



SNAC2 Project
Promotion of Good Governance:
fight against corruption and money laundering

1st Interim Narrative Report

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| Programme title | Towards Strengthened Democratic Governance in the Southern Mediterranean |
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ABBREVIATIONS

| | |
|--|-----------|
| <i>Anti-corruption</i> | AC |
| <i>Anti-Money Laundering and Counter Financing of Terrorism</i> | AML/FT |
| <i>Tunisian National Platform of NGOs against corruption</i> | ATIT |
| <i>National Association of National Controllers of the Moroccan administration</i> | CIGM |
| <i>Federation of the Moroccan Entrepreneurs of Morocco</i> | CGEM |
| <i>Council of Europe</i> | CoE |
| <i>Ministry of interior-Police</i> | DGSN |
| <i>Group of States against Corruption</i> | GRECO |
| <i>Economic Crime and Cooperation Unit</i> | ECCU |
| <i>European Union</i> | EU |
| <i>European Union Delegation</i> | EUD |
| <i>Group of States against corruption</i> | GRECO |
| <i>Ministry of interior-General Inspectorate of administration</i> | IGAT |
| <i>Ministry of finance-General Inspectorate of finance</i> | IGF |
| <i>Existing Moroccan Anti-corruption Authority</i> | ICPC |
| <i>Tunisian Anti-corruption Authority established by the constitution</i> | IBOGOLUCC |
| <i>Existing Tunisian Anti-corruption Authority</i> | INLUCC |
| <i>Jordanian Anti-corruption Commission</i> | JACC |
| <i>Moroccan Anti-corruption Authority established by the constitution</i> | INPPLC |
| <i>Office of the Directorate General of Programmes</i> | ODGPROG |
| <i>National Bar Association of Tunisia</i> | ONAT |
| <i>Objectively verified indicators</i> | OVI |
| <i>Middle East & North Africa Region</i> | MENA |
| <i>Moroccan Ministry of governance</i> | MAGG |
| <i>Moroccan Ministry of public administration</i> | MFPMA |
| <i>Moroccan Ministry of Justice</i> | MOJL |
| <i>South Neighbourhood Anti-corruption 2 Project</i> | SNAC 2 |
| <i>Moroccan Financial Intelligence Unit</i> | UTRF |
| <i>United Nations Convention against corruption</i> | UNCAC |

1 DESCRIPTION

1.1 Contact Person

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Action against Crime Department
Directorate of Information Society and Actions against Crime
Directorate General Human Rights and Rule of Law (DG1)
Council of Europe (CoE)

1.2 Name of Partners in the Action

The South Programme II is fully funded by the EU and implemented by the Council of Europe.

1.3 Title of Action

Programme title: "Towards Strengthened Democratic Governance in the Southern Mediterranean" (South Programme II)"

Project title: "Promotion of good governance: Fight against corruption and money laundering (SNAC 2)"

1.4 Contract Number

ENI/2014/340- 977

1.5 Start Date and End Date of the Reporting Period

1 January 2015 – 31 December 2015

1.6 Target Countries

Morocco, Tunisia and Jordan

1.7 Final Beneficiaries

Morocco Counterpart/Main Beneficiary and other beneficiaries

Main Counterpart:

- *Instance centrale de prévention de la corruption (ICPC)/ Moroccan National anticorruption authority;*

Beneficiaries:

- *Association marocaine de lutte contre la corruption/ Moroccan association against corruption - Transparency Maroc;*
- *Banque du Maroc/Central Bank of Morocco;*

- *Collège des inspecteurs généraux des ministères du Maroc (CIGM)/ Association of national controllers of the Moroccan Administration;*
- *Commission des marchés ;*
- *Confédération générale des entreprises du Maroc (CGEM/ Federation of Moroccan Entrepreneurs of Morocco;*
- *Conseil de la concurrence/ Competition Council ;*
- *Cour de comptes/ Court of Auditors ;*
- *Ministère de la défense-Gendarmerie Royale/ Ministry of defense-Gendarmerie;*
- *Ministère des finances-Douanes/ Ministry of finances-Customs;*
- *Ministère des finances-Inspection générale des finances (IGF)/ Ministry of finance-General Inspectorate of finance;*
- *Ministère de l'intérieur – Direction générale de la sûreté nationale (DGSN)/ Ministry of interior-Police;*
- *Ministère de l'intérieur – Inspection générale de l'administration territoriale (IGAT)/ Ministry of interior-General Inspectorate of administration;*
- *Ministère de la Justice et des Libertés (MOJL)/Ministry of justice;*
- *Ministère de la fonction publique et de la modernisation de l'administration (MFPMA)/ Ministry of Public Services and Modernization of the Administration;*
- *Office des changes/Exchange Office;*
- *Parliament;*
- *Secrétariat général du gouvernement,*
- *Trésorerie générale du Royaume, General Treasury ; and*
- *Unité de traitement du renseignement financier (UTRF)/ Financial Intelligence Unit.*

Tunisia Counterpart/Main Beneficiary and other beneficiaries

Main Counterparts:

- *Instance nationale de lutte contre la corruption (INLUCC)/National anti-corruption authority;*
- *Service de la gouvernance à la Présidence du Gouvernement, Directorate General for government services of the Presidency of the Government.*

Beneficiaries:

- *Assemblée des représentants du Peuple, Assembly of the Representatives of the People ;*
- *Alliance tunisienne pour l'intégrité et la transparence (ATIT)/National Platform of NGOs against corruption;*
- *Commission Tunisienne des Analyses Financières (CTAF)- Tunisian Commission for financial analysis (Tunisian FIU) Ministère de l'intérieur/Ministry of interior;*
- *Ministère de la justice/Ministry of justice;*
- *Ordre national des Avocats de Tunisie (ONAT)/National Bar Association of Tunisia;*
- *Ordre des experts-comptables de Tunisie (OECT)/National Association of Chartered accountants;*
- *Pôle contre le terrorisme/ Anti-terrorism Pole;*
- *Pôle judiciaire financier/Financial judiciary Pole;*
- *Réseau national de lutte contre la corruption (RNAC)/National Network against corruption; and*
- *Services du Conseiller juridique et législatif du Premier Ministre/ Legal Department of the Prime Minister's office.*

Jordan Counterpart/ Main Beneficiary and other beneficiaries

Main Counterpart:

Jordanian Anti-Corruption Commission (JACC)

Beneficiaries:

- Anti-money laundering and terrorism financing unit (AML/CTF);
- Audit Bureau;
- General Intelligence Directorate/ Anti-corruption Directorate;
- Judicial training institute;
- Ministry of Interior;
- Ministry of Justice;
- National NPO Registry;
- Royal Committee for Enhancing the National Integrity System;
- Prosecution Service;
- Parliament;
- Public Security Department;
- Private sector associations;
- Police Service;
- Civil society.

2 EXECUTIVE SUMMARY

The objective of the programme of the Council of Europe and the European Union “Towards Strengthened Democratic Governance in the Southern Mediterranean” (South Programme II) is to contribute to reinforcing human rights, rule of law and democracy in Southern Mediterranean partner countries in accordance with European and other international standards, based on a demand-driven approach. Programme implementation covers a three-year period from 1 January 2015 to 31 December 2017.

The South Neighbourhood Anti-Corruption Project (SNAC 2) is an integral part of South Programme II, implemented by the Economic Crime and Cooperation Unit (ECCU) of the Action against Crime Department, Directorate of Information Society and Action against Crime, Directorate General I of the Council of Europe. The overall Project objective is to promote good governance and prevention of corruption and money laundering in line with European and international standards. The geographical scope of the Project covers Jordan, Morocco and Tunisia, as well as the broader South Mediterranean through a number of regional activities.

The first year of the Project cycle resulted in the successful organizational and operational start-up of SNAC 2 and the consequent launch of substantive activities. The initial three-month inception period included the set-up of the Project team, establishment of Project Workplans through on-site consultations with beneficiaries, and the formal launch of activities at a conference in Strasbourg in April 2015.

During the subsequent nine-month implementation period the Project carried out a total of 18 activities, including 30 separate actions, involving a total of 554 participants (73% of men and 27% of women). The overall implementation rate of activities stands at 72% of activities planned for the 1st Project year, and makes 40% of Project activities planned for the entire 3-year period. The average monthly rate of actions stood at approximately 3 per month. A total of 14 technical and analytical papers were prepared and provided to beneficiaries.

Initial activities throughout the region focused on assessing needs, building networks of counterparts, as well as reviewing the legislative and institutional anti-corruption frameworks. The cross-cutting focus of activities was centred mainly on the anti-corruption bodies of Morocco, Tunisia and Jordan, given the on-going expansion of their mandates and functions.

In Morocco, the SNAC 2 Project implemented a wide range of activities aimed at building the institutional framework for the new Moroccan anti-corruption authority (INPPLC) established pursuant to the Moroccan Constitution. This included the creation of a new organizational design and human resource plan, as well as a procedural manual covering the new functions of the authority in the area of anti-corruption inquiries.

Legislative reviews were provided covering the whistleblower regime in Morocco, as well as ethics in civil service. In terms of methodological assistance, the Project developed a comprehensive toolkit to address corruption risks in the public procurement sector, as well as proposals for a project management methodology to implement the National Anti-Corruption Strategy. Capacity building activities included training of trainers in basic anti-corruption concepts as well as sharing of experience and networking through a study visit of Moroccan officials to Slovenia.

In *Tunisia* the Project focused on facilitating the legislative transition of the anti-corruption authority (INLUCC) to a new constitutional status with an expanded mandate. For this purpose a draft legislative text was prepared based on 6 rounds of expert consultations culminating in a public event with the participation of all relevant national stakeholders in

November 2015. This effort has moved significantly beyond the resources initially earmarked under the Project, and apparently further additional work and resources will be required in 2016. Thus a reconfiguration of the Tunisian component of SNAC 2 will eventually be required to take into account this resource shift. A comprehensive assessment of the Tunisian anti-corruption framework based on the Council of Europe GRECO methodology was launched in May 2015. The Project also made efforts to promote relevant Council of Europe Conventions on corruption and terrorism through high-level consultations and workshops with a broad range of national stakeholders.

In *Jordan* the Project undertook a number of thematic assessments and reviews covering priority areas mainly related to the growing competencies and functions of the Jordanian Anti-Corruption Commission (JACC). This included a review of the whistleblower protection regime based on CoE standards in the area, which served as the basis for two subsequent training activities on this topic for Jordanian authorities. A needs assessment of the IT infrastructure of the JACC and their capacities to undertake high-tech forensics operations was carried out. The results will serve as a basis for proposals on hardware and/or software procurement for the JACC. A review of the asset recovery system was also initiated with the purpose of building efficient procedures and interagency ties in this area. The capacities of JACC staff to conduct anti-corruption training were enhanced through a workshop on training techniques.

Overall during the reporting period the Project managed to ensure an intensive pace of Project activities, bringing about specific and tangible results. Smooth working relations were established with all Project counterparts and stakeholders.

The first year of Project implementation has highlighted a number of issues relevant for future planning and execution of SNAC 2. These relate both to the operational as well as substantive aspects of Project activities, in particular:

- Based on requests from beneficiaries the Project Workplans have prioritized and concentrated a large number of activities in year 1, as well as Q1 and Q2 of year 2. Taking into account the de facto capacities of the Project team as well as beneficiaries, a number of activities will be shifted in time in order to ensure a more even distribution throughout years 2 and 3. Additional activities requested by beneficiaries will not be considered before the passing of the Project midterm mark (July 2016), unless they are needed as a continuation of an already existing workstream.
- Taking into account the limits of capacities of field staff, the number of activities and the burdensome administrative processes for event organization, it is essential that ODGPROG finalize the arrangements to conclude framework contracts with event organizers in Tunisia, but most importantly Morocco and Jordan, where CoE field presence is minimal. This is especially acute, given that the recurring need to apply of the ‘three quotes’ procedure is eventually leading to lack of response from service providers, already having put at risk the successful implementation of a number of activities (e.g. in Jordan).

3 DESCRIPTION OF ACTION

3.1 Context of the Cooperation

The three-year programme of the Council of Europe and European Union “Towards Strengthened Democratic Governance in the Southern Mediterranean” (South Programme II) commenced in January 2015. It aims to contribute to reinforcing human rights, rule of law and democracy in Southern Mediterranean partner countries in accordance with European and other international standards, based on a demand-driven approach. It builds upon the cooperation framework established under the previous South Programme I carried out in 2012-2014.

The Middle East and North Africa (MENA) region continues to manifest significant interest in strengthening cooperation with the Council of Europe based on the framework of existing Council of Europe instruments and mechanisms, including in the domain of combatting corruption and other forms of economic crime. This is particularly visible with the substantive and geographical expansion of South Programme II to cover Jordan as a key beneficiary, as well as other jurisdictions in the region. The signature and implementation of the South Programme II facility thus marks a significant step in the development of cooperation which will now include both national and regional level activities.

The South Neighbourhood Anti-Corruption Project (SNAC 2) is an integral part of South Programme II, which is implemented by the Economic Crime and Cooperation Unit (ECCU) of the Action against Crime Department, Directorate of Information Society and Action against Crime, Directorate General I of the Council of Europe. The overall Project objective is to promote good governance and prevention of corruption and money laundering in line with European and international standards. The types of Project activities include strategic policy and legislative advice, risk-assessments, training, capacity and institution building, networking modalities among homologue institutions in Europe and the dissemination of good practices, as well as visibility actions and information campaigns, which include outreach to the relevant target audiences in the government sector and civil society, as well as media.

3.2 Approach

For over a decade the Council of Europe has been gathering multidisciplinary experience based on the drafting of AC norms and standards, assessment of implementation and support via technical assistance programmes, in particular for Member-States undergoing democratic transition. The cooperation of the Council of Europe with the South Mediterranean is thus mainly based on such good practice examples. It gives access to a pool of international consultants and experts from the public administrations of 47 Council of Europe Member States, who are able to share their broad practical experience in the anti-corruption area.

The SNAC 2 Project covers three principal beneficiary jurisdictions - Jordan, Morocco and Tunisia, and includes a number of cross-cutting regional activities. The workplans and expected results for each country have been designed based on the Neighbourhood cooperation priorities negotiated by them with the CoE on a bilateral basis. As the expected results are tailored to reflect the local needs and context, they differ from jurisdiction to jurisdiction. Regional activities will be organized on issues where the needs and interests of all three jurisdictions converge and can benefit from a mutual exchange of experience.

The intervention addresses the following four thematic areas to varying degrees depending on the needs of the jurisdiction: anti-corruption, good governance, anti-money laundering, countering terrorism and its financing. Project activities are implemented through the following four types of interventions:

1. **Assessments:** in-depth assessments of the legal and institutional frameworks on basis of the CoE methodologies, aimed at providing recommendations and policy direction in the area good governance and fight against corruption;
2. **Legislative reform:** Increased capacities on legislative reforms through legal advice and legal drafting through knowledge sharing of good practices and co-operation with civil society;
3. **Operational tools and procedures:** development of procedural frameworks and mechanisms for beneficiary institutions, as well as on an interagency basis to facilitate cooperation and information exchange;
4. **Capacity building, training and awareness raising:** Provision of training, modules and awareness-raising for relevant institutions and civil society groups in the area of good governance and fight against corruption and economic crime.

3.3 Workplan and organizational set-up

The inception phase of the project ended in April 2015 following the organisation of start-up activities in February (Tunisia), March (Morocco) and April (Jordan). The Workplans including calendars of activities were adopted by stakeholders at the Programme Launching Conference on 10 April 2015 in Strasbourg, France.

One field staff was recruited in Tunisia, and assistance by a locally-based consultant is provided in Jordan. An initial arrangement for a local project officer was made in Morocco, but was discontinued by May 2015. Coordination of activities in Morocco is thus carried out primarily by the main beneficiary – the ICPC, whereas logistical arrangements are undertaken by Strasbourg-based staff.

3.4 Progress in Achievement of Expected Results

3.4.1 Morocco

Project objective: To promote good governance and the prevention of corruption and money-laundering with due account for the relevant CoE standards, mechanisms and instruments by enhancing the policy framework, operational capacities and the co-ordination of the relevant stakeholders.

Expected Result I: The Moroccan national authorities, members of parliament and civil society have a good understanding of CoE standards in the prevention and fight against corruption with a view to Morocco's possible accession to the relevant instruments and the Group of States against Corruption (GRECO)

Activities under ER I will be implemented in 2016-2017.

Expected Result II: The recommendations deriving from the CoE's analysis of the Moroccan anti-corruption framework are implemented as part of the national anti-corruption strategy; the new internal operating rules of the

National Authority for Probity, Prevention and Fight against Corruption (INPPLC) are in line with the standards and practices promoted by the CoE; the CoE evaluates the implementation of the recommendations contained in the analysis of the Moroccan anti-corruption framework.

Over 50 % of activities under ER II have been implemented within the reporting period. A major priority under this ER has been the provision of support to the ICPC in its transition to a new constitutional status. The Project designed proposals for the organizational set-up of the new body, including human resources estimates. The proposals developed by CoE included two options: minimal staffing and adequate staffing. Moroccan authorities can take these proposals into account in the elaboration of decisions for allocation of resources and staffing to the new constitutional authority.

Following the expansion of the ICPC mandate to include administrative anti-corruption inquiries, the Project provided support in the design of a procedural manual, providing a step-by-step description and checklist of the inquiries procedure. This manual is currently under consideration by the ICPC, to be potentially integrated into its procedural framework following the transition to the new constitutional status.

In terms of methodological assistance, the Project developed a comprehensive toolkit to address corruption risks in the public procurement sector of Morocco. This document builds upon a risk-assessment exercise undertaken by the ICPC jointly with the General Finance Inspectorate of Morocco, which is integrated into the toolkit as one of the 4 modules. Moroccan authorities have requested an extension of this activity to cover workshops with various target groups aimed at implementation of the remaining modules (private sector, law enforcement and contracting authorities).

The Project carried out a legislative review of the Moroccan whistleblower legislation through the prism of Council of Europe standards in this area. A policy roundtable will take place in January 2016 in order to discuss the findings and map an action plan for Moroccan authorities in the area of whistleblower protection reform.

Expected Result III: Training and capacity-building activities are proposed on the basis of the recommendations contained in the analysis of the anti-corruption framework

The Project commenced capacity-building activities through the delivery of recommendations on setting up a Project Management Unit for the implementation of the National Strategy. The Ministry of Public Services and Modernization of the Administration as the agency responsible for the preparation of the National Strategy and its further management has been the beneficiary of this activity. Further support following the adoption of the National Strategy may be needed on this activity track.

The Project enhanced the capacities of a number of designated officials to conduct anti-corruption training through a workshop on training techniques. Further follow-up was requested by authorities to compile a train-the-trainer toolkit to be used in cascading training.

The Project supported Moroccan officials through developing networking and sharing of good practices with their Slovenian counterparts through a study-visit to Ljubljana. The activity included meetings with the Commission for Prevention of Corruption of Slovenia, the Prosecutors Office and specialized police units, which allowed the Moroccan delegation to obtain information for further use in domestic reform processes and initiatives.

Expected Result IV: Capacities regarding investigation techniques in the field of serious economic crime, and in particular money-laundering, are enhanced.

Activities under ER IV will be implemented in 2016-2017.

Expected Result V: Regional co-operation through the creation of /support to formal and informal networks focusing on the exchange best practices in the field of prevention of corruption and money-laundering is established.

Activities under ER V will be implemented in 2016-2017.

3.4.2 Tunisia

Project objective: *To promote good governance and the prevention of corruption, money laundering and terrorism on the basis of the relevant CoE standards, mechanisms and instruments by enhancing the policy framework and the stakeholders' capacities and co-ordination.*

Expected Result I: The Tunisian national authorities, members of the Assembly of the Representatives of the People, relevant institutions and civil society have a good understanding of the CoE standards on the prevention and combating of corruption, money laundering and terrorism with a view to possible accession by Tunisia to those instruments and to GRECO

The Project carried out one activity aimed at promoting CoE anti-corruption instruments among a broad interagency audience in May 2015. This activity is also an essential to support the overarching assessment process to review the anti-corruption system of Tunisia based on Council of Europe GRECO methodologies.

In order to promote the CoE Convention on the Prevention of Terrorism an awareness raising workshop was held in March 2015 with the participation of high-level Tunisian stakeholders, including parliamentarians. The Workshop resulted in an intensive policy discussion on parameters for the Tunisian counterterrorism framework and ensuring full compatibility with human rights safeguards.

Expected Result II: The legislative and institutional anti-corruption framework is assessed on the basis of GRECO methodologies

The Project initiated the assessment of the anti-corruption system of Tunisia based on Council of Europe GRECO methodologies in May 2015. The step-by-step assessment procedure and underpinning CoE standards were presented in the framework of an interagency workshop in May 2015. The assessment Questionnaire, specifically tailored to the Tunisian context and covering the themes of all four previous GRECO assessment rounds was presented, discussed and subsequently disseminated to all relevant ministries and agencies. The process of completion of the questionnaires is carried out under the overall coordination of the Directorate General for government services of the Presidency of the Government. As the next step in the assessment process the Project experts' team is scheduled to visit Tunisia in February 2016.

Expected Result III: Technical assistance is provided to support Tunisia in implementation of policies to combat corruption, money laundering and terrorism

Under ER III the Project focused on facilitating the legislative transition of the anti-corruption authority (INLUCC) to a new constitutional status with an expanded mandate. For this purpose a draft legislative text was prepared based on 6 rounds of expert drafting sessions

which included repeated redrafting and recalibration of the text with the involvement of CoE experts and INLUCC. The text includes the mandate, scope of functions, elections procedures of the President and members of the new authority and other provisions. A public event with the participation of all relevant national stakeholders in November 2015 was held in order to discuss the draft text of the Law. Based on the feedback received the final version of the text will be prepared for further submission to Parliament.

This effort has moved significantly beyond the resources initially earmarked under the Project, and apparently further additional work and resources will be required in 2016.

Expected Result IV: Tunisia co-operates more with other countries of the region in order to share good practices and set up networks enabling the fight against corruption, money laundering and terrorism to be extended beyond the national framework.

Activities under ER IV will be implemented in 2016-2017.

3.4.3 Jordan

Project objective To promote Good Governance and prevention of corruption, money laundering and the financing of terrorism in line with European and international standards

Expected Result I: The capacities for a better international and regional (MENA) cooperation on anti-corruption and money laundering are increased

Activities under ER I will be implemented in 2016-2017.

Expected Result II: Institutional Building Capacities and Legislation Framework reforms are in line with European standards

Under this expected result the Project undertook a number of thematic assessments and reviews covering priority areas mainly related to the growing competencies and functions of the Jordanian Anti-Corruption Authority (JACC). This included a review of the whistleblower protection regime based on CoE standards in the area, which served as the basis for two subsequent training activities for Jordanian authorities covering the topics of protection mechanisms, as well as managing the psychological expectations of the whistleblower.

An on-site needs assessment of the IT infrastructure of the JACC and their capacities to undertake high-tech forensics operations was carried out. The results will serve as a basis for proposals on hardware and/or software procurement for the JACC. Other agencies also participated in this assessment process including the FIU, however not specific IT-related needs were as yet identified.

A review of the asset recovery system was initiated with the purpose of building efficient procedures and interagency ties in this area. CoE experts carried out consultations with the full range of government institutions involved in the asset recovery chain in order to determine areas of improvement, as well as develop proposals to streamline interagency cooperation. Based on the result of this assessment the Project will develop internal procedures for the JACC as well as interagency guidelines to streamline the involvement of all agencies in the asset recovery chain.

The capacities of JACC staff to conduct anti-corruption training were also enhanced through a workshop on training techniques, highlighting the use of interactive training tools tailored to different target audiences.

Expected Result III: The capacities of Judiciary and Law Enforcement through specialized training on economic crime related offences are strengthened

Activities under ER III will be implemented in 2016-2017.

Expected Result IV: The capacities of Judiciary and Law Enforcement through specialized training on economic crime related offences are strengthened

Activities under ER IV will be implemented in 2016-2017.

3.5 Assumptions, risks and sustainability

The first year of Project implementation has highlighted a number of issues relevant for future planning and execution of SNAC 2. These relate both to the operational as well as substantive aspects of Project activities, in particular:

- Based on requests from beneficiaries the Project Workplans have prioritized and concentrated a large number of activities in year 1, as well as Q1 and Q2 of year 2. Taking into account the de facto capacities of the Project team as well as beneficiaries, a number of activities will be shifted in time in order to ensure a more even distribution throughout years 2 and 3. Additional activities requested by beneficiaries will not be considered before the passing of the Project midterm mark (July 2016), unless they are needed as a continuation of an already existing workstream.
- Taking into account the limits of capacities of field staff, the number of activities and the burdensome administrative processes for event organization, it is imperative that ODGPROG finalize the arrangements to conclude framework contracts with event organizers in Tunisia, but most importantly Morocco and Jordan, where CoE field presence is minimal. This is especially acute, given that the recurring need to apply of the 'three quotes' procedure is eventually leading to lack of response from service providers, already having put at risk the successful implementation of a number of activities (e.g. in Jordan).

4 ASSESSMENT OF ACTIVITIES AND BENCHMARK FULFILLMENT

The achievements relating to the expected results of the project are assessed below taking into consideration actions effectively delivered and objectively-verifiable indicator such as:

- Number of assessment reports
- Number of technical papers/legal opinion made available
- Number of workshops, seminars and conferences
- Participation

4.1 Morocco - Promotion of good governance: fight against corruption and money-laundering

| Inception phase/ coordination | |
|--------------------------------------|--|
| Actions implemented during Y1 | <p>Start-up activity Dates and place: 3- 4 March 2015, Rabat Number of participants: 46</p> <p>Deliverables: identification of the activities to be included in the project workplan</p> <p>South Programme Launching event Dates and place: 10 April 2015, Strasbourg Number of participants: 84</p> <p>Deliverables: approval of the project workplan</p> <p>0.1.6 Coordination meeting with the project focal points Dates and place: 27 November 2015, Rabat Number of participants: 15</p> <p>Deliverables: exchanges of view on the activities implemented so far, proposals for modification of the project workplan identified</p> |

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| Expected Result I: The Moroccan national authorities, members of parliament and civil society have a good understanding of CoE standards in the prevention and fight against corruption with a view to Morocco's possible accession to the relevant instruments and the Group of States against Corruption (GRECO) | |
| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Request of accession to CoE Criminal and Civil Law Conventions on Corruption ▪ Request of accession to GRECO submitted by Morocco |
| Activity 1.1 Raising awareness on CoE standards on corruption among a broad interagency audience (including Parliamentarians) | |
| Actions implemented during Y1 | -- |
| Progress made under activity 1.1 | rescheduled |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 1.1.1 Awareness-raising seminar on CoE anti-corruption conventions in 2016 |

Expected Result II: The recommendations deriving from the CoE's analysis of the Moroccan anti-corruption framework are implemented as part of the national anti-corruption strategy; the new internal operating rules of the National Authority for Probity, Prevention and Fight

| | |
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| against Corruption (INPPLC) are in line with the standards and practices promoted by the CoE; the CoE evaluates the implementation of the recommendations contained in the analysis of the Moroccan anti-corruption framework. | |
| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ INPPLC organigram is adopted and implemented ▪ The manual on pre-judicial investigation procedures is implemented and applied by ICPC staff ▪ Setting-up and implementation of a protocol for the exchange of information ▪ Number of recommendations identified by the experts in the field of public procurement and implemented by the authorities ▪ Number and level of implementation of the recommendation deriving from the Moroccan Anti-corruption assessment report ▪ The code of ethics for public officials is adopted and in line with CoE and other international standards ▪ The code of ethics for judges is adopted and in line with CoE and other international standards ▪ Introduction and practical use of procedures for corruption-proofing legislation (at least 15 texts examined using the methodology until the end of the project) ▪ Level of implementation of CoE recommendations to reform the legal and institutional framework for whistleblower protection |
| Activity 2.1 Accompanying INPPLC in the designing of its organigram | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.1.1 On-site visit by the team of experts to meet with ICPC officials ▪ 2.1.2 Preparation of a technical paper, including several propositions of organigram and an estimation of the needs in terms of human resources |
| Progress made under activity 2.1 | <p>Workshop to draft the organizational chart for the National Anti-corruption Authority of Morocco Dates and place: 13 and 15 April 2015, Rabat Number of participants: 11</p> <p>Deliverables: one technical paper delivered</p> |
| Further action under this activity | Activity finalised |
| Activity 2.2 Accompanying ICPC in the preparation of a manual on pre-judicial investigation procedures | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.2.1 Setting-up of a working group of national and international experts for the drafting of the manual ▪ 2.2.2 Development of a draft manual for ICPC |
| Progress made under activity 2.2 | <p>Workshop on the drafting of a manual on administrative inquiries for the National Anti-corruption Authority of Morocco Dates and place: 4-5 June 2015, Rabat Number of participants: 11</p> <p>Deliverables: one technical paper</p> |
| Further action under this activity | <ul style="list-style-type: none"> ▪ 2.2.3 Translation of the manual into Arabic |

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| Activity 2.4 Support in the preparation of a corruption-risks mapping in the public procurement sector | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.4.1 Examination of the results and risks identified by ICPC and IGF after the first phase of the risks analysis ▪ 2.4.2 On-site visit(s) by a team of national and international experts to collect additional information ▪ 2.4.3 Assistance and input for the drafting of the final report |
| Progress made under activity 2.4 | <p>On-site visit for risk-mapping in the public procurement sector Dates and place: 8-12 June 2015, Rabat and Casablanca Number of participants: 21</p> <p>Deliverables: one technical paper delivered</p> |
| Further action under this activity | Activity finalised |
| Activity 2.5 Drafting of the Codes of Ethics for public administration and for judges on the basis of CoE standards | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.5.1 CoE expertise on the draft Ethics Charter for public officials |
| Progress made under activity 2.5 | <p>Workshop on the ethic chapter of the draft general statute for public officials Dates and place: 15 April 2015, Rabat Number of participants: 11</p> <p>Deliverables: one technical paper</p> |
| Further action under this activity | <p>The actions related to the ethic charter for public administration are finalised: the seminar to present the recommendations of CoE experts was not requested by the beneficiaries (2.5.2)</p> <ul style="list-style-type: none"> ▪ 2.5.3 Setting-up of a working group (national and international experts) and preparation of an action plan for the drafting of an Ethics Charter for judges ▪ 2.5.4 Discussion with stakeholders and approval of the draft Ethics Charter ▪ 2.5.5 Conference to present the Ethics Charter for judges |
| Activity 2.7 Review of the legislative framework for the protection of whistleblowers | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.7.1 Assessment by CoE experts of the legislative framework for the protection of whistleblowers, in the context of the new CoE Recommendation CM/Rec(2014)7 and UNCAC |
| Progress made under activity 2.7 | <p>Compliance review of the Moroccan legislation for the protection of whistleblowers with the recommendation of the Council of Europe (CM/ Rec 2014- 7) on the protection of whistleblowers Dates and place: N/A (desk review) Number of participants: N/A</p> <p>Deliverables: one technical paper delivered</p> |
| Further action under this activity | <ul style="list-style-type: none"> ▪ 2.7.2 Workshop on Moroccan legislation for the protection of whistleblowers and CoE relevant standards |

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| Expected Result III: Training and capacity-building activities are proposed on the basis of the recommendations contained in the analysis of the anti-corruption framework | |
| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Strengthened capacities of the participants in the different training sessions ▪ Number of trainers of trainers formed during training activities ▪ Number of trainings carried out by the previously-trained trainers ▪ Number of reports on suspicious transactions related to corruption transmitted by financial and non-financial institutions to UTRF ▪ Number of information related to corruption transmitted by UTRF to judicial authorities ▪ Benchmark for the prevention of corruption are adopted by CGEM ▪ A project management unit in charge of the follow-up of the anti-corruption strategy's implementation is created and the working methods of the Unit are adopted |
| Activity 3.2 Strengthening the capacities of ICPC and Ministry of Justice staff, by sharing good practices and establishing networks with homologue institutions in Europe | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 3.2.1 First study visit to homologue European institutions for ICPC, Ministry of Justice and DGSN staff: Slovenian Commission for prevention of corruption, National police Directorate, Specialised Public Prosecutor Office of Slovenia |
| Progress made under activity 3.2 | <p>Study visit to the Republic of Slovenia Dates and place: 3-4 December 2015, Ljubljana Number of participants: 25</p> <p>Deliverables: one study visit for 10 Moroccan officials carried out</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 3.2.1 2 study visits |
| Activity 3.4 Training of trainers session on basic anti-corruption concepts | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 3.4.1 Training of trainers session |
| Progress made under activity 3.4 | <p>2 days training of trainers session on basic anti-corruption concepts Dates and place: 19-20 October 2015, Rabat Number of participants: 14</p> <p>Deliverables: 2 days training session delivered, 11 participants trained</p> |
| Further actions under this activity | Activity finalised |
| Activity 3.5 Accompanying the setting-up of a Project management Unit within the Interministerial Commission in charge of the national anti-corruption strategy | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 3.5.1 Setting-up of a working group ▪ 3.5.2 Development of internal methodologies of project management, in order to accompany the implementation of the strategy |
| Progress made under activity 3.5 | <p>Workshop with the Ministry of Public Administration on the project management unit foreseen by the national anti-corruption strategy Dates and place: 14 April 2015, Rabat Number of participants: 11</p> <p>Deliverables: one technical paper delivered</p> |

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| Further actions under this activity | <ul style="list-style-type: none"> ▪ Training seminar on project management methodologies |
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Expected Result IV: Capacities regarding investigation techniques in the field of serious economic crime, and in particular money-laundering, are enhanced.

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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Strengthened capacities of the participants in the training sessions ▪ A training module on economic crime is included in the training programmes of the Police Academy |
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Activity 4.1 Training on illicit enrichment and criminal liability of legal persons

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| Activities implemented during Y1 | --- |
| Progress made under ER 1 | rescheduled |
| Further actions under this activity | 2 training sessions on illicit enrichment, focusing on administrative and criminal aspects |

Expected Result V: Regional co-operation through the creation of /support to formal and informal networks focusing on the exchange best practices in the field of prevention of corruption and money-laundering is established.

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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Number and quality of initiatives and good practices exchanged in the regional framework under the Programme and adopted by Moroccan counterparts ▪ Number of people trained by the trainers which participated in the regional training sessions |
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Activity 5.1 Strengthening the capacities among national counterparts through training of trainers activities on administrative inquiries

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| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 5.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries |
| Progress made under activity 5.1 | <p>Working meeting of the experts, in order to prepare an outline the training programme and start the preparation of training materials Dates and place: 7 October 2015, Paris Number of participants: 4</p> <p>Deliverables: one working meeting, training outline finalised</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 5.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries (<i>ongoing</i>) ▪ 5.1.2 Regional training of trainers session on administrative inquiries ▪ 5.1.3 Support to strengthening national capacities on administrative inquiries |

4.2 Tunisia – Promotion of good governance: fight against corruption, money-laundering and terrorism

| Inception phase/ coordination | |
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| Actions implemented during Y1 | <p>Start-up activity Dates and place: 16- 18 February, Tunis Number of participants: 45</p> <p>Deliverables: identification of the activities to be included in the project workplan</p> <p>South Programme Launching event Dates and place: 10 April 2015, Strasbourg Number of participants: 84</p> <p>Deliverables: approval of the project workplan</p> |

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| Expected Result I: The Tunisian national authorities, members of the Assembly of the Representatives of the People, relevant institutions and civil society have a good understanding of the CoE standards on the prevention and combating of corruption, money laundering and terrorism with a view to possible accession by Tunisia to those instruments and to GRECO | |
| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Tunisian authorities start considering possible accession to CoE Conventions in the fields of fight against corruption and terrorism |
| Activity 1.1 Raising awareness on CoE standards (including soft law) on corruption, terrorism and mutual legal assistance | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 1.1.1 Presentation of CoE instruments against terrorism ▪ 1.1.2 Presentation of CoE Conventions and standards against Corruption |
| Progress made under activity 1.1 | <p>Seminar on CoE Convention against terrorism Dates and place: 12 March 2015, Tunis Number of participants: 86</p> <p>Deliverables: awareness raised on CoE standards</p> <p>Presentation of CoE anti-corruption Conventions and standards during the workshop to discuss and present the assessment questionnaire of the Tunisian Anti-corruption framework Dates and place: 20 May 2015, Tunis Number of participants: 70</p> <p>Deliverables: awareness raised on CoE standards</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 1.1.3 Presentation of CoE standards on mutual legal assistance, CoE Convention on mutual legal assistance and examples from a selection of countries |

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| Expected Result II: The legislative and institutional anti-corruption framework is assessed on the basis of GRECO methodologies | |
| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ The assessment process of the Tunisian anti-corruption framework is completed; ▪ Recommendations to reinforce the legislative and institutional framework to fight against corruption are developed |
| Activity 2.1 Drafting and presentation of the Assessment Questionnaire in the format of a training seminar | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.1.1 Identification of international and national experts ▪ 2.1.2 Introductory workshop to present the assessment questionnaire and relevant CoE standards |
| Progress made under activity 2.1 | <p>Presentation of CoE anti-corruption Conventions and standards during the workshop to discuss and present the assessment questionnaire of the Tunisian Anti-corruption framework Dates and place: 20 May 2015, Tunis Number of participants: 70</p> <p>Deliverables: a revised version of the questionnaire was prepared and sent to relevant Tunisian institutions</p> |
| Further actions under this activity | Activity finalised |
| Activity 2.2 Launching of the assessment process | |
| Actions implemented during Y1 | --- |
| Progress made under activity 2.2 | rescheduled |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 2.2.1 On-site visits by the team of experts |
| Activity 2.3 Drafting, discussion and adoption of the final assessment report | |
| Actions implemented during Y1 | --- |
| Progress made under activity 2.3 | rescheduled |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 2.3.1 Presentation of a preliminary assessment report including draft recommendations to Tunisian authorities ▪ 2.3.2 Discussion of the draft assessment report with relevant stakeholders |

| Expected Result III: Technical assistance is provided to support Tunisia in implementation of policies to combat corruption, money laundering and terrorism | |
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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ The draft IBOGOLUCC Law is developed in conformity with international and CoE standards and introduced into the legislative process ▪ Establishment of a functioning network of focal points responsible for interinstitutional cooperation ▪ Roadmaps (based on the anti-corruption Strategy) are adopted by Tunisian authorities and their implementation is underway ▪ At least two interinstitutional MoUs are adopted ▪ A concept on the whistleblowers center is adopted officially by Tunisian authorities ▪ The authorities adopt a roadmap in order to introduce legislative and institutional changes aiming for the creation of a system of integrity testing ▪ Integration of CoE recommendations into official programmes regarding the limitation of cash circulation |
| Activity 3.2 Provision of legislative advise and legal drafting reviews in support of the drafting of the Law establishing IBOGOLUCC and the anti-terrorism law | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 3.2.1 6 workshops on the drafting of the Organic Law of Instance de Bonne Gouvernance et de Lutte contre la Corruption (IBOGOLUCC) ▪ 3.2.2 Public event addressed to policy makers in order to promote the introduction of the draft law establishing IBOGOLUCC into the legislative process |
| Progress made under activity 3.2 | <p>1st Workshop on the new provisions concerning the Organic Law on the Tunisian Anti-corruption Authority Dates and place: 16-17 April 2015, Tunis Number of participants: 5</p> <p>2nd Workshop on the new provisions concerning the Organic Law on the Tunisian Anti-corruption Authority Dates and place: 13 May 2015, Tunis Number of participants: 4</p> <p>3rd Workshop on the new provisions concerning the Organic Law on the Tunisian Anti-corruption Authority Dates and place: 8 July 2015, Tunis Number of participants: 4</p> <p>4th Workshop on the new provisions concerning the Organic Law on the Tunisian Anti-corruption Authority Dates and place: 3-4 August 2015, Tunis Number of participants: 5</p> <p>5th Workshop on the new provisions concerning the Organic Law on the Tunisian Anti-corruption Authority Dates and place: 13-14 September 2015, Tunis Number of participants: 4</p> <p>6th Workshop on the new provisions concerning the Organic Law on the Tunisian Anti-corruption Authority Dates and place: 21 September 2015, Tunis Number of participants: 4</p> <p>Deliverables: 2 technical papers delivered; first draft text of the law establishing IBOGOLUCC finalised</p> |

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| | <p>Workshop on the independent constitutional Agency for Good governance and fight against corruption (IBOGOLUCC) Dates and place: 19 November 2015, Tunis</p> <p>Number of participants: 50</p> <p>Deliverables: 1 technical paper delivered; draft text of the law establishing IBOGOLUCC presented to a large audience of relevant stakeholders.</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 3.2.2 Technical assistance in the development of organizational methods of IBOGOLUCC ▪ (3.2.1) A 7th workshop on the new provisions of the organic law on the Tunisian Anti-corruption authority needs to be organised in January 2016 |

Expected Result IV: Tunisia co-operates more with other countries of the region in order to share good practices and set up networks enabling the fight against corruption, money laundering and terrorism to be extended beyond the national framework.

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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Number and quality of initiatives and good practices exchanged in the regional framework under the Programme and adopted by Tunisian counterparts ▪ Number of people trained by the trainers which participated in the regional training sessions |
| Activity 5.1 Strengthening the capacities among national counterparts through training of trainers activities on administrative inquiries | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 5.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries |
| Progress made under activity 4.1 | <p>Working meeting of the experts, in order to prepare an outline the training programme and start the preparation of training materials Dates and place: 7 October 2015, Paris Number of participants: 4</p> <p>Deliverables: one working meeting, training outline finalised</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 5.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries (<i>ongoing</i>) ▪ 5.1.2 Regional training of trainers session on administrative inquiries ▪ 5.1.3 Support to strengthening national capacities on administrative inquiries |

4.3 Jordan – Promotion of good governance: fight against corruption, money-laundering and the financing of terrorism

| Inception phase/ coordination | |
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| Actions implemented during Y1 | <p>Start-up activity Dates and place: 9 April 2015, Strasbourg Number of participants: 14</p> <p>Deliverables: identification of the activities to be included in the project workplan</p> <p>South Programme Launching event Dates and place: 10 April 2015, Strasbourg Number of participants: 84</p> <p>Deliverables: approval of the project workplan</p> |

| Expected Result I: The capacities for a better international and regional (MENA) cooperation on anti-corruption and money laundering are increased | |
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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Number and quality of initiatives and good practices exchanged in the regional framework under the Programme and adopted by Tunisian counterparts ▪ Number of people trained by the trainers which participated in the regional training sessions |
| Activity 1.1 Strengthening the capacities among national counterparts through training of trainers activities on administrative inquiries | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 1.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries |
| Progress made under activity 1.1 | <p>Working meeting of the experts, in order to prepare an outline the training programme and start the preparation of training materials Dates and place: 7 October 2015, Paris Number of participants: 4</p> <p>Deliverables: one working meeting, training outline finalised</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 1.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries (<i>ongoing</i>) ▪ 1.1.2 Regional training of trainers session on administrative inquiries ▪ 1.1.3 Support to strengthening national capacities on administrative inquiries |

| Expected Result II: Institutional Building Capacities and Legislation Framework reforms are in line with European standards | |
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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Asset recovery procedures/guidelines are adopted and operational at the level of the JACC and in terms of interagency cooperation ▪ Forensic/financial analysis software is installed/upgraded and efficiently utilized by staff of the relevant authorities ▪ At least ¾ of trained trainers deliver seminars on basic anti-corruption concepts, conflicts of interest, gift policy, and ethical dilemmas ▪ At least 60 public officials trained by the CoE-trained trainers ▪ A corruption proofing methodology is adopted by Jordanian authorities and at least 10 legislative acts are reviewed by the end of the Project ▪ Number of recommendations formulated in the risk assessment implemented by the authorities ▪ Strategic analysis products are produced by the FIU ▪ Regulatory framework for NPOs is enhanced ▪ Additional arrangements (e.g. MoUs) are made between authorities to exchange information on NPOs exposed to high terrorism financing risk ▪ Increased number of suspicious transactions in reported to the FIU by financial and non-financial businesses concerning terrorism financing |
| Activity 2.1 Supporting the Anti-corruption Commission with setting up an asset recovery unit | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ Scoping mission on the Jordanian asset recovery framework |
| Progress made under activity 2.1 | <p>Scoping mission on the Jordanian asset recovery framework Dates and place: 16-18 November 2015, Amman Number of participants: 12</p> <p>Deliverables: one mission report delivered by the experts</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 2.1.1 Developing of internal rules and standard operating procedures for the unit ▪ 2.1.2 Training on international good practices and case studies on asset recovery |
| Activity 2.2 Provide support to implementation of an efficient whistleblower system | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ Introductory meetings with JACC officials ▪ 2.2.1 Training and capacity building of authorities responsible for ensuring efficient protection of whistleblowers and use of whistleblower information in anti-corruption inquiries and investigations |
| Progress made under activity 2.2 | <p>Introductory meeting with JACC officials Dates and place: 16-17 June 2015, Amman Number of participants: 19</p> <p>Deliverables: one technical paper delivered</p> <p>Interactive training on the protection of whistleblowers (2 sessions) Dates and place: 12-14 October 2015, Amman Number of participants: 25</p> <p>Deliverables: 2 training sessions delivered, 20 participants trained</p> |
| Further actions under this activity | Activity finalised |

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| Activity 2.3 Upgrading of various forensic/financial analysis software and hardware (e.g. for information exchange) | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.3.1 Needs assessment and drafting of specification for software/hardware procurement |
| Progress made under activity 2.3 | <p>Mission of CoE experts to assess IT needs of the Jordanian Anti-Corruption Commission, the Financial Intelligence Unit and the Prosecution Service Dates and place: 6-7 October 2015, Amman Number of participants: 13</p> <p>Deliverables: 3 technical papers delivered</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 2.3.2 Procurement/installation of software/hardware ▪ 2.3.3 Training on the use of software/hardware |
| Activity 2.4 Establish interactive trainings of trainers for public officials on basic anti-corruption concepts, conflicts of interest, gift policy, and ethical dilemmas | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.4.1 Training of trainers session |
| Progress made under activity 2.4 | <p>Interactive training of trainers on basic anti-corruption concepts Dates and place: 9-11 November 2015, Amman Number of participants: 17</p> <p>Deliverables: one training of trainers, 11 participants trained</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 2.4.2 Cascade trainings organised by the previously trained trainers |
| Activity 2.7 Development of guidelines/ procedures for asset tracing in an interagency context | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 2.7.1 Scoping visit and setting-up of a working group of international-national experts |
| Progress made under activity 2.7 | <p>Scoping mission on the Jordanian asset recovery framework Dates and place: 16-18 November 2015, Amman Number of participants: 12</p> <p>Deliverables: one mission report delivered by the experts</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ Assistance with the drafting of guidelines for interagency information exchange on asset recovery ▪ Training activity on the guidelines/ procedures for asset tracing |
| Activity 2.8 Awareness-raising for the private sector in developing anti-corruption programmes | |
| Actions implemented during Y1 | --- |
| Progress made under activity 2.8 | rescheduled |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ Awareness-raising seminars and workshops on developing anti-corruption internal control in private sector institutions (up to 3 sessions) |

| Activity 2.9 Enhancing mechanisms to prevent terrorist financing abuse of the NGO sector | |
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| Actions implemented during Y1 | --- |
| Progress made under activity 2.9 | Due to the unavailability of the experts, the risk assessment review of the NGO sector and the first training session on financial analysis and investigations of NPO activities related to terrorism financing (scheduled for Y1) will be postponed to the second half of 2016 |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ Undertake a comprehensive assessment of the NGO sector with regard to its vulnerabilities to terrorism financing risks ▪ Develop policy /legislative proposals to enhance the regulatory system with regard to NPOs based on FATF Recommendation 8 and revised Best practices paper ▪ Enhance capacities of authorities responsible for the supervision of NPOs in undertaking checks and inspections ▪ Enhancing mechanisms for interagency cooperation and information exchange with regard to NPOs suspected of terrorism financing activities ▪ Building capacities of the FIU and law enforcement authorities to undertake financial analysis and investigation of NPO activities related to terrorism financing |

| Expected Result III: The capacities of Judiciary and Law Enforcement through specialized training on economic crime related offences are strengthened | |
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| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Mock trial programme integrated into Judicial Institute curricula ▪ Judicial institute trainers deliver at least two trainings on the Mock Trial programme ▪ At least 40 participants trained in CoE and Judicial Institute trainings using the Mock trial module |
| Activity 3.2 Building financial expertise related to economic crime | |
| Actions implemented during Y1 | --- |
| Progress made under activity 3.2 | The seminar to present the CoE Convention on mutual legal assistance and CoE Convention on laundering, search, seizure and confiscation of the proceeds from crime and on the financing of terrorism initially scheduled for the fourth quarter 2015, will be postponed to 2016 (dates TBC) |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 3.2.1 Seminar to present the CoE Convention on mutual legal assistance and CoE Convention on laundering, search, seizure and confiscation of the proceeds from crime and on the financing of terrorism ▪ 3.2.2 Networking to share best practices on international information exchange on anti-corruption and anti-money laundering cases |

4.4 SNAC2 Regional

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| Expected Result I: Regional co-operation through the creation of /support to formal and informal networks focusing on the exchange of best practices in the field of prevention of corruption and money-laundering is established | |
| Objectively verifiable indicators (OVIs) | <ul style="list-style-type: none"> ▪ Number and quality of initiatives and good practices exchanged in the regional framework under the Programme and adopted by national counterparts ▪ Level as to which international standards on corruption, money-laundering and terrorist financing are introduced in national legislations ▪ Number of stakeholders and potential multipliers involved in training activities |
| Activity 1.1 Strengthening the capacities among national counterparts through training of trainers activities on administrative inquiries | |
| Actions implemented during Y1 | <ul style="list-style-type: none"> ▪ 1.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries |
| Progress made under activity 1.1 | <p>Working meeting of the experts, in order to prepare an outline the training programme and start the preparation of training materials Dates and place: 7 October 2015, Paris Number of participants: 4</p> <p>Deliverables: one working meeting, training outline finalised</p> |
| Further actions under this activity | <ul style="list-style-type: none"> ▪ 1.1.1 Preparation of training materials on administrative inquiries, together with the experts of the institutions involved in administrative inquiries (<i>ongoing</i>) ▪ 1.1.2 Regional training of trainers session on administrative inquiries ▪ 1.1.3 Support to strengthening national capacities on administrative inquiries |

5 COOPERATION WITH STAKEHOLDERS

5.1 State of the Cooperation in Morocco

The cooperation with the coordinating institution in Morocco (ICPC) was regular, comprehensive and successful. The ICPC provided strong support to the CoE in the organisation of activities, in undertaking coordination of national authorities as well on substantial aspects of implementation of activities (even activities which did not fall under the direct mandate of ICPC). Overall ICPC was able to provide comprehensive support for the implementation of all of the activities implemented so far. As a result, the capacities of ICPC itself as well as its institutional standing among authorities in Morocco are constantly being reinforced.

Other beneficiaries also demonstrate a high degree of ownership of Project activities. The Ministry of public administration (MFPMA) is another key institution, which benefitted directly from several project activities. It will be important to further develop and consolidate this partnership following the adoption of the National Anti-Corruption Strategy.

5.2 State of the Cooperation in Tunisia

The Project received highly positive engagement from the two key beneficiary and coordinating institutions – the INLUCC and the Directorate General of Government Services under the Prime Ministry. At the same time involvement of other agencies (e.g. in the assessment process) so far has yielded minimal results.

Support to INLUCC has involved more resources than originally planned, and given the central role of this body in the anti-corruption system in Tunisia further adjustments to the resource planning and activity schedules may lead to the shifting of implementation dates for other activities under the Workplan.

5.3 State of the Cooperation in Jordan

In a short timeframe the Project managed to establish excellent working relationships with the Jordanian Anti-Corruption Commission (JACC), which is the key beneficiary of SNAC 2 activities. As a well-established institution the JACC has the necessary absorption capacities for the full range of activities implemented by the Project so far.

Initial engagements have also been made with other institutions in Jordan, who have thus far been highly interested and forthcoming in cooperation.

5.4 State of cooperation with third parties

In order to limit duplication of efforts, regular exchanges on the progress of activities were organised at the initiative of Council of Europe with other international providers of technical assistance: OECD, UNDP and UNODC. A donor coordination framework in Tunisia which receives the most volumes of international assistance, has been established with CoE participation.

6 CONCLUSIONS

The first year of Project implementation has resulted in the successful completion of the inception phase, including the design and adoption of Project workplans and calendars of activities. The Project quickly established efficient working relations with the key beneficiary institutions, namely the anti-corruption authorities of Morocco, Tunisia and Jordan, as well as a broad range of other stakeholders at the national level.

Building upon the results of South Programme I, implemented throughout 2012-2014 the Project continued intensive support to the anti-corruption authorities on Morocco and Tunisia in their transition to a new constitutional status. Extensive legislative and institutional advice and reviews were undertaken to support both authorities. Regional exchange of experience has been a key element in this process.

Given that the SNAC 2 Project marks the first instance of CoE engagement with Jordan on anti-corruption issues, the 1st year of activities was largely focused on undertaking comprehensive in-depth reviews of different aspects of the anti-corruption system and the institutional set-up of the Jordanian Anti-Corruption Commission (JACC). This allowed the Project to understand more comprehensively the procedures and modalities of functioning of anti-corruption mechanisms and to properly calibrate subsequent assistance. Capacity building in such priority areas as whistleblowing, IT and forensics analysis and asset recovery has commenced.

The intensive rate of implementation during the 1st year should nevertheless be revisited in the context of the overall 3-year Project workplan, which allows to more evenly balance out activities and shift implementation schedules by several months. This will allow to correct the initial disbalance in planning caused by the desire of beneficiaries to prioritize a large number of activities in the first year and a half of the Project. It will ensure a more proper distribution of the workload into Q3 and Q4 of 2016 as well as into the 3rd year of the Project.

Project implementation would also be highly facilitated if framework contracts for event organization were concluded by CoE in Tunisia, but especially Morocco and Jordan, where CoE local presence is minimal.

It can be concluded overall that the scope and number of actions completed and/or initiated during the 1st year of SNAC 2 will serve as an excellent basis for the further successful continuation of the Project on all its activity tracks. The constructive and efficient engagement of beneficiary institutions evidenced to date, if continued, should inevitably lead to concrete impact, and eventually to the achievement of the Project's expected results and overall objective.

7 ANNEXES

7.1 Project workplans

SNAC2 Morocco:

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/SNAC%202/MOROCCO/Documents/SNAC2_workplan_MOR_web.pdf

SNAC2 Tunisia:

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/SNAC%202/TUNISIA/Documents/SNAC2_workplan_TUN_web.pdf

SNAC2 Jordan:

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/SNAC%202/JORDAN/Documents/SNAC2_workplan_JOR_web.pdf

SNAC2 Regional:

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/SNAC%202/REGIONAL/Documents/SNAC2_workplan_REG_web.pdf

7.2 List of SNAC2 technical papers for 2015

SNAC2 Morocco

1. TP1: General analysis of Part 3 of the draft law reforming the General Statute of Moroccan Public Officials on “Guarantees, rights, duties and ethics”, *Richard Martinez and Luís de Sousa, Council of Europe experts*
2. TP2: Note to present a draft organigram of the future National Authority for Probity, Prevention and Fight against corruption, *Richard Martinez and Luis de Sousa (CoE experts) and Igor Nebyvaev (CoE Administrator)*
3. TP3: Enhancing the effectiveness of the project management Unit foreseen by the Moroccan national anti-corruption strategy, *Richard Martinez and Luís de Sousa, CoE experts*
4. TP4: Risk assessment methodology for public procurement in Morocco, *Joao de Almeida, Jean-Pierre Bueb, Francesco Clementucci (CoE experts) and Igor Nebyvaev (CoE Administrator)*
5. TP5: Manual of procedures on anti-corruption investigations carried out by the Central Authority for the Prevention of Corruption, *Jean-Baptiste Carpentier, Francesco Clementucci, Andrea Venegoni (CoE experts) and Igor Nebyvaev (CoE Administrator)*
6. TP6: Compliance analysis of the law of the Kingdom of Morocco for the protection of victims, witnesses, experts and whistleblowers vis-à-vis the recommendation of the Council of Europe (CM / Rec 2014- 7) on the protection of whistleblowers, *Francesco Clementucci, (CoE expert)*

SNAC2 Tunisia

7. TP1: Support to the Tunisian National Instance for the Fight against Corruption (INLUCC), *Richard Martinez, CoE expert*
8. TP2: Assessment questionnaire on the compliance of Tunisia with international standards to fight against corruption, *CoE Secretariat*
9. TP3: Draft text of the organic law on the Independent Constitutional Agency for Good Governance and Fight against Corruption
10. TP4: Explanatory note on the draft text of the organic law on the Independent Constitutional Agency for Good Governance and Fight against Corruption, *Richard Martinez, CoE expert*

SNAC2 Jordan

11. TP1: Review of the whistleblower regime in Jordan, *Dr Wim Vandekerckhove, CoE Expert*

12. TP2: Assessment of IT needs of the Jordanian Anti-Corruption Commission, the Financial Intelligence Unit and the Prosecution Service, *Dragan Jeremic, CoE expert*
13. TP3: Assessment of forensic IT and related training needs of the Jordanian Anti-Corruption Commission, the Financial Intelligence Unit and the Prosecution Service, *Michael Jameison, CoE expert*
14. TP4: Technical specification for the Jordanian Anti-Corruption Commission, the Financial Intelligence Unit and the Prosecution Service, *Michael Jameison and Dragan Jeremic, CoE experts*

7.3 Project website

The screenshot shows the Council of Europe website page for 'Action against economic crime'. The page features the Council of Europe logo and navigation menu. The main content area is titled 'Action against economic crime' and includes a 'BACK' link. Below this, there is a section titled 'Towards Strengthened Democratic Governance in the Southern Mediterranean' which is funded by the European Union and implemented by the Council of Europe. The page also features a section titled 'Promotion of good governance: Fight against corruption and money laundering (SNAC 2)' with a detailed paragraph and a table summarizing the project components.

Promotion of good governance: Fight against corruption and money laundering (SNAC 2)

In January 2015, the European Union and the Council of Europe renewed their commitment to support democratic reforms in the Southern Mediterranean through the launching of a new Joint Programme "Towards Strengthened Democratic Governance in the Southern Mediterranean" for 2015-2017 (South Programme 2). Endowed with a budget of €7,37 million, the three-year regional programme (January 2015 - 31 December 2017), is primarily directed towards supporting human rights institutions, democratic reform processes and governance structures, as well as fostering cooperation in the area of rule of law and consolidation of a common legal space between Europe and the Southern Mediterranean.

As part of the South Programme II, the Council of Europe is implementing the **South Neighbourhood Anti-Corruption Project (SNAC2)**, supporting countries in the region in combating corruption, money laundering and terrorism financing. Based on results of the preceding SNAC 1 project (2012-2014), cooperation will continue with Morocco, Tunisia and Jordan. A larger regional component will promote exchange of best practices and establishment of informal networks between competent authorities of Southern Mediterranean and Middle East countries with CoE member States.

| SNAC 2 JORDAN Fight against corruption, money laundering and the financing of terrorism | SNAC 2 MOROCCO Combating corruption and money-laundering | SNAC 2 TUNISIA Combating corruption, money-laundering and terrorism | SNAC 2 REGIONAL Fight against corruption, money-laundering: international cooperation in MENA region |
|--|--|--|---|
| € 0.5 M | € 0.5 M | € 0.5 M | |
| <ul style="list-style-type: none"> ▶ Project Summary ▶ Progress reports ▶ Workplan/Calendar ▶ Deliverables | <ul style="list-style-type: none"> ▶ Project Summary ▶ Progress reports ▶ Workplan/Calendar ▶ Deliverables | <ul style="list-style-type: none"> ▶ Project Summary ▶ Progress reports ▶ Workplan/Calendar ▶ Deliverables | <ul style="list-style-type: none"> ▶ Workplan/Calendar ▶ Deliverables |

Website address: www.coe.int/snac2