published. 10 Research Studies were undertaken, disseminated through 2 workshops and published – achieved (Output 6)

- The development of codes of conduct for elected office holders and the judiciary has been supported through reports and two workshops have been provided – achieved (Output 7)

- The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available: Three reports (a Systems Studies report, a Background Review and a Corruption report, with appropriate recommendations), have been completed – achieved (Output 8)

4.2 Specific Project Achievements

Beyond the delivery of nearly the Activities and Outputs of the project, the project has delivered some wider - and possibly lasting – achievements that reflected how the project addresses the concerns and question identified in the fourth theme under 2.2.3 above.

First, the Research Studies, written by experienced Turkish academics, have collectively reinforced the message about ethics training, with a number specifically note that both monitoring and review procedures, as well as an understanding of what is expected of a modern public official, are generally absent. The Law Enforcement Research Study noted that 'none of those who were interviewed has mentioned about the existence of any systematic "departmental control". Departmental control mechanism is nonexistent'. Others emphasise the

importance of simplification of legislation and procedures (for example, as suggested by the Planning Research Study) and the provision of clear guidance for citizens. For example, Customs 'should regularly inform its service users, in short and brief style, and make them more conscious about custom procedures in such matters as basic information about custom procedures, how citizens should behave when they face non-ethical behaviours in custom directorates, the fact that they can do custom works without using mediators and custom advisors and what will be their responsibilities if they themselves behave non-ethically'. Nearly all the Research Studies also called for, as proposed by the Law Enforcement Research Study, conceptual and practitioner ethics training for all public officials: 'Police ethics curriculum should be updated and include current issues police officers may be facing in their daily lives. Ethic education should not be limited to abstract ethical advices, but include scenarios taken from real life'.

Most call for ethics training at school and work. This, for example, is also recommended in the Land Registry Research Study which propose that 'regarding the fact that erosion in such basic societal values of honesty and straightness contributes to a great extent to increase in corruption and other non-ethical behaviours, an ethical consciousness campaign is needed for the society as a whole not only for public servants. Even, an effective ethics education in various levels of national education system, perhaps beginning with primary schools must be provided in order to make citizens more conscious about ethics issues and to prevent some problems in service provision resulting from citizens'.

Overall, Turkish researchers have through quantitative, practitioner-focussed research, generally established the need for, and importance of, ethics training.

Second, many of the Research Studies were undertaken in conjunction with ministries on whom the message has not been wasted. Ministries who have been involved in the research and whose senior staff have been exposed to the ethics training have understood its value and purpose and begun their own ethics training programmes on their own initiative. For example, the Land Registry has some 17,000 staff; there are 60 Inspection Board staff and 4 Internal Audit staff (IA). In 2009 the Land Registry set up its Ethics Commission in the General Directorate, for which terms of reference are being drafted. It is proposed that each of the 22 regional offices will also have an Ethics Commission, with supervisory responsibility resting with the General Directorate. The 22 Ethics Commissions will define the issues they will address and how they will be addressed (regional variations in terms of respect, nepotism and gift-giving are already noted), as well as undertake training. It will give consideration to its role in terms of the implementation of the Council of Ethics for Public Service Regulation, for those public officials who fall outside the Council's remit. While there is concern at the absence of guidance from the Council of Ethics for Public Service, the Land Registry Ethics Commission has already adapted the training material. It has also decided to use its IA staff to undertake ethics assessments, focusing in systems and transparency, within the Ministry of Finance IA strategy. Similar initiatives have been noted in the Ministry of Health and Customs.

A number of ministries, and the requests for more trainers, underline the creation by the project of an awareness of the value of demand for ethics training in public ethics. Both the Research Studies and the ethics training supported awareness of this demand, and the means to respond to it.

Third, the Systems Study was set up to consider the contribution of a number of areas to the prevention of corruption. It noted that the 2003 Law on the Right to Access to Information (Law no. 4982) was in place, as were responsible offices in most public bodies which appeared to work within the specified timescales and deliver the requested information. It also noted that the same law set up the Board of Review of Access to Information (BRAI), which handles appeals against refusal to provide information; both these new developments are in addition to the Prime Ministry Communications Centre which also handles requests for information through its own network (BIMER). The criminal law is in place and covers nearly all aspects of financial crime and corruption and the specialist unit (KOM) that uses the law has no particular issue with the contents or their application. The disciplinary system is an established procedure across the public sector and the use of the civil service law – where the offences are couched in much more general terms - offers a wide scope both for addressing misconduct and for the application of a range of sanctions. Collecting and collating the figures is underway through the State Personnel Office; current figures are not significant and most will relate to offences under the civil service law. Finally the Council of Ethics for Public Service was set up in 2004, drafting a wide-ranging code

of ethics for public officials and investigating breaches of the code by specific senior public officials. It has also required public bodies to set up ethics commissions. Overall, the four areas reflect the presence of legislation, institutions and procedures. While there are areas of institutional or procedural weakness, none of the four areas are wholly ineffectual or inadequate to their stated purposes.

On the other hand, the Systems Study has provided evidenced argument that there was not necessarily a direct correlation between the effectiveness of anti-corruption measures and, for example, public information action provision in itself. The public information action, and disciplinary provisions and procedures, are not in themselves primarily concerned with anti-corruption. Nor does information provided by their activities offer any clear guidance on whether they facilitate or inhibit the effectiveness of anti-corruption measures. Further, there is nothing in their current activity that would suggest that further changes would specifically benefit anti-corruption measures.

Where the Systems Study provides evidence of concern, is in its reinforcement of the message in the Background Review, that most of the laws, institutions and procedures to address corruption were in place. It identifies that the issues concern effectiveness related to the joined-up nature of the areas and the need to clarify roles and responsibilities as part of a wider ethical or preventative environment. The study stated:

- Instead of fragmented laws and regulations, a comprehensive "anti-corruption law" should be enacted; structure and language of the present national legislation should be simplified; and the links between this general anti-corruption law and other national legislation should be clearly regulated.

- A general "code of conduct" for all elected and appointed public officials should be prepared. In the light of this general code and international standards, special codes of conduct for certain categories of public servants may also be regulated or rearranged.

- The role of the Council of Ethics for Public Service (awareness, prevention and investigation roles) and its relations with other existing auditing and supervisory bodies should be clarified; and the structure (autonomy), authority (monitoring or investigating), span of duty (categories of public servants) and capacity (administrative and technical capacity) of the Council of Ethics for Public Service should be improved.

- Links between the Council of Ethics for Public Service and BRAI should be established; the accommodation of the Board within the Council of Ethics for Public Service should be seriously considered.

- Links among the Council of Ethics for Public Service, institutional ethics commissions, disciplinary boards and authorised superiors for personal performance appraisal should be reconsidered; necessary steps (e.g. merging or mixing ethics commissions and disciplinary boards) should be taken; and relations among criminal proceedings, disciplinary proceedings and ethical inquiry should be clarified by changing the related legislation.

- The consistency of the related policies and the degree of co-ordination, co-operation and even integration among policies and institutions should be enhanced; the links among responsible authorities for ethical conducts, law enforcement bodies (particularly the national police, the gendarmerie and the customs control officers), public prosecutors and courts should also be clarified and strengthened.

- In addition to the enactment of new anti-corruption legislation, the enforcement of legal provisions and continuous monitoring of activities of all public servants in the light of this new legislation should be improved.

- Institutional and central data collection systems about various AC measures (e.g. applications to access to information unit, information about disciplinary actions and sanctions) should be developed.

- More specialised ethics training should be provided to the members of institutional ethics commissions and disciplinary boards; and particularly to law enforcement officials, public prosecutors and judges dealing with corruption cases.

Overall, the Systems Study has validated the findings in the Background Review in suggesting that connectedness and coordination will improve anti-corruption work in Turkey. This supports both the recommendations in the Corruption Report and the emerging approach being proposed in the new National Anti-corruption Strategy.

Certainly this message was, fourthly, reinforced by the Corruption Report which worked on the assumption that any anti-corruption strategy will focus on developing an environment denying the opportunities for corruption, reducing the incentives for corruption, increasing the risks of detection and sanction, and encouraging public officials and citizens not to become involved in corruption. Having emphasised the importance of prevention through awareness and ethics training, the Report discussed recommendations in support of the anti-corruption strategy through improved management, coordination and monitoring roles of those institutions, including those focussing on public ethics awareness, involved in implementing the strategy. It did so primarily in terms of existing institutions and agencies and focussing on their roles and connectedness in working to implement the strategy. It proposed grouping institutions by sector to focus on core responsibilities: standards, audit, inspection and investigation. While there needs to a limited amount of institutional and legal reform, the core focus of the Corruption Report was on the added-value of developing an approach that promoted aligning and enhancing units or institutions toward one specific aspect of the prevention of corruption as the basis for developing an anti-corruption framework across the public sector. This – the connectedness of each institution wholly or partly involved in the prevention of corruption – is intended to ensure that roles and responsibilities are coordinated and integrated into a wider strategic approach.

Overall, the Corruption Report provides clear and evidenced guidance on the improved management, coordination and monitoring of anti-corruption strategies in Turkey and it would appear that this approach is likely to be the one adopted by those involved in the further development and delivery of the National Anti-corruption Strategy.

Finally, the project has delivered a lasting product in the training materials. The material was adapted from materials used by the Public Standards Commission, Victoria State, Australia, and then adapted for the Turkish context with new materials prepared for case studies, exercises and PPTs. The material was reviewed and revised on a number of occasions, and trialled with live training exercises. The materials now include:

- IMPLEMENTATION GUIDE – providing a training strategy that addresses the ethical environment within which to undertake training; recommendations of where and when training should take place; recommendations on other activities through to sustain the work of the training.
- TRAINERS GUIDE – a full end-to-end training guide, from discussing the specific aspects of adult learning, to room layout. It also includes timetables for 1-day and 2-day training events.
- ETHICS MATERIAL – presentations and material to improve trainers' understanding of the concepts and issues relating to public ethics.
- PPTs - covering ethics concepts, the training, the training materials and exercises.
- CASE STUDIES - a series of 'simple' and 'complex' case studies tailored to the Turkish contexts (including notes of guidance to trainers).
- EXERCISES – Decision cards, 5 Issues/3 Questions, etc – to stimulate discussion, facilitate group work, etc (including notes of guidance to trainers).
- ADMINISTRATIVE MATERIAL – ranging from letters of invitation to training, evaluation forms, etc.

The material is presented in ways that allow it to be adapted to a range of audiences and updated. It has been disseminated widely. Over 100 trainers have been trained in its use (and, equally importantly, the Adult Learning Department in the University of Ankara is not only fully conversant in adult learning but also in the training materials, thus providing a resource for further training of trainers).

Overall, and with quality training of further trainers (both as trainers and as trainers of others as trainers), there is no reason why this material should not become the basis of the ethics training material used across the Turkish public sector for the next decade. Together with the numbers trained as ethics trainers, and the beginnings of ethics training by ministries, the real achievement of the project will be that it established awareness of, and the need for, ethics training and initiated for the first time the public ethics training in the Turkish public sector.

4.3   Project Achievements by Objectives

The **Overall objective** of the project was:

> To contribute to the prevention of corruption in Turkey in accordance with European and other international standards.

The **Specific objective** of the project was:

> To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials.

The core work of the project has been the development of Turkey-relevant training materials and a potentially sustainable pool of trainers. Ethics Commissions have been thoroughly included in this process. Support has been provided to the Legislature and Judiciary through reports and workshops. To this extent, the Specific objective of the project - To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials – has been achieved. In addition, the project has drafted its corruption report which provides findings, analysis and recommendations to Turkish authorities. This work, together with the work in support of the implementation of the proposed National Anti-corruption Strategy also means that the Overall Objective of the project - To contribute to the prevention of corruption in Turkey in accordance with European and other international standards – has also been achieved.

5.1   Introduction

Section 4 stated that nearly all activities were undertaken, that the identifiable events, reports or production of other material were achieved (see Annex 4 for the list of products and publications) and thus that the Outputs as designated in the revised Workplan were delivered. This means that both the Specific and the Overall Objectives of the project have been achieved.

This Section discusses how the project managed the assumptions and risks identified at the start of the project, the lessons that have been learnt from the project, the issues associated with the impact and sustainability of the project. In so doing the Section will make recommendations to be followed up in support of the work of the project.

5.2   Assumptions and Risks

5.2.1   Assumptions

There were **three key assumptions** proposed before the start of the project as likely to affect effective delivery of the project: that the Council of Ethics for Public Service will require both strategic and operational independence as well as appropriate staffing and resourcing to ensure sustainable capacity-building; that the role of ethics commissions integrated with that of the Council of Ethics, and the development of a cross-public sector training capacity, as well as the implementation of intra-institution cascade training will require intensive work and negotiation during the time-frame of the project; and that the progression and development of a national anti-corruption strategy will require the involvement of a range of stakeholders and the support of the government to ensure that the work to date is translated into an effective, on-going strategy with clear milestones, realistic outputs and agreed performance measures.

Of the three, **the first two** relate to the Council of Ethics for Public Service. While the longer-term capacity issues are addressed below, and although the institution has limited capacity, the project was able to deliver its Activities and Outputs within that context; subject to staffing movements, there is a nucleus to support and deliver ethics training in the shorter-term. In relation to the second, there was a failure to evidence whether or not Ethics Commissions had been established; they had not by the start of the project. They were established during the project and engaged in the training component of the project. Both, the Review of the Council and the Implementation Guide were drafted to give guidance on the development of an ethical environment. Within the timescale available, much of the focus was on training as large a pool of trainers as possible although the question of cascaded training will be for post-project implementation (and is discussed in 5.4 and 5.5 below). In the case of **the third**, the project identified from the outset that there was no Ministerial Commission, no secretariat and no on-going work on a national strategy. The third assumption, therefore, was irrelevant (and Output 9 was merged with Output 8). On the other hand, the project developed a working relationship with the Prime Ministry Inspection Board and was able to access working drafts of the emerging National Anti-corruption Strategy, shaping its report for Output 8 accordingly.

5.2.2   Key Risks

At the start, the project identified a number of risks associated with delivering the project and addressed them as follows:

The Council of Ethics for Public Service [Output 1]

The major risk is that the Government does not provide the necessary resources, including staffing, with the consequence that the Council of Ethics for Public Service fails to address a raising work load and attracts adverse criticism. A secondary concern is that any trained Secretariat staff leave the Council of Ethics for Public Service in a short period, diluting the capacity of the Council of Ethics for Public Service and the transfer of knowledge and expertise.

The Council has recruited additional staff, a number of whom underwent ethics training. The Council is in discussions with the Prime Ministry about its future position and the project has provided guidance on the use of shared accommodation and resources for all those agencies which fall within its proposed 'Standards' sector (see the Corruption Report). Resources to undertake the work was available for the training but there is a longer term issue of capacity to sustain support for and delivery of ethics training. In relation to complaints or allegations of breaches of the Regulation, the Council resolved the issue of sufficient staff to deal with a raising work load by importing experienced seconded Inspectors from the Ministry of Justice. The secondary concern remains and is discussed below.

Training Materials [Output 2]

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

Once the project had decided on adapting the ethical material of the Public Service Commission, Victoria, Australia, formal permission to do so was agreed prior to any work on the material.

Training [Outputs 3-5]

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

One risk noted above is that not all the identified public officials will attend the programme. An equally important risk is that senior managers do not take on the responsibility of ensuring at a number of their staff are trained as ethics trainers to cascade the training within their organisations and do not incorporate ethics training into induction programmes for new recruits or into continuing staff development programmes. A longer-term risk is that the project does not provide the rationale for public sector institutions and the Council of Ethics to work more closely together to raise ethics awareness across the public sector.

Sufficient personnel were identified, and attended the training (ministries were responsible for the demand for an increase in the numbers trained). Appropriate public officials attended the training events. The issue of a diminishing pool of trainers and the engagement of ministries remains a risk in relation to impact and sustainability and are discussed below.

Research [Output 6]

There are insufficient bids of applied quality for the totality of the studies proposed; the studies are not submitted on time to be of use to the work of the project; and the quality of the submitted work is of insufficient standard to be of use to the work of the project.

Sufficient bids were received from experienced academics. The work was quality-assured and edited by the LTA. The work was submitted in sufficient time to be of use to the project.

Codes for the Legislature and Judiciary [Output 7]

The clear risk is that the Legislature and senior members of the judiciary are reluctant to participate because there is a concern over external interference or because neither or both institutions reject the idea of codes and associated procedures, including sanctions.

Both members of the Legislature, the Judiciary and Ministry of Justice participated in the workshops and the conference. Whether either pursue the question of Codes is too early to identify although there was no take-up of the project's offer to support further work during the life of the project.

Measures in Support of an Anti-Corruption Strategy [Outputs 8-9]

The government is reluctant to accept the need for a new review and a further strategy over and above the work completed in 2000-2. The risk is that the technical commission will be reluctant to accept the involvement of the project in its work and will retain sole ownership for the development of a strategy to itself. Key stakeholders will be reluctant to participate in the work of the project insofar as it relates to this sub-component. The meetings are too far apart to allow effective progress within the life of the project and that the meetings are formal rather than substantive.

The project specification risk was based on a false assumption. As noted above, initial work under Activity 8.1 quickly established that neither the Technical Commission nor the Inter-ministerial Commission exist (nor had they been in existence since 2004). Therefore, the work relating to the Output – Activity 9.2: Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey - was proposed to be undertaken during the work for Output 8. At the same time the Prime Ministry Inspection Board was preparing a new anti-corruption strategy and was willing to engage with the project by sharing drafts of the strategy. The work of the project was developed around this emergent strategy.

Overall, neither assumptions nor risks, once identified accurately, inhibited the delivery of the project. Where the risks appeared substantial measures were taken to mitigate or remove them. A small number, however, raise some risk as to the sustainability of some of the project Outputs.

5.3   Lessons

There were a limited number of lessons that emerged from the project. These related to the project specification, and the administrative and secretarial support.

First, the project specification could have been more simplified and realistic. By the time when the project was prepared and when the contractual arrangements were finalised, the project could have benefited from a more updated understanding of status on existing institutions, laws and procedures. For example, in relation to Output 1, the Council of Ethics for Public Service had a limited inquiry capacity, and had not issued any sanction under the Regulation (the Code) in the three years of its existence. It relied totally at the time of the start of the project on a small secretariat comprising 4 executive and 4 administrative staff – all on secondment from the Prime Ministry where the Council is based. Ethics Commissions were not in existence and there was no training capacity at all within the Council. Additionally, Output 9 was, by the time the project contract was signed and implementation has been initiated, became out of date.

Secondly, the project could have benefitted if there was more allocation for additional local administrative and secretarial support other than for the local project officer in Ankara and of the Project Manager in Strasbourg. Considering the size of the country and the number of trainings activities, the ambitious work plan of the project, and the considerable amount of administrative, logistical and organisational work involved, there could have been scope for the project to benefit from an increased assistant support exclusively dedicated to secretarial/administrative tasks[2]. It is also advisable to confirm formally the availability of appropriate staffing and administrative support from the beneficiary institution as an integrated approach to common services and infrastructure.

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[2] Interim Evaluation Report (December 2008), page 9. www.coe.int/tyec

5.4   Issues

The two main issues from the project relate, firstly, to the continued implementation of the project in relation to training in public ethics and secondly, taking forward the work on the national anti-corruption strategy.

In relation to the first, many of the other Activities and Outputs are being followed up by ministries. For example, the information from the research studies have been provided to ministries to help them develop general corruption prevention policies and take forward ethics training. While many of the proposals in the research studies are specific to each ministry, a number raise the cross-ministry issue of ethics training. Here there remains concern over how this is likely to be coordinated and managed post-project.

The issues relating to this fall in 3 areas. **First**, the Council of Ethics for Public Service continues in the short-term to remain a small unit within the Prime Ministry, reliant on Ministry funding and a small number of seconded staff (6 – later expanded to 12, of whom 3 were seconded Inspection Board staff to handle inquiries). Despite the production of a number of project Working Papers, a number of issues remain unresolved, including:

- Revisions to the Code;
- Confirmation of the strategic direction of the Council;
- Establishing the functions and responsibilities of Ethics Commissions;
- Establishing the relationships between the Council, the Ethics Commissions, and Inspectorates;
- Assessing the future staffing and non-staffing resources of the Council;
- Addressing the role of the Council as a training provider and responsible for the quality and review of the training material.

In other words, there is the question of what will be the role of the Council in relation to training (for example, provider, responsible for monitoring the work of other providers, training more trainers, ensuring that the material used is standard, etc). In addition to these strategic issues, and while a number of the Council of Ethics for Public Service Staff were trained, not all will continue as ethics trainers and a number may change jobs. The question of a training unit and manager was addressed informally but was not resolved by the end of the project. It will require a more formal arrangement if the Council of Ethics for Public Service is to continue to be involved in the delivery of further ethics training programmes, in monitoring ministry training programmes, and reviewing and updating the training material.

While there are sufficient trainers in ministries, the risk underlined in 5.2 above about the role of the Council of Ethics at the centre of the continued delivery of ethics training remains problematic, as does its guidance to Ethics Commissions and the latter's responsibilities in relation to those officials who are subject to the Regulation but not to the oversight of the Council of Ethics for Public Service.

Despite the fact that the Council of Ethics for Public Service was authorised to require Ethics Commissions to be established, the Council of Ethics for Public Service did not call for their establishment until the start of the project and has not provided them with Terms of Reference, nor guidance on sustaining the training through cascade training. Ethics Commissions will need substantive support in devising and implementing ethical environments, of which continued ethics training will be the core component.

Ministries made available appropriate staff for training, a number of whom had had training experience and/or were members of Ethics Commissions. The increase in number meant an increase in less experienced personnel and a shorter training. The initial group of trainers undertook the training under Outputs 4 and 5, and consequentially have substantial experience in both how to train and in the use of the materials. The issue of their responsibilities within their Ministries, including whether or not they will be used as full-time trainers and whether or not they will take line-management responsibilities for the other trainers is one issue. Another is whether there are sufficient to provide cascade training in the short-term, and until more trainers are trained, to provide the cascade element envisioned as part of the Training Strategy. Again the risk underlined in 5.2 above - *The issue of*

a diminishing pool of trainers and the engagement of ministries – remains in terms of the sustainability of the ethics training beyond the life of this project.

The **second** issue relates to the national anti-corruption strategy. It is an ambitious plan, involving a number of agencies, procedures and laws. To be effective, and noting the comments both of the Systems Study and the Corruption Report, much work will need to be done to facilitate inter-agency coordination and cooperation in a culture of compartmentalisation and legal rigidity. While the intention may be expressed clearly in the strategy, it will be the operational detail – ministry action plans, information-sharing, coordinated working, etc – that will determine success. At the same time, the preventative dimension – the ethical environment – needs to be brought fully within the scope of the strategy.

Tending to both issues could potentially effect the sustainability of the work of the project.

5.5   Impact and Sustainability

The project has had impact. It has drawn attention through the Research Studies to the need for training in public ethics. Part of the work of the current project has involved the design and development of a comprehensive generic public ethics training programme tailored for the Turkish public sector context, and including all materials necessary to administer and deliver the training. Over 100 trainers have been trained in the programme which focuses on ethical principles and dilemmas, intended to make public officials aware of what the ethical principles and conduct are required by the Council of Ethics for Public Service Regulation. It has been delivered to Ethics Commissions and senior public officials across the country.

The impact is identifiable, with a number of ministries unilaterally undertaking ethics training and the Council of Ethics for Public Service continuing to provide training in an *ad hoc* basis. The project has started the process but there are a number of issues relating to sustainability. The project identified the importance of the role of the training in changing the ethical culture in the public sector, which will have a lasting effect on the prevention of corruption. The training and the training strategy is designed for this purpose.

To ensure sustainability of the project in relation to ethics, attention must be given to ethics training, the provision of more trainers, the adaptation of the ethics training material, the monitoring both of the quality of training and the use of the training material to ensure a uniform approach. The Council of Ethics for Public Service should concentrate its main activity on overseeing and quality-assuring the expansion of the ethics training programme provided by the current and proposed EU projects, supervise training programmes for more ethics trainers, and trainers trained to train other ethics trainers, in ministries in conjunction with Ethics Commissions. It should require and deliver additional ethics training programmes for new recruits, those being promoted to management positions, and so on. It should take responsibility for the adaptation and development of the training materials and survey the effectiveness of the training and the trainers. It should also provide guidance for and oversee activities relating to the development of training programmes by Ethics Commissions.

Thus the sustainability of the training should be addressed. The training provided by the project is, however, only part of the development of an ethical environment which concentrates on corruption prevention. Ministries need also to develop organisational policies, management procedures and practices. Guidance for ministries is clearly laid out in the Implementation Guide, which provides the management context and responsibilities for extending and embedding the training provided in the Trainers Guide, but will require further external support and guidance to realize the issue of sustainability.

The trainers need to plan a systematic approach to delivering training events, delivered on a planned basis ('cascaded') across an institution and supported by other activities and procedures (the Ethical Leadership Training Programme). Ethics Commissions and ministries need to address those activities, arrangements and events that implement and sustain the Programme across the institution on a planned, longer-term basis is an 'Ethics Training Strategy'. The Programme and Strategy are discussed in the Implementation Guide.

The objective of the Ethics Leadership Training Programme is to raise awareness and understanding of the provisions of the 'Regulation on the Principles of Ethical Behaviour of the Public Officials' and its implications for the role and conduct of public officials in the fulfilment of their duties. Its purpose is to change the ethical culture of the organisation. In order for this to be sustainable, the Ethics Training Strategy has to address the policies, procedures and practices required to strengthen the control systems that will serve to prevent corruption. This will require an assessment of:

- Codes of conduct.
- Staff recruitment and selection.
- Procurement and contracting.
- Performance management.
- Discipline and grievance.
- Staff promotion.
- Interests and assets declaration.
- Internal and external audit and inspection.

Once addressed, and once the training has been cascaded, ministries can then carry out an "ethics/values audit" (proposed in the Corruption Report to be the responsibility of Internal Audit on behalf of management; further information will be available from the State Personnel Office, as discussed by the Systems Study). This will assess the current levels of awareness of, and adherence to, ethical principles, procedures and controls within the organisation.

Organisationally this will require coordination and cooperation between the Council of Ethics for Public Service, Ethics Commissions and ministries[3] to ensure:

- There are procedures to ensure compliance with the legislation relating to public officials;
- There are mechanisms for promoting awareness of adherence to the 'Regulation on the Principles of Ethical Behaviour of the Public Officials';
- the effectiveness of the Ethics Commission, Inspection Board and Discipline Board in terms of improving controls and providing punitive and deterrent measures for unethical conduct;
- the existence and application of internal policies, codes and procedures for guiding and requiring ethical standards.

To make the work of the project sustainable in relation to ethics training, a number of actions need to be undertaken by the various institutions noted above in relation to the Regulation:

- With the establishment of Ethics Commissions, the Regulation should be reviewed to allow some provisions to be delegated to Ethics Commissions, some provisions to become the responsibility of the Ombudsman (when activated) and some handled by the disciplinary processes. The Council of Ethics for Public Service and Ethics Commissions should focus primarily on those parts of the Regulation that address the public duty-private interest and conflict-of-interest issues; public service delivery and personal behaviour (respect, rudeness, etc) belong elsewhere. The range of sanctions for breaches of the Regulation should be expanded to ensure a wider range of sanctions (most similar bodies will include: mediation or further ethics training, transfers, verbal or written warnings, suspensions, fines, dismissal). The Council of Ethics for Public Service should review and monitor the development of the Regulation into a ministry-specific code of conducts based on the Regulation, to be implemented by Ethics Commissions.

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[3] This approach was recommended by the Corruption Report. It is also noteworthy that the Interim Evaluation report noted that the project team should support the Council of Ethics for Public Service in assisting the senior management and Ethics Commissions of central and local administrative units in drafting, implementing, and constantly updating a unit plan, providing the necessary steps and timeframe for cascading ethics training to the public servants in the respective unit's jurisdiction

- The Council of Ethics for Public Service should be responsible for all inquiries of breaches of the revised Regulation for certain levels of public official but they may decide to investigate more serious breaches/allegations involving senior public officials and delegate the investigation of less serious breaches to Ethics Commissions. These in any case should be enabled by law to implement the Regulation on all other grades of public officials not currently covered by the remit of the Council of Ethics for Public Service. Both the Council of Ethics for Public Service and Ethics Commissions' staff (unless the current practice of using seconded Inspection Board staff is continued) should be trained in and work to the same inquiry methodology; the Council of Ethics for Public Service would act as an appeal arena against decisions of Ethics Commissions. Consideration may also be given to the process of involving Ethics Commissions to be integrated into the general disciplinary arrangements. The Council of Ethics for Public Service would maintain and publish a central database of cases, and quality-assurance both the inquiry methodology and the uniformity of sanctions.

Once responsibilities for the Regulation are addressed, then training in its awareness, and investigation of breaches, become the two sides of prevention and regulation, addressed by the Council of Ethics for Public Service and the Ethics Commissions on a coordinated and sustainable basis.

This approach should be integrated with the development of the national anti-corruption strategy. Here the challenge for sustainability lies less with the institutional, legal and procedural issues the strategy identifies than, firstly, in bringing together those agencies wholly or partly responsible for addressing those issues and, secondly, identifying those who should lead and own the delivery of the strategy. Within each sector, the recommendations in the Corruption Report provide the basis for connectedness, cooperation and communication in that a range of activities are, or potentially are, inter-connected and inter-related by the nature of the work. There are, as noted above, obvious areas of connecting, coordinating and communicating between sectors, again because of the nature of the work and to promote inter-agency activity. This should be achieved by a formalised regular intra-sector and inter-sector commission to coordinate activities, discuss cross-cutting issues, share information, joint intra- and inter-sector working, and so on, so that connectedness is an operational and procedural reality within the overall framework as laid out. To manage the work of the sectors, to more effectively to join-up what they do, will require clarification of laws and procedures to sharing information, to ensuring operational independence, to exchanging or sharing staff and undertaking joint work but the key initiatives will rest with ownership and leadership of the approach, both within the public sector and external to the public sector, to oversee, guide and report on the work within and between sectors, and on the roles of the intra- and inter-sector commissions.

Within the public sector, the development and sustainability of the Corruption Report's recommendations in support of the implementation of the national anti-corruption strategy, certainly in the short- to mid-term, will rest on the work of the Prime Ministry Inspection Board. In order to institutionalise the question of ownership within the public sector, including responsibility for facilitating the management, coordination and monitoring the anti-corruption approach, should lie with the Prime Ministry Inspection Board. Its overall responsibilities should include:

- undertaking the collection and collation of adequate information or statistical data concerning criminal convictions or disciplinary measures imposed on public officials for corruption offences or breaches of the Regulation/codes of conduct;
- undertaking analysis of trends of causes and consequences of corruption and thus an objective assessment of risks;
- oversee systematic analysis by sectors of risk factors (e.g. conflicts of interest, securing of improper advantages, absence of rules on reporting of offences committed within the administration, etc.) and of the sectors exposed to corruption (e.g. public procurement, health care provision, issuance of permits and licences);
- Developing a better knowledge of the vulnerable sectors and develop relevant policies and practices for better prevention and detection of corruption;
- Receiving reports from the sector commissions;
- Maintaining a database of, and disseminating information, that may facilitate the work of the sectors in preventing, detecting and investigating alleged corrupt activity;

- Monitoring and reporting on the progress of the implementation of the national anti-corruption strategy, allocating responsibilities and requirements for action plans across sectors and monitoring performance delivery.

5.6   Visibility

The opening ceremony of the project was held on 7 February 2008 at the Hilton Hotel with a high level of participation, including Prime Minister, Mr. Recep Tayyip Erdoğan, Head of Delegation of the European Commission to Turkey, Ambassador Mr. Marc Pierini, Director of Cooperation of the Council of Europe, Ms. Margaret Killerby, Chairperson of the Council of Ethics for Public Service, Prof. Dr. Bilal Eryılmaz.

During the project timeframe, several interviews have been given to media organizations at the national and local level. In addition, the Long Term Advisor of the project, Mr. Alan Doig attended to a specific television programme devoted to the project in the national television channel, TRT Türk.

The project activities were published on two websites. A section within the Council of Europe/Economic Crime Division website was exclusively dedicated to the TYEC project: www.coe.int/tyec. The beneficiary institution, the Council of Ethics for Public Service has also designated a special section for the Project within its website: www.kamuetik.gov.tr. The project activities were consistently reported and regularly updated on these web pages in English and Turkish.

The project visibility was also ensured through the international conferences. During the lifetime of the project, two big international conferences were organised. These conferences brought together the representatives of various and respected organisations such as former deputy executive director of the United Nations Office on Drugs and Crime (UNODC), STAR initiative (UNODC and World Bank), Global Organization of Parliamentarians Against Corruption (GOPAC) and the representative of the Judicial Integrity Group.

The project produced booklets, brochures, training kits and books. An Ethical Leadership Programme was developed as a training kit which consists of a textbook, a booklet, a pocket guide and a CD-Rom. The Research Studies were published combined together and published as books in 2 volumes in both, Turkish and English.

The project's closing ceremony was held on 25 November 2009 at the Swiss Hotel, with the participation of the State Minister, Mr. Cevdet Yılmaz, representatives of the Delegation of the European Commission to Turkey and the Council of Europe. The closing ceremony revealed the outcome of the project as well as provided a background review and recommendations for fight against corruption in Turkey.

Throughout the implementation of the project, there was much interest from government, civil society, senior government officials and increasing attention of media which strengthened the visibility of the project.

5.7   Recommendations

This Section has discussed how the project managed the assumptions and risks identified at the start of the project, the lessons that have been learnt from the project, and the issues associated with the impact and sustainability of the project. In relation to this last issue -sustainability- this Section concludes with recommendations to be followed up in support of the work of the project, with particular reference to ethics training and to the development and delivery of the national anti-corruption strategy.

5.7.1   Ethics Training

As noted above, the project is a start in the process of introducing and embedding public ethics in the Turkish public sector. The project has also provided the opportunity to identify where further work is necessary to ensure both the impact and the sustainability of this project, so that momentum is not lost to ensuring that public ethics:

- Is embedded and consolidated in terms of the work from this project

- Is cascaded through training and prevention of corruption awareness
- Is institutionally supported.

These main areas – discussed in 5.4 - are: to develop the Council of Ethics for Public Service's capacity to deliver their own training events and to support the delivery of the training events with Ethics Commissions; to give Ethics Commissions more capacity; to support those Ethics Commissions that have already begun to develop ethical environment programmes as proposed by the Implementation Guide; to translate the work of the research studies into practical reform; and to promote a wider awareness of and understanding of public ethics.

To ensure that the work of the project on ethics training, and the development of ethical environments, is sustainable it is recommended that continuing work is necessary to:

As a consequence a follow-on project has been developed to:

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

To develop the Council of Ethics for Public Service's capacity to deliver their own training events and to support the delivery of the training events with Ethics Commissions, the staff of the Council of Ethics for Public Service will need further training and have the necessary working tools and procedures to manage, oversee and measure the dissemination and implementation of the Training Strategy. They will need training and support to coordinate measures to promote ethics and the Training Strategy and to have the capacity to organise training programmes and trainer training programmes. They will need support to increase the capacity of the Ethics Commissions to undertake training and to develop ethical environments.

Certain ministries with wide responsibilities for ethical training – such as the Ministry of Interior and the Land Registry which have already begun work on ethics training and the development of ethical environments should be supported in so doing: the former, for example, to adapt develop the Ethical Training Strategy and materials for application at governorate and local government levels and the latter to develop as an 'Island of Integrity' in terms of the effectiveness of a comprehensive ethical environment.

These initiatives would serve as the basis for the development of a wider cross-public sector on which future prevention strategies may be based. In relation to this, furthermore, the Ministry of Finance should be supported in training of internal auditors and Inspectors in undertaking ethics audits as an integral part "internal control system" is organized under Part Five of Public Financial Management and Control Law No. 5018 dated 10/12/2003.

Finally in recognition of the importance of introducing ethics as early as possible in family and education, the Council of Ethics for Public Service should develop prevention of corruption awareness campaigns in ministries, schools and universities, and the general public through the media and NGOs; creation of TV spot films and advertising material, competitions for brochures and slogans etc.

As far as possible the intention should be to raise awareness of ethics, and of its role in the delivery of public services. It should be mainstreamed within the Turkish public sector but, given its size, focussed incrementally on those ministries that will have a wider impact or a more comprehensive approach; both would serve as models to other ministries. To drive this forward, the Council of Ethics for Public Service in conjunction with Ethics Commissions should continue a managed, coordinated and monitored approach to expanding the pool of trainers, of trainers of other trainers, of the implementation of training strategies and of the development of ethical environments.

This would work toward ensuring that public ethics is embedded and consolidated in terms of the work from this project; is cascaded through training and prevention of corruption awareness; and is institutionally supported.
This will be achieved in 3 general areas as follows:

This should be set within a context where the Council of Ethics for Public Service is encouraged to reposition itself as a strategic regulator, supervising the work of Ethics Commissions in relation to the Code, overseeing the implementation of ethics training and development of an ethical environment, and investigating serious breaches of the Regulation (for which a proper inquiry procedure should be established and undertaken by inspectors seconded from ministry Inspection Boards). The Regulation should be amended to allow a range of sanctions, along the lines of those used by Professional Associations.

5.7.2   The national anti-corruption strategy

This approach – coordination, cooperation, management – is also that proposed in the Corruption Report for the delivery of the national anti-corruption strategy. The consolidation of the work on ethics training should lead to a sustainable and general application of the training across the public sector. It will begin to allow ministries to develop their own approaches to training within a monitoring framework that the Council of Ethics for Public Service should implement. This does not necessarily mean that the Council of Ethics for Public Service or Ethics Commissions will be solely responsible for the development of ethical environments, without which the training will not be effective in the longer-term. For that, the proposed National Anti-corruption Strategy will provide an over-arching framework and oversight arrangements. Indeed, it has proposed a central role for the Council of Ethics for Public Service that reflects the approach taken in this report and in the Corruption Report about the need for connectedness and joined-up working:

Under the supervision of Ethics Council of Public Officials, the separate and unique ethic principles for each public institutions will be determined, such as the ethic principles for officials of Central Bank of Republic of Turkey	Ethics Council of Public Officials will determine the general principles in developing separate ethic principles and declare it to the all public institutions. Each institution will set up a commission responsible to develop code of ethics of that institution. Code of Ethics prepared by above mentioned commission and approved by the chief bureaucrat of that institutions will be submitted to the Council of Ethics of Public Officials for review and, when approved, published and distributed to the employees.

This is, however, only one aspect of the national anti-corruption strategy. As noted above, the strategy will require substantive support to ensure its sustainability. In particular, attention needs to be given to the development of expertise within the other three sectors – audit, inspection and investigation - as well as the means to underpin the connectedness between the sectors.

Thus the supervision of the development of the effectiveness of ethical environments would be the responsibility of Internal Audit, a new management function but one where the responsibility for ethics and probity is already established. This responsibility should be adapted to include monitoring and reviewing the roles of ministry Ethics Commissions in promoting and supervising the development of ethical standards. It should also be able to comment on how ministries handle conflict-of-interest and other Regulation issues as part of its role to comment on the development of an ethical environment. In theory there is no conflict or overlap between the roles of Inspection Boards and Internal auditors (and even external audit) but consideration should be given to developing the Inspection Board structure as the main focus for delivery and monitoring of the anti-corruption strategy within the public sector, and integrating the work of Internal Audit into this process.

The Inspection Board structure would need to become more independent of ministerial and Prime Ministerial supervision in relation to their operational work, while remaining within the ministry structure. Additional resources, including seconded staff, should provided to the Prime Ministry Inspection Board to undertake a leadership, collating, coordinating, information-sharing and joint inquiry role, as recommended in the Corruption Report as well as establishing a central database for shared intelligence and case monitoring with the Inspection Board structure. Some form of central coordinating committee under the Prime Ministry Inspection Board should be created to develop inter- Inspection Board activity and consider cross-cutting issues; additional reporting lines to the police (for criminal cases), State Audit and legislature should be developed.

It is recommended that the degree of sustainability would be substantively enhanced through the role of the Prime Ministry Inspection Board, with the other institutions discussed in the Corruption Report taking common and joint responsibility for ensuring that the progress on, and the connectedness between themselves and the national anti-corruption strategy. While the strategy takes overall approach that reflects the specific roles and perspectives of the different agencies within sectors, and between sectors, there needs to be a practical, prioritized and measurable framework that is owned by the institutions involved and suitable for monitoring, review and revision. That framework should:

o   Set out clear goals and timelines for those expected to contribute to the achievement of goals;
o   Identify any law, institution or procedure that may inhibit progress, and addressing them appropriately;
o   Identify any weaknesses in the coordination, cooperation, communication and connectedness of the framework and approach;
o   Ensure that plans of action can and should be made public, ensuring overall transparency and helping to mobilize popular support and pressure to achieve the expected goals;
o   Clarify what actions must be taken, at what time and by whom, planning future actions and evaluating past or ongoing actions;
o   Ensure appropriate resources and staffing;
o   Review the strategy in terms of sequence, priority and timing, as well as adaptation and revision within a realistic assessment of what can be achieved within the specified timeframe;
o   Monitor horizontal and vertical integration of the various agencies involved;
o   Report on progress.

While the Prime Ministry Inspection Board may lead the process, its sustainability depends on the coordination, communication and *connectedness* between existing institutions involved in whole or in part in addressing corruption through the national anti-corruption strategy. In turn, as the Systems Study, the Research Studies and the Corruption Report emphasise, the importance of ethics training and the development of ethical environments is one dimension necessary to address corruption. Its effectiveness and sustainability will, however, be enhanced when the audit, inspection and investigative dimensions are also addressed. In other words, this Report would recommend that an effective anti-corruption approach through a national strategy would depend on the connectedness of all the institutions involved and the identification of strategic and sequenced interventions in support of those components and capacities essential for its delivery.

6. PROJECT MANAGEMENT ARRANGEMENTS: EVALUATION, REPORTING ARRANGEMENTS, KEY PARTIES

6.1   Meetings

Regular bi-monthly Steering Group meetings were held with the ECD, the CFCU and specific ministries. Each meeting comprised a comprehensive review of progress, any revisions to the workplan and any issues. Minutes were produced as a formal record of the meetings; there were no substantive areas of divergence or disagreement during the project.

6.2   Progress Reports

The following progress reports have been submitted to the European Commission Delegation (ECD), the CFCU and the Council of Ethics for the Public Service:

Inception Report (December 2007- February 2008)
First Quarterly Progress Report (March-May 2008)
Second Quarterly Progress Report (June-August 2008)
Activity Report (December 2007-September 2008)
Third Quarterly Progress Report (September-November 2008)
Evaluation Report (December 2008)
Fourth Quarterly Progress Report (December 2008-February 2009)
Fifth Quarterly Progress Report (March-May 2009)
Sixth Quarterly Progress Report (June-August 2009)
Seventh Quarterly Progress Report (September-November 2009)
Activity Report (December 2007-November 2009)
Monthly Reports (December 2007- November 2009)

In addition a number of other reports and working papers have been produced (Annex 4).

6.3   Interim Evaluation

Between 30 October and 13 November 2008, two evaluators visited Strasbourg and Ankara to review the project. The evaluators found that after 12 out of 24 months, the project delivery was well on track. The report stated that, especially the core task of the project, ethics training, started off promisingly and was met by high motivation among public servants. As for anti-corruption coordination and strategy, there was increasing scope for the project to work with other stakeholders in addition to its main counterpart, the Council of Ethics for Public Service.

6.4 Key Parties in Project Implementation

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7. CONCLUSIONS

The project effectively began work in March 2008, three months after the official start date. Despite this, and a number of issues to be addressed in the project specification, the project was quick to establish a positive working relationships with the Council of Ethics for Public Service, the ECD, the CFCU and various ministries (and in particular with the Prime Ministry Inspection Board).

The project delivered nearly the Activities and Outputs; in a number of areas the project increased its Activities and Outputs.

The project trained a significant number of trainers and produced comprehensive training materials relevant to the Turkish context. It has also, through the training and review of the training material, created a resource within the University of Ankara to undertake further training, to update the training material and to work with the Council of Ethics for Public Service to ensure the quality and uniformity of future training.

The project undertook Research and Systems Studies which provided the evidence that identified the need for and importance of ethics training. The Systems Study and the Corruption Report provide evidence-based recommendations that support the approaches taken by the emerging National Anti-corruption Strategy and specifically address recommendations for future prevention strategies, measures to promote ethics with other anti-corruption measures, and proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey.

The project was delivered to schedule (see Annex 3) on time and within budget.

The project has proposed further projects that will ensure the sustainability of its work.

The project has provided the impetus and the materials to make a lasting impact on the development of public ethics, and the national anti-corruption strategy in Turkey. In so doing it has worked to ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials (its **Specific Objective**) and thus has contributed to the prevention of corruption in Turkey in accordance with European and other international standards (its **Overall Objective**).

Annexes

Economic Crime Division / Directorate of Cooperation
Directorate General of Human Rights and Legal Affairs

COUNCIL   CONSEIL
OF EUROPE   DE L'EUROPE

– Project Summary –

Project title	Ethics for the Prevention of Corruption in Turkey
Project area	Turkey
Budget	EURO 1,500,000
Funding	The European Commission (90%) and Council of Europe (10%)
Implementation	Council of Europe (Economic Crime Division/Directorate of Cooperation / DG-HL)
Duration	24 months (December 2007 – November 2009)

BACKGROUND AND JUSTIFICATION

The people of Turkey consider corruption to be one of the key problems of their society. Surveys and reports confirm the adverse effects of corruption and point at the urgency to address it. The Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey provides for three short-term priorities with regard to the anti-corruption policy:

- Fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.
- Ensure implementation of the Regulation on Principles of Ethical Behaviour for Public Officials and extend its provisions to elected officials, judiciary, academics and military personnel
- Limit the scope of parliamentary immunity in line with European practice.

The European Commission's progress 2006 progress report refers to the need to better regulate the financing and auditing of political parties and underlined again the need for better coordination of the anti-corruption effort.

The GRECO report for Turkey adopted on 10 March 2006 recommends among other things:

- to provide the Council of Ethics for Public Service with sufficient independence, providing it with an appropriate budget and staff that would enable it to promote and promulgate the new codes of ethics throughout the public administration; to properly investigate complaints made against senior officials and undertake proactive studies into particular areas of concern in respect of ethical behaviour and corruption in the public administration
- to develop training material to be used in the training of all Public Officials on the new Code of Ethics and anti-corruption policies and to require all ministries and civil service bodies to include this training as part of their curriculum; it should be ensured that it forms a core part of the induction training for new civil servants as well as in the in-service training
- Develop systems for monitoring the impact of anti-corruption measures for the various sectors concerned.

Thus, the technical assistance project aiming at contributing to these objectives will serve as one tool for providing and supporting reforms and interventions in the following areas:

- Support the Implementation of the Code of Ethics across the public administration;
- Develop codes of ethics for other categories of officials or holders of public office;
- Develop systems of monitoring the effectiveness of prevention and other anti-corruption measures;
- Ensure and enhance coordination of anti-corruption measures.

OBJECTIVE, OUTPUTS AND ACTIVITIES

Overall objective	**To contribute to democracy and the rule of law strengthening further the ethics in preventing corruption in Turkey in accordance with European and other international standards as well as GRECO recommendations**
Project objective	**To support the implementation of Code of Ethics and develop other codes and systems for effective prevention of corruption**
General	**Inception Phase/Start-up of the project**
Activity 1	Start up activities/workshops/Meetings with the counterparts
Activity 2	Establish Office and Procurement of Office Equipment
Activity 3	Preparation of Detailed Workplan and Inception Report
Activity 4	Organisation of the Start up Conference
Output 1	**The staff of the Council of Ethics is trained and have the necessary working tools and procedures to better exercise their mandate**
Activity 1	Review the working procedures of the Council of Ethics for the Public Service
Activity 2	Train the staff of the secretariat in the management of complaints received
Activity 3	Train members of the Council in the investigation of complaints
Activity 4	Support and organise 2 study visits of staff of the Council of Ethics
Output 2	**A training package/module is available to support the application of the code of ethics for public officials**
Activity 1	Translate and review materials on ethics training available in other countries
Activity 2	Develop a coherent training package/curriculum for ethics training
Activity 3	Finalise the training package and make it available to different institutions
Activity 4	Produce and disseminate a training CD suitable for computer-based training
Output 3	**Train the trainers programme is available- (At least 10 trainers have been trained and are able to deliver ethics training)**
Activity 1	Select 10 to 15 trainers from training institutions of the public administration
Activity 2	Train these trainers in the application of the training package
Activity 3	Support these trainers in the delivery of initial training activities (under outputs 4 and 5)
Output 4	**The governors, deputy governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials**
Activity 1	Organise up to 10 training events for governors, deputy governors and district governors
Activity 2	Organise up to 15 training events for ethics commissions in provinces and municipalities
Output 5	**Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials**
Activity 1	Organise up to 6 training events for members of ethics commissions and officials
Activity 2	Organise up to 4 training events for senior officials of central level institutions
Output 6	**At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public**
Activity 1	Commission at least 10 research studies
Activity 2	Organise the publication and dissemination of the results of these studies
Activity 3	Support the organisation of up to 5 public workshops on the results of these studies
Output 7	**The development of codes of conduct for elected office holders and the judiciary will have been supported**
Activity 1	Organise workshops on the needs and possibilities for developing codes of conduct

Activity 2	Support the development and drafting sessions of identified Codes of Conduct
Output 8	**The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available**
Activity 1	Carry out studies evaluating the effectiveness of anti-corruption measures
Activity 2	Based on these studies, make proposals with regard to future anti-corruption strategies
Activity 3	Organise up to 2 national conferences on the prevention of corruption in Turkey
Output 9	**Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured**
Activity 1	Support the organisation of regular meetings with the technical commission
Activity 2	Develop proposals for management, coordination, monitoring of anti-corruption strategies

The Council of Europe, while taking into account the specific needs of the project area, will also contain a strong element of regional interaction, and facilitate experience exchange and networking among anti-corruption institutions.

PARTNERS/Beneficiaries

The main project partner from the Turkish side will be the Council of Ethics for the Public Service. Project beneficiaries/target groups will also include:
- Public institutions responsible for applying the Regulation on the Principles of Ethical Behaviour of Public Officials including their ethics commissions.
- 3 Members compose each ethics commission
- 81 Provinces of central institution as well as governors and deputy governors
- Other public institutions, universities, local administrations and non-governmental organisations
- Technical commission assisting the Inter-ministerial Committee in the coordination of the Government's anti-corruption measures.

IMPLEMENTATION ARRANGEMENTS

The Council of Europe will recruit a Long-term Adviser (LTA) and one Local Project Officer. The team will be based in Ankara and work directly with the Council of Ethics. This team will be responsible for project management and implementation of project activities in Ankara on behalf of the Council of Europe. The Government will appoint a Project Director who will be funded by the Government and be a senior expert of the Council of Ethics Unit. S/he will function as the main counterpart in the organisation of project activities on behalf of the Turkish authorities.

Overall administrative project management will be ensured by Economic Crime Division (Corruption and Fraud Unit/Economic Crime Division, Directorate of Cooperation, DG-HL) at the Council of Europe in Strasbourg. A Project Officer (PO) in Strasbourg will be assigned to oversee the project's implementation and daily follow up of actions and assist the team in Ankara. The project team will propose a Workplan detailing short-term and long-term international consultants/experts, including the long-term national experts that will be needed for the implementation of project activities. The Council of Europe will ensure the active participation of local professional skills where available, and a suitable mix of European and local experts in the project activities. All local experts are to be independent and free from conflicts of interests.

CONTACT

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Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
Overall objective:	To contribute to the prevention of corruption in Turkey in accordance with European and other international standards				
Specific objective:	To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials	**Overall Indicators:** ▪ Level of compliance with the Code of Ethics for Public officials in terms of: ▪ Number of complaints received and investigated ▪ Number of training activities carried out in different institutions ▪ Activities carried out by Ethics Commissions ▪ Adoption of a Code of Ethics by the Judiciary ▪ Adoption of a Code of Ethics by the Parliament			
Output 1:	The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate	**Overall Indicators:** ▪ Number of meetings held by the Council of Ethics ▪ Number of complaints treated and investigations completed ▪ Quality of work plan ▪ Development of procedures manual ▪ Quality of reports prepared by the			

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
		Council of Ethics			
Activity 1.1	Review of the working procedures of the Council of Ethics of Public Officials and its secretariat: Submission of proposals and recommendations for the improvement.	Round Table Discussion No. 1 on reviewing issues of concern and current status of the working procedures of the Ethics Council.	March 2008 Ankara	Ethics Council	Long-term adviser Up to 5 work days of short-term consultants 2 round-table discussions
		Round Table Discussion No. 2 on the Technical Paper on Recommendations and Proposals on the improvement of the working procedures of the Ethics Council.	April 2008 Ankara	Ethics Council	
Activity 1.2	Training of the secretariat of the Ethics Council on the management of complaints received and implementation of Ethics Principles in line with international standards	Training Conference on the "International Standards on the Principles of Ethics" for Ethics Council and Government authorities	May 2008 Ankara	Ethics Council Secretariat of the Ethics Council Disciplinary Boards	Long-term adviser Up to 10 work days of short-term consultants 1 Training conference
Activity 1.3	Train the staff of the Ethics Council in the investigation of complaints	Training Session on "Investigation of Complaints" for the secretariat of the Ethics Council	June 2008 Ankara	Secretariat of the Ethics Council	Long-term adviser Up to 10 work days of short-term consultants 1 Training session and 1 round-table discussion
Activity 1.4	Study visits of members and the staff of the Ethics Council to study	Five Days Study Visit No. 1 to an EU counterpart institution (10 Persons)	Ireland/UK June 2008	Secretariat of the Ethics Council Standard Board for England Ethics Commission, Ireland	2 International Travels to other international Ethics offices/Countries 10 Days in total for two visits 20 – 24 Persons in total

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
	the experience of similar bodies in other European Union countries	Five Days Study Visit No. 2 to an EU counterpart institution (10 Persons)	The Netherlands June 2009	Commissions of Ethics Ethics Council Secretariat of the Ethics Council Civil Society (subject to their own funding) Office of for Services of the Prevention of Corruption/Ministry of Justice, France (TBC)	
Output 2:	A training strategy is developed through consultations with ministries to sustain and consolidate the implementation of the training package and embed its use beyond the work of the project A training package is available to support the application of the code of ethics for public officials	▪ The draft training package is available by month 6 ▪ A training strategy is developed and is available by month 10 ▪ The final training package is available by month 10 and the training CD by month 12 ▪ Training conference to launch strategy and training package held in month 10 ▪ Quality of the training package ▪ Project reports			
Activity 2.1	Provision and dissemination of materials on training for ethics and on international standards and tools on enhancement of ethics from other	Review, Translation of models and good practices that exist in other European countries on training for ethics and on international standards and tools on enhancement of ethics	March 2008 Ankara	Secretariat of the Ethics Council	Translation in writing of approx 200 pages Translation and Round Table Costs
		Dissemination and Introduction of the materials for the Ethics Committees	April 2008 Ankara	Secretariat of the Ethics Council All Ethics Commissions	

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
	countries				
Activity 2.2	Develop a coherent training package and curriculum for ethics training based on the provisions of the Code of Ethics	Working and Consulting Sessions between the Ethics Council/ Secretariat and Experts on assessment and drafting of the training package and of the curriculum for ethics training based on the Code of Ethics and for the public officials, including professional editing of translated material	Ankara Start April 2008 End: Sept 2008	Secretariat of the Ethics Council Other public institutions and academia (experts)	Long-term adviser Up to 28 work days of short-term consultants
Activity 2.3	Undertake training strategy	Reports on training strategy	September/October/November Ankara	Ethics Council Ethics Commissions Personnel Departments	Long-term adviser Up to 20 work days of short-term consultants
Activity 2.4	Finalise the training package and make it available to different institutions for in-service training	Following a testing of the training package (under output 3.3)—hold a consulting table on the lesson learned and issues of concern coming out of the testing of package and trainings and conduct the last revisions to the Training Package;	October-November 2008 Ankara	Secretariat of the Ethics Council	Long-term adviser Up to 8 work days of short-term consultants
		Introduce and disseminate the training package to all institutions for internal trainings along with guidelines for trainers.	February 2008 Ankara	Secretariat of the Ethics Council	
Activity 2.5	Make available a CD suitable for computer-based training	Produce and disseminate a Training CD/ suitable for computer –based training by including in it the Final Training Package	January 2009 Distribution at large in all 81 provinces	Secretariat of the Ethics Council	Cost for publication and production of CD Cost of Distribution
Output 3:	At least 75 trainers have been trained and are able to deliver ethics training	▪ Quantity and quality of training activities carried out by trainers ▪ Project reports ▪ Study on the effectiveness of the Code of Ethics ▪ Trainers will remain available for training activities			

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
Activity 3.1	Select up to 75 trainers from training institutions of the public administration	Conduct consulting and information sessions with the relevant public administration training institutions to identify and assess 85 potential Trainers. Initiate a protocol or MOU with respective institutions prior to the selection and training of the trainers.	June/July 2008 March/April 2009 Ankara	Ministry of Health Ministry of Education Ministry of Interior Ministry of Justice State Planning Organisation and other interested institutions	Long-term adviser Up to 8 work days of short-term consultants
Activity 3.2	Train the trainers in the application of the training package of the "Code of Ethics"	Train the Trainers Course No.1 on "Application of Code of Ethics"	October 2008	To be confirmed as above	Long-term adviser Up to 20 work days of short-term consultants Up to 12 working days of a professional trainer of trainers organisation 2 train the trainer workshop
		Train the Trainers Course No.2 on "Application of Code of Ethics"	March 2009	To be confirmed as above	
		Train the Trainers Course No.3 on "Application of Code of Ethics	April 2009	To be confirmed as above	
Activity 3.3	Trainer of trainers pilot exercise	Training Exercise and evaluation of trainers and participants and revisions to training material (see output 2.3)	October 2008 April 2009	To be confirmed as above	Up to 10 work days of short-term consultants
Activity 3.4	Trainers Initiate the preparation for the delivery of the initial training activities (under outputs 4 and 5)	Consulting and drafting sessions in support the newly trained trainers in the preparation and design of the initial training, curricula and training methodology and tools prior to actions that are planned to be taken under Output 4 and Output 5.	November 2008 throughout November 2009	To be confirmed as above	Long-term adviser Up to 15 work days of short-term consultants Up to 1-2 train the trainer workshops
Output 4:	The governors, deputy governors, district governors and members of Ethics Commissions of the 81 provinces have been trained in the application of the code of ethics for public officials	▪ Number of training activities carried out ▪ Follow up activities by provincial officials ▪ Number of complaints received and investigated; ▪ Project reports ▪ Study on the effectiveness of the Code of Ethics			
Activity 4.1	Organise up to 10	Training Event No.1 Istanbul	May 2009	Governors, Deputy Governors, District	Long-term adviser 21 w/days of ST

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
	training events for **governors, deputy governors,** and **district governors,** on the application of the Code of Ethics and implementation aspects of complaining procedures.	Training Event No. 2 – Samsun	June 2009	Governors, Mayors Secretariat of the Ethics Council Trained Trainers	10 events in provinces Translation/ productions/training materials/Interpretation Costs of Transport Lodging for 250 prs. for 20 days
		Training Event No. 3 – Van	June 2009		
		Training Event No. 4 – Erzurum	July 2009		
		Training Event No. 5 – Trabzon	July 2009		
		Training Event No. 6 – Kayseri	September 2009		
		Training Event No. 7 – Diyarbakir	Sept 2009		
		Training Event No. 8 – Antalya	Oct 2009		
		Training Event No. 9 – Izmir	Nov 2009		
		Training Event No.10 – Gaziantep	Nov 2009		
Activity 4.2	Organise up to 10 training events for members of **Ethics Commissions** in provinces and municipalities on the application of the Code of Ethics and implementation aspects of complaining procedures	Training Event No.1 Istanbul	June 2009	Ethics Commissions in Provinces Ethics Commission in the Municipalities Secretariat of the Ethics Council Trained Trainers	Long-term adviser 21 w/d days of ST 15 events in provinces Translation/productions/Photocopy/distribution of training materials Interpretation Costs Transport for 15 Lunch/ Dinners for 300 Persons for 30 Days
		Training Event No. 2 – Samsun	June 2009		
		Training Event No. 3 – Van	July 2009		
		Training Event No. 4 – Erzurum	July 2009		
		Training Event No. 5 – Trabzon	September 2009		
		Training Event No. 6 – Kayseri	Sept 2009		
		Training Event No. 7 – Diyarbakir	Sept 2009		
		Training Event No. 8 – Antalya	Oct 2009		
		Training Event No. 9 – Izmir	Nov 2009		
		Training Event No.10 – Gaziantep	Nov 2009		
Output 5:	Officials of central institutions and	▪ Number of training activities carried out			

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
	organisations responsible for ethics (members of the Ethics Commissions and senior managers) have been trained in the application of the code of ethics for public officials	▪ Follow up activities by Ethics Commissions and senior managers ▪ Number of complaints received and investigated ▪ Project reports ▪ Study on the effectiveness of the Code of Ethics ▪ Officials from different institutions make use of the skills acquired and follow up with ethics activities in their respective institutions			
Activity 5.1	Organise up to 6 training events for **members of Ethics Commissions**	Training Event No.1 – Ankara Chairs of Ethics Commissions Training Event No. 2 – Ankara Training Event No. 3 – Ankara Training Event No. 4 – Ankara Chairs of Ethics Commissions Training Event No. 5 – Ankara Training Event No. 6 – Ankara	January 2009	Ethics Commissions from the Central Institutions Secretariat of the Ethics Council Ethics Council	
Activity 5.2	Organise up to 4 training events for **senior officials of central level institutions** of the public administration (<u>under secretary, general director, president, general secretary and deputy</u>	Training Event No.1 – Ankara Training Event No. 2 – Ankara Training Event No. 3 – Ankara Training Event No. 4 – Ankara	February 2009	Ethics Commissions from the Central Institutions Secretariat of the Ethics Council Ethics Council	Long-term adviser 8 w/d of ST consultants Cost of training events Lunch/ Dinners for 100 Persons for 4 Days in Interpretation Costs Translation/productions/ of training materials

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
	general secretary levels)				
Output 6:	At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public	▪ Quantity and quality of research studies ▪ Number of public workshops and feedback received ▪ Project reports ▪ Contribution of the relevant authorities to the research studies and active participation into workshops; ▪ Usage of the results of the research studies/outcomes in designing specific anti-corruption measures			
Activity 6.1	Initiate the identification of subject matter preparation and of the TORs for at least 10 research studies on ethics issues and corruption in general.	Working Table with the Ethics Council on the Identification of the 10 Research Studies Themes and expected outcomes	March 2008	Secretariat of the Ethics Council Senior Officials from selected public institutions	Long-term adviser Up to 20 work days of short-term consultants Cost for 10 research studies
		Drafting of the TORs for 10 Research Studies	March 2008 Oct/Nov 2008	Secretariat of the Ethics Council	
		Tender Procedures for commissioning of 10 research studies to different institutions (consultancies/NGOs/Academia)	April 2008 (6/10) Nov 2008 (4/10)	Open to tender applicants (*based on the procurement rules of the CoE*)	
Activity 6.2	Organise the publication of the results of these studies	Commissioning of Publication and carrying of Dissemination of 10 Research Studies 6 research studies- 2008 4 research studies-2009	Ankara and provinces August 2008 January 2009	Open to tender applicants (*based on the procurement rules of the CoE*)	Cost of Publication/Translation and Dissemination
Activity 6.3	Support the Ethics Council in the organisation of up	Public Workshop No 1 on the Results of the 4/10 Research Studies	Ankara May 2009	Ethics Council	Up to 5 workshops Cost for up 2 events Catering for 65 Persons for 2 Days in Total
		Public Workshop No 2 on the Results of other 6/10 Research Studies	Ankara July 2009	Secretariat of the Ethics Council	Interpretation Costs

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
	to 2 public workshops on the results of these studies				Preparation of materials and productions/Photocopy/distribution of training materials
Output 7:	The development of codes of conduct for elected office holders and the judiciary will have been supported	▪ Availability of proposals for codes of conduct for elected officials and the judiciary ▪ Number of workshops held; ▪ Studies on the effectiveness of anti-corruption measures ▪ Project reports; ▪ Adoption of proposed code of conducts			
Activity 7.1	Organise **workshops on codes of conduct** for <u>elected office holders</u> and the <u>judiciary</u> to identify possibilities for the development of such codes	Workshop No. 1 on Code of Conducts for Elected Office Holders	Ankara February 2009 *(Back to back)*	Government institutions Parliament	Long-term adviser 5 w/d of ST consultants 2 workshops; Cost of 40 Prs for 2 Days; Interpretation distribution of materials
		Workshop No. 2 on Code of Conducts for Judiciary members	Ankara February 2009 *(Back to back)*	Ministry of Justice and Prosecution	
Activity 7.2	Support the review and drafting sessions of identified Codes of Conduct for elected office holders through workshops and direct technical advice	Review and Drafting Workshop/Sessions No.1	Ankara To be Confirmed 2009	Government institutions Parliament	Long-term adviser 10 w/d of ST consultants 3 workshops Catering for 30 person for 3 Days; Interpretation Preparation of materials
		Review and Drafting workshop/Sessions No. 2	To be Confirmed 2009	Ministry of Justice and Prosecution	

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
Output 8:	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available and Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured.	▪ First study available by month 12 ▪ Further studies available by month 22 ▪ Quality of studies/ recommendations ▪ Project reports ▪ The results of the research studies will be followed up and feed into improved corruption prevention strategies ▪ Availability of proposals for improved coordination ▪ Project reports ▪ GRECO reports ▪ EU/EC reports			
Activity 8.1	Carry out system studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics	System Study No. 1: Effectiveness of AC measures through Code of Ethics System Study No. 2: Effectiveness of AC measures through the public Information Act System Study No. 3: Effectiveness of AC measures in Criminal Law System Study No. 4: Effectiveness of AC measures through disciplinary provisions in the legislation and existing structures	Ankara October 2008 – May 2009	-Ethics Council -Secretariat of the Ethics Council -Ethics Commissions - Ministry of Justice Public Information Council Law Enforcement Disciplinary Boards	Long-term adviser 24 w/d of ST consultants 4 studies Interpretation Costs Preparation of materials and productions/Photocopy/distribution of materials

Reference	Description of Activities	Expected Indicators and Activity Interventions/Outcomes	Timing/Venue	Participating Institutions	Inputs from the CoE
Activity 8.2	Submission of Proposals on specific Anti-corruption measures based on the Study Outcomes	Report on specific Anti-corruption measures based on the Study Outcomes	May-June 2009		Long-term adviser Up to 12 work days of short-term consultants
Activity 8.3	Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey	Submit proposals/recommendations on: ▪ Management; ▪ Coordination; ▪ Monitoring Tools of Anti-corruption Strategies in Turkey	Ankara July-September 2009	Secretariat of the Ethics Council Ethics Commissions Inspection Boards	Long-term adviser 10 w/d of ST consultants Preparation of materials productions/Photocopy/distribution of materials
Activity 8.4	Organise up to 2 national conferences on the prevention of corruption in Turkey	National Conference No. 1 on Prevention of Corruption	Ankara February 2009	Ethics Commissions and other relevant public institutions/ judiciary/civil society and business community representatives	Catering for 60 Prs for 2 Days; Interpretation Preparation of materials productions/Photocopy/distribution materials Cost of 2 nat. conf.
		National Conference No. 2 on Proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey	Ankara November 2009	Ethics Commissions and other relevant public institutions/ judiciary/civil society and business community	

Calendar of Activities (version based on second revised Workplan of TYEC Project)

Completed √	Planned

Outputs/ Activities	Description	Months / 1st Year												Months / 2nd Year															
		D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N			
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12			
	Inception phase (8 weeks)	√	√	√																								
Output 1:	**The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate**				√	√	√	√	√	√	√	√																
Activity 1.1	Review the working procedures of the Council of Ethics for the Public Service and its secretariat and make and implement proposals for improvement				√	√	√	√	√	√	√	√																
	RTD No.1				√																								
	RTD No.2						√																						
Activity 1.2	Train the staff of the secretariat in the management of complaints received and implementation of Ethics Principles in line with international standards																												
	Training Conference No. 1						√																						
	~~Training Conference No. 2~~																												
Activity 1.3	Train the staff of the Ethics Council in the investigation of complaints																												
	Training Session No. 1							√																					
	~~Training Session No. 2~~																												
Activity 1.4	2 Study visits of members and the staff of the Council of Ethics to study the experience of similar bodies in other European Union countries																												

Outputs/ Activities	Description	Months / 1st Year												Months / 2nd Year											
		D 1	J 2	F 3	M 4	A 5	M 6	J 7	J 8	A 9	S 10	O 11	N 12	D 1	J 2	F 3	M 4	A 5	M 6	J 7	J 8	A 9	S 10	O 11	N 12
	Five days Study Visit No. 1 to Ireland and UK							√																	
	Five days Study Visit No. 2 to The Netherlands																						√		
Output 2	**A training package is available to support the application of the code of ethics for public officials**				√	√	√	√	√	√	√	√	√	√	√	√	√	√	√						
Activity 2.1	Provision and dissemination of materials on training for ethics and on international standards and tools on enhancement of ethics from other countries				√	√	√	√	√																
	Review, Translation of models and good practices that exist in other European countries on training for ethics and on international standards and tools on enhancement of ethics				√	√	√	√	√																
	Dissemination and Introduction of the materials for the Ethics Committees				√	√	√	√	√																
Activity 2.2	Develop a coherent training package/curriculum for ethics training based on the provisions of the Code of Ethics					√	√	√	√	√	√	√	√	√	√	√	√								
	Working and Consulting Sessions between the Ethics Council/ Secretariat and Experts on assessment and drafting of the training package and of the curriculum for ethics training based on the Code of Ethics and for the public officials					√	√	√	√	√	√	√	√	√	√	√	√								
Activity 2.3	Finalise the training package and make it available to different institutions for in-service training												√	√	√	√	√	√	√						
	Following a testing of the training package (under outputs 4 and 5), finalise and the training package and make it available to different institutions for in-service training												√	√	√	√	√	√	√						
	Introduce and disseminate the training package to all institutions for internal trainings along with guidelines for trainers.												√	√	√	√	√	√	√						
Activity 2.4	Make available a CD suitable for computer-based													√	√	√	√	√	√	√	√	√	√		

Outputs/ Activities	Description	Months / 1st Year												Months / 2nd Year											
		D 1	J 2	F 3	M 4	A 5	M 6	J 7	J 8	A 9	S 10	O 11	N 12	D 1	J 2	F 3	M 4	A 5	M 6	J 7	J 8	A 9	S 10	O 11	N 12
	training																								
	Produce and disseminate a training CD suitable for computer-based training by including it in the Final Training Package													√	√	√	√	√	√	√	√	√			
Output 3	**At least 110 trainers have been trained and are able to deliver ethics training**							√	√	√	√	√	√	√	√	√	√	√	√						
Activity 3.1	Select 110 trainers from training institutions of the public administration							√	√	√						√	√	√	√	√	√	√	√			
	Conduct consulting and information sessions with the relevant public administration training institutions to identify and assess about 110 potential Trainers. Initiate a protocol or MOU with respective institutions prior to the selection and training of the trainers.							√	√	√						√	√	√	√							
Activity 3.2	Train the trainers in the application of the training package of the "Code of Ethics"											√													
	Train the Trainers Workshop No.1 on "Application of Code of Ethics"											√													
	Train the Trainers Workshop No.2 on "Application of Code of Ethics"																√								
	Train the Trainers Workshop No.3 on "Application of Code of Ethics"																								
Activity 3.3	Trainer of trainers pilot exercise												√				√								
Activity 3.4	Trainers Initiate the preparation for the delivery of the initial training activities (under outputs 4 and 5)												√				√	√	√	√					
	Consulting and drafting sessions in support the newly trained trainers in the preparation and design of the initial training, curricula and training methodology and tools prior to actions that are planned to be taken under Output 4 and Output 5.												√				√								
Output 4	**The governors, deputy governors and members of Ethics Commissions of the 81 provinces have been trained in the application of the code of ethics for public officials**																		√	√	√	√	√	√	√

Outputs/ Activities	Description	Months / 1st Year												Months / 2nd Year											
		D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
Activity 4.1	Organise up to 10 training events for governors, deputy governors, and district governors on the application of the Code of Ethics and implementation aspects of complaining procedures.																		√	√	√	√	√	√	√
	Training Event No.1 – Istanbul																		√						
	Training Event No. 2 – Samsun																			√					
	Training Event No. 3 – Van																			√					
	Training Event No. 4 – Antalya																							√	
	Training Event No. 5– Kayseri																						√		
	Training Event No. 6 – Diyarbakir																							√	
	Training Event No. 7 – Erzurum																				√				
	Training Event No. 8 – Trabzon																				√				
	Training Event No. 9 – Izmir																								√
	Training Event No.10 – Gaziantep																								√
Activity 4.2	Organise up to 10 training events for members of Ethics Commissions in provinces and municipalities on the application of the Code of Ethics and implementation aspects of complaining procedures																		√	√	√	√	√	√	
	Training Event No.1 – Istanbul																		√						
	Training Event No. 2 – Samsun																			√					
	Training Event No. 3 – Van																			√					
	Training Event No. 4 – Antalya																							√	
	Training Event No. 5– Kayseri																						√		
	Training Event No. 6 – Diyarbakir																							√	
	Training Event No. 7 – Erzurum																				√				
	Training Event No. 8 – Trabzon																				√				
	Training Event No. 9 – Izmir																								√
	Training Event No.10 – Gaziantep																								√
Output 5	**Officials of central institutions and organisations responsible for ethics**																								

Outputs/ Activities	Description	Months / 1st Year												Months / 2nd Year														
		D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N			
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12			
	(members of the Ethics Commissions and senior managers) have been trained in the application of the code of ethics for public officials																												
Activity 5.1	Organise up to 6 training events for **members of Ethics Commissions** and officials responsible for in-service training in different institutions of the public administration														√														
	Training Event No.1 – 6, Ankara														√														
Activity 5.2	Organise up to 4 training events for **senior officials of central level institutions** of the public administration (under secretary, general director, president, general secretary and deputy general secretary levels)																√											
	Training Event No.1 – 4, Ankara																√											
Output 6	**At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public**																											
Activity 6.1	Initiate the identification of subject matter preparation and of the TORs for at least 10 research studies on ethics issues and corruption in general.				√	√	√	√	√	√	√	√																
	Working Table with the Ethics Council on the Identification of the 10 Research Studies Themes and expected outcomes				√																							
	Drafting of the TORs for 10 Research Studies				√																							
	Tender Procedures for commissioning of 10 research studies to different institutions (consultancies/NGOs/Academia)					√						√	√																
Activity 6.2	Organise the publication of the results of these studies																											
	Commissioning of Publication and carrying of Dissemination of 10 Research Studies 6 research studies- 2008																											

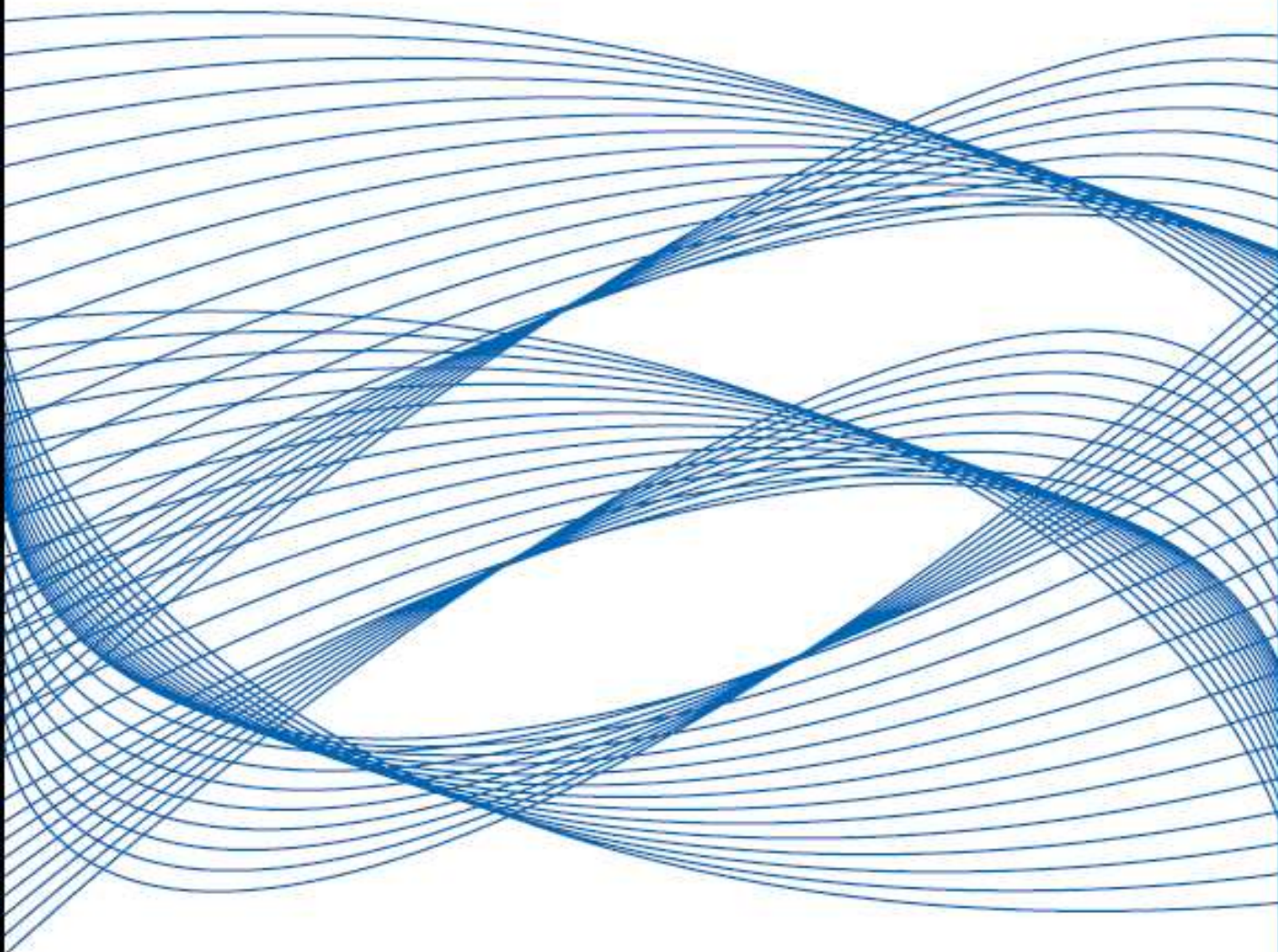| Outputs/ Activities	Description	Months / 1st Year												Months / 2nd Year											
		D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
	4 research studies-2009																								
Activity 6.3	Support the Council of Ethics in the organisation of up to 2 public workshops on the results of these studies																		√	√	√	√	√	√	
	Public Workshop No 1 on the Results of the 6/10 Research Studies																		√						
	Public Workshop No 2 on the Results of other 4/10 Research Studies																							√	
Output 7	**The development of codes of conduct for elected office holders and the judiciary will have been supported**																								
Activity 7.1	Organise workshops on codes of conduct for elected office holders and the judiciary to identify possibilities for the development of such codes														√	√									
	Workshop No. 1 on Code of Conducts for Elected Office Holders															√									
	Workshop No. 2 on Code of Conducts for Judiciary members															√									
Activity 7.2	Support the review and drafting sessions of identified Codes of Conduct for elected office holders through workshops and direct technical advice															√									
	Review and Drafting Workshop/Sessions No.1															√									
	~~Review and Drafting workshop/Sessions No. 2~~																								
Output 8	**The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available and coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured.**																								
Activity 8.1	Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics						√	√	√	√	√	√	√	√	√	√	√	√	√	√					

Outputs/Activities	Description	Months / 1st Year												Months / 2nd Year															
		D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N			
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12			
	System Study No. 1: Effectiveness of AC measures through Code of Ethics															√	√	√	√	√								
	System Study No. 2: Effectiveness of AC measures through the public Information Action															√	√	√	√	√								
	System Study No. 3: Effectiveness of AC measures in Criminal Law															√	√	√	√	√								
	System Study No. 4: Effectiveness of AC measures through disciplinary provisions in the legislation and existing structures															√	√	√	√	√								
Activity 8.2	Based on these studies, make proposals with regard to future anti-corruption strategies.																							√				
	Proposal No.1 on Effectiveness of AC measures through Code of Ethics																							√				
	Proposal No.2 on Effectiveness of AC measures through the public Information Action																							√				
	Proposal No.3 Effectiveness of AC measures in Criminal Law																							√				
	Proposal No. 4 Effectiveness of AC measures through disciplinary provisions in the legislation and existing structures																							√				
Activity 8.3	Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey													√	√	√	√	√	√	√	√	√	√	√				
Activity 8.4	Organise up to 2 national conferences on the prevention of corruption in Turkey													√	√	√	√	√	√	√	√	√	√	√				
	National Conference No. 1 on Prevention of Corruption															√												
	National Conference No. 2 on Prevention of Corruption																							√				

ANNEX 4: LIST OF REPORTS AND PUBLICATIONS

TP Number	Date	Title	Prepared by: Expert/Consultant
PC-TC(2008)	March 2008	Inception Report	Alan Doig, LTA Project Management Unit
PC-TC (2008)15	March 2008	Current Procedure and Possible Future Work of the Council of Ethics	Alan Doig, LTA Project Management Unit
PC-TC (2008)16	March 2008	Options for the Council of Ethics for Public Service as the National Prevention of Corruption Council	Alan Doig, LTA Project Management Unit
PC-TC(2008)17	March 2008	Revising the Code and Institutional Responsibilities	Alan Doig, LTA Project Management Unit
PC-TC(2008)	April 2008	1st Quarterly Progress Report	Alan Doig, LTA Project Management Unit
PC-TC(2008)40	April 2008	Complaints: Guide to Possible Inquiry Procedure	Alan Doig, LTA Project Management Unit
PC-TC(2008)43	April 2008	Working paper: Code for the Legislature	Alan Doig, LTA Project Management Unit
PC-TC(2008)44	April 2008	Working paper: A Judicial Code of Conduct	Alan Doig, LTA Project Management Unit
PC-TC(2008)	May 2008	Draft Working Paper: Institutional Capacity Review and Plan	David Watt
PC-TC(2008)	May 2008	Training Strategy	David Watt
PC-TC(2008)42	May 2008	Review of the Council of Ethics for Public Service	Alan Doig David Watt

PC-TC(2008)41	July 2008	A Guide for facilitators of ethics training An implementation guide for public services organisations The pocket guide for all public officials	David Watt
PC-TC(2008)45	September 2008	Technical Paper: Second Review of the Council of Ethics	Alan Doig, LTA Project Management Unit
PC-TC(2008)46	September 2008	Technical Paper: Sanctions Policy	Alan Doig, LTA Project Management Unit
PC-TC(2008)57	September 2008	2nd Quarterly Progress Report	Alan Doig, LTA Project Management Unit
PC-TC(2008)58	September 2008	Interim Report: Legal and Institutional Infrastructure of Ethical Administration in Turkey	Ugur Omurgonulsen
	December 2008	Interim Evaluation Report	Vera Devine and Tilman Hoppe
PC-TC(2009)4	September 2008	3rd Quarterly Progress Report	Alan Doig, LTA Project Management Unit
PC-TC(2009)12	December 2008	4th Quarterly Progress Report	Alan Doig, LTA Project Management Unit
PC-TC(2009)38	June 2009	An Evaluation Of The Effectiveness Of Anti-Corruption Measures Implemented In Recent Years, Including Criminal Law Measures, The Public Information Act, Disciplinary Provisions, and the Code Of Ethics	Ugur Omurgonulsen
PC-TC(2009)32	June 2009	5th Quarterly Progress Report	Alan Doig, LTA Project Management Unit
PC-TC(2009)53	September 2009	6th Quarterly Progress Report	Alan Doig, LTA Project Management Unit
PC-TC(2009)61	April 2009	Research Study: Conflict of Interest	Prof. Dr. Ömer Faruk Gençkaya
PC-TC(2009)62	April 2009	Research Study: Law Enforcement and Ethics	Prof. Dr. İbrahim Cerrah
PC-TC(2009)63	April 2009	Research Study: Title / Land Registry and Ethics	Assoc. Prof. Hamza Ateş

PC-TC(2009)64	April 2009	Research Study: Planning in the Local Administrations and Ethics	Assoc. Prof. Gökçen Kilinç
PC-TC(2009)65	October 2009	Research Study: Public Bidding and Ethics	Assoc. Prof. Arif Köktaş
PC-TC(2009)66	October 2009	Research Study: Ethics and Customs Services	Assoc. Prof. Dr. Hamza Ateş
PC-TC(2009)67	October 2009	Research Study: The Ethical Approaches, Codes of Conduct, Implementations and Internalization Level of the Public Professional Associations In Turkey	Assoc. Prof. Dr. Refika Bakoğlu Deliorman
PC-TC(2009)68	October 2009	Research Study: The Shadow Economy	Prof. Dr. Coşkun Can Aktan
PC-TC(2009)69	October 2009	Research Study: Ethical Conduct in Health Services	Prof. Dr. Haydar Sur
PC-TC(2009)70	October 2009	Research Study: Ethics, Culture and Society	Prof. Dr. Kemal Görmez
PC-TC(2009)57	November 2009	Corruption Report Background Review	Alan Doig, LTA Project Management Unit
PC-TC(2009)60	November 2009	Corruption Report	Alan Doig, LTA Project Management Unit
PC-TC(2009)71	November 2009	Activity Report (December 2007-November 2009)	Alan Doig, LTA Project Management Unit
PC-TC(2009)71	December 2009	7th Quarterly Progress Report	Project Management Unit