

Programmatic Cooperation Framework for
Armenia, Azerbaijan, Georgia, Republic of Moldova, Ukraine and Belarus



CoE/EU Eastern Partnership Programmatic Co-operation Framework (PCF)
Thematic Programme: Theme III
“Fight against Corruption and Fostering Good Governance-Fight against money-laundering”

1st Progress Report
December 2015

Programme title	Fight against Corruption and Fostering Good Governance/Fight against money-laundering
Project area	Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine
Reference number	ENI/2014/037-347
Project starting date	1 January 2015
Project duration	36 months
Implementation	Economic Crime and Cooperation Unit, Action against Crime Department, Directorate General Human Rights and Rule of Law, Council of Europe
Funding	European Union 90%; Council of Europe 10%
Programme budget	EURO 3,800.000
Date of report	23 December 2015
Reporting period	1 January 2015 – 31 December 2015

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This document has been produced with the financial assistance of the European Union. The views expressed herein can in no way be taken to reflect the official opinion of the European Union or the Council of Europe.

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ABBREVIATIONS

Anti-Money Laundering/Counter Financing of Terrorism	AML/CFT
Civil Service Commission	CSC
Commission for Combating Corruption	CCC
Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism	MONEYVAL
Council of Europe	CoE
Deutsche Gesellschaft für Internationale Zusammenarbeit	GIZ
Eastern Partnership	EaP
Eastern Partnership Programmatic Co-operation Framework	PCF
European Union	EU
Expected Result	ER
Group of States against Corruption	GRECO
National Anti-Corruption Action Plan	NACAP
National Anti-Corruption Bureau of Ukraine	NABU
National Agency for Prevention of Corruption	NAPC
National Risk Assessment	NRA
Office for Democratic Institutions and Human Rights	ODIHR
Organisation for Economic Co-operation and Development	OECD
Organization for Security and Co-operation in Europe	OSCE
PCF Regional Project “Fight against Corruption and Fostering Good Governance/Fight against money-laundering”	PCF-REG
PCF Azerbaijan Project “Strengthening capacities to Fight and Prevent Corruption in Azerbaijan”	PCF-AZ
PCF Belarus Project “Good governance and fight against corruption” (PCF-BE)	PCF-BE
PCF Georgia “Project on Combating Money Laundering and Terrorist Financing”	PCF-GE
PCF Ukraine Project “Fight against Corruption” – Open Advisory Facility	PCF-UA
Special Investigative Means	SIMs
Training of trainers	ToT
United Nations Development Programme	UNDP
United Nations Office on Drugs and Crime	UNODC
United States Department of Justice	U.S. DOJ
United States Department of State Bureau of International Narcotics and Law Enforcement Affairs	U.S. DOS/INL

1. DESCRIPTION

1.1. Contact Person for Corruption Theme

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Head

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1.2. Name of Partners in the Action

The Eastern Partnership Programmatic Co-operation Framework is 90% funded by the EU and 10% by the Council of Europe. It is implemented by the Council of Europe.

1.3. Title of Action

CoE/EU Eastern Partnership Programmatic Co-operation Framework (PCF) Thematic Programme “Fight against Corruption and Fostering Good Governance/Fight against money-laundering” (2015-2017)

1.4. Contract Number

ENI/2014/037-347

1.5. Start Date and End Date of the Reporting Period

1 January 2015 – 31 December 2017

1.6. Target Countries

Armenia, Azerbaijan, Belarus, Georgia, Moldova, and Ukraine

1.7. Beneficiaries

Regional Main Counterparts:

Ministry of Justice of Republic of Armenia, Commission on Combating Corruption under the President of the Republic of Azerbaijan, Department for Combating Corruption and Organised Crime Prosecutor General’s Office of Belarus, Ministry of Justice of Georgia, Prosecutor’s Office of Georgia, National Anti-Corruption Centre of the Republic of Moldova, and Ministry of Foreign Affairs of Ukraine.

Regional Beneficiaries:

- Governmental bodies at all levels, notably specialised structures within the ministries of justice, interior, and finance;
- Ministry units responsible for public administration and civil service;
- Specialised agencies/bureaux/commissions involved in prevention and fight against corruption and economic crime (i.e., anti-corruption agency);
- Financial intelligence units (FIUs);
- Judiciary and prosecutorial services;
- Training institutions; and
- Civil Society.

Azerbaijan Main Counterpart:

Commission on Combating Corruption under the President of the Republic of Azerbaijan

Azerbaijan Beneficiaries:

- General Prosecutor's Office;
- Civil Service Commission;
- State Agency for Public Service and Social Innovations/ASAN;
- Police Academy;
- Financial Monitoring Service;
- CARA;
- Custom's Academy;
- Justice Academy;
- Ministry of Education; and
- Civil Society.

Belarus Main Counterpart:

Prosecutor General's Office of Belarus.

Belarus Beneficiaries:

- Prosecutor's General Office of Belarus;
- Governmental bodies assigned to risk assessment policy and implementation; and
- Specialised agencies/bureaux/commissions assigned to prevention and fight against corruption and economic crime.

Georgia Main Counterparts:

- Ministry of Finance of Georgia;
- Ministry of Justice of Georgia; and
- Office of the Chief Prosecutor of Georgia.

Georgian Beneficiaries:

- Ministry of Finance of Georgia;
- Ministry of Justice of Georgia;
- Prosecutor's Office of Georgia;
- State Security Agency;
- Insurance State Supervision Service of Georgia;
- Revenue Service – legal entity of public law of the Ministry of Finance;
- Georgian Bar Association;
- Georgian Federation of Professional Accountants and Auditors;
- National Agency of Public Registry- legal entity of public law of the Ministry of Justice;
- National Bank; and
- Financial Monitoring Service.

Ukraine Main Counterpart:

- Ministry of Foreign Affairs of Ukraine;

Ukrainian Beneficiaries:

- Verkhovna Rada
- Ministry of Justice;
- National Anti-Corruption Bureau;
- National Agency for Prevention of Corruption; and
- Representatives of law enforcement agencies, prosecution service, the judiciary, civil society and media.

2. EXECUTIVE SUMMARY

The CoE/EU Eastern Partnership Programmatic Co-operation Framework (PCF) has been developed pursuant to the Council of Europe and EU Policy priorities in the context of the Eastern Partnership and is a continuation of an earlier Eastern Partnership initiative. The PCF follows the same logic providing the assistance to the Eastern Partnership countries (Armenia, Azerbaijan, Belarus, Georgia, Moldova, and Ukraine) in various areas on both a regional and country level. Its duration is 1 January 2015 to 31 December 2017.

The Thematic Programme's Theme III: "Fight against Corruption and Fostering Good Governance/Fight against money-laundering" is one of the PCF pillars focused on supporting reforms in the field of corruption and money laundering/terrorist financing and strengthening regional capacities to prevent and fight corruption and money laundering/terrorist financing. It is composed of:

- one Regional Component (involving all six Eastern Partnership countries);and
- four Country Components (projects for Azerbaijan, Belarus, Georgia and Ukraine).

The first year of the PCF cycle was marked with operational start-up and subsequent initiation of PCF Programme activities. Following extensive consultations with country beneficiaries on project Workplans, the Inception phase for all five components was completed successfully in June 2015, following the PCF Programme launching conference in May 2015, in Strasbourg. A number of secretariat members were recruited in both Council of Europe headquarters (two staff members) and field offices (3 local project officers and one international project advisor) to administer and implement project activities. A Long Term Advisor was selected pursuant to a public procurement procedure to provide overall expert support to implementation of all five components of the PCF Programme and a pool of mid- and short-term experts to be used for specific component interventions was created through a call for expression of interest. Additionally, other ordinary budget funded secretariat members in the headquarters were involved at a great extend from the design and the beginning of the project and throughout of the year in support to the implementation of the Theme, thus engaging a considerable time of 2 administrators and one assistant.

In 2015, activities were taken within four out of five components (project for Belarus will begin in 2016 pursuant to a 24 month time-line). In overall, the PCF Programme has had **2 activities** and **18 actions**, involving **1279** EaP officials (of which 478 were women [37.4%] and 801 were men [62.6%]). During the period of seven-months of implementation (starting from June 2015), the project team managed to complete 75% of planned interventions for 2015. Through the individual actions, the Programme produced and delivered to beneficiaries 7 technical advisory papers and one legislative toolkit, and has carried out and finalised, on average, 4 actions per month.

Substantively, interventions contributed very much to both on-going policy and legislative reforms in the EaP countries and strengthening of anti-corruption and anti-money laundering/counter financing of terrorism preventive and repressive mechanisms.

In the *PCF Regional Project "Fight against Corruption and Fostering Good Governance/Fight against money-laundering" (PCF-REG)*, EaP countries benefitted from a Model Law on Conflict of Interest (with explanatory memoranda) as guidance for current and future legislative reforms in this important field.

In *Azerbaijan*, the *PCF Project "Strengthening capacities to Fight and Prevent Corruption in Azerbaijan"* (PCF-AZ) interventions were geared toward reinforcing on-going anti-corruption and ethics training for public officials through development of a cadre of ethics trainers and fostering further specialization of criminal justice sector authorities on complex economic crime issues.

In Georgia, pursuant to country priorities, the PCF *“Project on Combating Money Laundering and Terrorist Financing” (PCF-GE)* provided crucial initial support to the launching (for the first time) of the National Anti-Money Laundering/Countering Financing of Terrorism Risk Assessment process by providing advice on the overall methodology and steps to be taken at the outset of the process, as well as generally directly supporting national authorities involved in the process.

In Ukraine, the most notable contribution of PCF *Ukraine Project “Fight against Corruption” – Open Advisory Facility (PCF-UA)* in 2015 has been to intensive anti-corruption legislative reforms in the country through provision of expert recommendations on possible avenues for improvement of reviewed draft/proposed pieces of legislation in line with applicable international standards and good practices.

That said the PCF Programme has, from the outset, experienced a number of substantive and operational challenges which have affected, at various levels, the implementation rate. These issues include multiplying requests for assistance, shifting of priorities by beneficiary institutions, staffing challenges, and donor fatigue. These challenges would need to be considered, and possibly mitigated, in the second year of the implementation of the PCF Programme.

3. DESCRIPTION OF ACTION

3.1. Context of Cooperation

The European Union launched the Eastern Partnership initiative (EaP) on 7 May 2009 at a Summit with its Eastern Partners. The Partnership sets out an ambitious path for tighter relations between Armenia, Azerbaijan, Belarus, Georgia, Republic of Moldova and Ukraine, through bilateral and multilateral activities. One component of the Eastern Partnership was the “Eastern Partnership – Council of Europe Facility Project on Good Governance and Fight against Corruption”, implemented from March 2011 until December 2014 (www.coe.int/eap-corruption).

The current Project “Fight against corruption and fostering good governance/ Fight against money-laundering”, under the CoE/EU Eastern Partnership Programmatic Co-operation Framework (PCF), represents a continuation of the previous Eastern Partnership assistance. It combines a Regional Component (involving all six Eastern Partnership countries) with Country Components for Azerbaijan, Belarus, Georgia and Ukraine. Whereas Country Components for Azerbaijan, Belarus and Ukraine primarily focus on combating corruption, the focus of the Country Component for Georgia is on fighting money-laundering.

The PCF as a whole is composed of five programmatic areas agreed between the European Commission and the Council of Europe. It stems from the Statement of Intent signed on 1 April 2014 by the Secretary General of the Council of Europe and the EU Commissioner for Enlargement and Neighbour Policy and has been developed pursuant to the Council of Europe and EU Policy priorities in the context of the Eastern Partnership, while relying on the Council of Europe expertise in standard-setting, monitoring and cooperation. “Fight against Corruption and Fostering Good Governance/Fight against money-laundering” is one of the pillars covered by the PCF. It is focused on supporting current reforms in the field of fight against corruption and money-laundering/terrorist financing and building good governance.

3.2. Approach

The Council of Europe has developed multidisciplinary expertise in the economic crime field for over a decade through standards setting, compliance monitoring, and provision of technical assistance. This knowledge has been the backbone of assistance to EaP countries in the previous period and will be used to deliver assistance on the regional and country level under the PCF platform.

In contrast to the previous EaP assistance format which was predominantly regional, with discrete country input, the PCF framework combines an overarching regional component aimed at all six EaP countries with four country specific components (for Azerbaijan, Belarus, Georgia and Ukraine). The regional component itself is a combination of regional and pilot activities. Regional activities engaging all six countries will allow for mobilisation of Council of Europe expertise, peer-to-peer reviews and advice, and the exchange of good practices among participating countries. Pilot activities will provide tailored assistance in response to individual country priorities in all six countries. Being run under the same programmatic platform, the regional and country components will mutually inform one another in an effort to provide individual countries, and the region as a whole, sufficient knowledge and expertise.

This also translates to thematic areas being covered under the programme. In line with identified key country needs and priorities, four country components have been developed to cover corruption/good governance or money laundering/terrorist issues specific for each country, respectively, while the regional component aims at addressing issues that emerge as common themes and address needs in areas outside the focus of country specific projects. Support will be extended in the areas of:

1. Policy and legislative reform;
2. Development of operational tools and procedures;
3. Development/strengthening of institutional operational and professional capacities;
4. Development /strengthening of inter-agency cooperation;
5. Development/strengthening of educational/training/awareness raising capacities.

4. EXPECTED RESULTS

4.1 Regional Project: (PCF-REG)

Overall Objective: Strengthening the capacities of six Eastern Partnership countries to fight corruption and money laundering and foster good governance.

Specific Objectives:

- 1.1. Improve the legal framework and professional capacities for prevention and criminalization of corruption, particularly in terms of implementation of relevant GRECO recommendations;
- 1.2. Strengthen corruption prevention capacities within the public administration, judiciary, prosecution service, and law enforcement;
- 1.3. Improve legal framework concerning ethics/codes of conduct, conflicts of interest, prohibition or restriction of incompatible activity, asset declarations, political activity financing, white collar crime, and immunity of high-ranking public officials;
- 1.4. Focus fight against corruption in specific areas, such as education and health sector; Support the development of prevention mechanisms and increase good governance in delivery of public services;
- 1.5. Facilitate public disclosure (whistleblowing) through development of a sound and applicable normative framework for the protection of whistleblowers and strengthening of professional capacities for its implementation;
- 1.6. Develop regional capacities and cross-border cooperation on common issues in fight against corruption, where cross-border and international cooperation is necessary to combat corruption and other forms of economic crime;
- 1.7. Strengthen national capacities to detect and suppress financial and economic crimes, notably in terms of implementation of applicable MONEYVAL recommendations;
- 1.8. Strengthen the capacities of financial intelligence units, law enforcement authorities, as well as supervisory bodies, in identifying money laundering/terrorism financing activity and other types of violation of applicable legislation.

Expected Result I: Strengthened anti-corruption preventive measures within public administration.

Expected Result II: National institutions tasked with providing policy advice, coordination and monitoring of anti-corruption- and good governance related reforms are strengthened.

Expected Result III: Independence of the criminal justice institutions and its mechanisms to combat corruption improved.

Expected Result IV: Strengthened national capacities through pilot activity intervention.

4.2 Azerbaijan Project: (PCF-AZ)

Overall Objective: Contribute to democracy and the rule of law through implementation of institutional reforms aimed at preventing and combatting corruption.

Specific Objectives: Strengthen institutional capacities aimed at fighting and preventing corruption in the public sector.

Expected Result I: Strengthened training capacities of the Commission for Combating Corruption and the Civil Service Commission.

Expected Result II: Reinforced law enforcement capacities of the Anti-corruption Department of the General Prosecutor.

Expected Result III: Support the preparation of an expected National Anti-Corruption Action Plan (NACAP).

Expected Result IV: Anti-Corruption training is introduced into the public service and the education sector.

4.3 Belarus Project: (PCF-BE)

Overall Objective: Contribute to democracy and the rule of law through strengthening of good governance and anti-corruption mechanisms.

Specific Objectives: Strengthen institutional capacities to prevent and counter corruption in Belarus, in accordance with applicable European standards

Expected Result I: Selected sectors of public governance are reviewed for corruption (risk assessments)

Expected Result II: Capacities of authorities to prevent, investigate, prosecute and adjudicate corruption and economic crime cases are enhanced.

4.4 Georgia Project: (PCF-GE)

Overall Objective: Contribute to democracy and the rule of law through prevention and control of money laundering and terrorist financing in Georgia in accordance with European and other international standards.

Specific Objectives: Enhance the capacities of the anti- money laundering and counter-terrorist financing system in Georgia in terms of legislation, institutional frameworks, skills and operational capabilities.

Expected Result I: Legislative proposals available to make Georgian legislation and sub-legal acts compliant with the applicable European and international standards.

Expected Result II: Risks of money laundering/terrorism financing at the national and sectoral level are understood and mitigating measures are elaborated.

- Expected Result III:** The supervisory and regulatory framework of preventative measures is reinforced for the sectors of insurance, casinos, lawyers, notaries, dealers in precious metals and stones, real estate agents and NPOs; beneficial ownership and transparency of legal persons is enhanced.
- Expected Result IV:** Capacities of authorities to investigate, prosecute and adjudicate money laundering and economic crime cases are enhanced.

4.5 Ukraine Project: (PCF-UA)

Overall Objective: Contribute to democracy and the rule of law through prevention and control of corruption in Ukraine.

Specific Objectives: Strengthen institutional capacities to counter corruption in Ukraine, in accordance with European standards, through targeted technical assistance.

Expected Result I: Increased compliance with anti-corruption legislation

Expected Result II: Strengthen capacities of National Anti-corruption Bureau (NABU)

Expected Result III: Strengthen Institutional capacities for (Recovered/Seized) Asset Management

Expected Result IV: Support National Agency for Prevention of Corruption (NAPC) and strengthening of anti-corruption prevention measures.

5. WORKPLAN/ACTIVITIES

The Inception phase for all five project components s ended in June 2015 when agreements were reached with national authorities of all six EaP countries on specific project activities and an expected time-line for implementation. Project Workplans were developed pursuant to these agreements.

5.1 Regional Project: (PCF-REG)

Expected Result I: Strengthened anti-corruption preventive measures within public administration

In 2015, PCF-REG focused on assisting EaP countries with developing and strengthening conflict of interest regulation. As a result, representatives of institutions dealing with conflict of interest were informed of international standards and good practices on regulating conflicts of interest and possible legislative solutions for EaP countries. Authorities of EaP countries are now equipped with a comprehensive legislative toolkit consisting of model legislative provisions for regulating conflict of interest and explanatory memoranda which will contribute to on-going reforms of the regulatory frameworks in the EaP region.

Expected Result II: National institutions tasked with providing policy advice, coordination and monitoring of anti-corruption- and good governance related reforms are strengthened

According to the PCF-REG Workplan, activities related to this expected result will begin in 2016.

Expected Result III: Independence of the criminal justice institutions and its mechanisms to combat corruption improved

Pursuant to specific request from all six EaP countries, PCF-REG interventions in 2015 aimed at raising capacity of prosecutors and investigators to effectively use international cooperation/mutual legal assistance in case investigations. Accordingly, representatives of main prosecution and investigation bodies of EaP countries assigned to international cooperation have been trained on mechanisms of informal and formal cooperation when working on cross-border economic crime cases, methods of overcoming challenges in gathering information from abroad, and informed about possible domestic and foreign/international sources of information and assistance.

Expected Result IV: Strengthened national capacities through pilot activity intervention

In 2015, three country pilot activities were implemented under the PCF-REG, providing support to legislative reforms in respective countries, on one hand, and raising professional capacities of criminal justice institutions, on the other. The project provided anti-corruption authorities and policy makers of the Republic of Moldova with expert advice on on-going legislative reforms of integrity testing. This includes an Expert Opinion on draft amendments to the Law on Integrity Testing with concrete recommendations for further improvement, taking into consideration good practices with integrity testing and the country context. The recommendations feed into the ongoing parliamentary process in Moldova on this matter. Separately, per specific request Georgian criminal justice authorities were trained on methods and tools for investigating and prosecuting legal entities for corruption offences.

5.2 Azerbaijan Project (PCF-AZ)

Expected Result I: Strengthened training capacities of the Commission for Combating Corruption and the Civil Service Commission

In the second half of 2015, PCF-AZ took first actions with a view toward strengthening training capacities of the Commission for Combating Corruption (CCC) and the Civil Service Commission (CSC). Per request of the CCC for a tailor made training curricula on anti-corruption and ethics concepts and tools, PCF-AZ has provided the CCC with outline curricula which will serve as a basis for development of accompanying training materials for future CCC trainers and trainees. The final result, a training package, is expected in 2016, and will be followed by train-the-trainers courses.

With the CSC, activities in 2015 focused on strengthening teaching capacities of the existing CSC ethics trainers and expanding the pool to new trainers through tailored made ethics train-the-trainers courses covering both substantive issues and teaching methodology. Pursuant to PCF-AZ interventions in 2015, the CSC has increased teaching capacities of its core set of trainers (6 trainers) and has expanded the pool to new trainers (total of 15 at the end of the year). The said group of trainers will be the key tool to deliver regional ethics trainings pursuant to a revised ethics curriculum in 2016 and further train new trainers from other public administration bodies in the second and third year of the project implementation.

Expected Result II: Reinforced law enforcement capacities of the Anti-corruption Department of the General Prosecutor

First in a set of actions aimed at achieving this expected result has been taken in 2015 through specialised, practice-oriented training of prosecutors and investigators of the Anti-Corruption Directorate of the General Prosecutor's Office (ACDGPO), as well as financial analysts and

auditors on economic crime investigations and prosecutions of legal entities and asset recovery. Trainees have been equipped with knowledge on specific aspects of investigation and prosecution of corporations, tools to be used and approaches to be taken for successful completion of such cases, and channels for close inter-agency cooperation. This intervention has contributed to readiness of law enforcement and justice sector authorities for anticipated entry into force of Criminal Code provisions on criminal liability of legal entities.

Expected Result III: Support the preparation of an expected National Anti-Corruption Action Plan (NACAP)

PCF-AZ interventions in respect to the preparation of the new National Anti-Corruption Action Plan (NACAP) have been postponed for 2016 per request of national counterparts, taking into consideration the early stage of the NACP development at the end of 2015.

Expected Result IV: Anti-Corruption training is introduced into the public service and the education sector

Pursuant to an agreement reached with the PCF-AZ beneficiaries, activities aimed at supporting introduction of on-going anti-corruption training in the public service training centres and the educational sector will begin in 2016.

5.3 Belarus Project: (PCF-BE)

Expected Result I: Selected sectors of public governance are reviewed for corruption (Risk assessments)

Expected Result II: Capacities of authorities to prevent, investigate, prosecute and adjudicate corruption and economic crime cases are enhanced

In mid-2015, an agreement was reached with PCF-BE focal point institution, the General Prosecutor's Office of Belarus, on specific project activities and the tentative time-line. Given that the PCF-BE is a 24 month project, agreed activities will begin being implemented as of January 2016.

5.4 Georgia Project: (PCF-GE)

Expected Result I: Legislative proposals available to make Georgian legislation and Sub-legal acts compliant with the applicable European and international standards

At the end of 2015, Georgian Ministry of Finance has identified key sectors where necessary changes to anti-money laundering/counter financing of terrorism (AML/CFT) legislation are needed (leasing, casinos, cash couriers, NPOs, DPMs, insurance, lawyers, auditors and accountants). In order to ensure that future legislative amendments are developed with full understanding of applicable international standards, PCF-GE has provided the Georgian Ministry of Finance and other relevant agencies with translation of FATF Recommendations that should serve as guidelines in the process. In the same vain, PCF-GE began review of AML/CFT legislation concerning NPO oversight which will serve as a basis for development of relevant legislative amendments in 2016. PCF-GE is expected to provide the same support in 2016 with legislative reforms concerning other sectors mentioned above.

Expected Result II: Risks of money laundering/terrorism financing at the national and sectoral level are understood and mitigating measures are elaborated

In October 2015, Georgia began the process of developing the National AML/CFT Risk Assessment (NRA) with PCF-GE support. The goals and the methodology for the NRA were discussed with the Georgian Ministry of Finance and representatives of all relevant agencies in the field at the end of September 2015. Subsequently, representatives of the inter-agency NRA Working Group were informed about the NRA process and methodology, sources of data, required and expected input from various institutions, and lessons learned from NRA processes of countries that developed their NRA with more or less success.

As a result of the PCF-GE interventions, the NRA Working Group has begun the first phase of the risk assessment process through gathering necessary data per specific recommendations provide under PCF-GE. The NRA process has continued until the end of the year 2015 and PCF-GE is actively following and supporting the developments by taking part in the working group coordination meetings.

Expected Result III: The supervisory and regulatory framework of preventative measures is reinforced for the sectors of insurance, casinos, lawyers, notaries, dealers in precious metals and stones, real estate agents and NPOs; beneficial ownership and transparency of legal persons is enhanced

According to agreement with national counterparts, activities under this expected result will begin in 2016 upon review of the existing legislative and regulatory framework in the specific sectors.

Expected Result IV: Capacities of authorities to investigate, prosecute and adjudicate money laundering and economic crime cases are enhanced

Through the project training component, national criminal justice authorities have developed skills and capacities to successfully investigate and prosecute corporate money-laundering. For the first time, Georgian prosecutors, investigators, and financial analysts were provided practical guidance on possible strategies and tools to be used for investigating and prosecuting corporate money laundering pursuant to Georgian legislation and comparative good practices.

5.5 Ukraine Project: (PCF-UA)

Expected Result I: Increased compliance with anti-corruption legislation

In 2015, PCF-UA contributed to the on-going anti-corruption reforms in the county through four expert opinions on draft legislation with recommendations based on international standards and comparative good practices. Policy makers in Ukraine were accordingly given specific advice on possible improvements of anti-corruption draft amendments to the Law on the Public Prosecution Service, Criminal Procedure Code, Criminal Code, Law on Administrative Procedures, legislation concerning political financing, and the draft Law on Integrity testing. PCF-UA input has resulted in a number of changes to original drafts, subsequently adopted by Verkhovna Rada. In addition to that, authorities held back on enforcing legislation not assessed favourably by Council of Europe experts.

PCF-UA has furthermore contributed to overall high-level policy discussions on ways for Ukraine to move forward with anti-corruption preventive measures, enforcement, and transparency by providing key policy makers expert guidance on best ways to address political financing, corruption and economic crime investigations and prosecutions, and make use of leveraging resources through greater engagement of other sectors, including media.

Expected Result II: Strengthen capacities of National Anti-corruption Bureau (NABU)

In the six months of the project implementation period, PCF-UA interventions in respect to this ER focused in three directions: a) raising awareness of NABU top management on Council of Europe standards and mechanisms relevant for NABU future work; b) building NABU capacities in regards to management and operational policies/procedures for an anti-corruption investigative body; and c) supporting development of efficient inter-agency cooperation between NABU and other state agencies through development of an electronic data exchange system. NABU top and middle management have been given specific recommendations on how to address overall and pending issues relating to management of NABU and beginning of its operations, in light of applicable Council of Europe and other international standards and good practices, and received advice on steps that would need to be taken to develop a NABU electronic data exchange system.

Expected Result III: Strengthen Institutional capacities for (Recovered/Seized) Asset Management

Activities under this expected result will begin in Year II of the Project cycle as planned in the Workplan.

Expected Result IV: Support National Agency for Prevention of Corruption (NAPC) and strengthening of anti-corruption prevention measures

Despite initial plans to begin engagement in this field in 2015, PCF-UA actions have been put on hold due to continuing struggles with establishment of the project main beneficiary, the National Agency for Prevention of Corruption (NAPC). Project activities are expected to begin in the second year of the implementation cycle.

6. MODIFICATION[S], ASSUMPTIONS, RISKS AND SUSTAINABILITY

6.1 Modification

The only modification under the PCF Programme in 2015 pertained to the overall direction of the PCF-AZ project. PCF-AZ was initially conceptualised to address enforcement of declaration of assets system in Azerbaijan. Pursuant to subsequent discussions with national counterparts, the focus of interventions has been shifted from this topic to strengthening of preventive and law enforcement capacities to address corruption in public administration. Key project documents (Logical framework and Workplan) have been developed pursuant to the new area of focus, in coordination with national stakeholders.

6.2 Assumptions, risks and sustainability

Implementation of all five projects largely relies on the following assumptions:

- Overall political will and continuity in carrying out reforms;
- Willingness of national authorities to adapt policies, in line with the EU and Council of Europe norms and standards;
- Capacity of specific beneficiary institutions to absorb assistance;
- Readiness of specific beneficiary institutions to address issues;
- Capacity and readiness of beneficiary institutions to use the acquired knowledge/assistance.

From the outset of the PCF Programme, and more specifically the five PCF projects, a number of issues, both substantive and operational in character, have affected, at various levels,

implementation of project activities. These issues, outlined below, would need to be taken into consideration and possibly mitigated in the second year of implementation of the PCF Programme.

6.3 Substantive related issues

Simultaneous and Multiplying requests: It is very encouraging to see great interest for cooperation from country beneficiaries given the importance of issues covered by the PCF Programme". Even well after the conclusion of the Inception phase, the PCF Project Team has continued receiving "new requests" for assistance, some of which either go beyond the agreed framework of project activities or represent a significant multiplication of existing project activities. Having in mind the PCF Thematic Programme overall time and budgetary limitations, it will be necessary in the forthcoming period to manage expectations in respect to assistance in order to avoid potential risks that expanding may pose to successful project implementation;

Country priority shifting: First year of implementation has also shown inclination of some project beneficiaries to either completely abandon initially stated priorities (not) indicating new ones or to swiftly cross from one priority to the next. If continued, this practice may impact the ability to render focused and continuing intervention in a specific area;

EU Delegations in capitals separate requests: In at least two countries covered by the PCF, European Union Delegations (EUD) in two respective capitals have made specific requests for inclusion or exclusion of activities covered by agreed project framework during the implementation of the PCF Programme in 2015. It will be important for the Programme in the future to carefully balance any such requests against available resources and priorities stated by national beneficiaries.

6.4 Operational related issues

Absence of Focal Point nomination: At least one project has suffered from lack of government appointed Focal Point as the formally agreed mechanism of communication with local beneficiaries. This has caused difficulties with identifying points of contact in relevant country institutions and poses concerns in terms of overall project buy-in by country governments. One project under the PCF Programme remains without a focal points at the end of 2015;

Local recruitment of project staff/instability: In 2015, the PCF Project Team experienced difficulties in and after the recruitment of locally based project staff. One factor is instability of the country's social and economic setting and the movement of people outside the countries. During 2015, despite the delays in recruitment of 3 local staff members and 1 international locally residing staff members, only 2 staff members (50%) are in place at the end of the year. Two staff members resigned from their respective positions due to personal (academic studies abroad) and social cohesion reasons;

Donor congestion/absorption capacity fatigue: Significant but disconcerted donor community has had a noticeable impact on implementation of their own interventions and activities in at least one country-beneficiary-Ukraine. This has resulted in simultaneous assistance requests to different technical assistance providers and an atmosphere where rapid delivery and quantity is valued over quality and thorough analysis aimed at avoiding donor and technical assistance congestion.

7. ACTIVITIES AND LEVEL OF PROGRESS

The achievements relating to the expected results of the projects are assessed below taking into consideration actions effectively delivered, project outcome indicators, and Year I output indicators:

7.1. PCF-REG

Expected Result I: Strengthened anti-corruption preventive measures within public administration	
Outcome indicators	<ul style="list-style-type: none"> ▪ Anti-corruption preventative administrative measures are re-enforced and streamlined through the use of good governance tools; ▪ Control mechanisms within the public sector strengthened; ▪ Increase in legislative and implementation regulations concerning anti-corruption and preventative measures; ▪ Increase in the number of procedures of monitoring mechanisms/bodies that are reformed and improved.
Year I output indicators	<ul style="list-style-type: none"> ▪ Increase in the level, number and frequency of media coverage and public relations material relating to training and awareness activities, and to the topics addressed by the activities; ▪ Increase in the number and scope of training manuals/guidelines.
Year I activities	<ul style="list-style-type: none"> ▪ Regional Workshop on Conflict of Interest Legislative Toolkit, 14-15 October 2015;
Progress made under ER 1	National authorities of EaP countries have been provided with: a) model legislative tool on Conflict of Interest with an explanatory memorandum; and b) guidance on developing conflict of interest legislation in line with international standards and good practices through a regional workshop. Information about activities and accompanying materials are readily available on the Council of Europe webpage (www.coe.int/PCF-EaP2)
Expected Result II: National institutions tasked with providing policy advice, coordination and monitoring of anti-corruption- and good governance related reforms are strengthened	
Outcome indicators	<ul style="list-style-type: none"> ▪ Anti-corruption preventative administrative measures are re-enforced and streamlined through the use of good governance tools; ▪ Control mechanisms within the public sector strengthened; ▪ Increase in legislative and implementation regulations concerning anti-corruption and preventative measures; ▪ Increase in the number of procedures of monitoring mechanisms/bodies that are reformed and improved.
Year I output indicators	<ul style="list-style-type: none"> ▪ Increase in the level, number and frequency of media coverage and public relations material relating to training and awareness activities, and to the topics addressed by the activities; ▪ Increase in the number and scope of training manuals/guidelines.
Year I activities	<ul style="list-style-type: none"> ▪ N/A for 2015
Progress made under ER 2	Activities under this ER will begin in 2016.
Expected Result III: Independence of the criminal justice institutions and its mechanisms to combat corruption improved	
Outcome indicators	<ul style="list-style-type: none"> ▪ Control mechanisms within the public sector strengthened; ▪ Increase in legislative and implementation regulations concerning anti-corruption and preventative measures; ▪ An annual report with comprehensive coverage of the use of Special Investigative Means (SIMs) and the capacity-levels of investigations into

	corruption/white collar crime is developed.
Year I output indicators	<ul style="list-style-type: none"> ▪ Increase in the level, number and frequency of media coverage and public relations material relating to training and awareness activities, and to the topics addressed by the activities; ▪ Increase in the number and scope of training manuals/guidelines.
Year I activities	<ul style="list-style-type: none"> ▪ Regional Workshop on International Cooperation, 19-20 October 2015
Progress made under ER 3	Activities planned under 3.4 of the Project Workplan delivered through Regional Workshop on International Cooperation; Capacities of investigators and prosecutors to handle corruption/economic crime cases with an international element increased through training and provision of reference materials to be used in every-day work; Information about activities and accompanying materials are readily available on the Council of Europe webpage (www.coe.int/PCF-EaP2)
Expected Result IV: Strengthened national capacities through pilot activity intervention	
Outcome indicators	<ul style="list-style-type: none"> ▪ Anti-corruption preventative administrative measures are re-enforced and streamlined through the use of good governance tools; ▪ Control mechanisms within the public sector strengthened; ▪ Increase in legislative and implementation regulations concerning anti-corruption and preventative measures; ▪ An annual report with comprehensive coverage of the use of Special Investigative Means (SIMs) and the capacity-levels of investigations into corruption/white collar crime is developed; ▪ Increase in the number of procedures of monitoring mechanisms/bodies that are reformed and improved.
Year I output indicators	<ul style="list-style-type: none"> ▪ Increase in the level, number and frequency of media coverage and public relations material relating to training and awareness activities, and to the topics addressed by the activities; ▪ Increase in the number and scope of training manuals/guidelines.
Year I activities	<p>Republic of Moldova – Roundtable discussion on integrity testing reforms, 20 January 2015</p> <p>Republic of Moldova – Expert Opinion on draft Amendments to Law on Integrity testing, October 2015</p> <p>Georgia – Training on Investigation and Prosecution of Legal Entities, 16-17 November 2015</p>
Progress made under ER 4	Activities under 4.1 (support to policy and legislative development) and 4.2. (capacity building) of the Project Workplan implemented in relation to Republic of Moldova and Georgia; Republic of Moldova provided with expert advice and guidance regarding integrity testing; Georgian investigative and criminal justice sector authorities trained on criminal liability of legal entities; All activities extensively reported in local media; Information about activities and accompanying materials are readily available on the Council of Europe webpage (www.coe.int/PCF-EaP2) .

7.2. PCF-AZ

Expected Result I: Strengthened training capacities of the Commission for Combating Corruption and the Civil Service Commission	
Outcome indicators	<ul style="list-style-type: none"> ▪ All new recruits to public service receive ethics and anti-corruption training. Ethics and anti-corruption trainings and seminars are integrated into most on-service training of civil servants. The Civil

	<p>Service Commission and the Secretariat of the Commission for Combating Corruption co-ordinate on their own the methodology and the work of the established pool of trainers.</p> <p>[n.b. the outcome indicators have been revised at the end of 2015]</p>
Year I output indicators	<ul style="list-style-type: none"> ▪ Number of trainers trained, training curricula, training materials and trained staff of beneficiary institutions;
Year I activities	<ul style="list-style-type: none"> ▪ Preparation of the anti-corruption training curricula outline for the Commission for Combating Corruption; ▪ Two train-the trainers workshops for Civil Service Commission existing and future trainers, 22-23 September 2015 and 3-4 December 2015 ▪
Progress made under ER 1	<ul style="list-style-type: none"> ▪ Actions under 1.1 of the Workplan (development of anti-corruption and ethics curricula for the Civil Service Commission and the Commission for Combating Corruption and delivery of trainings) initiated through: a) delivery of two training on ethics for future trainers of the Civil Service Commission; and b) development of the anti-corruption and ethics curricula outline for the Commission for Combating Corruption.
Expected Result II: Reinforced law enforcement capacities of the Anti-corruption Department of the General Prosecutor	
Outcome indicators	<ul style="list-style-type: none"> ▪ The Anti-corruption Department of the General Prosecutor has a high number of prosecutors with specialised skills who can carry out investigations more efficiently in certain categories of crimes. <p>[n.b. the outcome indicators have been revised at the end of 2015]</p>
Year I output indicators	<ul style="list-style-type: none"> ▪ Number, type and nature of expertise provided number of trainings, participants and training materials;
Year I activities	<ul style="list-style-type: none"> ▪ Training on Criminal Liability of Legal Entities and Asset Recovery, 19-20 November 2015;
Progress made under ER 2	<ul style="list-style-type: none"> ▪ Capacity of specialised prosecution and investigation bodies, financial analysts and auditors to tackle corporate corruption cases and asset recovery raised; Training materials developed jointly and provided to the Anti-Corruption Directorate with the Prosecutor General.
Expected Result III: Support the preparation of an expected National Anti-Corruption Action Plan (NACAP)	
Outcome indicators	<ul style="list-style-type: none"> ▪ At least 10 NACAP actions related to GRECO recommendations are implemented according to international standards with Project support. <p>[n.b. the outcome indicators have been revised at the end of 2015 pursuant to the change in the ER]</p>
Year I output indicators	<ul style="list-style-type: none"> ▪ International standards are reviewed and Project expertise is available with regard to selected fields of the anti-corruption action plan;
Year I planned activities	<ul style="list-style-type: none"> ▪ Review of the status of implementation of the current National Anti-Corruption Action Plan;
Progress made under ER 3	<ul style="list-style-type: none"> ▪ Activity tentatively planned for 2015 has been postponed for 2016 per request of national authorities.
Expected Result IV: Anti-Corruption training is introduced into the public service and the education sector	
Outcome indicators	<ul style="list-style-type: none"> ▪ Several educational institutions (universities, schools) include anti-corruption and ethics modules in their curricula and are continuing to deliver training/education modules without further assistance by the Project.

	[n.b. the outcome indicators have been revised at the end of 2015]
Year I output indicators	<ul style="list-style-type: none"> Number of training courses and trained persons in public service and educational institutions; number of training curricula and training material; number of trained educational staff;
Year I planned activities	N/A
Progress made under ER 4	<ul style="list-style-type: none"> Activities under this ER will begin in 2016.

7.3 PCF-BE

The implementation of this Project is scheduled to commence on 1 January 2016. Accordingly, no specific project activities were taken in 2015.

7.4 PCF-GE

Expected Result I: Legislative proposals available to make Georgian legislation and sub-legal acts compliant with the applicable European and international standards	
Outcome indicators	<ul style="list-style-type: none"> Level of implementation of the national anti-money laundering and terrorism financing strategy and action plan and results, is increased; Progress is made in the implementation of Objectives of the National Strategy ,as attested by the indicative data; Ratings provided in MONEYVAL's fourth report are upgraded.
Year I output indicators	<ul style="list-style-type: none"> National anti-money laundering and terrorism financing strategy and action plan are effectively implemented; Strengthened and further developed AML/CFT system with relevant guidelines for the monitoring entities in place;
Year I activities	<ul style="list-style-type: none"> Conference on Combating Money Laundering and Terrorist Financing 25 September 2015; Translation of FATF Recommendations to Georgian;
Progress made under ER 1	<ul style="list-style-type: none"> Conference on Combating Money Laundering and Terrorist Financing discussing the Georgian legislative framework vis-à-vis relevant international standards and the National Strategy and Action Plan organized under Activity 1.1 of the Workplan; Georgian authorities provided with a translation of FATF Recommendations that should serve as guidance for further strengthening of the country AML/CFT system.
Expected Result II: Risks of money laundering/terrorism financing at the national and sectoral level are understood and mitigating measures are elaborated	
Outcome indicators	<ul style="list-style-type: none"> Level of implementation of the national anti-money laundering and terrorism financing strategy and action plan and results, is increased; Progress is made in the implementation of Objectives of the National Strategy ,as attested by the indicative data; Ratings provided in MONEYVAL's fourth report are upgraded.
Year I output indicators	<ul style="list-style-type: none"> National anti-money laundering and terrorism financing strategy and action plan are effectively implemented; Strengthened and further developed AML/CFT system with relevant guidelines for the monitoring entities in place Upgraded systems for sharing and tracking law enforcement and financial intelligence information at the national level are introduced,

	including data-sharing, statistics and case-monitoring;
Year I activities	<ul style="list-style-type: none"> ▪ National Risk Assessment Workshop for members of the working group in-charge of conducting the National Risk Assessment; ▪ Expert Opinion on National Risk Assessment methodology for Georgia;
Progress made under ER 2	<ul style="list-style-type: none"> ▪ Under Activity 2.1. of the Workplan a workshop on standards and good practices with development of a National Risk Assessment (NRA) was organized for members of the NRA drafting working group; Relevant authorities also provided with an expert opinion on the NRA development methodology with specific recommendations on procedural steps.
Expected Result III: The supervisory and regulatory framework of preventative measures is reinforced for the sectors of insurance, casinos, lawyers, notaries, dealers in precious metals and stones, real estate agents and NPOs; beneficial ownership and transparency of legal persons is enhanced	
Outcome indicators	<ul style="list-style-type: none"> ▪ Level of implementation of the national anti-money laundering and terrorism financing strategy and action plan and results, is increased; ▪ Progress is made in the implementation of Objectives of the National Strategy ,as attested by the indicative data; ▪ The number and level of trained officers vis-à-vis those involved in the practical implementation of the national strategy, is increased; ▪ Ratings provided in MONEYVAL's fourth report are upgraded.
Year I output indicators	<ul style="list-style-type: none"> ▪ Strengthened and further developed AML/CFT system with relevant guidelines for the monitoring entities in place;
Year I planned activities	N/A
Progress made under ER 3	<ul style="list-style-type: none"> ▪ This activity will begin in 2016.
Expected Result IV: Capacities of authorities to investigate, prosecute and adjudicate money laundering and economic crime cases are enhanced	
Outcome indicators	<ul style="list-style-type: none"> ▪ The number and level of trained officers in operations, including the number and progress of data sharing and financial intelligence operations, is increased;
Year I output indicators	<ul style="list-style-type: none"> ▪ The capacities of AML/CFT authorities to undertake their functions and effectively co-operate domestically are enhanced;
Year I activities	<ul style="list-style-type: none"> ▪ Training on Corporate Money Laundering schemes, 17 November 2015
Progress made under ER 4	<ul style="list-style-type: none"> ▪ Training on Criminal Liability of Legal Entities delivered under Activity 4.2 of the Workplan; Trainees are equipped with practical guidance on possible strategies and tools to be used for investigating and prosecuting corporate money laundering.

7.5 PCF-UA

Expected Result I: Increased compliance with anti-corruption legislation	
Outcome indicators	<ul style="list-style-type: none"> ▪ Level and percentage of implementation of anti-corruption reform is increased;

	<ul style="list-style-type: none"> ▪ GRECO compliance report recommendations are dealt in an effective manner;
Year I output indicators	<ul style="list-style-type: none"> ▪ Active participation of major stakeholders in meetings held to discuss anti-corruption policy and legislation; ▪ Expert recommendations, developed in consultations with major stakeholders, are provided to the national authorities;
Year I activities	<ul style="list-style-type: none"> ▪ Expert Opinions on: a) amendments to the Law on the Public Prosecution Service, Criminal Procedure Code, Criminal Code, Law on Administrative Procedures, legislation concerning political financing, and b) the draft Law on Integrity testing; ▪ International Conference ““Preventing. Fighting. Acting.” (16 November 2015)
Progress made under ER 1	<ul style="list-style-type: none"> ▪ Expert recommendations provided on four sets of legislative packages and overall guidance on reforms in the area of political financing, investigating and prosecuting corruption, and multi-stakeholder involvement under Activities 1.1 and 1.2 of the Workplan.
Expected Result II: Strengthen capacities of National Anti-corruption Bureau (NABU)	
Outcome indicators	<ul style="list-style-type: none"> ▪ Significant increase in the number of trained capacities / people leading and being involved in the implementation of the regulatory framework establishing relevant anti-corruption institutions;
Year I output indicators	<ul style="list-style-type: none"> ▪ Expert recommendations, developed in consultations with major stakeholders, are provided to the national authorities;
Year I activities	<ul style="list-style-type: none"> • NABU study visit to Council of Europe, 22 June 2015 • Management and operational mentoring, 19-20 November 2015 • Electronic data exchange feasibility study, 9-11 December 2015
Progress made under ER 2	<ul style="list-style-type: none"> ▪ Pursuant to activities taken under 2.1 and 2.5 of the Workplan, NABU top management has been made aware of Council of Europe standards and mechanisms relevant for the NABU’s future work. Furthermore, NABU managers are trained and advised on good practices with management and operational policies/procedures for an anti-corruption investigative body. In addition, the NABU has received specific guidance on steps to be taken with the aim of developing an efficient inter-agency cooperation mechanism on case investigations through the development of an electronic data exchange system.
Expected Result III: Strengthen Institutional capacities for (Recovered/Seized) Asset Management	
Outcome indicators	<ul style="list-style-type: none"> ▪ Significant increase in the number of trained capacities / people leading and being involved in the implementation of the regulatory framework establishing relevant anti-corruption institutions;
Year I output indicators	<ul style="list-style-type: none"> ▪ Expert recommendations, developed in consultations with major stakeholders, are provided to the national authorities;
Year I planned activities	N/A
Progress made under ER 3	<ul style="list-style-type: none"> ▪ This activity is expected to begin in 2016, following related legislative reforms.
Expected Result IV: Support National Agency for Prevention of Corruption (NAPC) and strengthening of anti-corruption prevention measures	

Outcome indicators	<ul style="list-style-type: none"> ▪ Increase in the number of recommendations issued and addressed in sectorial reforms to prevent corruption;
Year I output indicators	<ul style="list-style-type: none"> ▪ Expert recommendations, developed in consultations with major stakeholders, are provided to the national authorities;
Year I planned activities	N/A
Progress made under ER 4	<ul style="list-style-type: none"> ▪ Activities under this ER are expected to begin in 2016, following the establishment on NAPC.

8. COOPERATION WITH STAKEHOLDERS

8.1. Regional level

Cooperation with the coordinating institutions for the PCF-REG in 2015 proceeded without difficulty. Project Focal Points were identified in time, for all countries with the exception of Ukraine. Thanks to the Ukraine Permanent Representation to Council of Europe the PCF Project Team managed to overcome this gap in the first half of the year. As of fall 2015, PCF-REG is supported by the Ukraine appointed PCF National Coordinator, in the absence of a Focal Point. All Focal Point institutions provided full support to the organization of PCF-REG activities. Some delays were observed regarding Pilot initiatives due to slow country feedback. Communication exchange was on the whole timely, with slight delays.

8.2. Azerbaijan

The PCF-AZ has been received well by relevant Azerbaijani counterparts. Main project beneficiary institutions, the Commission for Combating Corruption, Civil Service Commission, and the Anti-Corruption Directorate with the Prosecutor General, showed willingness to actively engage in 2015 project activities and provide the PCF Project Team with necessary information. Other project constituencies (e.g. the Police Academy, Justice Academy, Chamber of Auditors, and the Financial Monitoring Service), as well as counterparts with whom activities will begin as of next year (namely the Ministry of Education) were open for discussion regarding plans for involvement and future steps. Communication was slightly hampered by loss of a Local Project Officer in October 2015, but Azerbaijani authorities responded very well to Strasbourg team efforts to minimize the impact on delivery of project assistance.

8.3. Belarus

As PCF-BE will begin only in 2016, cooperation with Belarus authorities in 2015 was mostly in regards to PCF-REG. So far, communication and cooperation with the project Focal Point institution, the General Prosecutor's Office, went well.

8.4. Georgia

Cooperation with Georgian counterparts has been equally positive. The PCF-GE has established communication with all project counterparts/beneficiaries and has begun with first activities under the Workplan pursuant to beneficiary priorities. As in Azerbaijan, Georgian key beneficiary institutions, the Ministry of Finance and the General Prosecutor's Office, have taken an active role in organization of first project events in 2015, and very receptive to ideas and recommendations delivered from and through the project. Other direct and indirect project beneficiaries have expressed great interest in receiving assistance under PCF-GE. The Local Project Officer has had a significant role in shaping a positive project perception in the eyes of the beneficiaries.

8.5. Ukraine

Cooperation under the PCF-UA can be best described as volatile. The PCF-UA has experienced significant setback at the outset due to absence of PCF coordinating representatives on behalf of Ukraine. Project activities and a tentative time-line for implementation could not have been finalized in the absence of relevant national institutions. The impasse was overcome through a specially organized visit of representatives of the main project beneficiaries to Council of Europe Headquarters in Strasbourg which was implemented jointly with the Office of the Special Advisor to the Secretary General for Ukraine. In the absence of a PCF-UA Focal Point, the PCF Project Team has continued liaising directly with the beneficiaries. Some delay in communication regarding project activity implementation has been observed. Key beneficiary institutions, namely legislative bodies

(e.g. Verkhovna Rada and Ministry of Justice) and the National Anti-Corruption Bureau have also exhibited a certain degree of indecisiveness in regards to implementation of specific project actions agreed upon at an earlier stage. Due to the shifting landscape in Ukraine, requests for PCF-UA assistance tend to change making it difficult to follow through with specific set of activities. One expected key project beneficiary, the National Anti-Corruption Prevention Agency, is yet to come into existence. The PCF Project Team hopes for more stability in the following year once the groundwork has been set in place.

8.6. Third parties/Partners

In order to limit duplication of efforts, the CoE staff assigned to all five components has established contacts with other international organizations working on the same and similar issues (e.g. UNDP, UNODC, OECD, GIZ, U.S.DDJ, U.S. DOS/INL, country specific twining projects). This seems to be most pertinent for Ukraine where a significant number of donors are working on anti-corruption reforms. To date, communication was namely focused on exchange of information on respective activities, with the exception of Ukraine where PCF-UA cooperated with a number of other assistance providers, including OECD and UNDP, in organizing a large scale international anti-corruption conference (see <http://conference.reforms.in.ua/en>). PCF-GE has been approached by a number of organizations, including the law enforcement attaché at the French Embassy in Georgia, with proposals for specific activity cooperation. The projects have not come across any major problems regarding coordination. Beneficiary inclination to request the same type of assistance from several donors and to go with the first provider has been observed.

9. VISIBILITY OF THE PROJECT

Visual identity of PCF Programme components' follows the PCF Communications Strategy, agreed between the European Union and the Council of Europe, and is applicable to all programmatic outputs, including official communication, technical papers, activity agendas and presentations, news/media feeds, and project visibility kits (i.e. banners, folders, notepads, and pens).

The PCF-Corruption Programme is paying particular attention to visibility of its interventions. Key Programme documents and information on programmatic events and deliverables (e.g. expert opinions on reviewed legislation) can be found on the webpage of the Council of Europe Economic Crime Cooperation Unit (<http://www.coe.int/corruption>) and webpage sections specifically dedicated to the five PCF Programme components (www.coe.int/PCF-EaP2). Information about specific country activities can also be found on webpages of Council of Europe offices in respective countries (see, Council of Europe Office in Georgia - <http://www.coe.int/en/web/tbilisi>; and Council of Europe Office in Ukraine - <http://www.coe.int/en/web/kyiv>).

Furthermore, two promotional clips on the PCF-Corruption Programme and its interventions in Georgia and Ukraine were prepared at the end of the first year of its implementation providing information on the respective projects and their target area. Both clips are available to at the project websites, in addition to the programme website (www.youtube.com/channel/UCELB0Gasv_XMBbkoMTiATAg).

Lastly, information on PCF programmatic interventions is also made readily available within EaP countries through webpages and media feeds of respective partner and beneficiary institutions (see Annex II). In 2015, two PCF events, Georgia workshop on the "National Risk Assessment" and Ukraine Conference "Preventing.Fighting.Acting.", were largely covered by local media outlets.

10. CONCLUSIONS

Despite the number of project setbacks, mostly related to project staffing on both the Council of Europe and country-beneficiary side, the EU/CoE PCF Thematic Programme “Fight against Corruption and Fostering Good Governance/Fight against money-laundering” has overall gotten off to a good start. Under the PCF-REG, all EaP countries have received assistance in addressing conflict of interest legislation and policies and strengthening operational capacities to deal with corruption and economic crime cases with international components. Similarly, Georgia and Republic of Moldova have benefited from Council of Europe expert advice and guidance on criminal liability of legal entities, integrity testing, conflict of interest and asset declarations through trainings, workshops, and expert opinions.

Within PCF-AZ, initial steps have been taken toward strengthening the training capacities of the Azerbaijani Commission for Combating Corruption and the Civil Service Commission and operational capacities of the Anti-Corruption Directorate with the Prosecutor General of the Republic of Azerbaijan, as well as other investigative and financial analytical bodies (e.g. Financial Monitoring Service and the Chamber of Auditors). From the end of the inception phase PCF-AZ delivered three trainings (two for the Civil Service Commission and one for the Anti-Corruption Directorate with the Prosecutor General of the Republic of Azerbaijan) and begun work on the development of training package for the Commission for Combating Corruption. The PCF Project Team also set grounds for activities with other beneficiaries, namely the Ministry of Education, for 2016.

PCF-GE was similarly successful in getting off the ground with active involvement in one of the key AML/CFT systemic efforts – development of a National AML/CFT Risk Assessment. In the first year, the project assisted authorities assigned to developing the National Risk Assessment get a better understanding of the requirements for the process and good practices in that respect through specifically tailored workshop and expert recommendations. PCF-GE will follow this process in 2016. At the same time, in order to boost efforts aimed at improving the countries legislative framework PCF-GE has provided country authorities with translation of the key standard-setting tool – the FATF Recommendations and has begun the review of anti-money laundering/counter financing of terrorism legislation for the NGO sector. Prosecutors, investigators, and financial analysts were provided capacity building courses under the joint PCF-REG/PCF-GE scheme.

In contrast, setting up of PCF-UA and initial assistance efforts were somewhat challenging due to absence of local project Focal Points and/or shifting beneficiary priorities. Against such a background, the project did manage to implement a number of important actions, such as provision of four expert opinions on different sets of anti-corruption related legislative amendments and organization of first mentoring sessions on management and operational issues for high and middle management of the National Anti-Corruption Bureau. It has furthermore set groundwork for future assistance on strengthening of inter-agency cooperation through direct exchange of data and information. It is expected for 2016 that all project beneficiary institutions will be in place which would allow for PCF-UA to expand activities to cover all expected results.

During 2015 the PCF Programme has also faced a number of substantive and operational challenges in implementation which, if continued, would need to be mitigated in order not to jeopardise expected project delivery.

11. ANNEX I: WORKPLAN OF ACTIVITIES

Please attach the WP as an attachment not as pasted document.

12. ANNEX II: VISIBILITY

Council of Europe Economic Crime and Cooperation Webpage

PCF REGIONAL: Fight against Corruption and Fostering Good Governance / Fight against Money-Laundering	PCF AZERBAIJANI: Strengthening capacities to fight and prevent corruption	PCF BELARUS: Good governance and fight against corruption	PCF GEORGIAN: Strengthening anti-money laundering measures	PCF UKRAINE: Fight against Corruption
€ 1.2 M	€ 1 M	€ 0.1 M	€ 0.5 M	€ 1. M
<ul style="list-style-type: none">Project SummaryDiagnostic reportProgress reportsWorkplanCalendarDeliverables	<ul style="list-style-type: none">Project SummaryProgress reportsWorkplanCalendarDeliverables	<ul style="list-style-type: none">Project SummaryProgress reportsWorkplanCalendarDeliverables	<ul style="list-style-type: none">Project SummaryProgress reportsWorkplanCalendarDeliverables	<ul style="list-style-type: none">Project SummaryProgress reportsWorkplanCalendarDeliverables

Project beneficiary webpages

AZƏRBAYCAN RESPUBLİKASININ BAŞ PROKURORLUĞU

Xəbərlər

Hüquq şaxələrin cinayət məsuliyyəti və əmtahın bərpası Baş prokuror yanında Korrupsiyaya qarşı Mübarizə Baş İdarəsində müzakirə edilmişdir.

23.11.2015

Noyabrın 19-dan 20-dək Baş prokuror yanında Korrupsiyaya qarşı Mübarizə Baş İdarəsində Avropa İttifaqı və Avropa Şurasının birgə maliyyələşdirədiyi və Avropa Şurası tərəfindən həyata keçirilən "Proqram Əməkdaşlıq Çərçivəsi" layihəsi üzrə "Hüquq şaxələrin cinayət məsuliyyəti və əmtahın bərpası" mövzusunda təlim keçilmişdir.

Baş Prokurorluğun müvafiq idarələrinin, Baş prokuror yanında Korrupsiyaya qarşı Mübarizə Baş İdarəsinin, Hərbi Prokurorluğun və Bakı şəhər prokurorluğunun, habelə Respublika Auiditoratı Palatası və Mərkəzi Bank yanında Maliyyə Monitorinq Xidmətinin nümayəndələrinin iştirak etdiyi tədbirdə Baş İdarənin Təşkilatı və İnformasiya Təminatı İdarəsinin rəisi Cənab İsayev gənş edərək korrupsiyaya qarşı mübarizənin Azərbaycanda dövlət siyasətinin prioriteti təbii olaraq olmasını vurğulamaqla bu mübarizənin mühüm siyasət inisiyvası olduğunu qeyd etmiş, bu sahədə ölkə daxilində, eyni zamanda beynəlxalq səviyyədə əməkdaşlığın böyük əhəmiyyət kəsb etdiyini bildirmişdir.

Avropa Şurasının ekspertləri Martin Poleyn və Nimfa Aqveral Hüquq şaxələr tərəfindən törədilən korrupsiya cinayətlərinə qarşı mübarizənin aspektləri, bu kateqoriyadan olan cinayətlərin mübarizə sahəsində müəhlət bənzər, hüquq şaxələrin cinayət məsuliyyətinə cəlb olunmasının hüquqi və praktik tərəfləri barədə təqdimatlar keçirmişdir.

Tədbirdə Hüquq şaxələrin cinayət məsuliyyəti ilə əlaqədar tədris təqdimatları iştirakçılar tərəfindən müvafiqyaytla icra edilmiş, onları maraqlandıran suallar ətrafı müzakirə edilmişdir.

Sosial şəbəkələrdə paylaş

* Anti-Corruption Directorate with the Prosecutor General of the Republic of Azerbaijan

Media coverage of PCF actions



* EPN Georgia report on the PCF Georgia National Risk Assessment Workshop, 19-20 October 2015



* Jurnal.md report on the PCF Regional Pilot Activity in Republic of Moldova, Roundtable on the Anti-Corruption Package of Laws, 20 January 2015