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**COUNCIL OF EUROPE COOPERATION PROGRAMME**

**Ethics for the Prevention of Corruption in Turkey (TYEC)  
CoE Project No. EC/1062**

**INSTITUTIONAL CAPACITY REVIEW AND PLAN OF COUNCIL OF ETHICS FOR PUBLIC SERVICE**

**REPORT**

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**The views expressed in this document are  
author's own and do not necessarily reflect  
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## **1. REPORT INTRODUCTION AND EXECUTIVE SUMMARY**

### **1.1 Terms of Reference**

To draft an institutional capacity plan for the Council of Ethics for Public Service (CoE) based on a current strategic plan prepared by LTA that addresses: the management structure, together with decision-making and reporting procedures, and resource implications - finance, staffing, IT, premises, and equipment to deliver the CoE's proposed functions.

### **1.2 Introduction**

The purpose of this report is to provide an institutional capacity plan for the CoE that addresses: the management structure, together with decision-making and reporting procedures, and resource implications - finance, staffing, IT, premises, and equipment to deliver its proposed functions. It has been prepared by means of the following approaches and sources of information:

- Meetings and discussions with the CoE Chairperson;
- meetings and discussions with the Project Director;
- interviews with individual members of the Secretariat;
- working papers prepared by the Long Term Adviser (LTA) Ethics for the Prevention of Corruption in Turkey (TYEC) project.

In relation to the Terms of Reference capacity is taken to encompass the following factors:

- Legal Status and Powers – what and how it is established to fulfill its purpose and objective
- Strategy – overall direction it is taking and most crucially the scope and scale of its activities.
- Structure – how it organises and carries out its functions.
- Resources – how it deploys available resources: human, financial, equipment
- Capabilities – the expertise held by and available to the organisation.

Before the CoE can address its resource needs and its capability requirements it has to make a number of key strategic decisions based upon:

- How it is best able to fulfill its mandate?
- Which parts of its mandate can be and should be prioritised?
- What therefore should be its main strategic objectives?
- What structure needs to be put in place to support the strategy?
- What resources and capabilities are required to implement the strategy?

The starting point for answering these questions is represented by an understanding of the current position of the CoE. This “situational analysis”, is based upon with the Chairperson, Project Director and other members of the Secretariat and the Project Adviser plus analysis of available reports of recent Board discussions. Its principal findings were presented in summary form to the Board on May 13th 2008.

### **1.3 Summary of Main Findings**

The principal findings of this report are as follows:

- The CoE has an important role to fulfill and can make a substantial contribution to promoting ethical principles and standards of ethical conduct in the Turkish Public Services at national and provincial levels.

- At present its legal powers and the regulations that it is required to implement are insufficiently clear or strong enough to support the CoE's capability to fulfill its legal mandate.
- This legal standing is further weakened by its lack of institutional independence and its current level of capacity and resources.
- The CoE's relative authority and unclear working relationships with Ethics Commissions, Inspection Boards and Disciplinary further constrains the CoE's activities and their potential efficacy.
- The current level of capacity and resources will be unable to sustain, in equal measure and at acceptable minimum levels the CoE's three functions of ethical standards development, complaints investigation and public awareness. This will be further exacerbated if major public awareness campaigns are implemented in advance of the level of capacity being developed to enable the CoE to respond to any increase in the number of complaints and denunciations received.

## **2. THE PRINCIPAL RECOMMEDATIONS IN DETAIL**

### **Summary of Principal Recommendations.**

The following recommendations are presented to the Board to provide the bases for discussion and decision:

#### **2.1 In relation to issues of Legal Status and Powers**

- The CoE should, as matter of priority, tighten the Regulation to distinguish sections that are essentially human resource management issues and those issues more relevant to the role of the CoE in preventing corruption.
- The CoE should develop, in alignment with its prioritised functions, proposals for the legislative reforms required to strengthen its prevention powers in relation to its inspections, systems reviews and initiating systemic and procedural improvements in the public administration systems.
- There is a need for clarification and areas of strengthening of the Law in terms of its own role and its relationship with other relevant agencies.
- There is a need for greater clarity in Regulations to provide clearer sense of mission, clearer ethical principles to be followed, more specific standards of conduct required and more specific ethical infractions.
- Most crucially there should be a wider range of sanctions available under the Regulation, commensurate with different levels of ethical infractions.

#### **2.2 In relation to Strategy**

The CoE's activities should focus on monitoring the implementation of the Regulation by conducting systmatic reviews of institutional perfomance in relation to ethical principles and conduct. This will require:

- The CoE, in the short to mid-term, to focus its main efforts and resources on its Prevention and Monitoring role and establish via inspection, risk analysis, pro-active reviews and systemic and procedural developments the 'Ethics System' that will prevent, deter and detect corrupt practices.
- The CoE to maintain a subsidiary role in Complaints and Investigation Management, based wherever possible on the delegation of the investigation of complaints, or in some cases the devolution of the complaints to other authorities. It should establish its own investigation capability, with a minimal staffing complement, in order to support deterrence

and to monitor ethical breaches in order to provide data and analysis that will contribute to its above primary role.

- The CoE to also contribute to the long-term process of Awareness Raising by means of liaison with appropriate bodies and the coordination of individual events e.g. Ethics Day. In the short to mid-term, however, the CoE should focus its resources into targeted public relations activities to promote its activities and disseminate its systems analysis and development findings to relevant public institutions.

### **2.3 In relation to Structure**

An organisational structure should be established to support the agreed prioritisation of functions and also to support the growth of the CoE in the mid-term, based upon the following functions and sub-functions:

#### **Prevention and Monitoring, incorporating:**

- Inspection, Risk Analysis and Control Systems Reviews and Development.
- Policy Research and Development.
- Training and Development.

#### **Complaints and Investigation, incorporating:**

- Complaints Intake and Assessment.
- Investigation Supervision
- Complaints Follow-Up

#### **Awareness Raising, incorporating:**

- Publications.
- Media and Public Relations.

### **2.4 In relation to the identification, acquisition and allocation of Resources and Capabilities**

this will follow from the above strategic and functional decisions. The Board should also evaluate the priorities within its own role and function in relation to implementing its agreed strategic objectives and functional priorities for the CoE.

### **2.5 Structure of the Report**

The remainder of the report has the following structure:

- |          |  |
|----------|--|
| Part 2.  | Analysis of the Current Status, Structure and Procedures of the Council of Ethics for Public Service   |
| Part 3.  | Proposals for the Development of the Council's Capacity and Analysis of the Institutional Development and Additional Resource Requirements.          |
| Annexe 1 | Tables outlining a functional structure, main activities, decision-making procedures, staffing requirements and other resource needs of the Council. |

### **3. ANALYSIS OF THE CURRENT STATUS, STRUCTURE AND PROCEDURES OF THE COUNCIL OF ETHICS FOR PUBLIC SERVICE**

#### **3.1 The Legal Powers and Responsibilities of the Council of Ethics for Public Service**

The CoE was established in May 2004 under the 'Law related to the establishment of Council of Ethics for Public Service and making modifications on some laws.'

The CoE has three areas of responsibility and related powers, under Article 3 of the Law:

1. To determine, with the regulation it prepares, the ethical standards to be followed by public officials in the performance of their duties. Its powers in this area includes the establishment of codes of conduct, the review of public service procedures in relation to their ethical integrity, e.g. recruitment and selection procedures to confirm fairness of procedures and objectivity in their application;
2. to undertake investigations of reported violations of ethical principles and report their findings to the relevant authorities;
3. to raise ethical culture awareness within the public.

The CoE has the following principal powers:

- Article 6 of the Law requires Ministries, other public institutions and agencies and private enterprises to provide information and documents related to an allegation.
- Article 8 of the Law authorises the CoE to examine, where necessary, asset declarations.
- Article 9 of the law authorises the CoE to determine the scope of the public service ban of receiving gifts and to request the list of gifts received by any public official of the grade of General Manager or above.
- Article 28 of the Regulation authorises the CoE to make necessary investigations and researches and gather information and documents including through competent authorities.
- The CoE has one sanction available for proven breaches of the code is the publication in the Official Gazette of the adjudication and the name of the public official(s) concerned. The sanction is subject to the right of appeal.

#### **3.2 Establishing the Principles of Ethical Behaviour**

The CoE's first main task was to formulate a set of ethical principles for the Turkish civil service, which were published in May 2005 as, 'Regulation on the Principles of Ethical Behavior of the Public Officials and Application Procedures and Essentials

The Regulations contain a combination of general social values, public service values, proscribed areas of conduct and prescribed personal behaviours for public officials, procedures for reporting ethical breaches, their investigation and adjudication.

#### **3.3 The Management Structure of the Council of Ethics for Public Service**

As defined in the Law's 'Article 2 Establishment' the CoE has 11 members, one being the Chairperson, all of whom are elected and assigned by the Council of Ministers. Members are appointed for a term of four years and can be re-appointed for an unlimited number of terms.

### **3.4 Complaints and Reporting Procedures and Key Relationships of the Council of Ethics for Public Service**

Allegations of ethical breaches considered by the CoE are received in the form of direct complaints or via scrutiny of denunciations found in the media. The average annual total for complaints/denunciations received is approximately 150 of which around 60 fall within the scope of the CoE.

Allegations are reviewed by the Council Secretariat staff to confirm the grade of the subject of the allegation and the legal basis for alleged offence. Allegations relating to public officials below the grade of general manager are forwarded with the covering letter to the relevant Inspection Board or Disciplinary Board. Allegations, which may include a criminal dimension must be redirected to the Prosecutors Office. Similarly any allegations, which are already under criminal investigation cannot be investigated by the CoE. Allegations which do fall within the remit of the law and code are presented in the form of summary reports to the CoE's Board which makes the decision on whether to pursue the allegation. If the allegation is to be pursued then the Secretariat places the allegation before the institution concerned and requests an explanation. The information received is then reviewed by the CoE for decision on whether further information, other action or the sanction is required. To date the sanction has not been imposed.

### **3.5 Key Relationships of the Council of Ethics for Public Service**

Key "partner" institutions for the CoE include the following bodies:

- Ethics Commissions, Article 29 of the Regulation requires that each public institution should establish an 'Ethics Commission' of at least three senior staff members.
- Disciplinary Boards are ad hoc committees established as and when in institutions in order to adjudicate on personnel disciplinary issues of public officials below the grade of General Manager.
- Inspection Boards/Inspectorates are internal audit and investigation units in all public institutions and are responsible for compliance auditing and investigation of financial and procedural irregularities.

### **3.6 The Current Establishment and Resources of the Council of Ethics for Public Service**

The CoE has a Secretariat with a current establishment of 6 staff comprising a Project Director at Expert grade; an Expert, two Assistant Experts, an Assistant and a secretary/receptionist. All members of the Secretariat were assigned to their current posts directly from within the Prime Ministry establishment. Secretariat staff are well educated and qualified for their legal and administrative roles but none are trained in investigation procedures and techniques.

The CoE is paid for from the overall Prime Ministry budget, where there is no specific budget line, from an allocation intended for meeting hospitality and for staff work-related travel. It is housed in well-appointed offices in the Prime Ministry building of the State Planning Organisation. The CoE's offices are located in a designated section comprising a reception area, one office shared by two Secretariat staff, one office shared by three Secretariat staff, the Chairman's office and a Council meeting room. In addition there is a separate office, located on the same floor, which provides office accommodation for the Ethics for the Prevention of Corruption in Turkey (TYEC) project. All staff have PCs and access to a telephone. There is little scope for housing any additional staff within the current office accommodation.

### **3.7 Institutional Capacity to Fulfil Current Role and Responsibilities**

The Law gives the Council a very wide mandate without providing sufficiently clear or specific powers to fulfill this mandate. The Regulations, again are very broad and mainly aspirational in terms of aim and exhortational in tone without a clear overall purpose statement and also without references to specific standards of conduct.

Both Law and the Regulations are required to be implemented without the foundation of a strong, comprehensive and coherent ethics control system incorporating e.g. standard operating procedures for the provision of administrative services, an effective human resource management infrastructure, a performance management structure and culture, an effective inspection and investigation function and the commitment to implement firmly and consistently robust disciplinary procedures.

The CoE though adequately resourced for its current method of operation would be woefully under-resourced if it were required to fulfill its current mandate and be able to respond to any large-scale efforts to raise public awareness of how to complain about ethical breaches within the provision and management of the public services. Thus before any significant revision is made to the Law and Regulation or any attempt made to raise public awareness and the level of complaints received it would be prudent for the CoE to undertake the following four-stage process in management planning:

1. Establish key priorities in support of the fulfillment of its mandate over a phased period: short-term 1-3 years, mid-term 3- 5 years and long-term 5-10 years;
2. create the structure, decision-making and reporting procedures required to provide the capacity to meet these priorities;
3. identify (and acquire) the additional resources required to provide this initial capacity in the short-mid term;
4. make the case for further resources in the mid-long term based upon the achievement of the identified priorities within the specified timescales.

The remainder of this report will focus on the first three-stages within this proposed process of organisational development for the CoE all of which should be directed at supporting the Council's overall strategic aim: To establish the CoE, through its activities and their efficacy, as the pre-eminent authority in Turkey on ethical principles and conduct within the public services and in its relationships with the business sector.

## **4. PROPOSALS FOR THE DEVELOPMENT OF THE COE'S CAPACITY**

### **4.1 Establish Key Priorities for the CoE in support of the fulfillment of its Mandate over a Phased Period**

The establishment of key priorities of course represents the prerogative of the CoE, which has acknowledged the need to identify a primary role or roles from its three main functions of investigation, awareness and prevention; to review its current status, legal powers and institutional capacity; and to evaluate existing and potential areas of cooperation and collaboration with other agencies. Initial consultations, as part of the 'Ethics for the Prevention of Corruption in Turkey' (TYEC) project, have established the predominant view of the Council that its primary role should focus on its prevention role in relation to ministries and other public bodies, encompassing: receiving annual self assessments and risk assessments, monitoring training programmes, liaising with Inspectorates, undertaking research, carrying out proactive reviews and supervising the roles and responsibilities of Ethics Commissions. It would retain a monitoring role over the investigations carried out by Inspectorates within ministries and publicise its own and the



ministries' activities (and successes) to the public but without mounting any major public awareness campaigns.

This initial process of prioritisation should then serve to identify the following primary role for Council based upon its current status and potential resource base as the 'Authority' which establishes and promulgates the ethical framework, the ethical principles and related standards of conduct to be followed by the Turkish public service at national and provincial level. This involves a shift from the inadequately resourced "investigation" of complaints as the current main focus of activity and available resources towards the setting of standards and the design of management and control systems required to support the maintenance of these standards. Here complaints investigation represents the *means* of identifying weaknesses in the system where the *end* becomes the systemic improvement needed to remedy the weakness. A shift in role from the chasing out of unethical conduct, once detected and proven, to designing in the ethical standards and systems that should prevent unethical behaviour from occurring or at least provide the framework of rules and procedures that will make it easier to detect if it does occur.

This new primary role of prevention is to be fulfilled by means of the following key ethical leadership responsibilities:

- Formulation of the ethical framework and environment for the Turkish public service and its relationship with the corporate sector.
- Development of a risk-based ethics management system encompassing improved management and financial controls, including systems audit; codes of conduct including conflict of interest reporting; standard operating procedures; internal complaints investigation procedures etc.
- Monitoring and reviewing the ancillary ethics management systems developed by individual public bodies.
- Formulation of CoE organisational strategic objectives and confirmation of functional strategies and workplans.
- Formulation of proposals for ethics-related legislative reform .

In support of this primary role the Board would also have a portfolio of secondary roles and responsibilities based upon oversight functions required to monitor and evaluate the progress achieved in the development of an ethical system and culture. These secondary roles and responsibilities will include:

- Periodic progress review of CoE's operational activities in ethics system development.
- Periodic review of complaints and follow-up activities.
- Confirmation of selected publishing projects and public relations activities.
- Annual strategic review of CoE organisational performance and future objectives.

#### **4.2 Create the Structure, Decision-Making and Reporting Procedures required to provide capacity to meet these priorities**

The primary and secondary roles for the Council would then both enable and require a range of core functions to be developed in relation to prioritising prevention, using complaints and investigation management to detect flaws in the ethics systems and to deter others and to use awareness raising to promote the authority of the Council. The core functions for each of the areas of responsibility of the CoE are as follows:

##### *4.2.1 Prevention and Monitoring*

Short-Mid Term - **High Priority** to support achievement of strategic objectives and for the allocation of available resources within the following functions:

- Inspection, Risk Analysis and Control Systems Reviews and Development.
- Policy Research and Development.
- Training and Development.

#### 4.2.2 *Complaints and Investigation*

Short-Term Mid Term - **Medium Priority** based upon a clearly defined CoE role and the maximal delegation of activities to Inspectorates within the following functions:

- Complaints Intake and Assessment
- Investigation
- Complaints Follow-Up

#### 4.2.3 *Awareness Raising*

Although it represents an important long-term aim in supporting of changing public attitudes, in the Mid-Long Term - **Low Priority** focusing on intra-public administration communication and periodic public relations activity within the following functions:

- Publications
- Media and Public Relations

Tables outlining the main activities, decision-making procedures, staffing requirements and other resource needs for each of the above functions are presented in Annexe 1.

### 4.3 **Identify the Additional Resources required to establish this Initial Capacity in the Short-Mid Term**

#### 4.3.1 *Organisational Structure*

The Board is requested to consider possible organisational structures in support of its agreed priorities and to provide the basis for future strategic planning and management.

The structural issues to be addressed include:

- Prioritisation of prevention and monitoring activities and confirmation of structured required to support the achievement of established priorities.
- Changes required to legal powers to facilitate institutional independence and functional capacity.
- Clarification of working relationships with Ethics Commissions, Inspection Boards and Disciplinary Boards, including roles concerning complaints and the ethical environment.
- The policy and procedural developments required to implement and operationalise all the CoE's structure and functions.

#### 4.3.2 *Capacity Development of Current Staff*

The Ethics for the Prevention of Corruption in Turkey project incorporates institutional capacity development activities for the CoE. Clearly there are wider dimensions of public service reform that should also impact positively on the individual and organisational development of the CoE.

The institutional development issues to be addressed include:

- Staff retention and succession planning.
- Areas of executive authority to be granted to the Secretariat.
- Specific areas of capacity development required to facilitate functional activities, organisational reviews, ethical frameworks and procedures including, investigation techniques, case file and records management etc.

#### *4.3.3 Resource Implications*

Decisions on structural and functional developments will have to incorporate resource implications, which are likely to require a balance between potential resource needs and actual resource availability. The process of institutional strengthening and capacity development should be managed on a planned incremental basis building positively on activities and their achievements. The resource issues to be addressed include:

- Budgetary independence for office accommodation, equipment and operational and management activities
- Phased increase in staffing.
- Increase in available office accommodation and personal computers for the additional staff.

The additional resources required over the next *1 to 5 years* to implement these prioritised functions should be based upon the following organisational and functional level resources:

#### *4.3.4 Organisational Infrastructure*

##### *Office Accommodation*

A single designated area or individual building, identified externally as the headquarters of the CoE, with office accommodation for up to 25 staff, board room, meeting and interview rooms and related social accommodation and required facilities.

##### *Information Technology*

Local area network connecting all personal computers and a secure organisational intranet with different levels of internal security and access for different areas of information in relation to confidentiality. Desktop publishing capacity and a range of photocopiers including high volume machines.

##### *Organisational Development*

Performance based professional development programmes.

## **4.4 Functional Structure**

The agreed functional areas should be developed with a phased increase of staffing up to the following levels. The reporting lines would have to be reviewed and revised in accordance with the phases of development. Staffing numbers are indicative and intended for Board discussion, decision and strategic planning.

#### *4.4.1 Prevention and Monitoring*

##### Inspection, Risk Analysis and Control Systems Reviews and Development

One Head of Prevention and up to four Inspectors/Analysts, providing expertise in audit, human resource management, public administration etc.

##### Policy Research and Development

One Policy Analyst and up to three researchers

Training and Development

One Training Coordinator and one Assistant

*4.4.2 Complaints and Investigation*

Complaints Intake and Assessment

One Senior Complaints Assessor, up to three assessors and one assistant.

Investigation Management

Two Investigators.

Complaints Follow-Up

One Coordinator and one Assistant

*4.4.3 Awareness Raising*

Publications

One Publications Coordinator

Media and Public Relations

One Media and Public Relations Officer and one assistant

| <b>PREVENTION &amp; MONITORING.</b>                |  |  |   |
|--|--|--|---|
|  | <b>Inspection, Risk Analysis &amp; Control Systems Reviews &amp; Development.</b>  | <b>Policy Research &amp; Development.</b>  | <b>Training &amp; Development.</b>  |
| <b>Main Activities.</b>                            | <ul style="list-style-type: none"> <li>▪ Design of corruption risk assessment methodologies.</li> <li>▪ Introduction, on a phased basis, and supervision of ministry/province risk assessments.</li> <li>▪ Analysis of risk assessment reports and analysis summaries.</li> <li>▪ Targeted institutional inspections, undertaken in collaboration with “institutionally neutral” Inspection Board.</li> <li>▪ Analysis of inspection findings to establish systemic failures.</li> <li>▪ Analysis of risk assessment reports to identify corruption prone sectors and provinces.</li> <li>▪ Monitoring and evaluation of CoE management systems and procedural reviews.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Consultations and research to support a CoE corruption prevention policies.</li> <li>▪ Undertaking or commissioning reports and research studies into cross government and sector based issues.</li> <li>▪ Undertaking or commissioning legislative reviews.</li> <li>▪ Review and Development of CoE policies feeding into strategic management processes.</li> <li>▪ Analysis and internal dissemination of international issues and developments in corruption prevention practice.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Design and implementation of ethics awareness training for public service induction programmes.</li> <li>▪ Design and implementation of ethical principles and conduct components of in-service training programmes.</li> <li>▪ CoE in-service training in ethics, training of trainers and inspection skills.</li> <li>▪ Design of print CD Rom and web-based training packages in ethical principles and conduct.</li> </ul> |
| <b>Decision-Making &amp; Reporting Procedures.</b> | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Formulating proposals and annual work plans/budgets for review and approval.</li> </ul>   | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Formulating proposals and work plans/budgets for review and approval.</li> </ul>  | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Formulating annual workplans/budgets</li> <li>▪ Providing ethics training</li> </ul>   |

|                                       |   |  |  |
|---------------------------------------|---|--|--|
|                                       | <ul style="list-style-type: none"> <li>▪ Designing and revising proposed risk methodology.</li> <li>▪ Nominating institutions for inspection.</li> </ul> <p>Reporting to Board by</p> <ul style="list-style-type: none"> <li>▪ Annual workplan and budget</li> <li>▪ Quarterly activities report and proposed changes to work plan.</li> </ul> <p>Directing Reporting Line:</p> <ul style="list-style-type: none"> <li>▪ Via Head of Prevention and Inspection</li> <li>▪ To Board</li> </ul> | <ul style="list-style-type: none"> <li>▪ Formulating proposals for review of legislation.</li> <li>▪ Updating intelligence on International issues and developments</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Annual workplans and budgets.</li> <li>▪ Legislative reviews</li> </ul> <p>Directing Reporting Line:</p> <ul style="list-style-type: none"> <li>▪ Via Head of Prevention and Inspection</li> <li>▪ To Board</li> </ul> | <p>inputs for public service inservice training.</p> <ul style="list-style-type: none"> <li>▪ Coordinating CoE inservice training.</li> <li>▪ Developing training media</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Annual work plans and budgets.</li> <li>▪ Reports on inservice training activities.</li> <li>▪ Provision of training packages.</li> </ul> <p>Directing Reporting Line:</p> <ul style="list-style-type: none"> <li>▪ Via Head of Prevention and Inspection</li> <li>▪ To Board</li> </ul> |
| <b>2007/08 Current Staffing:</b>      | 0   | 0  | 0  |
| <b>2009/13 Staffing Requirements:</b> | 2/4   | 1/3  | 2  |
| <b>2009/13 Resource Needs:</b>        | Office resources and professional development programmes.   | Office resources and professional development programmes.  | Office resources and professional development programmes.  |

| <b>COMPLAINTS &amp; INVESTIGATION.</b>             |  |  |   |
|--|--|--|---|
|  | <b>Complaints Intake &amp; Assessment.</b>   | <b>Investigation Supervision</b>   | <b>Complaints Follow Up</b>   |
| <b>Main Activities.</b>                            | <ul style="list-style-type: none"> <li>▪ Registration of complaints and denunciations received.</li> <li>▪ Analysis of media coverage and other published findings on corrupt practices.</li> <li>▪ Review of received complaints and denunciations.</li> <li>▪ Delegation of non-CoE compliant complaints and denunciations to appropriate authorities, with action reporting requirements.</li> <li>▪ Initial assessment of CoE compliant complaints and denunciations.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Investigation of CoE retained complaints in liaison with relevant authorities.</li> </ul>   | <ul style="list-style-type: none"> <li>▪ Liaison with Inspection and Disciplinary Boards on delegated cases.</li> <li>▪ Review of action reports received from relevant authorities.</li> <li>▪ Review of action taken by CoE.</li> <li>▪ Summary reports to Council.</li> </ul>  |
| <b>Decision-Making &amp; Reporting Procedures.</b> | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Records management of complaints.</li> <li>▪ Allocation of complaints to appropriate body.</li> <li>▪ Assessing initial action to be implemented in CoE investigation.</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Quarterly reports of complaints/ denunciations received and delegations.</li> </ul>  | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Investigating complaints/ denunciations received from Complaints Intake and Assessment</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Monthly reports of investigations in progress.</li> <li>▪ Monthly report of completed investigations and recommendations.</li> </ul> | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Monitoring progress of complaints delegated to external bodies.</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Monthly reports of investigations in progress.</li> <li>▪ Monthly report of completed investigations and recommendations.</li> </ul> |

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|  | Directing Reporting Line: <ul style="list-style-type: none"><li>▪ Via Intake Coordinator</li><li>▪ To Head of Secretariat</li></ul> | Directing Reporting Line: <ul style="list-style-type: none"><li>▪ Via Senior Investigator</li><li>▪ To Head of Secretariat</li></ul> | Directing Reporting Line:<br>Via Follow Up Coordinator.<br>To Head of Secretariat |
|--|---|--|---|



|                                       |   |   |   |
|---------------------------------------|---|---|---|
| <b>2007/08 Current Staffing:</b>      | 1-3   | 0   | 0   |
| <b>2009/13 Staffing Requirements:</b> | 2/4   | 2   | 2   |
| <b>2009/13 Resource Needs:</b>        | Office resources and professional development programmes. | Office resources and professional development programmes. | Office resources and professional development programmes. |

| <b>AWARENESS RAISING</b>                           |  |   |
|--|--|---|
|  | <b>Publications</b>  | <b>Media and Public Relations.</b>  |
| <b>Main Activities.</b>                            | <ul style="list-style-type: none"> <li>▪ Control System Improvement Reports</li> <li>▪ Risk Assessment Methododology.</li> <li>▪ Risk Assessment Reports.</li> <li>▪ CoE Annual Report</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Media communications and relations.</li> <li>▪ Collation of sector survey reports on corruption problems identified and remedial measures implemented.</li> <li>▪ Editorial coordination of CoE Annual Report.</li> <li>▪ Coordination of National Ethics Awareness Day.</li> </ul>  |
| <b>Decision-Making &amp; Reporting Procedures.</b> | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Coordinating the production and distribution of CoE publications.</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Annual workplan and budget.</li> <li>▪ Quarterly reports on publications in progress and completed publications.</li> </ul> <p>Directing Reporting Line:</p> <ul style="list-style-type: none"> <li>▪ To Head of Secretariat</li> </ul> | <p>Responsible for:</p> <ul style="list-style-type: none"> <li>▪ Records management of CoE research material and publications.</li> <li>▪ Preparation and distribution of media releases.</li> <li>▪ Managing CoE media statements and appearances.</li> <li>▪ Editorial content of CoE Annual Report.</li> </ul> <p>Reporting to Board by:</p> <ul style="list-style-type: none"> <li>▪ Annual workplan and budgets.</li> <li>▪ Media Activity briefing report to every board meeting.</li> <li>▪ Monthly reports on media coverage.</li> <li>▪ Proposals for Annual Report content and design.</li> </ul> <p>Directing Reporting Line:</p> <ul style="list-style-type: none"> <li>▪ To Head of Secretariat</li> </ul> |
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|                                       |   |   |
|---------------------------------------|---|---|
| <b>2007/08 Current Staffing:</b>      | 0   | 1   |
| <b>2009/13 Staffing Requirements:</b> | 1   | 2   |
| <b>2009/13 Resource Needs:</b>        | Office resources and professional development programmes. | Office resources and professional development programmes. |

