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 moneylaundering"

"Strengthening capacities to Fight and Prevent Corruption in Azerbaijan" (PCF-AZ)

2nd Progress Report December 2016

Programme title	Fight against Corruption and Fostering Good Governance/Fight against money-laundering
Project area	Azerbaijan
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 1,000,000
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ABBREVIATIONS

AML/CFT - Anti-Money Laundering/Counter Financing of Terrorism

CSC - Civil Service Commission

CCC - Commission for Combating Corruption

MONEYVAL - Committee of Experts on the Evaluation of Anti-Money Laundering

Measures and the Financing of Terrorism

CoE - Council of Europe

GIZ - Deutsche Gesellschaft für Internationale Zusammenarbeit

EaP - Eastern Partnership

PCF - Eastern Partnership Programmatic Co-operation Framework

EU - European Union ER - Expected Result

GRECO - Group of States against Corruption
 NACAP - National Anti-Corruption Action Plan
 NABU - National Anti-Corruption Bureau of Ukraine
 NAPC - National Agency for Prevention of Corruption

NRA - National Risk Assessment

ODIHR - Office for Democratic Institutions and Human Rights
OECD - Organisation for Economic Co-operation and Development

OSCE - Organization for Security and Co-operation in Europe

PCF-REG - PCF Regional Project "Fight against Corruption and Fostering Good

Governance/Fight against money-laundering"

PCF-AZ - PCF Azerbaijan Project "Strengthening capacities to Fight and Prevent

Corruption in Azerbaijan"

PCF-BE - PCF Belarus Project "Good governance and fight against corruption" (PCF-

BE)

PCF-GE - PCF Georgia "Project on Combating Money Laundering and Terrorist

Financing"

PCF-UA - PCF Ukraine Project "Fight against Corruption" – Open Advisory Facility

SIMs - Special Investigative Means

ToT - Training of trainers

UNDP - United Nations Development ProgrammeUNODC - United Nations Office on Drugs and Crime

U.S. DOJ - United States Department of Justice

U.S. DOS/INL - United States Department of State Bureau of International Narcotics and

Law Enforcement Affairs

1 DESCRIPTION

1.1 Contact Person for Corruption Theme

Ardita ABDIU

Head of Economic Crime and Cooperation Division – DGI

Council of Europe (CoE)

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

Azerbaijan Main Counterpart:

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

Azerbaijan Beneficiaries:

- General Prosecutor's Office;
- Civil Service Commission¹;
- State Agency for Public Service and Social Innovations/ASAN;
- Financial Monitoring Service;
- CARA;
- Justice Academy;
- Ministry of Education;
- Universities and public sector training centres;
- Civil Society.

 $^{^{\}mbox{\tiny 1}}$ Now part of State Examinations Centre.

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 specific level. The implementation started on 1 January 2015 and is planned to conclude on 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 and strengthening regional capacities to prevent and fight corruption, money laundering and terrorist financing. It is consists of:

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

The second year of the PCF cycle was characterised by an intensive pace of implementation of PCF Programme activities in accordance with the agreed workplan. In 2016, the PCF Programme successfully implemented 6 activities including 55 actions, involving 1052 EaP officials (of which 290 were women [27.56%] and 755 were men [72.44%]), thereby finalizing 97% of planned actions for 2016. Building-up on initial efforts made in 2015, during 2016 the PCF Programme actions continued assisting EaP countries with legislative and policy changes and building and strengthening corruption prevention and repression tools. Ten expert advisory papers and 3 model laws were produced and made available, contributing to on-going policy and legislative reforms in the EaP region. Furthermore, a total of 27 capacity building actions (workshops, seminars and conferences) for representatives of the preventive and enforcement sector took place. Forty-one international and 12 national experts were engaged in providing advice and training to the EaP.

In <u>Azerbaijan</u>, the *PCF Project "Strengthening capacities to Fight and Prevent Corruption in Azerbaijan"* (PCF-AZ) interventions were geared toward supporting the drafting process of the National Action Plan on Promotion of Open Government 2016-2018²; developing the electronic platform for monitoring and reporting on the implementation of the National Action Plan on Promotion of Open Government; strengthening training capacities of the

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² Formerly National Anti-Corruption Action Plan (NACAP)

Commission on Combatting Corruption and Civil Service Commission³ by developing tailor-made anti-corruption and ethics curricula and materials for public officials; and reinforcing law enforcement capacities by providing specialised trainings on complex economic crime issues.

In year two of the project cycle, the PCF Programme has not experienced any major setbacks. Shift in priorities of beneficiary institutions, emerging duplicative projects and overall donor fatigue continue to have an impact on planning and implementation of activities, albeit to a lesser extent than in 2015 which to a great extend can be attributed to the good working relations between the PCF Project Team and representatives of the beneficiary institutions.

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/eapcorruption).

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 t 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

³ As of April 2016, the CSC is under the authority of the State Examinations Centre.

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 is being 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 PROJECT OBJECTIVES

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.

5 WORKPLAN/ACTIVITIES

Azerbaijan Project (PCF-AZ)

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

During 2016, PCF-AZ made good progress toward strengthening training capacities of the Commission for Combating Corruption (CCC) by producing a tailor-made training curriculum and handbook on anti-corruption concepts, standards, and practices for the CCC. The training curriculum and handbook will serve as a basis for creating a pool of future anti-corruption trainers of the CCC in early 2017. Similarly, the Civil Service Commission (CSC)⁴ has been equipped with a curriculum and handbook on "Ethics in Public Service", which will be used in 2017 as a basis for development of an continuing ethics training program for public administration in Azerbaijan.

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

In 2016, PCF-AZ continued developing specialisation of prosecutors of the Anti-Corruption Directorate of the General Prosecutor (ACDGP), law enforcement agencies, and the judiciary on complex economic crime issues. Pursuant to project interventions authorities have acquired skills and knowledge on use of plea bargaining and non-prosecution agreements, investigation of money laundering, and use of informal and formal mutual legal assistance tools in case investigations and prosecutions. The authorities have moreover been provided expert recommendations on legislative framework and good operational practices through technical papers on "Plea Bargaining, Immunity and "Restricted Use" Agreements, Witness

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⁴ Currently part of the State Examination Centre.

Protection and Deferred Prosecution Agreements" and "Mutual Legal Assistance in Asset Recovery.

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

The PCF-AZ facilitated a large scale public and expert discussion in support of the efforts of the Commission on Combatting Corruption (CCC) to obtain extensive public input on the draft National Anti-corruption and Open Government Action Plans. Furthermore, the CCC was provided with detailed expert advice on ways to improve the draft strategic documents through an Expert Opinion on the Draft National Anti-corruption and Open Government Action Plans. Upon the adoption of the "National Action Plan on Promotion of Open Government 2016-2018", PCF-AZ provided to the CCC a tailor made electronic platform for collecting information on the implementation of the Action Plan and assessment of the rate of implementation, which will also be accessible to the civil society.

Separately, in an effort to further boost implementation of outstanding international anticorruption recommendations in Azerbaijan, PCF-AZ strengthened the awareness raising and training capacities of the Central Election Commission of Azerbaijan through training for political party representatives on financial reporting. As a result, representatives of the majority of political parties in Azerbaijan have been acquainted with international standards, good practices, and national rules regarding political party financial reports.

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

In 2016, PCF-AZ established contacts with the Ministry of Education, as well as several higher education institutions such as the Law Faculty at Baku State University and Public Administration Academy, to set ground for the activities under this ER planned for 2017.

6 MODIFICATION[S], ASSUMPTIONS, RISKS AND SUSTAINABILITY

6.1 **Modification**

In 2016, the PCF Programme had only one minor modification regarding PCF-BE activities. The Belarus authorities requested that the initially proposed activity under ER 2 "training on inclusion of NGOs in fight against corruption" be eliminated to provide room for more specialised trainings on economic crime issues for the criminal justice and law enforcement authorities.

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.

During 2016, the five PCF projects have faced substantive and operational challenges that affected implementation of project activities to a lesser degree due to mitigating measures put in place by the PCF Project Team after year one of the PCF Programme cycle. The below issues nonetheless continued to be present or had emerged in 2016 requiring further adjustments in order to ensure successful during implementation .

6.3 Substance related issues

<u>Simultaneous and Multiplying requests</u>: The PCF Project Team continues to receive new requests for assistance, which is largely a reflection of emerging issues in the country. In 2016, the PCF Programme has accommodated a number of such requests where the overall substantive framework, the time-line, and the budget permitted it.

Rise of twinning/TA projects with substantive overlap: In 2016, the PCF Project Team has witnessed the emergence of a new (post PCF start date) number of EU funded twining/TA projects which overlap, to different degree, with the PCF Programme. This development has created a degree of confusion among beneficiaries, especially where assistance being provided would not be in-sync, and provided room for local beneficiaries to pick and choose the modality of assistance they prefer (e.g. study visits instead of in-country trainings). Steps are being taken to adjust to such new realities as they occur, however this situation seem to persist and create a challenging environment for the programme management and re-design of certain agreed activities.

6.4 Operational related issues

<u>Institutional changes</u>: A minor challenge encountered by PCF-AZ project was the institutional reform which took place in April 2016. The Civil Service Commission (CSC), as one of the main Project beneficiaries under ER 1, was dissolved, while its tasks were placed under the authority of a new body, State Examinations Centre. In view of uncertainty concerning the key functions of the CSC that bear direct relevance to project implementation and the fact that the reforms were finalised only in November 2016, the project had to postpone all trainings until CSC had informed the project they could continue with planned activities during the first quarter of 2017.

7 LEVEL OF PROGRESS: ACTIVITY AND ACTION BASED APPROACH

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

Expected Result I: Strengthened training capacities of the Commission for Combating			
Corruption and the Civil Service Commission			
Outcome indicators	■ The Civil Service Commission and the Anti-Corruption Commission have developed standardised anti-corruption and ethics curricula, which are adaptable to the specific needs of different civil service institutions. Eighty (80) active ethics and anti-corruption trainers have been trained to provide training to cover the entire civil service in Azerbaijan, and are conducting trainings using the new curricula in institutions at central and local levels.		
Year II output indicators	Training curricula and materials/handbook on ethics, performance appraisal and anti-corruption are developed and delivered to target beneficiaries (Civil Service Commission and Commission for Combating Corruption); related training including training-of- trainers courses and pilot training courses are delivered to targeted audiences; pool of quality trainers on these issues is developed;		
Year II actions	 Development of the Anti-corruption curriculum and handbook for trainers; Development of Ethics in Public Service curriculum and handbook for trainers. 		
Progress made under ER 1	Under Activity 1.1 and Activity 1.2, Anti-corruption and Ethics in Public Service curricula and handbooks were developed for the Commission for Combating Corruption and Civil Service Commission. In view of the institutional reforms consolidating the Civil Service Commission within the State Examination Centre, it has been agreed with the beneficiaries to deliver training-of-trainers and pilot training courses in 2017.		
-	II: Reinforced law enforcement capacities of the Anti-corruption		
Department of the General Prosecutor			
Outcome indicators	• All prosecutors and investigators in the Anti-Corruption Directorate of the General Prosecutor's Office (ACDGP) have acquired specialised and advanced knowledge on key issues (such as criminal liability for legal persons; asset forfeiture) and skills to investigate and prosecute corruption and other forms CoE/EU PCF: Theme III "Combating Threats to the Rule of Law" of economic crime; relevant training curricula are developed in co-		

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	operation with the ACD's training department for future continuous training purposes.
Voca II outrout	 Tailored training curricula and materials/handbook on specific
Year II output	topics covering economic crime related issues are developed and
indicators	trainings to targeted audiences are delivered;
	 Training on Challenges and Best Practices in Money-Laundering
	Investigations on 16 May 2016;
	Training on Plea Bargaining, Cooperation and Non-Prosecution
Year II actions	Agreements on 17 May 2016;
real if actions	 Training on Mutual Legal Assistance in Asset Recovery on 31 October – 1 November 2016;
	 Technical Papers on "Plea Bargaining, Immunity and "Restricted
	Use" Agreements, Witness Protection and Deferred Prosecution
	Agreements" and "Mutual Legal Assistance in Asset Recovery".
	Raised capacity of specialised prosecution and investigation bodies,
Duo omaso mada	judges, financial analysts and auditors in money laundering
Progress made under ER 2	investigations, plea bargaining and mutual legal assistance in asset
under EK 2	recovery including the development of accompanying training
	materials.
Expected Result	III: Support the preparation of an expected National Anti-Corruption
Action Plan (NA	
	The new NACAP is developed using a participatory approach
	involving experts and civil society, and takes into account the
Outcome	evaluation of the 2012-1015 Anti-Corruption Action Plan. It
indicators	incorporates measures to implement outstanding
	recommendations from the second, third, and fourth GRECO evaluation rounds and other monitoring bodies (e.g.
	evaluation rounds and other monitoring bodies (e.g. MONEYVAL).
Year II output	 Technical support, advice and expertise to the drafting of the new
indicators	National Anti-Corruption Action Plan and to the development of a
mulcators	monitoring tool has been provided;
	Public Discussion on Draft Action Plans on Anti-Corruption and
	Open Government Partnership on 14 March 2016;
	 Technical review of the draft National Anti-Corruption Action Plan for 2016-2019 and draft National Action Plan on Promotion of
Year II	Open Government for 2016-2018 Action Plan;
activities	 Developed an IT tool ("e-platform") for Monitoring and Reporting
	on the Implementation of the "National Action Plan on Promotion
	of Open Government 2016-2018";
	• Seminar on Transparency in Political Party Financing: Financial
	Reporting by Political Parties on 7 June 2016
Progress made	Support was provided to the national authorities in drafting the
under ER 3	National Anti-Corruption Action Plans by organising a public
	discussion on the draft Action Plan, with participation of

Expected Result	representatives of state agencies and civil society organisations, and providing an expert review of the draft Action Plans. To increase the capacities of relevant state institutions to monitor and report on the implementation of the National Action Plan on Promotion of Open Government 2016 - 2018, an electronic platform was developed. Pursuant to request from the authorities, support was provided to the Central Election Commission to ensure financial transparency of political parties through expert input and in line with GRECO recommendations.		
Expected Result IV: Anti-Corruption training is introduced into the public service and the education sector			
Outcome indicators	 Up to 15 tertiary education institutions (including universities) and public service training centres teach anti-corruption and ethics through mandatory modules in their curricula, and are continuing to deliver these modules without further assistance by the Project. 		
Year II output indicators	• Awareness regarding continuing education on anti-corruption and ethics issues raised among representatives of education institutions and public services training centres; teaching methodology is developed, curricula and accompanying materials for educational institutions and public service training centres initiated (their finalisation, training courses and impact assessment will continue in 2017); beneficiary/partner institutions are identified.		
Year II actions	 Meetings with educational institutions and the Ministry of Education to raise awareness and agree on modalities of introducing the anti-corruption training into education sector. 		
Progress made under ER 4	The Anti-Corruption curriculum and materials developed under ER 1 will be tailored to the target group of this activity and will be supplemented by teaching methodology. The training courses will take place in 2017.		

8 COOPERATION WITH STAKEHOLDERS

8.1 Azerbaijan

During 2016, PCF-AZ developed excellent working relations with key project partners, such as the Commission on Combatting Corruption, who have taken ownership over project outputs from the very beginning. Good cooperation with other project partners, such as the Anti-Corruption Directorate under the General Prosecutor and the Civil Service Commission, provided for smooth and efficient implementation of project activities. In addition, the project also had very good cooperation with the Financial Monitoring Service and Chamber of Auditors in relation to AML activities and with the Central Election Commission with regard to political financing. The project also further developed cooperation with the Ministry of Education and several higher education institutions, such as Baku State University and Public Administration Academy. With regard to international partners, the project maintained regular communication with EUD and took part in bimonthly information meetings. In addition, the project co-chairs the Democracy and Rule of Law Donor Group together with USAID.

8.2 Third parties/Partners

The PCF Project Team continues to liaise with international organizations working on the same and similar issues in the EaP countries (e.g. UNDP, UNODC, OECD, GIZ, U.S.DOJ, U.S. DOS/INL, country specific twining projects) in order to ensure complementarity and avoid overlap. The PCF Project Team continues to take part in donor coordination groups and continues to exchange information on activities with organisations represented in the five EaP countries. No major challenges regarding cooperation have been observed, but an overlap of project portfolios has been noted in Azerbaijan. Beneficiary inclination to request the same type of assistance from several donors and duplicate activities continues to persist.

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 Division (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 <u>- http://www.coe.int/en/web/tbilisi;</u> and Council of Europe Office in Ukraine <u>- http://www.coe.int/en/web/kyiv)</u> and office newsletters (see Annex III).

A promotional clip on the PCF-Corruption Programme and its interventions in Azerbaijan was done in 2016, illustrating support provided to national counterparts through this initiative (https://www.youtube.com/watch?v=sd1xRIGalvc).

Lastly, information on PCF programmatic interventions continues to be readily available within EaP countries through webpages and media feeds of respective partner and beneficiary institutions (see Annex II).

10 CONCLUSIONS

In the 2nd year of implementation the PCF Programme was fully focused on activity implementation on the regional and country level. Six activities and 55 actions were realized, thereby completing 97% of the planned PCF Programme interventions for 2016. In doing so, the PCF Programme produced 10 expert advisory papers and 3 model laws for the EaP region and conducted 27 capacity building workshops, seminars and conferences.

On the country level, PCF-AZ has provided marked support to strengthening the training capacities of the Commission on Combating Corruption and the Civil Service Commission and specialised operational capacities of the Anti-Corruption Directorate under the General Prosecutor and other judicial, investigative and financial intelligence bodies. It furthermore served as the main facilitator of expert and public dialogue regarding the draft National Anti-Corruption and Open Government Action Plans on Promotion of Open Government 2016-2018 and source of substantive expert advice for the two Working Groups. In Belarus, the PCF-BE provided contribution to ongoing discussions regarding national risk assessment frameworks for corruption and other types of economic crime and begun building law enforcement expertise on liability of legal entities.

11 ANNEX I: WORKPLANS OF ACTIVITIES

Separate attachment.

12 ANNEX II: VISIBILITY

Council of Europe Economic Crime and Cooperation Webpage



Project beneficiary webpages



* Report on the public discussion on the Draft National Anti-Corruption Action Plan posted on the webpage of the Commission on Combatting Corruption of the Republic of Azerbaijan, 16 March 2016



* Information on the training on Plea Bargaining and Non-Prosecution Agreements posted on the webpage of the Anti-Corruption Directorate with the General Prosecutor of the Republic of Azerbaijan, 18 May 2016.

Media coverage of PCF actions



^{*} Trend News Agency Report on PCF-AZ Training on Plea Bargaining and Non-Prosecution Agreements, 17 May 2016