



Ethics for the Prevention of Corruption in Turkey (TYEC)

Council of Europe Project No. EC/1062

Interim Evaluation Report

by

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The views expressed in this report are those of authors and do not necessarily reflect official positions of the Council of Europe or of the donors funding this project.

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1. Summary and Recommendations

To assess the **design, delivery** and **impact** of the project, the evaluators carried out a desk review of the available project documents (see annex 5.3) and, from 10-13 November 2008, conducted semi-structured interviews with numerous stakeholders during an on-site visit in Ankara (see annex 5.2).

As for the **project design**, the evaluators find that, after a number of adjustments made during the implementation phase, it is a pragmatic combination of activities well accustomed to the current situation in Turkey. In the future, the strategic approach to projects of this kind might be further strengthened by taking the actual size of the public administration as a starting point for detailed calculations (number of targeted persons and institutions, sequencing of trainings etc.). There might also be scope for reassessing the staffing needs for projects like this to provide for dedicated secretarial/administrative support.

The evaluators find that after 12 out of 24 months, the **project delivery** is well on track. Especially the core task of the project, ethics training, has started off promisingly and is met by high motivation among public servants. As for anti-corruption coordination and strategy, there is increasing scope for the project to work with other stakeholders in addition to its current counterpart, the Council of Ethics. The possibility to do so should be formalised through the project's Steering Committee.

In order to further strengthen sustainability of the **project impact**, the evaluators recommend:

I. Training

- a) The project team should support the Council of Ethics in drafting, implementing, and, if necessary, adjusting a **national plan** setting out concrete steps and the necessary timeframe for cascading ethics training to a total of about 3 million public servants.
- b) The project team should support the Council of Ethics 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.
- c) The project team should offer technical advice to the Council of Ethics in its efforts to **report** regularly to the public and/or to the parliament on the progress of lit. a)-c).

II. Research, strategy and coordination

- a) The project team should support the Council of Ethics in **feeding** results of research studies into the ethics trainings, the anti-corruption strategy, and the coordination of anti-corruption measures.
- b) The project team should support the Council of Ethics and/or a future body coordinating anti-corruption policies in consolidating **data** and creating **public transparency** on the pervasion and characteristics of corruption in different sectors, its prevention (e. g. ethics training) and its control and prosecution, the actors involved and their competences.

III. Possible follow-up

Judging from the implementation at this stage of the project, the evaluators find that the project will probably have generated a critical momentum by the end of its timeframe, in 2009: The training of senior trainers will, at best, be formally completed, but will most likely need further attention; the Council of Ethics will - if at all - just have set up a training unit to monitor and assist the training activities; a coordinating body for anti-corruption measures will just have worked for a year at best, and might only have started implementing an anti-corruption strategy. In order to safeguard the achievements of the project and to increase the prospects of sustainability of the projects outputs, the evaluators strongly feel that a follow-up project might be considered already at this stage, with a focus on supporting a future **training unit** of the Council of Ethics, and on providing technical advice for the implementation of an **anti-corruption strategy** and to the body **coordinating anti-corruption measures**. Also, technical advice to the Council of Ethics on **work with the media and outreach to the public** could be considered.

2. Project design

The TYEC Project addresses three major needs in the fight against corruption:

- **Training** of public servants in ethics.
- **Preparation** of other anti-corruption measures.
- **Coordination** of anti-corruption measures.

2.1. Training

2.1.1. Internal

The internal part of the training targets the Council of Ethics itself. It focuses on one of the three functions of the Council of Ethics: **management** and **investigation** of complaints. The training on the management of complaints only mentions the "staff" of the Council, whereas the training on the investigation of complaints does only refer to "members" of the Council. There is no obvious reason for such a distinction, since both functions are in reality mainly performed by the staff. (The wording has been adapted to "staff" for both cases during the course of the project, see infra 3.1.1).

However, neither internal parts of the training seem to match the current needs and capacity of the Council of Ethics: There is only a very **limited investigative capability** so far. However, according to various interview partners, the Council of Ethics is expected to take on up to 10 more staff before the end of 2008 to enable it to investigate complaints. The activities foreseen to train staff on investigations could therefore begin in early 2009.

There is one more function of the Council of Ethics relevant for training: **Awareness raising** work, which is also mentioned in Art. 25 of the Code of Ethics.¹ The TYEC project's activities support this awareness raising function of the Council through research studies, conferences, coordination measures etc. The project is therefore a learning-by-doing opportunity for the staff. Nonetheless, the public's acceptance of the Council's work, and hence its success, depend to a large extent on strategic and professional publicity work. This is underlined by the following two points: First, some of the short-term experts have observed that the Council of Ethics is still known to only a few citizens. Second, the media has reacted negatively to the first report of the Council, which could have been possibly partly avoided.²

1 Art. 25 Code of Ethics: "The Council makes all sorts of studies about the establishment and development of ethical behaviour, have them made, arranges researches, inquiries, public opinion polls, scientific meetings and similar activities [...]."

2 Activity Progress Report, October 2008, p. 7 par. 5.

Separate training or technical advice on strategic **publicity/outreach work** could therefore have been considered as part of the project's design.

2.1.2. External

The external training of public servants is – by numbers – the most challenging task of the project. The trainings carried out during the project include Governors, members of Ethics Commissions, and senior public servants as follows:

Table 1: Senior Public Servants falling into the scope of the project training

Line	Category	Quantity
1	Provinces	81
2	- Governors	81
3	- Deputy Governors (Ø 7/province)	567
4	total (2+3)	648
5	Districts/District Governors	923
6	<i>Governors total (4+5)</i>	<i>1,571</i>
7	Local Ethics Commissions (1+5)	1,004
8	<i>Local Ethics Commission members*</i>	<i>3,012</i>
9	Central institutions**	40
10	- Ethics Commissions: members*	120
11	- Senior Public Servants (Ø 5 per institution)	200
12	<i>Central Public Servants/members total</i>	<i>320</i>
13	Senior Public Servants total***	4,903

* Conservative estimate: 3 members/commission (= legal minimum).

** Number depends on definition of "central institution".

*** Some public servants might be counted twice: they could, for example, be a member of an Ethics Commission and be a Senior official at the same time.

The Grant Application for the project stipulates that "a critical number of trainers need to be trained in order to [...] ensure sustainability"³ and puts this number at "not less than 1,000 persons".⁴ However, taking into account the above calculation, it seems not immediately clear on what basis it is assumed that the figure of approximately 1,000 persons constitutes this "critical number to ensure sustainability". In this context, it also has to be kept in mind that those 1,000 persons would only be able to train public servants in ethics, but not to train other public servants to be trainers – this would, however, be crucial to create a cascading system.

3 Direct Grant Application Form, p. 7, 3rd bullet point.

4 Direct Grant Application Form, p. 6 at No. 1.6.3.

Table 2: Senior Public Servants actually reached by the project’s trainings

Line	Category	Quantity	Trainings	Trainees*	% of total
1	Local Governors	1,571	10	250	16 %
2	Local Ethics Comm. members	3,012	15	375	12 %
3	Central Ethics Comm. members	120	6	150	125 %
4	Central Senior Public Servants	200	4	100	50 %
5	Σ	4,903	35	875	Ø 17,6 %

*Assumption: 25 people per training.

By numbers, the training is very much concentrating on the **central** level, whereas only a minor fraction of the **local** senior servants is reached by the initial trainings. The initial focus on the central level appears to make sense for several reasons: First, the **motivation** for ethics training might be higher at the central level, as staff at these institutions might be more familiar with national and international perspectives and standards on ethics and corruption. Second, many central institutions (e. g. land registry) have **branches** at the local level, and thus can spread ethics also to that level. Third, starting work at the central level would also seem to be in line with the country’s **administrative culture**, where commitment and leadership from the top level is important for successful implementation at the local level.

In a country the size of Turkey and with the limited resources offered by any technical cooperation project, the need to be highly strategic is evident. Future projects of this kind might want to start with a comprehensive **ex-ante calculation** as a way of projecting feasible figures. In this context, the project’s timeframe of two years might be too tight for reaching out to the actual number of public servants within the scope of the project’s trainings (see also 4.1.2 Project Impact: Training).

2.2. Preparation of other anti-corruption measures

2.2.1. Research studies

There are no specifications according to what criteria the topics of the research studies were chosen. On the one hand, this flexibility might support ownership of the project and might lead to studies contributing to the fight against corruption in general. On the other hand, the Council of Ethics has only a mandate for Senior Public Officials. With regards to this, the research could have focussed on corruption issues especially relevant to Senior Public Officials. However, even information on **low level corruption** will contribute to the training of Senior Officials: As they promote ethics to their subordinates, they have to understand how corruption

works on low levels, and how subordinates perceive the role of Senior Officials in the context of corruption.

2.2.2. Codes of Conduct for Legislative and Judiciary

The need for Codes of Conduct for the legislative and judiciary not covered by the existing Ethics Code has been confirmed by the majority of counterparts interviewed in the framework of this evaluation. The mandate of the Council of Ethics, which is the counterpart institution in this project, does not, however, extend to the legislative and judiciary, posing somewhat of a dilemma as to how this can be delivered. At the time, no other formal counterpart was available for the development of codes for the legislative and the judiciary; with this in mind, the Council of Ethics seems to be a reasonable and pragmatic starting point.

Without apparent reason there is only a workshop foreseen on the development and drafting of a Code for the Legislature, but not on the **Judiciary** (output 7, activity 2). Therefore, the evaluators welcome the fact that the actual planning supports drafting of a Code also for the Judiciary (see infra 3.2.2).

2.2.3. Anti-corruption strategy

The need for an anti-corruption strategy has been regularly highlighted in international reports, including, most recently, the 2008 Progress Report released by the European Commission in November (the chapter on anti-corruption policy is informed, inter alia, by the reports of the Council of Europe's GRECO).⁵ The project's counterpart is the Council of Ethics at the Prime Minister's office. This choice of counterpart is sensible for delivering the project's core objective of ethics training. However, the assignment of roles and responsibilities in the fight against corruption in Turkey is, as yet, not conclusively settled; institutions other than the Council of Ethics might, in the future, take leading roles in preparing and coordinating anti-corruption measures. Currently, no provisions seem in place to extend the range of possible counterparts, potentially leaving a dilemma for the team as implementation proceeds: while the project objectives need to be delivered, the possibility of working with **other counterparts** than the Council of Ethics is not necessarily formalised. This issue could possibly be clarified through the project's Steering Committee.

2.3. Coordination of anti-corruption measures

The need for an effective coordination of anti-corruption measures has also been a repeat feature of international recommendations (see previous paragraph). The

⁵ Turkey 2008 Progress Report, p. 10 ff., http://ec.europa.eu/enlargement/pdf/press_corner/key-documents/reports_nov_2008/turkey_progress_report_en.pdf.

project document foresees, under output 9, activity 1, the support to meetings of the “technical commission assisting the Inter-ministerial Anti-corruption Commission”. The evaluators understand that this technical commission has not been functioning for several years now, and the Inter-Ministerial Commission has been largely **non-active** (there are indications that this could be about to change with work underway on drafting an anti-corruption strategy, which might be overseen by this Commission). It is therefore not immediately clear how the activity under this output was agreed upon.

2.4. Project management

The project team in Ankara consists of the TYEC Long-Term Advisor, and a Local Project Officer. Given the ambitious work plan of the project, and the considerable amount of administrative, logistical and organisational work involved in particular in the trainings (which is likely to increase in the following 12 months of the project with training to take place at the province level), the evaluators feel that there could have been scope for the project to have assistant capacities available exclusively dedicated to **secretarial/administrative** tasks, not least to maximise the use of the qualifications and expertise in the existing team.

3. Project delivery

3.1. Training

3.1.1. Internal

Review of the **working procedure** of the Council of Ethics: The project reacted flexibly to the current lack of an investigative capacity in the Council of Ethics. An international conference was dedicated to presenting European best practice and examples of agencies similar to the Council of Ethics, and several technical/working papers were produced on the future work of the Council.

Study visits: In June 2008, the project conducted one out of two planned study visits. The choice of Irish and UK examples seems to be reasonable as the Irish and UK Ethics institutions are part of a complex ethics infrastructure, thus presenting a contrasting picture for the Turkish Council of Ethics on its future role and cooperation with other stakeholders.

3.1.2. External

At the time of the evaluation, the activities under Output 2 were close to being finalised. A training package had been prepared based on the training package developed by the Public Standards Commission of the State of Victoria in Australia. The package has been adapted to meet the needs of the Turkish counterparts: the material has undergone several phases of translation and extensive proofreading to ensure coherence of concepts, while the **case studies** have been developed based on real-life cases from Turkey (the project involved a Turkish expert who had skimmed mass media and files from Turkish trade unions to ensure the relevance of cases to be included in the material and the training). As the training is rolled out to line ministries, ministry-specific case studies should be developed on the basis of which staff is being trained. The project team has already made provisions for this task.

A significant adjustment has been made to increase the number of **trainers** to be trained through the project from initially 10/15 to 25. This change was necessary to increase the chances of the project delivering sustainable results, also taking into account that not all of the selected candidates would eventually deliver training. Candidates to become trainers were identified by line ministries themselves, upon receipt of a circular by the Council of Ethics. Prospective candidates were required to have some previous teaching/training experience and basic knowledge of English (given the mainly international sources on ethics and anti-corruption). The two trainers interviewed by the evaluators were selected out of a two-digit number of applicants/volunteers in both ministries. Initially, training was scheduled to take

one week; this was deemed not sufficient and the time was extended to four weeks. The trainers were able to test their skills for the first time during an ethics training conference in November.

More significantly, the project has added the drafting of a training **strategy** to institutionalise the training within line ministries/public bodies. This came with the realisation that training a limited number of trainers might be of little value without there being a strategy embedding the training in the line ministries. First steps seem to have been taken by line ministries to develop ministry-specific strategies with the trainers from their institutions.

3.2. Preparation of other anti-corruption measures

3.2.1. Research studies

At the time of the evaluation, four out of ten research studies had been commissioned under Output 6. Fields where corruption was most prevalent and where the lack of data was most intense were chosen as topics for the research. The studies had been publicly tendered, both through advertisements in national newspapers as well as circulars to universities and academic institutions, and advertisements on the Council of Ethics' website and the TYEC project webpage of the Council of Europe website; contracts were signed in August, and the research teams are to deliver results within five months; this **timeframe** was considered too short by the researchers, since all research studies will be based on **surveys** and the review of past corruption complaints files and not on theoretical assumptions. The strengths of the researches would seem to lie in the fact that they are being carried out with the active support of the institutions targeted, that they are based on internal surveys, and that they take a practical approach. If implemented successfully, these studies should yield interesting inside perspectives. The research findings might also inform the drafting of a national anti-corruption strategy.

3.2.2. Code of conduct for Legislative and Judiciary

The evaluators have interviewed the project's short-term expert, who is already working with officials from the Parliament on a legislative code of conduct. The project team has supported this **independent** process of drafting a code by providing thorough technical papers, and by preparing a conference – also on a future judicial code of conduct – to be held by the end of 2008/beginning of 2009.

3.2.3. Anti-corruption strategy

At the time of the evaluators' on-site visit, activities were underway in the Prime Ministry's **Inspection Board** of drafting an anti-corruption strategy for 2009-2012, which is to be submitted by mid-December. The evaluators understand that there

have been contacts between the project team and the Prime Ministry's Inspection Board to discuss the strategy, albeit these contacts would appear to be informal given that the project is working with and through the Council of Ethics (see above 2.2.3).

3.3. Coordination of anti-corruption measures

Activities foreseen under this Output (Output 9) were hampered not least by the fact that the **Inter-ministerial Committee** that was supposed to be assisted has not been operating since 2004. According to various interview partners this is expected to change (see infra 4.3).

3.4. Project management

The project seems to be well managed across the board. Relationships between the project team and the Turkish counterpart institution are good, and there appears to be a good level of ownership of the project. The Resident Advisor appears to be **sensitive** to the specific Turkish context and manages the balance between delivering the project activities on the one hand, and carefully avoiding imposing advice and views on counterparts on the other hand. For example, the project team guided and facilitated the first training delivered by the 25 newly trained trainers, while keeping discreetly in the background during the actual event. Short-term advisors report having been given very precise guidance, instructions, and support from the Resident Advisor, issues that are important in order to keep deliverables focussed and useful for counterparts. The project team has been able to adjust a number of activities to better meet the requirements of the Turkish counterparts, while still keeping within the project logic (raising the number of trainers from 10/15 to 25 etc.). **Adjustments** are also being made in terms of the time required to see activities through to a very high standard (time required to train trainers, ensuring a high quality of training material through repeat translations/proofreading). **Reporting** is being done in a timely and correct fashion, and budget execution appears to be on track (as has also been confirmed by the Central Finance and Contracts Unit), while some reallocations in the budget have been made to be able to meet the costs of implementing a training strategy.

3.5. Visibility of the Project

The project is fulfilling its obligations with regards to visibility.⁶ There is a link to the TYEC page on the Council of Europe's "Action against Economic Crime" website on the website of the Council of Ethics. Individual participants of project activities are, as in other projects of this kind, occasionally confused as to the distinction between

6 As stipulated in Article 6, Annex II to the Direct Grant Application Form.

the European Union and the Council of Europe. Even if so, the evaluators feel that, in some cases, a presence in the background could even be helpful for achieving the objectives than any appearances of the project activities as being imposed from the outside.

3.6. External factors

It seems clear that compliance/progress reports resulting from Turkey's membership in the Council of Europe's GRECO and its status of candidate country to the European Union help the delivery of the project's objectives. Also, delivery of some of the project's objectives depends on many more stakeholders than the Council of Ethics (Parliament, judiciary, inspection boards, Inter-ministerial Committee etc.). Furthermore the lack of an independent status, appropriate staff and its own budget weaken the work of the Council of Ethics, and thus threaten the sustainability of the project impact. It is worthwhile noting in this context that the recently published draft of the "National Programme of Turkey for the Adoption of the EU Acquis"⁷ calls for "[e]nsuring the Board of Ethics for Public Officials to have a budget and secretariat with a quality in consistent with its tasks".

7 Draft, August 2008, p. 250, www.abgs.gov.tr/files/UlusalProgram/UP2008/npaa2008_draft.pdf.

4. Project impact

4.1. Training

4.1.1. Internal

The analysis of working procedures and the training on the **management** and **investigation** of complaints will take place as soon as the necessary staff is installed with the Council of Ethics (reportedly end of 2008, see supra 3.1.1). The impact can only be assessed afterwards.

The discussions the evaluators had with various stakeholders (secretariat of the Council of Ethics, Prime Ministry Inspection Board, researchers etc.) during the in-country mission contained references to the content of the **technical papers** delivered under output 1. This suggests that the papers have contributed to a structured discussion on the issues touched, and that they had an inspiring effect on the involvement of the Council of Ethics. At the time of the evaluators' visit, the Council of Ethics prepared for a brainstorming with the members of the Ethics Commissions outside Ankara, which possibly featured some of the options/ideas for future cooperation put forth in the technical paper.

References to the **study visits** indicate a benefit to the staff of the Council of Ethics of having a comparative perspective.

4.1.2. External

The evaluators have been observing parts of one of the **training events** (with about 50 participants) and had detailed exchanges with two of the **future trainers** present at those events. The feedback by the future trainers interviewed has left the impression that the impact of the training on participants was rather strong:

- The call for trainers and their selection process for ethics trainings seems to have given the work of the respective **Ethics Commissions** a strong and concrete impulse:
 - o They have had to select among their **members** who would go to the trainings provided for by the project;
 - o They have short-term opportunities of ethics **trainings** in their institutions;
 - o They have to respond to the need of a training **strategy**.
- This probably also holds true for the **heads** and senior management of the various institutions.

- The first impulse preceding the training will be followed by an impulse following the training: The trainers and/or the relevant Ethics Commissions plan to spread the **information** about their training and future ethics trainings delivered within their institutions.
- The evaluators encountered a high level of motivation with the future trainers. It is obvious that there are possible future trainers in the institutions who welcome the opportunity of spreading ethical work in their workplace. Experiencing a high quality training event on ethics clearly added to their already existing **motivation**. It is now important to keep this momentum.
- The members of Ethics Commissions interviewed by the evaluators have announced that they want to make ethics part of the **pre-service** training of future public servants in their institutions.
- The project team attributes importance to the **group-building** effect of the group of selected trainers, thus reassuring the trainers in their new field.

The evaluators witnessed two sessions of the pilot training and had therefore a chance to get an indication of the possible impact on the **ethics awareness** of the trainees. The case studies used during the training for active group activities and discussions do not allow for right or wrong answers. The strong reactions by many of the participants showed that the training managed to confront them with a new perspective on some of their professional actions against an ethics background. Numerous participants would take sometimes surprising positions not necessarily in accordance with the Code of Ethics. These positions were then contrasted with "what the law actually is", which clearly made an impression on those participants. This seems to suggest that the training fills gaps of information on the legal framework as well as taking advantage of some authoritative effect of laws on public servants.

As for the **medium** and **long-term impact** of the project, one has to take into consideration that there is a total of about 3 million public servants in Turkey. The following number of trainers would be needed to train all public servants:

Table 3: Number of trainers needed for the "cascading" effect

Line	Category	Scenario 1	Scenario 2	Scenario 3
1	Public Servants in Turkey (approximate figure)	3,000,000	3,000,000	3,000,000
2	Servants per training	25	25	25
3	Number of trainings necessary	120,000	120,000	120,000
4	Assumed total of trainings given by each trainer	20	20	20
5	Number of (junior) trainers needed	6,000	6,000	6,000
6	(Senior) trainers able to train trainers	25	50	75
7	(Junior) trainers per senior trainer	240	120	80
8	Train the junior trainer sessions per senior trainer*	24	12	8

* 10 people maximum for the intensive train the trainer sessions.

Given ideal circumstances and maximum support, the ethics trainings could **cascade** through senior trainers and junior trainers into a total of 120,000 necessary trainings that would reach 3 million public servants in 2014 at the earliest:

Table 4: Number of trainers needed for the "cascading" effect

Line	Year	2009	2010	2011	2012	2013	2014	2015	2016	total	
1	Train-the-trainer sessions	2	3							5	
2	Senior trainers being trained*	20	30							50	
3	Units pass training plan**	100	400	544						1,044	
4	Junior trainers being selected	100	900	1,500	1,750	1,750				6,000	
5	Junior trainers being trained		100	900	1,500	1,750	1,750			6,000	
6	Junior trainers available (total)		100	1,000	2,500	4,250	6,000			6,000	
7	Ethics trainings given by each junior trainer:										
8	5 per year (scenario a)		500	5,000	12,500	21,250	30,000	30,000	20,750	120,000	
9	10 per year (scenario b)			10,000	25,000	42,500	42,500			120,000	
10	15 per year (scenario c)			15,000	37,500	63,750	3,750			120,000	

* Based on scenario 2 of table 3, a total of 50 senior trainers are being trained.

** Estimated quantity derived from table 1 (see above p. 6), line 7 and 9.

Caveats:

- The figure of 3 million public servants includes the **educational sector**, which is currently only partially covered by the Code of Ethics. It is, however, intended to be fully included possibly by 2009.
- The figure of 3 million public servants does not include members and staff of the **professional associations**, which also fall into the scope of the Code of Ethics and its training.
- Neither at central nor local level are **Ethics Commissions** fully established in all institutions. The Council of Ethics is currently trying to collect data for a full overview of the establishment of Ethics Commissions nationwide.
- The above tables no. 3 and 4 are only a first **rough sketch** of a possible cascading plan. Its timeframe and assumptions are rather ambitious. Dynamic effects such as fluctuation of trainers or servants are not reflected. There are many variations possible in modelling a "cascading-plan".

The training of "senior" and "junior" trainers, the implementation of training strategies in the various institutions, and the adaptation of the training material to the various sectors requires the Council of Ethics to take over a monitoring and coordinating role. The Council is currently not staffed to be able to set up a "**training unit**". Any such training unit would probably need technical advice, which probably could not be provided for by the project within its remaining time. It is noteworthy in this context that the current draft of the "National Programme of Turkey for the Adoption of the EU Acquis"⁸ plans for a budget of 1.2 million € (1.0 million € EU-funds, 0.2 million € national funds) for the "education" and "improvement" with regards to ethics culture.

4.2. Preparation of other anti-corruption measures

4.2.1. Research studies

Despite some concerns over the scope of the research studies beyond the mandate of the Council of Ethics (see above sections on project design and delivery), the research studies can have a very practical impact on the relevant sectors: The conduction of **surveys** and **interviews** might send an impulse of awareness and discussion through the middle and lower management of those sectors.

The research studies should also provide a basis for future **strategic decisions**: their results provide data on the manifestations and prevalence of corruption, what

8 Draft, August 2008, p. 251, www.abgs.gov.tr/files/UlusalProgram/UP2008/npaa2008_draft.pdf.

factors support its continuance, and in what terms people think about it. This data on the subjective perception of corruption among public servants is important for two reasons: First, future **trainings** can accustom to the language and thinking of the public servants in different sectors taking the findings into account. Second, the subjective perspective of public servants might point out factors of enhancing **anti-corruption** measures, which might not have been apparent previously.

Furthermore, the research studies can deliver **material** to work with for **universities**, schools, political parties, NGOs, journalists and **anti-corruption bodies** such as public prosecutors or inspection boards. The studies also can provide more **sector-specific data** than is published by organisations such as Transparency International. Furthermore, the surveys and interviews of the studies will actively involve the relevant sectors. The administration looking at corruption can also deliver a good example and may also have a positive impact on the awareness of individual citizens' involvement in corruption.

4.2.2. Codes of conduct for the Legislative and Judiciary

Many people interviewed by the evaluators have underlined the fact that any impact of a legislative or judicial code of conduct will depend on the scope and flexibility of future **immunities** regulations. The draft of the "National Programme of Turkey for the Adoption of the EU Acquis"⁹ forecasts work on the "Draft Law on the Establishment of a Political Ethics Commission and Amending Various Laws" as to "be completed rapidly".

4.2.3. Anti-corruption strategy

According to the timetable of the project, activities concerning an anti-corruption strategy (output 8) are largely due after the interim evaluation. At this stage of the project the following impact can however already be observed:

Two of the other outputs of the project could contribute to a future anti-corruption strategy: The papers on the Council of Ethics produced under Output 1 ("Future work of the Council of Ethics", "Institutional Capacity Review" and "Review of Sanctions") can help clarify the **future role** of the Council of Ethics as part of a future ethics and anti-corruption infrastructure, and thus provide material for drafting an anti-corruption strategy. The research studies produced under Output 6 will deliver **data** on the needs and priorities in several public sectors which, in turn, should inform policy measures of the anti-corruption strategy.

In addition, the evaluators understand that the project team is in contact with other potential anti-corruption actors, such as law enforcement bodies or inspection

9 Draft, August 2008, p. 4, www.abgs.gov.tr/files/UlusalProgram/UP2008/npaa2008_draft.pdf.

boards. During their interview with a representative of the Prime Ministry's Inspection Board, the evaluators learned that the Board is currently **drafting** an anti-corruption strategy which includes sequenced, concrete measures to be implemented over the next four years (2009-2012). The board is reportedly in close exchange on the draft with the political branch.

4.3. Coordination of anti-corruption measures

As of now it is not clear which institution will finally take on the role of a coordinating body. In their interviews with a representative of the Prime Ministry's Inspection Board the evaluators have, however, learned that the **Inter-ministerial Commission** is about to take on an active role in anti-corruption efforts, after having been largely dormant in the past four years. The further impact of the project (output 9) on the actual coordination of anti-corruption measures through the Inter-ministerial Commission depends on how soon the Commission will actually take up its work. The draft of the "National Programme of Turkey for the Adoption of the EU Acquis"¹⁰ provides for the Prime Ministry Inspection Board to ensure "coordination among institutions fighting against corruption and development of strategy on the fight against corruption". A budget of 1.6 million € is planned for "Reconstructing and training studies in order to improve the capacity of the Inspection Board on the fight against corruption".¹¹

10 Draft, August 2008, p. 4, www.abgs.gov.tr/files/UlusalProgram/UP2008/npaa2008_draft.pdf.

11 Ibid, p. 251.

5. Annexes

5.1. Evaluation Assignment

In accordance with No. 1.8.4 of the Grant Application (p. 15), an evaluation of the project is foreseen to take place twelve months after the commencement of the project. The evaluation shall be carried out by two external independent evaluators and shall provide an assessment of:

- The overall progress of the project for twelve months against the project's objectives;
- The project's activities, as set out in the project document;
- The project's value-added and impact.

The assessment will describe findings and conclude with proposals to the Council of Europe, which then shall be provided to the donor, the contracting authority and to the beneficiary institution.

5.2. Meetings

Friday, 31 October 2008, Strasbourg
<ul style="list-style-type: none">- Mr Alexander Seger, Head of Economic Crime Division, DGHL- Ms Ilknur Yuksek, Project Manager, DGHL- Ms Leyla Kayacik, former Head of CoE-Office in Ankara
Monday, 10 November 2008, Ankara
<ul style="list-style-type: none">- Mr Alan Doig, CoE Long-Term Advisor- Mr Serhan Alemdar, CoE Local Project Officer- Mr Ömer Atalar, Project Director, Expert, Council of Ethics- Ms Özlem Öztürk, Assistant Expert, Council of Ethics
Tuesday, 11 November 2008, Ankara
<ul style="list-style-type: none">- Ms Gamze Kösekahya, Delegation of the European Commission to Turkey- Mr Pedro Brandao Faria, Delegation of the European Commission to Turkey- Prof. Dr. Ibrahim Cerrah, Police Academy, Head of research team- Prof. Dr. Hasan Huseyin Cevik, Police Academy, Member of research team- Prof. Dr. Omer Faruk Genckaya, Bilkent University, short-term expert- Mr Yüksel Yilmaz, Prime Ministry Inspection Board
Wednesday, 12 November 2008, Ankara
<ul style="list-style-type: none">- Mr Hakan Akdag, Ministry of Environment and Forestry, future ethics trainer- Mr Yener Karatas, General Directorate of Land Registry, future ethics trainer, member of Ethics Commission- Dr. Ferda Akgül, Central Finance and Contracts Unit- Ms Bengü Ersan, Central Finance and Contracts Unit- Prof. Dr. Inayet Aydin, Ankara University, short-term expert- Mr Omer Atalar (2nd round)
Thursday, 13 November 2008, Ankara
<ul style="list-style-type: none">- Prof. Dr. Bilal Eryilmaz, Chair of the Council of Ethics- Prof. Dr. Ugur Omurgonulsen, Hacettepe University, short-term expert- Mr Alan Doig (2nd round)- Mr Serhan Alemdar (2nd round)
Thursday, 20 November 2008, telephone interview
<ul style="list-style-type: none">- Dr. Gary Hickey, Research and Policy Manager, Standards Board for England, Manchester/UK, short-term expert

5.3. Documents

The evaluators have been provided with and reviewed the following documents:

TYEC-Documents:	Date	Author
“Founding” Documents:		
Direct Grant Application Form	September 2007	-
Agreement between the Central Finance and Contracts Unit and the Council of Europe	November 2007	-
Reports:		
Inception Report	January 2008	Alan Doig
1st Quarterly Progress Report	June 2008	Alan Doig
2nd Quarterly Progress Report	September 2008	Alan Doig
Activity Progress Report	September 2008	Alan Doig
Monthly reports		
- December 2007		Alan Doig
- January 2008		Alan Doig
- February 2008		Alan Doig
- March 2008		Alan Doig
- April 2008		Alan Doig
- May 2008		Alan Doig
- June 2008		Alan Doig
- July 2008		Alan Doig
- August 2008		Alan Doig
- September 2008		Alan Doig
Technical Papers:		
Review of the Council of Ethics for Public Service	May 2008	Alan Doig
- Current Procedures and Possible Future Work of the Council of Ethics	April 2008	Alan Doig
- Revising the Code and Institutional Responsibility	April 2008	Alan Doig
- Options for the Council of Ethics for Public Service as the National Prevention of Corruption Council	April 2008	Alan Doig

- Institutional Capacity Review and Plan	April 2008	David Watt
Code for the Legislature	January 2008	Alan Doig
A Judicial Code of Conduct	January 2008	Alan Doig
Complaints: Guide to Possible Inquiry Procedures	June 2008	Alan Doig
Proposed Terms of Reference for Draft Tender Specification for the Research Studies	April 2008	Alan Doig
Second Review of the Council of Ethics for Public Service	September 2009	Alan Doig
Review of Sanctions for the Council of Ethics	September 2009	Alan Doig
Amendments to Project: Training	May 2008	David Watt
Interim Report: Legal and Institutional Infrastructure of Ethical Administration in Turkey	September 2008	U. Omurgonulsen
Training Material:		
The Training Strategy	July 2008	David Watt
The Implementation Guide	September 2008	David Watt
The Facilitators Guide	September 2008	David Watt
Regulations:		
Law of 25/05/2004, No. 5176, on the Organization of a Council of Ethics and Amendment of Some Laws – English translation		
Code of Ethics of 13/04/2005 – English translation		
Miscellaneous:		
List of staff of the Council of Ethics	October 2008	Serhan Alemdar
Non-TYEC Documents:		
GRECO-Evaluation Report on Turkey (1 st and 2 nd round)	March 2006	GRECO
EU-progress report 2007	November 2007	European Commission
EU-progress report 2008	November 2008	European Commission
National Programme of Turkey for the Adoption of the EU Acquis	August 2008	General Secretariat for the EU
Sigma Turkey Public Integrity Assessment 2008	May 2008	OECD/Sigma