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Version of 20 June 2019

Workplan for Horizontal Facility Phase II (Regional): Fighting Corruption, Economic Crime and Organised Crime

Implemented by: Economic Crime and Cooperation Division - DG I

Overall Objective	Objectively Verifiable indicators OVI(s)	Sources of verification	Assumptions	Total cost
Trust in rule of law and democracy in the Western Balkans (Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia) and Turkey	Level of compliance of legislation and institutional framework with CoE standards and recommendations of CoE evaluations Number of guidelines/recommendations and good practices produced by the Projects and implemented by authorities	GRECO and MONEYVAL evaluation and compliance/progress reports ICRG/FATF Reports EU Progress Report Project progress reports and final report Official statistics and annual reports of government institutions	Political stability in the participating countries and willingness of governments and authorities to suppress and prevent economic crime. Continued commitment of key beneficiaries and participating institutions, and continued political will from high-level government officials and political entities. The beneficiary institutions are provided with sufficient resources to consider and implement the recommendations and advisory material provided by the action. Willingness and capacity of the beneficiary institutions to revise and amend the legislative, regulatory, and policy framework, and to concretise recommendations and good practices generated through the action. Capacity, including technical and human, to ensure continued use of new tools, systems and methodologies after the project's completion.	675,000.00 EUR

Sector Objective: Anti-corruption	Objectively Verifiable indicators OVI(s)	Means of verification	Risks and Assumptions	Cost
Enhanced public procurement framework in the Western Balkans and Turkey	Indicator 1: Procurement corruption risk assessment conducted, risks identified, and recommendations for improvement and regional harmonization provided; Indicator 2: Authorities equipped with same guidance on good practices with managing corruption risks in procurement and contract oversight through workshops/conferences and written guidance; Indicator 3: Number of jurisdictions taking follow-up measures to address gaps in practices and % of CoE recommendations addressed.	GRECO reports European Commission reports, EU Annual Reports and reports of other relevant international organisations. Post-adoption review of legislation, regulations and policy documents.	Availability and responsiveness by all stakeholders and beneficiaries to participate in and contribute to the Action's activities; Willingness and readiness by all beneficiaries and stakeholders to apply the skills acquired through the Action.	

	Immediate Outcome		Inputs/Actions	Outputs	Beneficiary Institutions	Target groups	Means	Timeline labels
1.1	Regional Typologies and Corruption risks in public procurement system[s]	1.1.1	Regional Risk Assessment	Regional assessment of corruption risks in public procurement practices with recommendations for improvement	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Anti-corruption bodies Non-profit Organisations and Associations Private Sector supervisors (incl. DNFPBs) Representatives Customs and Border Authorities	Public procurement supervisors, policy-makers, anti-corruption specialists, ministerial representatives	Project team (HQ) STCx4 (including cost of international travel and per diems) Translation and interpretation (Albanian/BCS/MK/TR) Cost of multi-country risk assessment Cost of drafting and presenting risk assessment report Cost of accommodation, travel to participating countries to conduct assessment meetings with stakeholders Cost of stakeholder consultation meetings in [host country/HQ] Development and piloting of a Regional Risk Assessment methodology, comprised of national and cross-border analysis of threats, vulnerabilities and risks.	Planning and design; Methodology; Stakeholder Engagement; Risk assessment; Report drafting and review; Stakeholder Consultation
		1.1.2	Workshop to follow-up on recommendations of the Regional Risk Assessment	Guidelines on transposing assessment recommendations	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Anti-corruption bodies Non-profit Organisations and Associations Private Sector supervisors (incl. DNFPBs) Representatives Customs and Border Authorities	Public procurement supervisors, policy-makers, anti-corruption specialists, ministerial representatives	Project team (HQ) STCx4 (including cost of international travel and per diems) Translation and interpretation Cost of 3 day workshop in [host country] Present and discuss good practices with preparing policy documents, guidelines and training manuals on risk management methodologies, database procedures and risk-mitigation policies.	
		1.1.3	Country Pilot Actions to support the implementation of the recommendations from the Regional Risk Assessment	Available tools and guidelines on risk management and mitigation practices, including: - Legislative reviews - IT Assessment and Advisory Support - Trainings, workshops	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Anti-corruption bodies Non-profit Organisations and Associations Private Sector supervisors (incl. DNFPBs) Representatives Customs and Border Authorities	Public procurement supervisors, policy-makers, anti-corruption specialists, ministerial representatives	Project team (HQ) STCx4 (including cost of international travel and per diems) Up to 3 technical papers Translation and interpretation (Albanian/BCS/MK/TR)	
1.2	Prevention mechanisms during the execution of awarded public contracts	1.2.1	Develop guidelines on good practices relating to contract oversight.	Guidelines on public contract oversight.	Governments and Ministries State agencies and entities National FIUs Anti-corruption bodies	Public procurement supervisors, policy-makers, anti-corruption specialists, government entities	Project team (HQ) STCx2 (desk review) Up to 1 technical paper Translation and interpretation (Albanian/BCS/MK/TR)	
		1.2.3	Workshop on good practices with contract execution oversight and management of risks related to implementation of contracts.	Common understanding on public contract oversight and risk management.	Governments and Ministries State agencies and entities National FIUs Anti-corruption bodies	Public procurement supervisors, policy-makers, anti-corruption specialists, government entities	Project team (HQ) STCx3 (including cost of international travel and per diems) Translation and interpretation (Albanian/BCS/MK/TR) Cost of 1 workshop with expert participation and national presentations Outcome documents and reportss	

Sector Objective: AML/CFT	Objectively Verifiable indicators OVI(s)	Means of verification	Assumptions	Cost
Exchange of good practices on Transparency of Beneficial Ownership	Indicator 1: Authorities equipped with models and road-maps of good practices with transparency of beneficial ownership and cross-border exchange of data. Indicator 2: Jurisdictions provided with advice and skills development trainings on use of liability of legal entities in the context of abuse of corporate vehicles for committing economic crimes.	Official publications, statistics and communications from beneficiary institutions and national/local governments. MONEYVAL reports. EU Annual reports. Post-adoption review of legislation, regulations and policy documents.	Availability and responsiveness by all stakeholders and beneficiaries to participate in and contribute to the Action's activities; Willingness and readiness by all beneficiaries and stakeholders to apply the skills acquired through the Action.	

	Immediate Outcome		Inputs/Actions	Outputs	Beneficiary Institutions	Target groups	Means
2.1	Available Models and Road-Mapping on beneficial ownership registry regimes	2.1.1	Regional meetings to discuss and develop suitable models of transparency of beneficial ownership.	Inter-regional sharing of suitable models on transparency of beneficial ownership, + Proposals for procedures and processes regarding transparency of beneficial ownership by the respective jurisdictions.	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Business Registries BO Registries Central Banks Financial Police/Investigators Judiciary	Policy-makers, business registries and international cooperation specialists	Project team (HQ) STCx3 (including cost of international travel and per diems) Cost of 1 meeting (2 days) Up to 1 technical papers Translation and interpretation (Albanian/BCS/MK/TR)
		2.1.2	Conference on possible avenues of cross-border exchange of data.	Common challenges' and regional understanding on cross border exchange of data and possible cooperation venues, + Models on cross-border exchange of data provided at the event.	Governments and Ministries (MoFinance and MFA) National FIUs Financial Supervisors and Regulatory Authorities Business Registries Beneficial Ownership Registries Financial Police/Investigators Judiciary	Business registries and international cooperation specialists	Project team (HQ) STCx4 (including cost of international travel and per diems) Cost of 1 international conference (2 days) Translation and interpretation (Albanian/BCS/MK/TR)
2.2	Improved understanding and increased awareness on liability of legal entities	2.2.1	Workshops on good practices for the investigation and prosecution of legal entities for corruption and money laundering offences.	Capacity-building for investigators, prosecutors and judiciary on the law and practice of liability of legal persons.	Governments and Ministries National FIUs Anti-Corruption bodies Financial Supervisors and Regulatory Authorities Business Registries Central Banks Financial Police/Investigators Judiciary Private Sector representatives	Policy-makers	Project team (HQ) STCx3 (including cost of international travel and per diems) Cost of 1 workshop (3 days) Translation and interpretation (Albanian/BCS/MK/TR)
		2.2.2	Develop guidelines on anti-corruption, AML/CFT compliance measures and transparency rules relating to beneficial ownership, + Workshop for supervisory bodies on anti-corruption, AML/CFT compliance measures, and transparency rules relating to beneficial ownership	Policy guidelines for supervisory bodies on anti-corruption, AML/CFT compliance programs and transparency of beneficial ownership requirements, + Model compliance frameworks developed and delivered to the jurisdictions.	Governments and Ministries National FIUs Anti-Corruption bodies Financial Supervisors and Regulatory Authorities Central Banks Financial Police/Investigators Judiciary	Supervisory bodies	Project team (HQ) STCx2 (to draft and finalise publication) Up to 3 technical papers Translation and interpretation (Albanian/BCS/MK/TR)

Sector Objective: AML/CFT	Objectively Verifiable indicators OVI(s)	Means of verification	Risks and Assumptions	Cost
Improved capacities for the management of NPO (non-profit organisations) terrorism financing risks	Indicator 1: Regional/national NPO terrorist financing risk assessments conducted. Indicator 2: Follow-up measures taken by authorities to establish NPO oversight. Indicator 3: Investigative and other steps taken by authorities to look into NPO terrorist financing abuses.	Official publications, statistics and communications from beneficiary institutions and national/local governments. Project reports and reporting documents. MONEYVAL reports European Commission reports, EU annual Reports and reports of other relevant international organisations.	Availability and responsiveness by all stakeholders and beneficiaries to participate in and contribute to the Action's activities; Willingness and readiness by all beneficiaries and stakeholders to apply the skills acquired through the Action.	

	Immediate Outcome		Inputs/Actions	Outputs	Beneficiary Institutions	Target groups	Means	Timeline labels
3.1	Broadened understanding of the contemporary threats and vulnerabilities relating to terrorist financing through the NPO sector	3.1.1	Pilot actions: Regional- and/or national-level NPO-TF Risk Assessment	NPO-TF Risk Assessment/s and findings	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations and Associations Anti-terrorism bodies Central Banks Law enforcement/financial police	NPO sector supervisors and inspectors	Project team (HQ) STCx4 (including cost of international travel and per diems) Translation and interpretation (Albanian/BCS/MK/TR) Cost of multi-country NPO risk assessment Cost of drafting and presenting risk assessment report Cost of accommodation, travel to participating countries to conduct assessment meetings with stakeholders Cost of stakeholder consultation meetings in [host country/HQ]	Planning and design; Stakeholder Engagement; Risk assessment; Report drafting and review
		3.1.2	Regional meeting/s to support regional sharing of best practices to prevent the NPO sector from being misused for terrorist financing purposes.	Regional sharing of good practices: Regional Typologies	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations and Associations Anti-terrorism bodies Central Banks Law enforcement/financial police	Policy-makers, NPO sector supervisors and inspectors, NPOs and CSOs, law enforcement and CT agencies	Project team (HQ) STCx4 (including cost of international travel and per diems) Translation and interpretation Cost of 1 workshop (3 days) in [host country] Present and discuss good practices on typologies of terrorist financing through NPOs, and implementing effective risk management methodologies and risk-mitigation policies.	
3.2	Available tools on prevention and oversight of NPO terrorist financing	3.2.1	Advise on the development of an AML/CFT oversight framework for NPOs.	Recommendations for an AML/CFT oversight framework for NPOs	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations (and Associations) Anti-terrorism bodies Central Banks Law enforcement/financial police	NPOs and CSOs, NPO sector supervisors and inspectors	Project team (HQ) STCx3 (desk review; cost of international travel and per diems) Cost of 1 workshop (2 days) Up to 2 technical papers Translation and interpretation (Albanian/BCS/MK/TR)	
		3.2.2	Development of NPO AML/CFT supervision guidelines.	Guidelines on NPO AML/CFT supervision	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations and Associations Anti-terrorism bodies Central Banks Law enforcement/financial police	NPO sector supervisors and inspectors	Project team (HQ) STCx3 (desk review) Up to 2 technical papers Translation and interpretation (Albanian/BCS/MK/TR)	
		3.2.3	Workshop for supervisors, CSOs and NPOs on financial reporting and compliance with AML/CFT legislation	Enhanced financial reporting, transparency and compliance with AML/CFT legislation through synergies with supervisors of the NPO sector and CSO.	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations and Associations Anti-terrorism bodies Central Banks Law enforcement/financial police	NPOs and CSOs, NPO sector supervisors and inspectors	Project team (HQ) STCx3 (cost of international travel and per diems) Cost of 1 workshop (2 days) Translation and interpretation (Albanian/BCS/MK/TR)	
3.3	Increased capacities to investigate and prosecute terrorist financing through the NPO sector	3.3.1	Publication of guidelines for national authorities, law enforcement and judiciary on investigating and prosecuting the financing of terrorism through the NPO sector.	Guidelines on investigating and prosecuting the financing of terrorism through the NPO sector.	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations and Associations Anti-terrorism bodies Central Banks Law enforcement/financial police Prosecution services Judiciary	FIU, law enforcement, prosecutors & judges and sector-relevant institutions/entities	Project team (HQ) STCx4 (desk review) Up to 3 technical papers [investigation, prosecution, and adjudication, for instance Translation and interpretation (Albanian/BCS/MK/TR)	
		3.3.2	Workshop/s for law enforcement, prosecutors and judiciary on detecting and interrupting terrorism financing through the NPO sector.	Capacity building for detecting and interrupting terrorism financing through the NPO sector.	Governments and Ministries National FIUs Financial Supervisors and Regulatory Authorities Non-profit Organisations and Associations Anti-terrorism bodies Central Banks Law enforcement/financial police Prosecution services Judiciary	FIU, law enforcement, prosecutors & judges and sector-relevant institutions/entities	Project team (HQ) STCx3 (desk review; cost of international travel and per diems) Cost of 1 workshop (2 days) Translation and interpretation (Albanian/BCS/MK/TR)	

SC Meetings
Start-Up Conference
Inception Report
Annual Progress Report
Evaluation Process/Report
Final Conference and Reporting