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Controlling Corruption through Law Enforcement and Prevention in Moldova (CLEP)

2nd Progress Report

1 May 2018 – 30 April 2019

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Reporting period	1 May 2018 – 30 April 2019
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Abbreviations

AML	Anti-Money Laundering
ARO	Asset Recovery Office
CARIN	Camden Assets Recovery Interagency Network
CFT	Countering Financing of Terrorism
CoE/EU JP	Joint Programme between the Council of Europe and the European Union
DNFBP	Designated Non-Financial Businesses and Professions
EU	European Union
FATF	Financial Action Task Force
FIU	Office for Prevention and Fight against Money Laundering
GPO	General Prosecutor's Office
GRECO	Council of Europe's Group of States against Corruption
MoF	Ministry of Finance
MIA	Ministry of Internal Affairs
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
NAC	National Anti-Corruption Centre
NIA	National Integrity Authority
NIJ	National Institute of Justice
NIAS	National Integrity and Anti-Corruption Strategy
NII	National Investigative Inspectorate
PCCOCS	Prosecution for Combating Organized Crime and Special Cases
PEP	Politically Exposed Persons
SIENA	Secure Information Exchange Network Application
SOE	State Owned Enterprise
SPIA	Internal Protection and Anti-Corruption Service/MIA
UNDP	United Nations Development Programme
USAID	U.S. Agency for International Development

1. EXECUTIVE SUMMARY

The Project “Controlling Corruption through Law Enforcement and Prevention” (CLEP) in the Republic of Moldova is a Joint Programme (JP) of the Council of Europe (CoE) and the European Union (EU). The project’s duration is 36 months (1 June 2017 – 31 May 2020) with a total budget of €2,225,000, funded by the EU and the CoE, and implemented by the CoE.

This report covers the second year of implementation of the project (1 May 2018 – 30 April 2019). The inception phase activities (1 June – 30 September 2017) have been reported in detail in the Inception Report while the First progress Report covered the period 1 June 2017 – 30 April 2018.

The Project continued its efforts in support of the **strategic and legislative frameworks** concerning key anti-corruption, anti-money laundering and asset recovery priorities in Moldova. This included a **review of the Integrity Law** in order to determine implementation gaps, as well as recommendations to enhance its effective application. The review will serve as a roadmap for further actions by the CLEP Project in order to facilitate the practical implementation of provisions of this Law in the area of gifts policy. CLEP provided a legal opinion on draft amendments to the **Law on money laundering and terrorist financing penalties**, highlighting the need to adjust the legislative proposal to ensure its compatibility with the 4th EU AML Directive, while maintaining a balance of enforcement powers between the Financial Intelligence Unit and supervisory authorities. Assistance was also provided to prepare the new national **Anti-money laundering (AML) and countering financing of terrorism (CFT) strategy** through a series of working group meetings with government stakeholders.

CLEP assisted in the preparation of **guidelines** to facilitate effective implementation of existing conflict of interest requirements for managers of public institutions; AML/CFT guidelines were also updated for the sector of designated non-financial businesses and professions, and followed up by training for this sector.

During the reporting period, CLEP prioritised anti-corruption actions in a number of **high-risk sectors**, in particular health and business. With regard to the **health sector**, CLEP assisted the finalization of the anti-corruption sectorial action plan, which was adopted by Decision of the Government of the Republic of Moldova in September 2018. Furthermore, CLEP created and delivered an integrity curriculum for medical professionals and pharmacists. This course was embedded in the medical continuous education programme and made obligatory for managers of healthcare institutions by the Ministry of Health, Labour and Social Protection. Concerning **private sector**, CLEP reviewed the current regulatory requirements for anti-corruption compliance and made concrete suggestions for revision of the legislative framework in this field. In addition, the project enhanced the capacities of both state and private sector institutions to enhance private sector compliance. For this purpose, CLEP delivered trainings for state owned enterprises as well as private companies from the transportation and construction sectors. A curriculum and additional training was also provided to the NAC on implementation and monitoring of anti-corruption controls in state and private companies.

Concrete **institutional support and capacity building** was provided to key selected agencies through training and the procurement of necessary IT infrastructure. The **National Integrity Authority (NIA)** benefitted from targeted capacity building for the integrity inspectors and legal advisors. Furthermore, as a result of CLEP methodological support NIA adopted a set of comprehensive operational procedures covering the main areas of NIA's mandate. Assistance was provided to the **Financial Intelligence Unit (FIU)** through technical trainings on Open Source Intelligence (OSINT) Investigations and FOREX and Inter-banking transactions. Specialised as well as interagency trainings were delivered for the **Asset Recovery Office (ARO), the General Prosecutor's Office (GPO) and the Specialized Prosecution Offices**. These agencies also received IBM i2 Analysts Notebook, iBase and iBase Designer licenses for their analytical work. Following Project support, the ARO obtained a secure connection to the Europol Secure Information Exchange Network Application (SIENA), which will enable the Agency to exchange confidential information with counterparts in Europe on asset recovery cases.

CLEP continued to work at the **local level** by providing trainings for public administration officials on the implementation and monitoring of local anti-corruption action plans. Support was also provided to CSOs from Moldovan regions on anti-corruption and integrity concepts, as well as techniques for monitoring local-level anti-corruption action plans.

The level of engagement from the beneficiary institutions remains high. At the same time, existing differences in the institutional capacities and work experience with technical cooperation projects of anti-corruption bodies had a certain impact on the quality of cooperation. In addition to the significant changes in the institutional set-up and management of key beneficiary agencies during the first year of implementation, new leadership has been recently appointed for the ARO and for the Anti-Corruption Prosecution Office (*ad interim*, for this latter). The frequent changes of management in key project beneficiaries serve as complicating factors for effective project implementation.

Longer-term planning of cooperation activities remains difficult with several institutions, also due to staffing issues. Coordination with new donor-funded anti-corruption projects has been cumbersome and brought a higher risk of undesirable duplication of efforts.

Overall and in line with the Project's Objectives and Expected Results, the Project implemented 46 activities (carried out through 69 actions), which included 1079 participants (59% men and 41% women) during the reporting period. From the beginning of the project, 1930 beneficiaries took part in project activities and experts' missions. A total of thirteen Technical Papers¹ (bringing the total number to thirty-one) were produced whereas four training curricula were created, piloted and handed over to the competent institutions.

Pursuant to the Communication and Visibility Plan, the project team is regularly updating the website: www.coe.int/clep, which contains all relevant information on the project, updates on activities and deliverables. In addition, a leaflet containing the achievement of the first year of implementation was produced and distributed in the second half of 2018.

¹ See Annex I.

The project in numbers

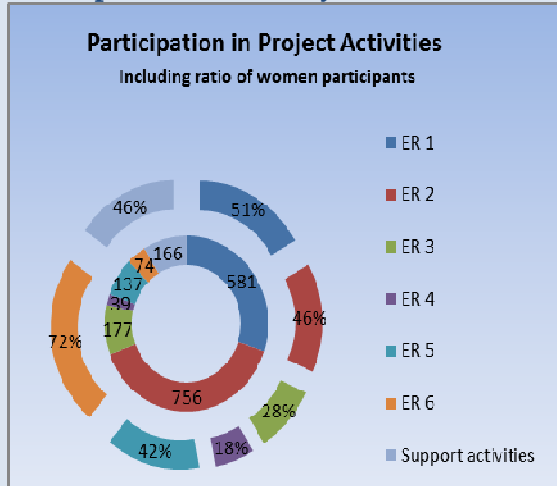
Overall: 46 Activities

1930 participants (46% women)

31 Technical -Papers

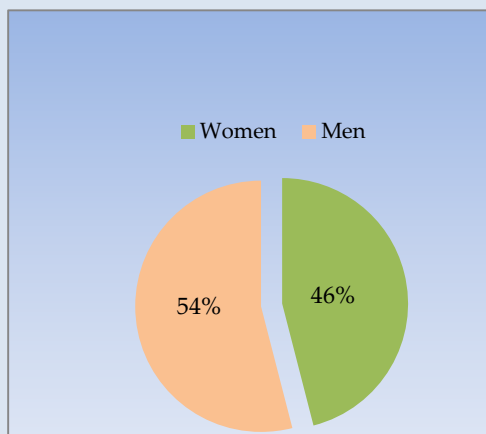
4 Training Curricula

Participants numbers by ERs

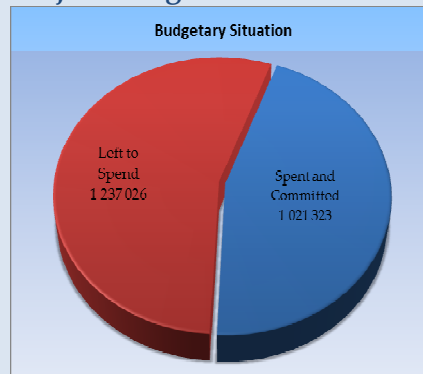


ER 1	581 participants, 51% women
ER 2	756 participants, 46% women
ER 3	177 participants, 28% women
ER 4	39 participants, 18% woman
ER 5	137 participants, 42% women
ER 6	74 participants, 72% women
Support Activities	166 participants, 46% women

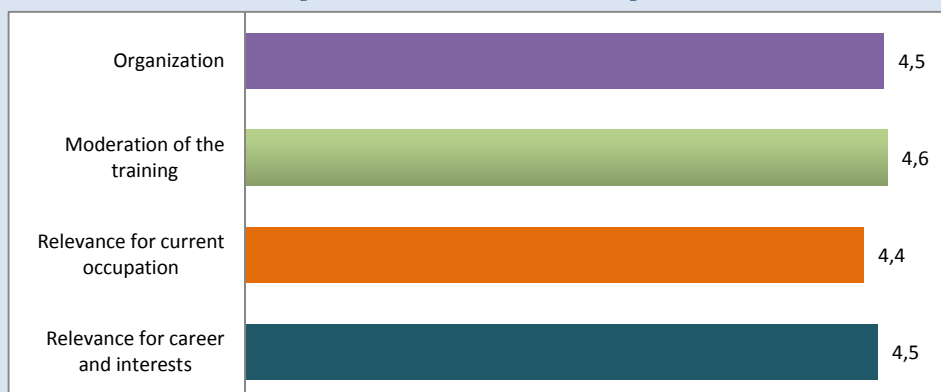
Gender ratio of total participants:



Project budget disbursement:



Post-trainings participants feedback: trainings are marked 1 to 5 and 5 is the highest mark



2. DESCRIPTION OF ACTION

Name of Contact Person (EU Delegation):

Tsvetomir SVILENOV: Programme Manager, European Union Delegation to the Republic of Moldova.

Name of Contact Person (Council of Europe)

Ardita ABDIU: Head, Economic Crime and Cooperation Division – DGI.

Name of beneficiary(ies) and affiliated entity(ies) in the Action:

- National Anti-Corruption Centre (NAC);
- National Integrity Authority (NIA);
- Ministry of Justice (MoJ);
- General Prosecution Office (GPO);
- Anti-Corruption Prosecutor's Office (ACPO);
- Designated Non-Financial Businesses and Professions (DNFBP);
- Police Academy (PA);
- Public Procurement Agency (PPA);
- Customs Service (CS);
- Superior Council of Magistracy (SCM);
- Ministry of Internal Affairs (MIA);
- Internal Protection and Anti-Corruption Services of MIA (SPIA);
- National Bank of Moldova (NBM);
- National Institute of Justice (NIJ);
- Office for Prevention and Fight Against Money Laundering (FIU);
- Parliament;
- Prosecution for Combating Organized Crime and Special Cases (PCCOCS);
- State Fiscal Service (SFS);
- National Commission for Financial Markets (NCFM);
- Superior Council of Prosecutors (SCP);
- Anti-Corruption Alliance (ACA);
- Centre for Investigative Journalism (CIJ);
- Transparency International (TI - Republic of Moldova);
- Centre for Analysis and Prevention of Corruption (CAPC).

Other beneficiaries are the financial sector and the industry (AML/CFT reporting entities), the civil society and journalists.

Title of the Action: Controlling Corruption through Law Enforcement and Prevention (CLEP)

Contract number: ENI/2016/381/731

The Project Controlling Corruption through Law Enforcement and Prevention (CLEP) in the Republic of Moldova is funded by the European Union and the Council of Europe, and implemented by the Council of Europe. The Project duration is 36 months (2017 – 2020) and its budget is €2,225,000.

Overall objective

To strengthen the anti-corruption framework in the Republic of Moldova in line with the CoE conventions and other international treaties.

Project Purpose

To support the reform of the anti-corruption regulatory framework and relevant institutions in line with European and international standards and re-enforce national and international co-operation of specialised law enforcement and prevention systems.

Expected results

- i. Gaps and deficiencies in the regulatory framework concerning prevention and fight against corruption and money laundering/terrorism financing are addressed in line with relevant CoE and EU practices;
- ii. Capacities of authorities to design and implement corruption and money laundering prevention measures are enhanced;
- iii. Strengthened asset recovery framework and capacities of relevant involved and dedicated structures;
- iv. Upgraded information sharing systems and capacities for the national mechanisms concerning corruption offences/violations and of tracing of assets and their recovery;
- v. National and international co-operation between the national and international law enforcement agencies on data exchange and international tracing of crime proceeds concerning corruption and other forms of economic crime are supported and enhanced;
- vi. Public awareness and participation in the fight against corruption is increased.

3. COUNTRY CONTEXT

The 2018 Transparency International Corruption Perception Index rated the Republic of Moldova at 33 (117 out of 180 assessed countries)², therefore gaining two points compared to the previous analysis. On the other hand, for the World Bank Ease of Doing Business parameter³, Moldova moved from 44th in 2017 to 47th in 2019. In the Basel Institute AML Index⁴, Moldova went from 5.43 in 2017 to 5.37 in 2018, remaining in the regional average.

In February 2019, Parliamentary elections took place in the Republic of Moldova. The new Parliament met for the first time on 21 March 2019 but as at the date of this report no Government has been formed.

² Transparency International, 2018, *Transparency Corruption Perception Index 2018*, accessed in April 2019.

³ World Bank, 2019, *Ease of Doing Business Index*, accessed in April 2019.

⁴ Basel Institute on Governance, 2018, *Basel AML Index*, accessed in April 2019.

With regard to **combating corruption**, NAC 2018 Activity Report⁵ indicates that criminal prosecution officers initiated 714 criminal cases of which 615 constituted corruption and related offenses (in particular influence peddling, active and passive corruption, abuse of power or abuse of office including in the private sector). In 87% of the cases brought to court, the defendants were found guilty. 70% of the convictions ended with a fine (average of 77,416 MDL compared to 55,000 MDL in the previous reporting period). 9% of the cases ended in imprisonment with real enforcement. Importantly, data suggests an increase in corruption reports by civil servants. In turn, this highlights an increase in corruption crime detection rate in priority sectors, such as health, education and public procurement. Concerning **corruption prevention**, corruption-proofing reports were regularly provided with an average of 70% of recommendations further implemented.

The reporting process of the **National Integrity and Anti-Corruption Strategy (NIAS 2017-2020)** is on-going, with NAC coordinating and analysing a vast amount of data. Two biannual reports were published, collecting data from both national and local level. While efforts are commendable, it was noticed that data on integrity and implementation of integrity tools by elected officials is missing. In addition, no independent sources of verification for data obtained by the institutions have been included in the reporting process.

In October 2018, the head of the **ARO** resigned and a new head was appointed via public competition in January 2019. Aside of this change, ARO has received additional staff and equipment during summer 2018. The regulation on asset valuation and management was approved in October 2018. Based on this document, tasks in this field were divided between ARO and the Ministry of Finance (MoF). In 2018, ARO received 140 referrals and executed 78. The total amount of seized assets (including cash in different currencies, land plots, cars, buildings, etc.) totalled more than €9M. In addition, a separate connection with SIENA was granted in April 2019. Despite these improvements, ARO still needs support in dealing with both national and international referrals in a systematic manner and in establishing working practices for assets management.

According to the GPO Activity Report 2018⁶, the **Anti-Corruption Prosecution Office (ACPO)** during 2018 opened and sent for trial a larger number of criminal cases compared to 2017. In 2018, the ACPO initiated 1065 criminal investigations (714 cases were jointly conducted by ACPO and NAC and in 351 cases only by ACPO). In total, during 2018, 284 cases were sent to court. The ACPO also worked on several high profile cases involving a former General Prosecutor, judges of the Appellate Court of Chisinau, prosecutors of Chisinau Prosecutor's Office and family members of a former President of the country. Concerning the bank fraud in the Republic of Moldova, the ACPO published a strategy for the recovery of the stolen money, although no progress on the set objectives was reported.

Data taken from the abovementioned document also reports that the **Prosecution for Combating Organized Crime and Special Cases (PCCOCS)** investigated 1960 cases during 2018 (either conducting or supervising the criminal investigation). In total, 397

⁵ National Anti-Corruption Centre of the Republic of Moldova, [Annual Activity Report 2018](#), accessed in April 2019.

⁶ General Prosecutor's Office of the Republic of Moldova, [Annual Activity Report 2018](#), accessed in April 2019.

cases were sent to trial during 2018. The types of crimes mostly investigated by PCCOCS during 2018 related to drug trafficking, tax evasion, smuggling and trafficking in human beings.

Throughout 2018, the **FIU** was equipped with more human resources and coordinating competences for sanctioning purposes. A draft law on AML/CFT sanctions is still pending approval. After the introduction of the new guidelines on identification of suspicious transactions, FIU reported a five-fold decrease in the quantity of such reports accompanied by an overall increase in quality, which in turn allowed them to carry out more in-depth analyses and to focus on feedback. FIU carried out 29 training sessions with supervisory and reporting entities. The results of 130 financial investigations reports were disseminated to relevant national authorities. Based on these, 16 criminal investigations were initiated, of which 9 linked to money laundering⁷. In July 2018, a package of legislative acts on fiscal amnesty was approved, without public consultations and against the advice of the international community. These measures were carried out between December 2018 and February 2019. Data from the MoF and State Fiscal Service (SFS) from April 2019 suggests that the state budget received about €45,000, originating from €750,000 declared. In October 2018, the on-site visit of the MONEYVAL V Mutual Evaluation took place; the report will be publicly available in July 2019.

With regard to **NIA**, several internal regulations and the standard operating procedures were approved for its inspectors. The backlog of approximately 70,000 previously submitted disclosures still represents a challenge for this body. NIA's management launched the hiring process for the 46 integrity inspectors. Nevertheless, only nine suitable candidates were hired as of February 2019. An additional recruitment procedure was launched in April 2019. As reported in NIA's 2018 Activity Report⁸, serious efforts were undertaken to train subjects of declarations in the capital and in the regions. As far as the work of the inspectors is concerned, they examined some of the complaints lodged between 2016 and 2018. 38 ascertaining acts were finalized in the second half of 2018. In April 2018, NIA sanctioned for the first time a public official with the ban from holding public offices for three years. With logistics support from the Agency for Public Services, 1345 integrity certificates were produced for new civil servants and especially for candidates running for office in the Parliamentary elections of February 2019. The assets declarations online submission process was finalized on 31 March 2019, with 57972 disclosures lodged by this deadline. The Integrity Council has so far failed to approve NIA's long-term Institutional Strategy and Action Plan.

During 2018, the **Internal Protection and Anti-Corruption Service** (SPIA) of the Ministry of Internal Affairs (MIA) trained over 1600 employees from the authorities subordinated to the MIA on ethics and anti-corruption principles and carried out several awareness campaigns. 186 criminal cases (including concerning passive and active corruption, influence peddling, abuse of power) were initiated.

Civil Society was generally active in organizing events, especially during the pre-electoral period, and voicing their concerns over institutional changes and legislative amendments. With regard to local level, the participation remains low but interest of

⁷ Financial Intelligence Unit of the Republic of Moldova, *Annual report 2018*, accessed in May 2019.

⁸ National Integrity Authority of the Republic of Moldova, *Annual Activity Report 2018*, accessed in April 2019.

some civil society organizations (CSOs) in monitoring the work of public institutions and the integrity climate is increasing.

During the reporting period, the following **relevant laws, amendments and Government decisions** were adopted:

Legislative acts:

- a) The Law on protection of whistle-blowers No. 122 of 12.07.2018;
- b) The Law on fiscal amnesty No. 180 of 26.07.2018;
- c) The Law on salaries in the budgetary sector No. 270 of 23.11.2018;
- d) The Civil Code of the Republic of Moldova was amended by Law no. 133 as of 15.11.2018 (anti-corruption compliance measures were introduced for legal persons such as the obligation to avoid conflicts of interest, not to accept benefits from third parties and the obligation to declare an interest when signing a legal act).

Government Decisions:

- a) Government Decision on the Regulation on the valuation, management and recovery of criminal (seized) assets was approved by Government Decision No. 684 of 11.07.2018;
- b) Government Decision on the Sectorial Plan of Anti-Corruption Actions in the field of Health and Compulsory Health Insurance for the years 2018-2020 was approved by Government Decision No. 892 of 12.09.2018;
- c) Government Decision on the Regulation on the issuance of the integrity certificates by the NIA was approved by the Order of the National Integrity Authority, Public Service Agency and the National Probation Inspectorate No. 90/653/07 of 09.10.2018;
- d) Amendments to the Government Decision on the Regulation on filling in the declaration on assets and personal interests in electronic format (amendments entered into force on 12.12.2018).

Internal orders/regulations issued by the institutions:

- a) Regulation issued by the National Bank of Moldova on requirements for prevention and combating money laundering and terrorism financing in the activity of non-bank payment service providers No. 202 of 9.08.2018;
- b) Regulation issued by the National Bank of Moldova on the requirements for the prevention and combating of money laundering and terrorism financing in the activity of foreign exchange offices and hotels, No. 201 of 9.08.2018;
- c) Order issued by the FIU on the Guidelines for the identification and reporting of money-laundering suspicious activities or transactions No.15 of 08.06.2018;
- d) Order issued by the FIU concerning approval of Guidelines for identification of terrorist financing suspicious activities and transactions No.16 of 08.06.2018;
- e) Order issued by the FIU regarding the approval of the Guidelines on the identification and monitoring of Politically Exposed Persons No.17 of 08.06.2018;
- f) Order issued by the FIU on reporting of activities or transactions falling under the Law on prevention and fight against money laundering and terrorism financing No. 18.06.2018;

- g) Order issued by the FIU regarding the approval of the Regulation on prevention and control measures against money laundering and terrorist financing (real estate), No.34 of 23.08.2018;
- h) Order issued by the FIU on approval of the Instruction on enforcing international restrictive measures No.35 of 23.08.2018;
- i) Order issued by the NAC on approving the Methodology for corruption risk assessment.

4. PROGRESS DURING SECOND YEAR OF IMPLEMENTATION

The activities carried out in the period covered by this report contribute to all Expected Results.

Expected Result 1

Gaps and deficiencies in the regulatory framework concerning prevention and fight against corruption and money laundering/terrorism financing are addressed in line with relevant CoE and EU practices

The Project continued its activities towards the achievement of the ER 1 with a number of important legal assessments on integrity, sanctions against AML/CFT infringements, as well as specialised trainings, as described below.

Activity 1.1.3 Review of the Integrity Law from an effectiveness perspective

As part of the support to NAC, CLEP provided an assessment of the Law No. 82 on Integrity from an effectiveness perspective. The CoE experts provided a set of recommendations to increase the understanding and boost the application of selected integrity tools. Specific suggestions were also given on how to improve the work with private sector entities. As a follow-up to this assessment, CLEP will support NAC in reviewing the Government Decision on the regulation on gifts for public officials and publish guidelines on this topic.

Activity 1.1.5 Review of the sanctions linked to AML/CFT infringements

CLEP followed up on the expert opinion on the state of play of the sanctions regime for AML/CFT infringements (provided by the project in the previous reporting period). These recommendations paved the way to draft the Special Law on Sanctions foreseen in the new Moldovan AML Law. As further support in this area was needed to establish a multilevel functioning regime for AML/CFT sanctions, CLEP also reviewed the draft Law on Sanctions, highlighting the need to keep the operational independence of the supervisory authorities and their enforcement powers. The opinion also underpinned the importance of maintaining the level of fines sufficiently high to act as serious deterrents. While the draft is still being consulted by the Ministry of Justice, FIU reported that the majority of the recommendations provided by CLEP were incorporated.

Activity 1.2.4 Update guidelines for DNFBPs

CLEP provided support to revise a handbook for DNFBPs, to bring its content in compliance with international AML/CFT standards and to make it a user-friendly tool for a diverse and non-specialized audience. The scope of the Handbook was also broadened to include relevant topics such as beneficial ownership and legal arrangements. As a

follow-up, CLEP organized an awareness event for DNFBPs on AML compliance, where the new manual was presented. The event was attended by 63 participants, of which 31% men and 69% women.

Activity 1.3.2 AML trainings for DNFBPs and Financial Institutions

As part of the support to the FIU, CLEP organized a series of separate trainings with representatives of banks, lawyers and notaries as well as new reporting entities such as real estate agencies and dealers in luxury goods (. The training sessions were more advanced with financial institutions, lawyers and notaries, and focused to the nature of their work, vulnerabilities and needs. At the same time, , this activity represented the first introduction and awareness on AML/CFT legal obligations, as well as the role of FIU for new reporting entities. The trainings were attended by 131 participants, of which 52% men and 48% women.

Activity 1.3.3 Training for judges and prosecutors on money laundering investigations, prosecution and new trends

As part of the work done in collaboration with the National Institute of Justice (NIJ), CLEP carried out two two-day trainings with judges from the capital and the regions and prosecutors from specialized offices and the GPO focused on money laundering investigations, prosecution, new trends and typologies. The activity proposed concrete cases and walked the participants through the conduct of the investigations. New trends were illustrated and explained bringing examples from other CoE member and non-member States. Discussions with the NIJ will continue on the future of this course and the possibility to embed it in the continuous legal education programme. The trainings were attended by 48 participants, of which 79% men and 21% women; 28 prosecutors and 20 judges.

Expected Result 2

Capacities of authorities to design and implement corruption and money laundering prevention measures are enhanced

CLEP progressed well with the implementation of activities under ER 2 at the strategy development, strategy monitoring, capacity building and methodological levels support.

Activity 2.1.1 Establishment and support to working group to prepare the AML/CFT Strategy

FIU created a Working Group to draft a new AML/CFT Strategy⁹. All relevant institutions involved in preventing and combating money laundering and terrorist financing contributed to identifying priorities and vulnerabilities to be addressed. Three Working Group meetings (May 2018, August 2018 and January 2019) took place with the support of CLEP and international experts. In January 2019, the strategic framework proposed by CLEP and endorsed by the FIU was approved by the Working Group and the process progressed to sector-based consultations. The working group meetings had 84 participants, of which 69% men and 31% women.

⁹ Republic of Moldova, [Government Decision No. 112 of 12.09.2018](#), accessed in April 2019.

Activity 2.1.2 Design of draft AML/CFT Strategy

In the reporting period, CLEP followed-up on the scoping mission organized in 2017 and which provided a clear roadmap and recommendations to Moldovan authorities on the new AML/CFT Strategy based on international good practices. The drafting process started with an expert's mission and the participation in the Working Groups mentioned under Activity 2.1.1. Through a series of debriefings with FIU, in October 2018 CLEP finalized a draft of the Strategy. In this context, Strategic Objectives were brought into line with FATF Immediate Outcomes and the risks identified in the National Risk Assessment of 2017 were addressed. At the date of this report, FIU is fine-tuning the Strategy, matching all national requirements for strategic documents, while the institutions involved started sending inputs for the Action Plan.

Activity 2.1.3 Consultation meetings on the draft AML/CFT Strategy

After the proposed strategic framework was approved in the Working Group, a series of back-to back meetings targeted the supervisory and reporting entities by sector. These meetings supported the final adjustment of the strategy's drafting process while ensuring a participatory approach. Concretely, the actors were asked to start suggesting possible actions targeting identified gaps specific to their sectors and contributing to the goals enshrined in the strategic framework. This activity facilitated the submission of inputs to populate the Action Plan. The two-day back-to-back sector-based meetings had 41 participants (73% men and 27% women).

Activity 2.2.2 Training on Strategy monitoring for pillars' focal points (local level)

Local level officials from the second level public administrations (*raions*) are mandated to draft, implement and monitor local level anti-corruption action plans based on a model developed by NAC. Based on the methodology developed under activity 2.2.1. (carried out during the first reporting period), CLEP organized eight training sessions with local level officials on data collections and reporting in Orhei, Hincesti, Cahul, Ungheni, Soroca, Causeni, Singerei and Chisinau. The activity covered all the regions of the country. As a result of these, NAC reported an increased reporting and implementation of the anti-corruption action plans at the local level after this activity took place. 216 officials (44% men and 56% women), including 3 participants from the Gagauzia Autonomous Administrative Territorial Unit, took part in these events, which also gave NAC the opportunity to explain relevant concepts from the Integrity Law.

Activity 2.3.1 Trainings with SOEs on corruption risk management and anti-bribery

With the aim to support the implementation of the NIAS 2017-2020, CLEP carried out three training sessions with managers and legal advisors of SOEs and municipal enterprises. Half of the active SOEs, as recorded by the Public Property Agency, underwent the training and were mentored on risk identification and management as well as on drafting integrity plans based on individual risks. The discussions among the participants at the training on good governance policies, such as gifts and conflict of interest, serve as an indication of interest and importance thereof. The trainings had 58 participants (69% men and 31% women).

Activity 2.3.2 Trainings with Private Sector on corruption risk management and anti-bribery

In partnership with NAC, CLEP piloted a one-day training curriculum for private sector companies on risk identification and management, implementation of internal controls, integrity plans and the adoption of a code of conduct. Businesses dealing with construction and transportation were selected, given the vulnerabilities of the sectors and frequency of contacts with public institutions. This training gathered 21 participants (85% men and 15% women). The one-day curriculum was well-received and handed over to NAC for future activities. Lastly, to respond to the needs identified within the NAC Education Division and Institutional Integrity Assessment Division, CLEP carried out a two-day Training of Trainers (ToT) focused on corporate governance and methodologies of work with private companies. The ToT had 9 participants (44% men and 56% women).

Activity 2.3.5 Support to building the Sectorial Action Plan for the Ministry of Health

In March and July 2018, CLEP, together with NAC, provided expert support to draft the Sectorial Plan on anti-corruption actions in healthcare and medical insurance for 2018-2020. The expert support also included a review from a gender perspective, which highlighted the importance of sex-disaggregated data collection to inform and monitor the gender perspective and to carry out a gender impact analysis as part of the final evaluation. The equal importance of both representation, especially in relevant medical committees, and active participation of both men and women was brought forward for detailed monitoring throughout the action plan implementation. In addition, as a review of price setting for medicines was included in the action plan, the project requested special attention on types of medicines which may impact men or women's well-being respectively. The Project also facilitated the drafting process with two targeted working group meetings involving a variety of health related institutions and civil society. These meetings were attended by 38 participants (35% men and 65% women). The above culminated with a final public consultation meeting with 28 participants, of which 35% - men and 65% women. The Action Plan was approved in September 2018 by Government Decision¹⁰, which makes the Ministry of Health responsible for its implementation and reporting thereon.

Activity 2.3.6 Training of trainers for the staff of the School of Public Health Management

As a follow-up to the approval of the sectorial anti-corruption action plan in the field of health, CLEP created a curriculum on integrity for medical professionals and organized a training of trainers for the staff of the School of Public Health Management (10 participants, 10% men and 70% women). The curriculum targeted all integrity instruments present in the Integrity Law and in the Law on assets and personal interest declarations, with a special focus on the obligations of managers of public healthcare institutions. As a result of these efforts, an ethics and integrity training was embedded in the medical continuous education programme and made obligatory for managers of public healthcare institutions by Order of the Ministry of Health, Labour and Social Protection No. 646d of 8 December 2018. Ten ethics and integrity courses have been scheduled for 2019 and up to April 2019, 4 sessions were delivered with 69 participants trained (of which 32 men and 37 women). A Medical Integrity Guide to complement the course is being finalised by the Project.

¹⁰ Republic of Moldova, [Government Decision No. 892 of 12.09.2018](#), accessed in April 2019.

Activity 2.4.2 Guidelines on solving conflict of interest and training for managers

As of October 2017 CLEP, in collaboration with NIA, prepared Guidelines on identifying and solving conflict of interest for managers of public institutions. The preparation of the guidelines involved meetings with a variety of actors including NIA, NAC, State Chancellery and civil society representatives. Cases dealt with by the former National Integrity Commission were analysed to create examples as close as possible to the practical context. The Guidelines were updated with the legislative amendments approved in summer 2018, printed and published in October 2018. Between November 2018 and January 2019, CLEP organized six training sessions in Balti, Soroca, Comrat, Causeni, Orhei and Chisinau with local public officials, but also heads of schools and public hospitals. 101 officials (49% men and 51% women), including participants from the Gagauzia Autonomous Administrative Territorial Unit, took part in these events, which also gave NIA the opportunity to present their mandate and role. The activity covered all regions in the country. CLEP Project distributed over 4500 guidelines to public officials from local and central level throughout the country.

Activity 2.5.1 Advice on the draft methodological guidelines for inspections conducted by NIA (including role and responsibilities of the inspectors)

As a result of CLEP's recommendations on the draft guidelines for inspectors, NIA fine-tuned the document and internalized the suggested Operational Procedures covering the main areas of NIA's mandate, thereby setting a methodology. In November 2018, as a follow-up and with some delays due to the slow recruitment of integrity inspectors, CLEP organized a mentoring session with NIA staff (6 participants, 67% men and 33% women) to discuss verification and control procedures. The event also envisioned the presentation of good practices and concrete examples from Romania and Slovenia.

Activity 2.5.2 Development of an institutional Strategy and Action Plan for NIA, including management, cooperation and institutional positioning

In the first year of implementation, CLEP supported NIA in drafting an institutional strategy and action plan. The document targeted issues identified through an initial problem analysis and proposed four strategic objectives focused on institutional capacities building, path to building a track record of cases linked to NIA's mandate, running preventive and education activities and developing a communication and reporting plan. As per NIA's Law, the Strategy shall be approved by the Integrity Council. Despite CLEP project team's efforts vis-à-vis the Integrity Council, which included several meetings with its members, the Strategy has not been approved, therefore NIA is functioning with no strategic vision and set baselines but on the basis of an annual work plan.

2.5.7 Training on analytical techniques for the FIU

Upon discussion with FIU's management on the needs of its staff, CLEP organized a five-day training on OSINT Investigations (18 participants, 67% men and 33% women) in August 2019. The activity covered plans for online investigations, browser based tools and anonymization techniques, emails and website analyses. Social networks and handling internet evidence were also part of the course. The Dark Web, its potentials and safe use were explained while specific resources on advanced internet searches were distributed at the end of the activity. The trainers used online OSINT training platforms and led

interactive exercises to consolidate the participants' knowledge and skills. Additionally, support was provided in the field of FOREX and inter-bank transactions. A workshop, especially dedicated to the operational and strategic analysis units, increased FIU's understanding on the use of FOREX, mirror trades and offshore facilities for money laundering purposes (11 participants, 63% men and 27% women).

2.5.8 Support to draft a methodology for corruption risk identification and analysis (SPIA, Analytical Unit)

CLEP involved the staff from IPAS and the new anti-corruption unit in the General Police Inspectorate in a corruption risk assessment training. This activity served the purpose of harmonizing knowledge of the staff carrying out such assessments and clarifying concepts. The training was attended by 23 participants (74% men and 26% women). In addition, in close collaboration with IPAS, CLEP drafted a methodology for assessing risks and devising targeted actions focusing on the needs and peculiarities of the MIA and the police. The methodology was discussed with the beneficiaries and approved by the Minister of Internal Affairs on 13 May 2019.

Expected Result 3

Strengthened asset recovery framework and capacities of relevant involved and dedicated structures

The Project continued to support the strategic development and responded to the capacity building needs of the sector, as described below.

Activity 3.1.2 Development of an effectiveness oriented assets recovery strategy

CLEP supported ARO in drafting an institutional strategy and action plan, oriented towards the future goal of fully operationalizing the office. The document targets issues identified through a SWOT (strengths, weaknesses, opportunities, threats) analysis carried out during an expert's mission with ARO's staff and contributions from specialized prosecution offices and tax authorities. On 15 May 2018, CLEP launched the document publicly together with the management of NAC and ARO, in the presence of representatives from Moldovan institutions, diplomatic community, development partners, civil society and media. The event was attended by 61 participants, of which 63% men and 37% women. The support provided led to the document being approved by the head of ARO. It is guiding ARO's strategic direction in all the sectors in need for development, stabilization or improvements. A first review of the progress made is planned for May 2019.

Activity 3.2.1 Training for the ARO on parallel financial investigations

CLEP organized a training for ARO's staff on assets tracing and parallel financial investigations (13 participants, 76% men and 24% women). As a result of the training, participants learned about the planning and management of an investigation through a number of exercises, including the analysis of bank documentation and real life scenarios. Trainees also gained knowledge of good practices in international cooperation and the use of special investigative measures.

Activity 3.2.4 Open Source Intelligence and Covert Online Investigations Techniques Training

In an inter-agency setting, including ARO, NAC and prosecutors, CLEP organized two training sessions on OSINT and Covert Online Investigations Techniques. This computer-based course introduced the participants to online investigations, browser based tools and anonymisation techniques, website and emails investigations. In addition, the training introduced the participants to the planning of a covert online investigation, the use of social media and covert online surveillance. The activity enhanced the knowledge of the participants about online sources. It also instructed them on how to use the results of these searches to direct their investigations. The training had 13 participants (76% men and 24% women).

3.3.1 Development of guidelines on asset management after seizure and confiscation

As the regulation on valuation, management and recovery of criminal (seized) assets was published on the Official Gazette in October 2018, CLEP started the support activities in this field. The Asset Management Unit in the ARO was provided with expert support and a detailed needs assessment is underway. This will include also options of methodologies on the management of seized and confiscation assets, involving several actors. In addition, a two-day training on asset management good practices, pre-seizure planning and risk management as well as liquidation involved ARO, specialized prosecution offices, the MoF (specifically State Fiscal Service) and Customs. The training was attended by 12 participants (50% men and 50% women).

Expected Result 4

Upgraded information sharing systems and capacities for the national mechanisms concerning corruption offences/violations and of tracing of assets and their recovery

The project supported the IT infrastructure of the anti-corruption institutions by delivering IBM i2 products for investigative purposes.

4.1.1 Needs assessment and feasibility study covering IT (including databases, interoperability and hardware)

CLEP carried out an in-depth needs assessment focused on IT equipment among anti-corruption institutions. A workshop to present the findings to the institutions involved was carried out in October 2018 (21 participants, 85% men and 15% women). While the assessment helped the institutions in planning their future procurement, it also guided the project's procurement process by prioritizing items for purchase. An international call for tender was launched in February 2019. However, due to the receipt of one non-compliant application only, the call will be re-launched in May 2019.

4.1.2 Creation of selected connections to enhance interoperability and/or databases

Works to design an interoperable database for the ARO started in April 2019. Following Government's procedures for the approval of interoperable platforms, a Concept Note is being drafted and will be submitted for approval in the coming months. The final goal is to provide ARO with a functioning database, able to exchange data with E-Case.

4.2.1 Procurement of visualization software/analytical tools for investigations

An international call for tender was launched in December 2018, following the needs assessment promoted by CLEP among anti-corruption investigative bodies. The project procured IBM i2 concurrent licenses for the ARO and for the analytical units of the ACPO and PCCOCS. The software contributes to improving the investigative processes, especially when it comes to visual analysis of patterns and forensics links. The beneficiary institutions accessed the licenses at the beginning of April 2019 and reportedly started using them. As a follow-up to this activity, CLEP will carry out training sessions with analysts from different Moldovan anti-corruption institutions in the second half of 2019.

Expected Result 5

National and international co-operation between the national and international law enforcement agencies on data exchange and international tracing of crime proceeds concerning corruption and other forms of economic crime are supported and enhanced

The project improved inter-agency co-operation and provide concrete recommendations on data and info exchange at the international level.

Activity 5.2.1 Analytical review of the current national and international cooperation MoUs

CLEP carried out two analytical reviews of the national and international MoUs used by anti-corruption institutions to exchange information and data related to asset recovery, parallel financial investigations, corruption and other economic crimes. The results of the first analysis were presented in a workshop (22 participants, 68% men and 32% women) in October 2018. A list of essential elements to be included in inter-agency agreements was elaborated during the workshop and shared with the audience. On the other hand, the study on international MoUs was presented in December 2018 (29 participants, 51% men and 49% women). In both cases, the events triggered robust discussion on personal data protection issues and opportunities for swifter information exchange. The Republic of Moldova recently signed a new agreement with Romania on the topic mentioned above while some of the institutions signed MoUs with several bodies or are in the process of reviewing the existing ones.

Activity 5.3.3 Training on asset recovery (international cases)

In an inter-agency setting, including ARO, NAC, FIU, prosecutors and judges, CLEP organized a training focused on gathering financial intelligence during a criminal investigation with the purpose of international asset recovery through formal and informal international cooperation mechanisms. Thanks to tailor-made group exercises, the training participants (gained concrete knowledge on how to use informal asset recovery networks (e.g. Camden Assets Recovery Interagency Network) and how to draft Mutual Legal Assistance requests. A total of 14 participants, of which 78% men and 22% women, attended the training.

Activity 5.4.1 Development of national standards/regulatory framework for anti-corruption compliance in the private sector

Private sector has been identified as one of the areas in need of support, as part of the NIAS 2017-2020. CLEP facilitated a workshop (25 participants, 52% men and 48% women)

with private sector representatives and NAC in July 2018. As a follow-up to this activity, CLEP recommended a series of necessary actions to clarify integrity legislation and making it more sensitive towards the size of the businesses (in particular, for small and medium enterprises) and the nature of their activities. The recommendations were presented to NAC and will be followed by a study on incentives for companies respecting anti-corruption compliance.

Expected Result 6

Public awareness and participation in the fight against corruption is increased

The project equipped CSOs with skills and knowledge to monitor and report on anti-corruption strategic and policy documents at the local level.

Activity 6.3.2. Training on integrity concepts for local CSOs

A two-day training on integrity concepts involved CSOs from the different regions of the Republic of Moldova. The activity equipped the participants with solid knowledge on the legal and institutional anti-corruption framework in the country and provided them with know-how on corruption risks assessments. 18 participants (27% men and 73% women) from 14 different organizations, including from the Gagauzia Autonomous Administrative Territorial Unit took part in the event.

Activity 6.3.3. Training on NIAS action plans monitoring and reporting

While CSOs in Chisinau regularly draft alternative reports on the implementation of anti-corruption policies and strategies, so far, such contributions did not come from CSOs based in the regions. The training equipped 14 CSOs (14 participants, 43% men and 57% women) with solid knowledge on the preparation of alternative reports. The training included sessions on the monitoring and reporting of the local anti-corruption and sectorial action plans (health in particular). One of the participating CSOs ("Concordia") organized further activities related to monitoring of public procurement procedures in Telenesti and monitoring of the implementation of the anti-corruption action plan of the Rayon Council.

5. MANAGEMENT AND ORGANIZATION

Management

A new Project Linguistic Assistant was recruited in December 2018. Otherwise, the status of management and organisation remained unchanged since the first annual report.

Steering Committee (SC)

3rd Project Steering Committee (16 October 2018). CLEP project team presented the SC members with the activities implemented and the achieved results. In addition, future planned activities for the last months of 2018 and beginning of 2019 were discussed and agreed. Changes of implementation schedule and supplementary actions (4) to be included under existing activities in the Workplan were presented and approved by the SC.

4th Project Steering Committee (24 April 2019). The SC considered the Project's progress, project statistics, necessary Workplan modifications and the activity plan for the

upcoming implementation period. In addition, the importance of follow-up to capacity building activities and ownership of the results from the side of the beneficiary institutions was brought up for discussion, along with the openness for feedback on the quality of the support provided. Two new activities under Expected Result 5 were added, while the planned mentoring programme was cancelled due to unavailability of suitable experts to undertake this task.

6. COOPERATION WITH STAKEHOLDERS

Counterpart beneficiaries

The relationship between CLEP and the beneficiary institutions remains solid, while the international community in the Republic of Moldova awaits a clear commitment to fight corruption and money laundering from the new Government.

In the course of the reporting period the Project made advancements in the procurement of software and hardware for beneficiaries. At the same time, this was complicated by fluctuating needs of institutions. While all beneficiaries took part in the needs assessment carried out in May 2018, later on they repeatedly communicated different necessities. In some cases, while initially they refused the assistance identified as necessary in CLEP's assessments, they contacted CLEP months later communicating a change in their needs. Due to constantly changing needs of beneficiaries, CLEP was unable to accommodate some of the new requests.

Changes in management, staffing structures and institutional attribution continued to occur during the reporting period. In October 2018, the head of ARO resigned and a new manager was officially appointed in January 2019. FIU started operating under a different institutional set-up. An *ad interim* Chief Prosecutor was appointed in the ACPO. Overall, these changes did not impact the project's operations and objectives. On the other hand, the low number of recruited inspectors in the NIA postponed the implementation of some dedicated activities. It is likely that due to this situation, NIA's representatives will be unable to dedicate significant human resources to engage in upcoming project activities.

CLEP has continued to successfully broaden the work with local level authorities on anti-corruption policies as well as on implementing the conflict of interest regime. Similarly, activities on integrity and anti-corruption were delivered to local level CSOs from Northern and Southern regions of the country.

The pre-electoral period did not influence negatively the implementation of the activities.

Coordination with other anti-corruption initiatives

Coordination with other on-going and upcoming projects focused on anti-corruption remains a challenge. The Anti-Corruption Twinning Project funded by the EU contained potential overlaps, which were the subject of regular coordination meetings. An additional Twinning Project focused on Anti-Money Laundering started in December 2018. In both cases, close coordination is necessary to ensure common approaches and mutual reinforcing activities.

In December 2018, UNDP launched a follow-up project to assist NAC, without undertaking any consultations with development partners and technical assistance projects in the anti-corruption field. The project presented relevant overlaps with other

on-going and planned initiatives. It required a last minute meeting to avoid effectiveness issues. However, in the coming months, more coordination will be necessary and will require a considerable amount of time.

CLEP continued the coordination meetings initiated by USAID and hosted one in June 2018. Nevertheless, it is worth mentioning that this format presents effectiveness limitations, as few development partners attend and the information shared is limited. Nevertheless, CLEP remains fully committed to ensuring effective coordination with development partners in the Republic of Moldova in the AC and AML/CFT areas.

7. MODIFICATIONS, ASSUMPTIONS, RISKS, SUSTAINABILITY AND GENDER MAINSTREAMING

Modifications

Some timeline modifications were experienced in undertaking work with the NIA and with the ARO. In both cases, activities were carried out after relevant staff was hired and officially appointed. CLEP also introduced the following changes in the Workplan:

- Cancellation of the mentoring programme planned to support the specialized prosecution offices (activity 5.2.2.) due to unavailability of suitable experts;
- Introduction of a new activity: study visit focused on international cooperation, tentatively scheduled to take place in France (new activity 5.2.4.);
- Introduction of a new activity: training in co-operation with EUROPOL on the handling of the SIENA platform in the second half of 2019 (new activity 5.2.5.).

Assumptions

In July 2018, during its last meeting before summer recess, the Parliament approved the Law on Fiscal Amnesty, without public consultations, advice from MONEYVAL or the international community at large. In this context, project assumptions regarding **political will** to prevent and fight corruption and risks, as articulated previously by the Project, still stand.

With the launch of other anti-corruption initiatives (e.g. the UNDP project) some areas of clear overlap have been identified. Coordination work will be essential to avoid duplication of efforts and ensure complementarity and effectiveness of results.

As reported in the 1st Annual Progress Report, CLEP continues to engage where possible local expertise, however a shortage of the latter has been identified in particular in the field of anti-money laundering and assets recovery. This is compensated by engaging additional international experts as well as through secretariat input.

Sustainability

A number of sustainable outputs were produced by the project in the reporting period, due to: high-level government endorsement and/or adoption of deliverables by the government and institutions, including here such CLEP products as action plans and training curricula. The project team is regularly following up to ensure recommendations are taken on board by beneficiary institutions. Measures are being taken to monitor the impact of CLEP trainings on the job performance of attendees.

Gender mainstreaming

With regards to gender mainstreaming, CLEP team has collected gender-disaggregated data from all activities carried out and regularly requests advice to the CoE Gender Advisor to apply CoE's internal standards and practices to the project. Both equal representation and participation are encouraged in all actions. In addition, many of the suggestions from the CoE Gender Advisor were taken on board in the Health anti-corruption sectorial action plan, which was approved by the Government in September 2018. Due to underrepresentation of women in some of activities involving law enforcement investigative units, CLEP will carry out a study on the causes of gender imbalances and their eventual impact on effectiveness, efficiency and institutional integrity.

8. VISIBILITY

The Project paid special attention to the visibility of its actions and it ensured the visibility of EU contribution in its activities. The Council of Europe took all appropriate measures to publicise the fact that the Project funding has been received by the European Union. In this respect, some of the beneficiary institutions have been reminded to mention the donor in their news items. The JP logo was appropriately displayed in the materials distributed in the activities and in the publications. A disclaimer was placed in all Project related documents. Furthermore, folders, notebooks and pens with the Project title and logo were regularly distributed to all beneficiaries during the events organised by the Project, and the Project banners were displayed in conference rooms.

On the Council of Europe Economic Crime and Cooperation Division website (www.coe.int/corruption), the section dedicated to the CLEP Project (www.coe.int/clep) is regularly updated. Project news, upcoming events, relevant project documents (e.g. DoA, project Workplan, inception report, project summary, etc.) and other links of relevance to the Project are available through this website.

In order to promote the results achieved during the First Year of Implementation, the project prepared a leaflet (300 copies, in both Romanian and English), which was distributed during the activities (including at the local level) and to development partners. A new updated edition concerning the second year of implementation is under preparation.

CLEP Project also attended the EU Village Day organized in Chisinau in May 2018, where several project visibility materials were distributed to a large audience and information was provided regarding project activities.

9. CONCLUSIONS

During the reporting period, CLEP achieved tangible progress through targeted technical advice and capacity building across a range of institutions and sectors. This provided solid ground for the on-going and future anti-corruption and anti-money laundering reforms with support from CLEP aimed at optimising the strategic, legislative, institutional and operational frameworks in the anti-corruption, AML/CFT and asset recovery areas.

The second year of implementation resulted in the successful completion of 29 activities (some finalized or completed with supplementary actions from the previous reporting period). In particular, support to vulnerable areas identified by the NIAS 2017-2020 (namely health and private sector) resulted in positive anti-corruption developments in these sectors, achieved through CLEP support. Essential capacity building was delivered to NIA, ARO and FIU and MIA. The Project carried out comprehensive work at the local level and with civil society to tackle the gaps in awareness and capacity in the regions.

In general, the agreed interventions and priorities in all key sectors (anti-corruption, anti-money laundering/combating the financing of terrorism and asset recovery) did not change, with only few necessary modifications being made to the Workplan taking into account some short-term capacity limitations of beneficiaries.

Considering the rather volatile institutional circumstances and the changes brought by the parliamentary elections yet to be gauged, CLEP kept striving to achieve results and sustainability. The scope and number of activities completed or underway serve as excellent basis for the next implementation period. The constructive engagement of the institutions involved in this initiative, if continued, should lead to concrete results in the targeted areas and eventually to sustainable changes in institutional practices. Overall, CLEP continues to be regarded by beneficiaries as a reliable project, providing timely and consistent inputs.

With 66 % of the Workplan implemented to date, and 6 additional actions (beyond the initial Workplan) carried out, CLEP has managed to make budgetary savings in multiple budget lines, due to well-negotiated agreements with service providers. This could lead to the opportunity to carry out additional activities, in a longer span of time, paving the way for more impact in the areas covered by the Project.

Ardita Abdiu



Head of Economic Crime and Cooperation Division
Action against Crime Department
Directorate General Human Rights and Rule of Law (DG I)

Date:

06/06/2019

ANNEXES

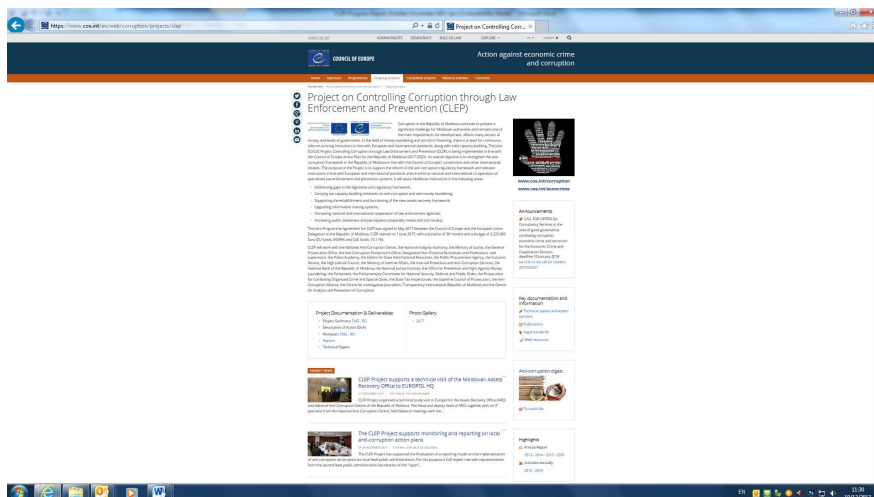
- Annex I Technical Papers (May 2018 – April 2019);
- Annex II Project website and visibility;
- Annex III Updated Logical Framework matrix;
- Annex IV WorkPlan May 2019 – May 2020.

Annex I. Technical Papers (May 2018 – April 2019)

1.	May 2018	Review of the Draft Methodological Manual for the application of AML/CFT measures by the DNFBPs (ECCD-CLEP-MLD-TP10-2018)
2.	June 2018	Analytical tools Needs Assessment of the anti-corruption bodies in the Republic of Moldova (ECCD-CLEP-MLD-TP11-2018)
3.	July 2018	Needs assessment of hardware, databases (including interoperability) of the anti-corruption bodies in the Republic of Moldova (ECCD-CLEP-MLD-TP12-2018)
4.	July 2018	Analytical Review of the existing anti-corruption inter-agency cooperation agreements (ECCD-CLEP-MLD-TP13-2018)
5.	August 2018	AML/CFT Strategy for the Republic of Moldova (ECCD-CLEP-MLD-TP14-2018)
6.	September 2018	Module on Integrity standards and practices for healthcare institutions and health professionals in the Republic of Moldova (ECCD-CLEP-MLD-TP15-2018)
7.	September 2018	Analytical review of the draft law on sanctions drafted by the Moldovan FIU (ECCD-CLEP-MLD-TP16-2018)
8.	September 2018	Technical Paper on anti-corruption compliance standards for the private sector in the Republic of Moldova (ECCD-CLEP-MLD-TP17-2018)
9.	October 2018	Technical Paper on Analytical Review of International cooperation MoUs (ECCD-CLEP-MLD-TP18-2018)
10.	October 2018	Technical paper on Corruption risk assessment methodology for the Internal Protection and Anti-Corruption Service (ECCD-CLEP-MLD-TP19-2018)
11.	November 2018	Technical Paper on the review of the Integrity Law from an effectiveness perspective (ECCD-CLEP-MLD-TP20-2018)
12.	February 2019	Technical Paper on the needs assessment of the Moldovan asset management office (ECCD-CLEP-MLD-TP1-2019)
13.	April 2019	Technical Paper on the analysis of Government Decision no. 134 on the gifts regime (ECCD-CLEP-MLD-TP2-2019)

Annex II. Project website and visibility

A snapshot of the website:



Samples of visibility materials produced by CLEP:



CLEP leaflet (I Year of Implementation):

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The Joint European Union/Council of Europe Project on Controlling Corruption through Law Enforcement and Prevention (CLEP) aims to strengthen the anti-corruption framework of the Republic of Moldova. CLEP is funded by the European Union and the Council of Europe and is implemented by the Council of Europe. The duration of CLEP is 36 months (1 June 2017 – 31 May 2020).

The Council of Europe is the continent's leading human rights organisation. It comprises 47 member states, 28 of which are members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

The Member States of the European Union have decided to link together their know-how, resources and destinies. Together, they have built a zone of stability, democracy and sustainable development whilst maintaining cultural diversity, tolerance and individual freedoms. The European Union is committed to sharing its achievements and its values with countries and peoples beyond its borders. The European Union and the Council of Europe have implemented successful joint programmes since 1993.

www.coe.int

<http://europa.eu>



CLEP

Controlling Corruption
through
Law Enforcement and Prevention



Funded by the European Union and the Council of Europe



Implemented by the Council of Europe

OVERVIEW

The Controlling Corruption through Law Enforcement and Prevention (CLEP) Project aims to strengthen the anti-corruption framework in the Republic of Moldova in line with the Council of Europe conventions and other international treaties. Building on the Council of Europe's experience in fighting corruption, money laundering and financing of terrorism, CLEP is providing targeted technical assistance in support of the reforms and the functioning of the relevant institutions, as well as the implementation of findings of Council of Europe monitoring mechanisms such as the Group of States against Corruption (GRECO) and the Committee of Experts on the Evaluation of Anti Money Laundering Measures and the Financing of Terrorism (MONEYVAL).

CLEP works with a wide variety of actors in carrying out specially tailored interventions

- National Anti-Corruption Centre;
- National Integrity Authority;
- Office for Prevention and Fight Against Money Laundering;
- General Prosecution Office;
- Anti-Corruption Prosecutor's Office;
- Prosecution for Combating Organized Crime and Special Cases;
- Ministry of Internal Affairs and its Internal Protection and Anti-Corruption Services;
- Ministry of Justice;
- Designated Non-Financial Businesses and Professions;
- National Institute of Justice;
- National Bank of Moldova;
- National Commission for Financial Markets; and
- Civil Society.

RESULTS TO DATE

CLEP's support to Moldovan authorities to improve the anti-corruption regulatory framework; reinforce national and international co-operation of specialised law enforcement and prevention systems; as well as anti-money laundering and asset recovery mechanisms has resulted in the following:

Standard operating procedures for the Asset Recovery Office and the National Integrity Authority developed.

Institutional Strategy and Action Plan of the Asset Recovery Office adopted.

Enhanced inter-agency coordination and cooperation between anti-corruption institutions.

Specialised training for the private sector on anti-money laundering on Politically Exposed Persons (PEPs) and Suspicious Transactions Reporting (STR).

Capacity building for 220 local public officials trained in monitoring and reporting implementation on anti-corruption action plans.

PLANNED INTERVENTIONS

CLEP's planned interventions are in respect of the following categories of support:

I. Expert Legal Reviews on:

- the practical implementation of the Integrity Law;
- design of the new National Strategy on anti-money laundering and counter terrorist financing;
- existing national and international agreements on information and data exchange.

II. Institutional Capacity Building for:

- the Asset Recovery Office on parallel financial investigations and asset management;
- judges and prosecutors on international cases, presentation of evidence and asset tracing;
- civil society and investigative journalists on money laundering and open source intelligence.

III. Specialised training for:

- judges and prosecutors on money laundering investigations;
- private sector and state owned enterprises on anti-corruption and anti-bribery.

IV. IT

- procurement and installation of hardware and software for government institutions.

Guideline on conflict of interest:



Controlling Corruption through Law Enforcement and Prevention (CLEP)



Selected pictures from events held during the reporting period:



III Working Group on the AML/CFT Strategy, August 2018



Presentation of the findings of the analytical review of national MoUs, October 2018



Covert Online Investigations Training, February 2019