



Support to the Anti-Corruption Strategy of Azerbaijan (AZPAC)

Evaluation Report

by

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A project supported by USAID and implemented by Council of Europe in cooperation with the Commission on Combating Corruption of Azerbaijan

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1. SUMMARY AND RECOMMENDATIONS

As for the **impact, design** and **delivery** of the project, the evaluator comes to the following overall conclusions:

The project has reached, or prepared, as much **impact** as was possible. In order to achieve full and **sustainable** impact of the project's outputs, it is now necessary that the beneficiaries make further use of the numerous tools provided for by the project – otherwise the efforts potentially risk being lost. The tools, where a considerable part of the potential is yet to unfold, are:

- Advice on the conduct of future surveys (activity 1.5);
- Advice on draft laws (activity 2.2) and on compliance of the national legislation with international anti-corruption conventions (activities 2.3-2.4);
- Advice and training on setting up a system to prevent money laundering and terrorism financing (output 3);
- Recommendations for policy reforms in micro-systems studies (activity 4.1);
- Training strategy and pilot trainings for the civil service on ethics and conflict of interest (activities 4.4-4.5);
- Guidelines and training on the facilitation of whistleblowing and protection of whistleblowers (activity 4.6).

It now depends on the beneficiaries to bring the full potential of the above tools into effect. There are, however, areas where **further outside assistance** might be needed. The Financial Intelligence Unit (output 3) and the ethics training (output 4) are probably the two areas, which – already by design – are to be seen rather as the first necessary steps and should be given further consideration in order to safeguard sustainability:

Output 3 – Anti-money Laundering/Anti-Terrorism Financing

- The FIU should be offered assistance in further complying with international standards and in reporting, as well as progressing, during the further MONEYVAL process; this might include practical advice for regulating/supervising entities and cooperation with law enforcement agencies, on analysing transactions, and on the technical set-up of the future FIU;
- Reasons for the total absence of money laundering cases should be analysed, and the FIU and law enforcement agencies should be given more specialised training on investigating and prosecuting money laundering and terrorist financing cases, and on money laundering typologies.

Output 4 – Corruption Prevention

- Ethics trainings should be provided to cover all civil servants; it can not be expected that three pilot trainings conducted with human resource departments of the various state agencies could automatically multiply into trainings for all 30,000 civil servants. Future train-the-trainer events would need to be accompanied by advice e. g. on specific training materials and on strategic training planning. The Civil Service Commission would be the ideal counterpart, given the positive feedback on their work the evaluator received from all relevant interviewees. Under any circumstances, the success of the training measures will depend on sufficient staffing of a future training department and the agreement on a training and timetable. Furthermore, the content of trainings should be informed by an integrity assessment (e. g. through a survey) conducted prior to the activities.

For the **design** of the project, the entire spectrum of possible stakeholders had been consulted and included. As a result, the four major needs were appropriately addressed (strategy, legislation, establishment of FIU, and prevention of corruption in the civil service). The project's indicators are rather broad and point mostly beyond the actual completion of the project; this makes sense since the project depends on the beneficiaries now carrying forward the advice and training provided for by the project. With hindsight, it seems that the activities could have been more **conditional** to participation of the beneficiaries, e. g. the advice on surveys could have been made conditional to the publication of already existing surveys and/or to the conduction of a survey during the course of the project.

The project has been **delivered** in a professional and timely fashion, and in good cooperation between the local project team and the beneficiaries. The evaluator recommends posting all non-confidential technical papers, presentations and activity reports produced in the framework of the project on the **website** of the project and on the website of the beneficiaries. This would provide an opportunity of the project's valuable outputs and resources being used by a wider public and allow for full transparency. The reporting has been of very good quality and reports show – where appropriate – to what extent both **genders** could profit from the project. Insofar as this has not happened already, the evaluator recommends setting this as standard for future projects.

2. PROJECT IMPACT

As an overall assessment, it can be said that the project has already achieved, or prepared, considerable impact with a comparatively small budget; in order to achieve full and sustainable impact of the project's outputs it is necessary that the beneficiaries make further use of the numerous tools provided for by the project.

2.1. Impact According to Indicators

2.1.0. Overall Indicators

Indicator 1: "Level of compliance with the Council of Europe Criminal Law Convention on Corruption"

National legislation has achieved a fairly good level of compliance with the Council of Europe Criminal Law Convention on Corruption (CoECLC) as far as the domestic issues of the Convention are concerned. Shortcomings concern mostly bribery of foreign officials or members of international institutions. On corporate liability, a draft law is under way. As for money laundering of proceeds from corruption offences, this area is covered by the new Anti-Money Laundering Law (Law on the Prevention of the Legalisation of Criminally Obtained Funds or Other Property and the Financing of Terrorism). The project has supported the implementation of UNCAC and the CoECivLC through a **technical paper** and a **compliance matrix** (activities 2.3 and 2.4). The Commission on Combating Corruption has indicated that it is considering to use the matrix to draft further amendments to national legislation; however, the matrix being completed in May 2009, it is too early to assess any progress yet.

Indicator 2: "Level of compliance with the GRECO and OECD/ACN recommendations"

GRECO has concluded, in its October 2008 Compliance Report¹, that Azerbaijan implemented satisfactorily, or dealt with in a satisfactory manner, only over just one third of the recommendations. However, this quota cannot depict the actual impact: First, the October 2008 report by GRECO gives only an image of the situation until that time; second, the project deals only with a fraction of the areas covered by the GRECO report. Nevertheless, many of the project's activities have helped to further implement recommendations given by **GRECO**:

- Implementing the national strategy (activity 1.2) and template system on reporting (activity 1.3) for recommendation ii;

1 [www.coe.int/t/dghl/monitoring/greco/evaluations/round2/GrecoRC1&2\(2008\)4_Azerbaijan_EN.pdf](http://www.coe.int/t/dghl/monitoring/greco/evaluations/round2/GrecoRC1&2(2008)4_Azerbaijan_EN.pdf).

- Advice on conducting surveys (activity 1.5) for recommendation i; the survey carried out in 2007 by a local NGO for the Commission on Combating Corruption has not been made public yet, though, or even provided to the AZPAC project team, despite the relevant activity being related directly to it;
- Draft law on conflicts of interest (activity 2.2) for recommendation xviii;
- Anti-money laundering training (activity 3.1) for recommendation xiv;
- Training for judges (activity 3.3) for recommendation xi and xii;
- Micro-system studies (activity 4.1) for recommendation i and xxvi;
- Ethics training and strategy (activity 4.4 and 4.5) for recommendation xxii, xviii and xxi;
- Whistleblower protection (activity 4.6) for recommendation xx.

The project has also contributed to implementing the recommendations in the 2004 "Review of Legal and Institutional Framework for Fighting Corruption" by **OECD/ACN**²:

- Awareness raising (activity 1.1) for recommendation 1 and 2;
- Implementing National Strategy (activity 1.2) and template system on reporting (activity 1.3) for recommendation 1;
- Support surveys (activity 1.5) for recommendation 5;
- Draft law on conflicts of interest (activity 2.2) for recommendation 19;
- Performance assessment (activity 4.5) for recommendation 16.

As an overall assessment, the project – within its limited range of outputs and activities – has made an important contribution to the compliance of the beneficiaries with GRECO and OECD/ACN recommendations.

Indicator 3: "Level of implementation of Council of Europe and other international standards in the fight against corruption"

There are mainly two international conventions falling under indicator 3 that are not covered by indicator 1: The United Nations Convention Against Corruption (UNCAC), and the Council of Europe Civil Law Convention on Corruption (CoECivLC). The implementation of UNCAC is rather advanced: 30 provisions have been fully implemented, 14 partially, and 12 not, or not clearly visible. CoECivLC has been implemented at least 50% – with six requirements being fully implemented and six more requirements being partially, not, or implemented not clearly visible. The project has supported the implementation of UNCAC and the CoECivLC through a **technical paper**

2 www.oecd.org/dataoecd/51/1/37228539.pdf.

and a **compliance matrix** (activities 2.3 and 2.4). The Commission on Combating Corruption has indicated that it is considering to use the matrix to draft further amendments to national legislation; however, as the matrix has been completed only in May 2009, it is too early to assess any progress yet.

The project has also made a contribution to the Council of Europe Recommendation on Codes of Conduct for Public Officials (No. R(2000)10) through advice on the Draft Law on Conflict of Interest and on the Law on Rules of Ethical Conduct. As far as the Council of Europe Recommendation on Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns (No. R(2003)4) is concerned, there have been no activities during the Project: During the inception phase, the original activity 2.5 "Review and evaluation of regulatory framework related to [...] financing of political parties [...]" has been tagged to the recommendations issued by the 3rd Evaluation Report of GRECO, and has finally been dropped due to the lack of a set date for the 3rd evaluation round.

Indicator 4: "Level of implementation of the measures of the new Anti-corruption Strategy and Action Plan"

This indicator has, for two reasons, only **limited** value to measure the Project's impact: First, the measures of the Anti-corruption Strategy, and especially of the new Action Plan for 2007-2011, are comprehensive and far-reaching; the Project covers only a fraction of those measures. Second, the Project depends on the beneficiary to request or accept assistance for implementing any measure in the framework of the Anti-corruption Action Plan. The Project's main contribution to enhancing the implementation of the Strategy and Action Plan is probably the advice on reporting on implementation of anti-corruption policy by state bodies (activity 1.4), and the advice on anti-corruption plans of state bodies (activity 1.3). Both activities have in general supported the implementation of the National Strategy and Action Plan.

It is, however, **unclear** to what extent central executive bodies have actually drafted these action plans and are reporting on them, since at the time of the evaluation not all action plans and reports to the Commission on Combating Corruption had been available to the local project team, yet; it is expected that this matter will have been clarified by the time of writing of the draft of the final project report. It should also be mentioned that the awareness raising seminars of activity 1.1 contribute to raising the level of public expectations and scrutiny of the Commission's work, which might further motivate implementation of the Strategy and Action Plan.

Indicator 5: "Positive trend in future corruption perception indices, including Transparency International's CPI and Freedom House, as well as WB Governance indicators, and other surveys, including those done

in the framework of the project."

In the short and medium-term perspective, this indicator has a very limited suitability for measuring the project's impact: The Transparency International Annual Corruption Perceptions Index (CPI) for 2008 is the only one available before completion of this two year project, and having been released at a time when the project was half-way into its implementation, it is clearly **too early** for reflecting any impact already made. Surveys carried out as a result of the project would lack comparative figures for periods before the project's inception. Even if more survey results were already available, they would probably not yet depict any possible change: The beneficiaries still need to apply the project's results to achieve tangible impact; in addition, public perception of corruption is slow to change and has a tendency to lag behind the actual measures undertaken. So, between the project's impact and the absence of an improvement in the CPI for 2008 and Freedom House's "Country in Transit Report 2008" there is no causal relation. It has long been acknowledged that the CPI as an instrument to measure the short- and medium-term impact of anti-corruption projects is problematic. The main reasons are that perception indices rather measure general dissatisfaction than changes in reality and perception of corruption might even increase due to raised awareness and other causes, as soon as effective anti-corruption measures are put in place. Therefore, even though the CPI might be standard reference for the general public, it is important that Council of Europe projects enhance a critical review of existing indices and future surveys to be carried out – as done with this and other Council of Europe projects. In this sense, the project's advice and technical papers on surveys have created a strong impact.

2.1.1. Strategic Framework

Indicator 1: "Strategy and Action Plan have been drafted, and are perceived to have been drafted, in a transparent and participatory process, involving a multitude of stakeholders, including civil society, and incorporating their input."

In its literal sense, this indicator is already outdated: the Strategy and Action Plan have been drafted and adopted in July 2007, at a time when the project was not even in its inception phase. The project has, however, contributed to raising awareness of the Strategy and Action Plan, and to including civil society through five seminars for public officials, NGOs, journalists and others, in some instances bringing together officials and NGO representatives for the first time:

Table 1: Overview of Awareness-raising Seminars (activity 1.1)

2008	Location	Participants	No.
21 February	Baku	Officials, NGOs, journalists, etc.	80
17 March	Sheki	Officials, NGOs, journalists, etc.	50
18 March	Ganja	Officials, NGOs, journalists, etc.	50
10 April	Yevlakh	Officials, NGOs, journalists, etc.	50
14 May	Lankaran	Officials, NGOs, journalists, etc.	50
Total			280

Whether state body action plans will be drafted in a transparent and participatory way has yet to be seen (see following indicator).

Indicator 2: "The State Commission is working, and is perceived to be working, in a transparent and participatory way."

There are two activities contributing to the achievement of the indicator: First, the awareness-raising activity 1.1 (see above indicator 1) supported transparency of the Commission's work. Second, the advice on reporting on implementation of anti-corruption policy by state bodies and the advice on anti-corruption plans of state bodies helped the participation of state bodies in the Commission's work.

Furthermore, at the Civil Service Commission's request, the project provided a model presentation in September 2008, which the Commission was able to use to train local government officials on the implementation of the Law on Rules of Ethical Conduct.

The project has also supported the carrying out of surveys, by providing advice and recommendations on drafting and conducting future surveys. The impact of these activities will be visible once the Commission publishes the results of these surveys, which have yet to be carried out. The Long-Term Advisor could not illustrate the advice on surveys, though, by comments on the unpublished survey carried out in 2007 for the Commission on Combating Corruption.

2.1.2. Legislative Framework

Indicator 1: "International monitoring reports acknowledge progress made by Azerbaijan in complying with standards and in filling legislative gaps."

As for anti-corruption, it is still **too early** for progress to be reflected by the latest GRECO report of October 2008; according to the latest report, the beneficiary is invited to submit information regarding the implementation of recommendations by 30 April 2010. Any ensuing GRECO report could evaluate the progress made in the areas of

conflict of interest, plea bargaining, and lobbying (see below indicator 2). The same is true for MONEYVAL reports. If the beneficiaries manage to fully implement the assistance or outputs of the project, one can predict that there will be numerous legislative achievements to be acknowledged by future reports.

Indicator 2: "New legislation introduced has been feasibility studied prior to introduction, and has started to be implemented in a tangible and sustainable way."

Activity 2.1 "Training on Treaty Law implementation" has supported legal drafting in general. There have been legislation/regulations introduced during the course of the project, without comprehensive intervention by the project as such; an awareness-raising event in July 2008 on money laundering appears to have contributed to the later passage of an improved draft of the Anti-money Laundering Law, including an obligation on reporting suspicious transactions.

Table 2: Overview of New Legislation

Legislation/Regulations	Date
AML/CTF-Law	18/2/2009
Presidential Decree on AML/CTF Law	23/2/2009
Presidential Decree on Changes on the Law on Civil Service	3/10/2008

The project has furthermore supported, through expert opinions, the possibility of a future introduction of the following legislation/regulations:

Table 3: Overview of Planned Legislation

Legislation/Regulations	Status
Plea bargaining	Seminar planned for September 2009 on the options for introduction of plea bargaining into national law
Lobbying	Drafting of various laws and amendments to existing legislation facilitated through expert advice
Draft Law on Conflict of Interest	Draft law commented on
Regulations for Evaluating the Performance of Civil Servants	Draft Regulations for Evaluating the Performance of Civil Servants commented on

Indicator 3: "Introduction of a Compliance Matrix for anti-corruption, and money laundering legislation and other relevant legislation with benchmarking parameters progress measuring takes place against the international standard observance."

The indicator goes actually further than the activities foreseen by the Workplan: output 2 and specifically activity 2.4 only cover anti-corruption legislation, whereas the indicator

also includes anti-money laundering. The relevant **matrix** on the compliance of national law with the three major international anti-corruption conventions **is available**, and provides a basis for further implementing the international conventions in all their details. As for anti-money laundering, the conventions do contain requirements on money laundering that are set out in the matrix.

2.1.3. Anti-Money Laundering

Indicator 1: "Progress acknowledged by MONEYVAL, Azerbaijan taken off Stage 2 monitoring and of compliance procedure"

It is still too early to expect any explicit reaction from MONEYVAL. Any impact so far on this output has been delayed because of the **late adoption** of the "Law on the Prevention of the Legalisation of Criminally Obtained Funds or Other Property and the Financing of Terrorism" on 10 February 2009. Any outside pressure on the beneficiaries to adopt the law had to be exerted by MONEYVAL. The project has, however, **prepared** all necessary measures to complete implementation by the end of the project in September 2009, depending on the Statute of the Financial Monitoring Organ being approved. Furthermore, the project – together with the US Department of Justice – held an awareness-raising event in July 2008, which appears to have contributed to the later passage of an improved draft including an obligation on reporting all suspicious transactions.

Indicator 2: "Number of participants in training activities"

Table 4: Trainings and Participants

Topic (activity)	No	Participants	No	Date
Awareness-raising on fighting money laundering and terrorism financing (3.1)	1	Members of Parliament, Working Group, NGOs, Media, Executive Branch	60	22/7/2008
Training on AML/CTF law for future Financial Monitoring Organ officials and banks (3.1)	1	Staff of reporting banks, future staff of FIU	70	16/6/2009
Training on AML/CTF law for future Financial Monitoring Organ officials and non-bank financial institutions (3.1)	1	Staff of reporting financial entities, future staff of FIU	70	17/6/2009
Training on AML/CTF law for future Financial Monitoring Organ officials and non-financial institutions (3.1)	1	Staff of reporting non-financial entities, future staff of FIU	20	18/6/2009
Implementation of the new law to prevent money laundering and terrorism financing (3.1)	2	Future staff of FIU and relevant law enforcement bodies	50	7-8 and 9-10 7/2009

Special investigative means (3.2)	1	Future staff of FIU, prosecutors, national bank officers, auditors and tax officials	-	planned for 8 or 9/2009
International Mutual Legal Assistance, Extradition, and Foreign Asset Seizure (3.3)	1	Prosecutors, Judges, Ministry of Justice	26	25/2/2009
International Mutual Legal Assistance, Extradition, and Foreign Asset Seizure (3.3)	1	Instructors and students	50	27/2/2009

Total 346

The trainings on anti-money laundering/anti-terrorist financing have reached more or less all reporting entities, all regulating authorities (Ministry of Finance, Securities Committee, Ministry of Justice, Central Bank), all future staff of the FIU, and a fair amount of law enforcement and judicial staff. Moreover, the activities reached members of parliament, NGOs as well as the media.

Indicator 3: "Evaluation/feedback from participants confirms usefulness of training"

From the interviews with the project team and one participant of the trainings, the evaluator has an impression of the trainings carried out having been motivating and inspiring. This is not only simply due to the past lack of substantial money laundering know-how, but probably also due to the interactive nature of the training, including numerous case studies and group breakout sessions. Questions asked by the participants during the trainings have reportedly been very detailed, which shows the need for clarification met by the trainings. According to an activity report by the trainer of the Department of Justice, participants in trainings on activity 3.3 appeared extremely interested and engaged, with much discussion generated.

Indicator 4: "FIU working according to operational guidelines"

The Statute of the Financial Monitoring Organ (the FIU) regulating organisational and procedural aspects has still to be approved; if passed, the project could, in time – given the technical nature of this task – manage to have a FIU working according to operational guidelines by the end of the project.

Indicator 5: "Number of MoUs concluded with FIUs of other countries"

Due to the late adoption of the "Law on the Prevention of the Legalisation of Criminally Obtained Funds or Other Property and the Financing of Terrorism" on 10 February 2009, this indicator refers to a time after conclusion of the project. The FIU will be able to

operate by the end of the project, and will then be a possible partner for future MoUs to be concluded.

2.1.4. Prevention of Corruption in the Civil Service

Indicator 1: "Repeat assessment figures show an improvement in the levels of awareness and knowledge about policy reforms introduced"

There are no assessment figures so far that would show an improvement in awareness and knowledge about ethics in the workplace. Any impact of the pilot trainings will only be visible if and after the human resource departments taking part in the pilot trainings have disseminated their knowledge into their institutions through further trainings. One has to be cautious, though, whether the few pilot trainings foreseen and delivered by the project and the model presentation on the Law on the Code of Ethics will actually be enough to create a critical momentum for ethics trainings to be rolled out on a wider scale. Further work in this area could be done through a possible follow-up project.

Indicator 2: "Number and portfolio of participants in training"

Table 5: Trainings and Participants

Topic (activity)	Participants	Date	Location
Implementation of the Law on Rules of Ethical Conduct (4.5)	37	11/4/2008	Baku
Implementation of the Law on Rules of Ethical Conduct(4.5)	50	15-16/4/2009	Baku
Implementation of the Law on Rules of Ethical Conduct (4.5)	45	7-8/5/2009	Baku
Performance assessment (4.5)	36	15-16/9/2009	Baku
Best practices in the area of whistleblowing (4.6)	30	12/3/2009	Baku
Concept of Integrity tests in the Judiciary for Legal Judicial Council (4.3)	-	planned for 8 or 9/2009	Baku
Total	198		

Around 20% of the participants in all trainings were from the Civil Service Commission, and around 80% from the human resources departments of state institutions, thus allowing for some multiplication in the relevant state institutions. More or less half of the participants were women, compared to about a third³ of all civil servants in Azerbaijan being women. Reportedly, the trainings will be mostly used upon request by other human resource departments and for the training of new civil servants.

³ Azeri-Press Agency, "Women account for 50.6% of population in Azerbaijan", 4/3/2009, <http://en.apa.az/news.php?id=98263>.

Indicator 3: "Number and content of micro system studies"

Indicator 4: "Feedback reforms that could and may be initiated due to outcomes of system studies"

Indicator 5.1: "Evaluation/feedback from participatory institutions in micro system studies confirms usefulness"

The project has conducted all three foreseen micro system studies. The studies cover institutions mentioned in the Workplan, which carry a high corruption risk, thus offering the opportunity for a far-reaching effect. Each study analyses legal, organisational, financial, and other aspects of the relevant ministry. The studies identify **achievements** already made in the past, and give concrete **recommendations** for future actions.

At the time of the evaluation, the studies had only been drafted and delivered to the ministries for comments and corrections of possible factual mistakes. After having reviewed the drafts, the Ministry of Health and the Ministry of Taxes have listed various factual corrections and some passages they view as not being covered by the topic of the studies that will be the subject of discussions with the authors and the project team in the course of **finalising** the **studies** (the Ministry of Education had not delivered feedback by the time of the evaluation report being finalised). The ministries have voiced concern to the evaluator over a methodological aspect of the studies: It is their perspective that the authors of the studies did rely too much on – in their view sometimes sensational – **incidents** reported by singular **anonymous "users"**, a local NGO, or other third parties to illustrate the study's findings with examples. With hindsight, the ministries would have preferred a more objective method for assessing actual corruption: The authors should have conducted a **survey** using a representative sample of people, who could have given a statistically more correct feedback of the total of the ministries' "users" (e. g. taxpayers). However, the budget foreseen for activity 4.1 could not have financed such surveys. Correspondingly, the methodology that had been circulated to the ministries before conducting the studies did not foresee a survey, but did make reference to interviews conducted with, amongst other, "users [...] other stakeholders and independent experts", which were eventually carried out by the project.

The evaluator finds that surveys could – if they were to include risk-prone segments, such as e. g. businesses for taxes – indeed deliver statistical representative data to identify areas with need for systemic changes. As the project provided valuable advice to the Commission on Combating Corruption on how to properly carry out surveys, there is certainly potential for future surveys on the initiative of other projects, or on the own

initiative of the ministries; as far as the Commission on Combating Corruption is concerned, though, it has **not** yet **published** the result of a **survey** carried out in **2007**.

As the studies have not been finalised so far, the evaluator cannot assess their final impact, yet. At this stage, and based on the feedback by the ministries to the evaluator, it seems, however, that the **acceptance** of the studies' recommendations is **mixed**: Whereas the Ministry of Health agrees with the recommendations and sees them in line with the Ministry's annual action plan, and while only rejecting some parts of the analysis, the Ministry of Taxes sees need for redrafting of the study with regards to both findings and recommendations. The final decision on **publishing** the studies formally resides with the Commission on Combating Corruption, which leaves the decision up to the ministers in question; in any case, the evaluator strongly recommends publishing the final version of the studies, incorporating or accounting for the positions of the ministries; the project team and authors of the studies intend to work on any possible factual corrections/clarifications and to add the ministries' opinions concerning the reports' findings on practices (such as corruption) within the sectors as annexes to the study.

Indicator 5.2: "Evaluation/feedback from participants in training confirms usefulness"

An estimated two thirds of participants has reportedly given **positive feedback** about the ethics trainings. This can be seen as a good result: Feedback on ethics trainings will never be 100% positive; a typical first reaction by some is that those trainings are not necessary at all. For two of the trainings (7-8 May and 15-16 September 2008), evaluation forms have been handed out showing an average feedback between 4 and 5, with 5 being the highest possible performance. The evaluator recommends using **evaluation forms** in all future trainings of this and other Council of Europe projects, if this is not yet standard practice.

2.2. Sustainability

The strategic framework (output 1) and the legislative framework (output 2) are probably the two outputs which carry the potential for the most far-reaching sustainability: In both areas, the most important steps are made and it will be comparatively easy for the beneficiaries to continue with further implementing the National Strategy and Action Plan, as well as bringing the identified legislative shortcomings in line with international standards. However, sustainability depends on the **beneficiaries** making use of the numerous tools provided for by the project – otherwise the efforts put into those activities potentially risk being lost; namely, these tools are:

- Advice on anti-corruption plans of state bodies (activity 1.3);

- Advice on the conduct of future surveys (activity 1.5);
- Advice on a number of draft laws (activity 2.2) and on compliance of the national legislation with international anti-corruption conventions (activities 2.3-2.4);

There are also various tools provided for under output 3 (anti-money laundering) and output 4 (prevention of corruption), which now have to be further implemented by the beneficiaries:

- Advice and training on a system to prevent money laundering and terrorism financing (output 3);
- Recommendations for policy reforms in micro-systems studies (activity 4.1);
- Training strategy and pilot trainings for the civil service on ethics and conflict of interest (activities 4.4-4.5);
- Guidelines and training on the facilitation of whistleblowing and protection of whistleblowers (activity 4.6).

Medium- and long-term impact, however, does not solely depend on the beneficiary. The Financial Intelligence Unit (part of output 3) and the ethics training (part of output 4) are probably the two areas, which – by their design – are to be seen rather as the first necessary steps, and should be given further consideration in order to safeguard sustainability:

Output 3 – AML/CTF

- The FIU should be offered assistance in further complying with international standards and in reporting, as well as progressing, during the further MONEYVAL process; this might include practical advice for regulating/supervising entities and cooperation with law enforcement agencies, on analysing transactions, and on the technical set-up of the future FIU;
- Reasons for the total absence of money laundering cases should be analysed, and the FIU and law enforcement agencies should be given specialised training on investigating and prosecuting money laundering and terrorist financing cases and on money laundering typologies.

Output 4 – Corruption Prevention

- Ethics trainings should be provided to cover all civil servants; it can not be expected that three pilot trainings conducted with human resource departments of the various state agencies could multiply into trainings for all 30,000 civil servants.⁴ Future train-the-trainer events would need to be accompanied by advice e. g. on specific training

4 ABC news, "Azerbaijan registers 30,000 civil servants", 24 June 2009, <http://abc.az/eng/news/36106.html>.

materials and on strategic training planning. The Civil Service Commission would be the ideal counterpart, given the positive feedback on their work the evaluator received from all relevant interviewees. In any circumstances, the training measures will depend on sufficient staffing of a future training department and the agreement on a training and timetable. Furthermore, the content of trainings should be informed by an integrity assessment (e. g. through a survey) conducted prior to the activities.

3. PROJECT DESIGN

The design of the project started in late 2006 and ended shortly after the first quarter of 2007. For determining the necessary outputs and activities, the Council of Europe consulted not only **all stakeholders** (Commission on Combating Corruption, Civil Service Commission, Prosecutors Office, National Bank, Ministry of Justice, Ministry of Interior), but also local NGOs. In this way, all actual needs were fed back into the project document, which positively influenced the implementation of project activities.

Three **activities** (1.2, 2.5, 4.2) needed to be dropped for reasons outside of the project (see Performance Report 30 June 2009, p. 35); the evaluator finds that those reasons could not have been foreseen at the design stage.

Furthermore, one of the activities – 2.1 “Training on Treaty Law Implementation” – needed to be delivered with a focus slightly different than initially foreseen. The planned training on how to implement treaty law in general was not necessary, given the detailed specific advice on compliance of national law with treaty law under activities 2.3 (“Review of national legislation”) and 2.4 (“Compliance matrix”). The evaluator agrees that the activity delivered instead – a conference on integrity and efficiency of the legislative process – made more sense, and the **Workplan** was **flexible** enough to allow for focusing on this actual need.

With hindsight, it seems that the activities could have been more **conditional** to participation of the beneficiaries, e. g. the advice on surveys could have been made conditional to the publication of already existing surveys and/or to the conduction of a survey during the course of the project.

Also with hindsight, activity 1.3 “Assist in implementing the Anti-corruption Action Plan” could have listed some more **specific measures** to be taken, since the beneficiary did not request any assistance in implementing concrete measures of the Action Plan. In this way, important actions such as “approving a declaration form on financial disclosure of public officials” (foreseen in the Action Plan, line no. 2, for 2007-2008) have not been implemented yet, despite the relevant legal obligation being in force since 2004.

Activity 2.4 “Compliance matrix of national legislation” could have possibly been scheduled **earlier** in the **Workplan** in order to allow the project over a longer period of time to assist with any legislative changes to be made based on the findings laid out in the matrix.

The project uses **quantitative** and **qualitative indicators** for all outputs. The evaluator finds this mix of indicators to be helpful to assess the project’s impact. The indicators partly point beyond the project’s completion: e. g., for the overall indicator “Positive trend in future corruption **perception indices**” it is most likely that there would be no measurable quantitative change during the course of a two- year project: Surveys carried

out as a result of the project would lack comparative figures for periods before the project's inception. The CPI of 2008 would be the only index available before completion of the project, and in any case, it would be premature to expect to account for any impact. Apart from that, and as mentioned earlier (see above no. 2.1.0 "Overall Indicators", p. 8), the evaluator recommends to carefully reflect on the use of *perception* indices to assess project impact. Also, indicators that point beyond the project's completion, however, support the argument that the project's impact depends on the beneficiaries' further application of the advice and training provided in order to achieve medium- and long-term impact. In this context, it is helpful that some indicators are tagged to future GRECO and MONEYVAL reports.

Some **indicators** could have been **tied** less to the project activities themselves, but rather to **actions** showing impact on the **beneficiaries' side**: E. g. for output 4, the impact ultimately corresponds less to the "number and portfolio of participants in training" than to the specific ethics training modules actually included in the Civil Service Commission's training programme and in the number of trainings conducted by the Civil Service Commission and/or the human resource departments in the various state agencies. Such more beneficiary-oriented indicators would also set further incentives to the beneficiaries for actually using the tools provided. To further elaborate their quantitative nature, the indicators in output 3 could have included the **number of reports** received by reporting entities or international requests sent and received by the FIU.

One of the indicators of output 4 refers to "repeat assessment figures" showing "an improvement in the levels of awareness about policy reforms introduced". As there have not been and are no such assessments in place it is not clear how this indicator should be verified. Furthermore, not all activities relate to a specific indicator, such as output 4.6 "Elaboration of guidelines for reporting corruption"; these activities are covered by the overall indicators.

4. PROJECT DELIVERY

4.1. Delivery of the Workplan

The counterparts interviewed by the evaluator have emphasised the very good **cooperation** and support by the Long-Term Advisor, and have expressed gratitude for the continuous informal and formal expertise and training he and the experts provided. The impact achieved is down to the intense engagement of the local project team and the project management. Also, the cooperation between the project team, the project management, the beneficiaries and the donor has been reported to have been very good.

The project has delivered all activities foreseen in the **Workplan** within the given timeframe, or even ahead of schedule (see Performance Report 30 June 2009, p. 13 following); only activities under output 3 have been delayed due to the stalled legislative process in Parliament. As mentioned earlier (see above 2.1.3, indicator 1), the project has done as much as it could to speed up this matter.

The Long-Term Advisor has provided various **technical papers** of high quality. As far as the activities give room for discretion, e. g. activity 2.2 "Advice on draft laws", the Long-Term Advisor and the beneficiaries opted for effective topics: Support on the draft Law on Conflict of Interests correlates to activities 4.5 (Ethics training) and 4.6 (Whistleblowing), support on a corruption-free legislative process (lobbying) correlates to activity 2.1 "Legal drafting" and has the potential of a broad and general implication on all laws. The Project Manager and the Long-Term Advisor also paid attention to effective **budgetary** spending, i. e. the Long-Term Advisor managed to deliver activities beyond the Workplan without incurring any additional cost (one training extra under activity 4.5).

As far as can be seen from the presentations and papers produced, as well as from the feedback of trainees, and other stakeholders outside the project, the national and international **experts** chosen and guided by the Long-Term Advisor and the Project Manager have contributed to the project in a professional and valuable manner.

The evaluator recommends posting all non-confidential technical papers, presentations, and activity reports produced in the framework of the project on the **website** of the project and on the website of the main beneficiary. This would provide an opportunity of the project's outputs and resources being used by a wider public and allow for full transparency. It would probably make sense to make sure all documents show the original date of completion and make reference to the activity under which they were drafted; in this way it would be easier for an outside user to put the document in the right context.

Reporting on the project done by the Long Term Advisor and the Project Manager has been – in accordance with the Terms of Reference – very informative and allowed the outside reader to follow the gradual implementation of activities and see their impact. It

has to be noted that the reports show – where appropriate – to what extent both **genders** could benefit from the project. As far as this has not happened, yet, the evaluator recommends setting this as a standard for future projects as much as possible, in order to give motivation not only to the project management, but also to the beneficiaries to equally include women, especially in training activities.

The project did not significantly overlap with any activity of **other donors** or **organisation** in the region. The OSCE has done some activity on anti-corruption in the past, not in the areas of AZPAC, though. No project has been launched yet in the framework of the European Neighbourhood Policy (ENP) of the European Commission. A UNDP project on “Good Governance through Civil Service Reform”, running from 2006 to 2008, included some training on the Code of Ethics, but had no special focus on anti-corruption. AZPAC, however, dovetailed with UNDP efforts by providing a model training presentation on ethics, upon request of the Civil Service Commission, which was used to train local officials in cooperation with UNDP. Apart from other donors, the project team coordinated efforts with local organisations, especially Transparency International, which provided background information for the micro system studies.

The project and its donor were **well visible**: All stakeholders interviewed by the evaluator were well aware of USAID as the donor of the project. All **technical papers** mention funding by USAID and provide visibility of the Council of Europe. The same was ensured when carrying out training activities. In addition, the **website** of the beneficiary posts on its homepage a well visible link to the USAID website and the AZPAC website, the latter being well maintained by the Project Manager. The website of the Civil Service Commission published several press releases on AZPAC activities.

4.2. External Factors

Table 6: Materialisation of Assumptions

Out-put	Assumption	Materialisation
1	Government and State Commission are committed to opening the drafting process of the new Anti-corruption Strategy and Action Plan to a wide variety of stakeholders, including from civil society.	The drafting had been completed before the project; the awareness raising campaigns have received full support by the Commission and cooperation with the Commission has been reportedly good.
2	<p>Delays in drafting legislation and adoption procedures from the government and the parliament are avoided and prevented.</p> <p>Conduction of financial and institutional feasibility studies on the need of the legislation and its implementation.</p>	<p>The only law (on conflict of interest) ready to be passed by Parliament in the course of the project has not been even submitted to parliament. The law on AML/CTF and the statute on the future FIU have not been treated with the necessary speed, but do not fall under assumption 2.</p> <p>There are only two possible laws being discussed on the field of plea bargaining and lobbying; it is yet too early to assess the conduction of feasibility studies.</p>
3	<p>Continuous commitment of the government of Azerbaijan to establish a Financial Intelligence Unit (FIU) and to make it operational.</p> <p>Preliminary measures for new institutional structures are already anticipated.</p>	<p>There is apparently no substantial explanation for the delay in the passing of the law on AML/CTF; given the delay, the adoption of the statute on the future FIU should have been treated with more priority with regards to the projects input potentially being put in danger.</p> <p>Apart from the statute of the FIU the beneficiary supported well preliminary measures for the set up of the FIU.</p>
4	<p>Institutional cooperation is sustainable and continuous with the Commission.</p> <p>Political will to undertake trainings and micro system studies is present and facilitates all the process and activity outcomes.</p>	<p>As far as the project implementation is concerned cooperation has been very well.</p> <p>Trainings have been fully supported as well as the conduction of micro system studies; finalising the studies is yet unfinished though.</p>

5. ANNEXES

5.1. Evaluation Assignment

In accordance with the Terms of Reference (ToR) of the project, the evaluation exercise has to take place two months before the end of the project, to be carried out by two external and independent evaluators. One evaluator is to be commissioned by the Council of Europe and the other one is to be commissioned by the Donor organisation [The second evaluator was not assigned in time, therefore the task was carried out by one evaluator].

i) Overall Objective

The assignment is to provide an evaluation of the overall project progress from its start in October 2007 to date against the objectives and indicators of achievement as set out in the ToR, as well as its overall impact.

ii) Specific Objectives

The evaluation should address the following issues:

a) Results and Impact Produced

- Results produced (against indicators of success),
- Achievement of project objectives (against indicators of success),
- Actual or likely impact of the project on anti-corruption and anti-money laundering systems (among other things against GRECO and MONEYVAL recommendations),
- Overall impact of assistance provided through the project.

b) Relevance of Project Design

- To what extent was the initial needs assessment relevant to the project structure and design?
- How was it translated into the rationale for specific project objectives and activities?
- Which other inputs could/should have been used at the project design stage?
- To what extent did the project workplan and calendar of activities take into account the need for possible adjustments?
- How were quantifiable indicators of performance used?
- To what extent did the project address needs of beneficiaries/counterpart institutions?

c) Efficiency/Effectiveness of Implementation

- To what extent have the activities as defined in the original logframe and the workplans been implemented?
- To what extent were the beneficiaries receptive to the project proposals and assistance provided, and to what extent did they participate in/contribute to the project?
- Activities of which type proved to be most effective throughout the project implementation?

d) Assumptions/Influence of External Factors

- What were the external factors that had a positive/negative influence of the course of project implementation?
- To what extent was the project influenced by them?
- To what extent have the assumptions indicated in the logframe materialised?

e) Sustainability Potential

- What kind of effort will be required from the beneficiaries in order to prolong the project impact after its conclusion? Is it feasible?
- How can the CoE/other donors assist in ensuring the sustainability of impact beyond the project completion date?

f) Relationship With Other Projects/Donor Actions

- How efficient/relevant/visible was the project's placement amongst other actions in the field?
- What were its relationships with other projects?

g) Conclusions and Implications for Future Projects

- What are the overall conclusions regarding this project?
- What lessons can be drawn, what recommendations made for future projects?

5.2. Methodology

This report is the result of work carried out between 20 June and 19 July 2009. The work included:

- Desk review of relevant country background information;
- Available project documents (primarily forwarded by the Council of Europe secretariat in Strasbourg and by the local project team in Baku; some information was also taken from the project website);
- A meeting with the project manager in Strasbourg;
- An in-country visit to Baku from 6 to 8 July 2009 consisting of 10 semi-structured interviews with various beneficiaries, the donors, peers and the project team on the ground (see Annex for list of interviewees); The counterparts of the interviews were chosen by the evaluator based on the project reports, supported by recommendations made by the local project team;
- E-mail exchanges with the project team before and after the completion of the in-country visit.

5.3. Meetings/Interviews

Wednesday, 20 May 2009, Strasbourg
<ul style="list-style-type: none">- Mr. Lado Lalovic, Project Manager, Anti-corruption and Fraud Unit, Economic Crime Division, Directorate General of Human Rights and Legal Affairs, Council of Europe
Monday, 6 July 2009, Baku
<ul style="list-style-type: none">- Mr. Mehman Aliyev, Director, Turan News Agency- Ms. Rena Safaraliyeva, Executive Director, Transparency Azerbaijan- Mr. Joe Taggart, Head of Democracy and Governance Office, USAID- Ms. Aynur Yusifova, Democracy and Governance Office, USAID- Ms. Nargiz Ismayilova, Head of International Relations Department, Civil Service Commission- Mr. Azer Mammadov, Local Project Officer- Mr. Quentin Reed, Long-Term Advisor
Tuesday, 7 July 2009, Baku
<ul style="list-style-type: none">- Mr. Viktor Gasimov, Head of Sanitary Epidemiological Department, Member of Anti-Corruption Working Group, Ministry of Health- Mr. Samir Abdullayev, Head of International Relations, Ministry of Health- Mr. Farzali Gadirov, Head of Strategic Analysis, Planning and Human Resources Management Division, Ministry of Education, Member of the Legislative Working Group of the Commission on Combating Corruption- Mr. Enver Imanov, Senior Advisor, Department on High and Secondary Education, expert on ministry hotline, Ministry of Education- Mr. Vidadi Mammadov, Internal Security Department, Ministry of Taxes- Mr. Zaur Fati-zadeh, Head, Department on State registration of Commercial Legal Entities and Economic Analysis, Ministry of Taxes- Mr. Vugar Aliyev, Head, Department on Preliminary Investigation of Tax Crimes, Ministry of Taxes- Mr. Hamid Zeynalov, Acting Head, Strategic Research Department, Ministry of Taxes- Mr. Fariz Samadov, Press Secretary, Ministry of Taxes- Mr. Azer Mammadov, Local Project Officer- Mr. Quentin Reed, Long-Term Advisor
Wednesday, 8 July 2009, Baku
<ul style="list-style-type: none">- Mr. Anar Salmanov, Head of Anti-Money Laundering Division, Central Bank; Trainee of output 3.1 "Training on investigation"- Mr. Inam I. Karimov, Senior Adviser, Secretariat of the Commission on Combating Corruption, Executive Office of the President- Mr. Vusal Huseynov, Secretary of the Legislative Working Group of the Commission on Combating Corruption- Mr. Quentin Reed, Long-Term Advisor

5.4. Documents

The evaluator has been provided with and reviewed the following documents:

AZPAC-Documents
Project Application (May 2007)
Reports:
Inception Report (December 2007)
Performance Report 1 (30 September 2007 – 31 March 2008)
Performance Report 2 (1 April – 30 June 2008)
Performance Report 3 (1 July – 30 September 2008)
Performance Report 4 (1 October – 31 December 2008)
Performance Report 5 (1 January – 31 March 2009)
Performance Report 6 (1 October 2007 – 30 June 2009)
Technical Papers:
Activity 1.1
The Council of Europe Project of Support to the Anti-corruption Strategy of Azerbaijan (AZPAC) – Presentation for Awareness Raising Events (Quentin Reed)
Activity 1.3-1.4
Proposed guidelines and templates for reporting and monitoring of implementation of the National Anti-corruption Strategy of the Republic of Azerbaijan (Quentin Reed)
Template for Agency Action Plans (Quentin Reed)
Elaboration of National Action Plan Measures into Agency Action Plan Tasks: Guidelines (Quentin Reed)
State Body Anti-corruption Action Plans (Quentin Reed), Presentation to events held with Commission on Combating Corruption and state bodies on implementation of National Anti-corruption Strategy, 18 June and 12 December 2008
Activity 1.5
Surveys on corruption in FSU countries: what can we get from them and what are best practices? (Quentin Reed), Presentation to Roundtable discussion on conducting surveys on corruption in Azerbaijan, 16 July 2008
Synopsis of outputs of Seminar on types and modalities of corruption surveys and Recommendations to the Commission on Combating Corruption on the development of Terms of Reference for surveys (Quentin Reed)

Activity 2.1-2.2
Maximising Efficiency and Integrity in the Legislative Process: a Positive Approach (Quentin Reed). Presentation to Roundtable Discussion on Improving Efficiency and Integrity in the Legislative Process, Milli Majlis of the Republic of Azerbaijan, 11 February 2009
Technical Paper: Curbing Corruption by Maximizing Integrity and Efficiency in the Legislative Process: an Overview of the Issues for the Roundtable Discussion on Improving Efficiency and Integrity in the Legislative Process, Milli Majlis of the Republic of Azerbaijan, 11 February 2009 (Quentin Reed)
Technical Paper: Expert Opinion on Regulation of Lobbying in the Republic of Azerbaijan (Quentin Reed)
Technical Paper on Typology of corruption risk factors in legal regulations or draft legal regulations (Quentin Reed)
Technical Paper on Regulation of Lobbying in Legislative Process of Azerbaijan: Lessons Learnt and Recommendation from International Experience (Alimammad Nuriyev)
Plea bargaining and issues related to its implementation in Azerbaijan (Anar Bagirov)
Analytical Review of "Plea bargaining and issues related to its Implementation in Azerbaijan" (Richard Vogler)
Technical Paper: Assessment of draft Law of the Republic of Azerbaijan on the Prevention of Conflicts of Interest in the Activities of the Public Officials (Quentin Reed)
Activity 2.3
Technical Paper on Compliance of the Azerbaijani legislation with its obligations under the Council of Europe Criminal and Civil Law Conventions and United Nations Convention Against Corruption (Rovshan Ismayilov)
Technical Paper on Compliance of the Legislation of the Republic of Azerbaijan with International Anti-corruption Conventions (Bostjan Penko)
Technical Paper on Compliance of the Azerbaijani legislation with its obligations under the United Nations Convention Against Corruption (Alimammad Nuriyev)
Technical Paper: Expert Opinion on various prevention-oriented laws related to the Republic of Azerbaijan's compliance with the United Nations Convention Against Corruption (Keith Henderson)
Technical Paper on Regulation of Lobbying in Legislative Process of Azerbaijan: Lessons Learnt and Recommendation from International Experience (Quentin Reed)
Activity 2.4
Technical Paper: Matrix of Compliance of Azerbaijan Legislation and Institutional Setup with Relevant International Legal Instruments (Vera Devine)
Output 3
Mission report on Fighting Money Laundering and Terrorism Financing in Azerbaijan Seminar, 22 July 2008 (Daniel Thelesklaf)

12 Presentations for 3 trainings on Prevention of Money-laundering and Terrorism Financing, for future Financial Monitoring Organ and entities with obligations provided by the Law on the Prevention of the Legalization of Criminally Obtained Funds or Other Property and the Financing of Terrorism, 16-18 June 2009 (Kristel Poh)
Activity 4.1
Methodology for three micro-system studies on the ministries of Taxes, Education and Health
Three Micro-systems studies reports
Activity 4.4
Drafting and implementing ethical conduct rules: best practices and lessons learned (Quentin Reed), presentation to Workshop on drafting and assessment of training needs and modalities for the Civil Service Commission, 31 January 2008
Proposed National Strategy for Training on Ethics and Conflict of Interest for Civil Servants of the Republic of Azerbaijan (Quentin Reed)
Activity 4.5
Training on Implementation of Law on Rules of Ethical Conduct, 11 March 2008 (Quentin Reed): 4 presentations
Training on Implementation of Law on Rules of Ethical Conduct, (Linda Austere)
Training on Implementation of Law on Rules of Ethical Conduct, 7-8 May (Hans-Joachim Rieger)
Model Civil Service Commission presentation on implementation of ethical rules for officials of local executive authorities (Quentin Reed)
Performance Evaluation (Hans-Joachim Rieger), Presentation for Training on Performance Evaluation
Technical Paper on draft Performance Evaluation System (PES) For Civil Servants in Azerbaijan (Hans-Joachim Rieger)
Comments on the Draft Regulations for Evaluating the Performance of Civil Servants, issued by the Civil Service Commission of the Republic of Azerbaijan (Quentin Reed)
Activity 4.6
Three presentations plus accompanying documents with case studies and law excerpts for Training on Whistleblowing provided on 12 March 2009 (Quentin Reed)
Non-AZPAC Documents:
GRECO-Compliance Report 2008
GRECO-Evaluation Report 2005
MONEYVAL Report 2008
Azerbaijan's National Strategy and Action Plan 2007-2011

Law of the Republic of Azerbaijan On the Prevention of the Legalization of Criminally Obtained Funds or Other Property and the Financing of Terrorism

Decree of the President of the Republic of Azerbaijan On application of the Law of the Republic of Azerbaijan "On the Prevention of the Legalization of Criminally Obtained Funds or Other Property and the Financing of Terrorism"

Law of the Republic of Azerbaijan On Combating Corruption

Law of the Republic of Azerbaijan On Civil Service

Law of the Azerbaijan Republic "On Approval of Procedures for Submission of Financial Information by Public Officials"