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Planned | Postponed | Implemented | Cancelled

Start Activity s

Finalise Activity f

Version of 11 October 2019

Montenegro Workplan for Theme II: Fighting Corruption, Economic Crime and Organised Crime				Total cost
Implemented by: Economic Crime and Cooperation Division - DG I				
Overall Objective	**Objectively Verifiable indicators OVI(s)**	**Sources of verification**	**Assumptions**	
Trust in rule of law and democracy in Montenegro	**Legal and operational framework aligned with CoE and other international standards and good practices**	**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.**	**Continued political will to implement necessary reforms in economic crime area; Sufficient absorption capacities of beneficiary institutions.**	**700,000 EUR**

Sector Objective No. 8	Objectively Verifiable indicators OVI(s)	Sources of verification	Assumptions	Cost
SO 1 (TR 8) – Improved legal and operational framework on preventing and combating corruption	**Legal and operational framework aligned with CoE and other international standards and good practices 50 - At least 50% of recommendations on improvement of legal and operational frameworks adopted by the authorities.**	**GRECO evaluation and compliance reports; EU Progress Report; Official reports of relevant institutions; Action progress reports and final report.**	**Commitment of beneficiary institutions to the action expected result; Ability of beneficiary institutions to absorb action assistance; Constructive interagency participation and engagement in development of legislative proposals.**	

	Expected results	Inputs/Actions		Deliverables	Beneficiary Institutions	Target groups	Means	2019												2020												2021												2022				
								5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
1.1	**Oversight of political expenditure at the central and local level is operational**	1.1.1	Institutional and capacity building for Agency for Prevention of Corruption (APC) on inquiries of abuse of state resources in election campaigns.	- Methodology to conduct inquiries into potential abuses of state resources in elections - up to 2 trainings for APC on conducting administrative investigation of abuse of state resources in electoral purposes - up to 1 training for public institutions and enterprises on adequate use of resources in pre-electoral campaining - Methodology and training program for control of political party financial reports, collection and processing data on financial management of political entities during campaigns - up to 1 training of APC on implementation of off-site and on-site control of finanancial management of political entities	Agency for Prevention of Corruption (APC), public institutions, public enterprises, political entities	Agency for Prevention of Corruption (APC), public institutions, public enterprises, political entities	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Up to 3 technical papers – Cost of up to 4 workshops/seminars – Translation/interpretation							s									f																									
		1.1.2	Capacity building on reporting in-kind contributions and access to information on political funding	Guidelines for political entities on reporting on in-kind contributions - Up to 1 training for political entities on reporting on in-kind contributions - Assessment of transparency of political funding provided through track-record system of the APC - Guidelines for the APC on transparency of political funding information, third-party campaigning - Training for the APC on transparency of political funding information, third-party campaigning	APC, political entities,	APC, political entities,	– Project team – STC (incl. int. travel and per-diems) – Up to 3 technical papers – Cost of up to 2 workshops/seminars – Translation/interpretation											s											f																	

	Expected results	Inputs/Actions		Deliverables	Beneficiary Institutions	Target groups	Means	2019												2020												2021												2022				
								5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
1.2	**Poposals to strengthen lobbying regulatory and oversight framework available**	1.2.1.	Regulatory and operational framework on lobbying improved	Legal opinion on draft amendments of legislation regulating lobbying Legal opinion on draft sublegal acts regulating processing of cases of illegal lobbying	APC, Ministry of Justice		– Project team – STC (incl. int. travel and per-diems) – STC (local) – Up to 2 technical papers – Cost of up to 2 conferences/seminars – Translation/interpretation								s												f																						
		1.2.2.	Capacity and instituional building for executive power on ethics, conflict of interests and lobbying	-Guidelines on ethics, lobbying and conflict of interests for top executives - Training for top executive officials on ethics and integrity - Training for lobbyists on implementation of the the legal provisions - Training for lobbied persons on implementation of the new legislation -Training of police officers on ethics and integrity	APC, Government of Montenegro, Directorate of Police,	APC, Government of Montenegro, Directorate of Police, lobbyists, lobbied persons	– Project team – STC (incl. int. travel and per-diems) – Up to 2 technical papers – Cost of up to 4 conferences/seminars – Translation/interpretation																						s									f									

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	Sector Objective No. 14-15	Objectively Verifiable indicators OVI(s)	Means of verification	Assumptions		Cost	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	SO 2 (TR14-15) - Enhanced AML/CFT prevention mechanisms	**- National and sectorial risks assessed and mitigation measures introduced - Regulatory framework concerning the non-financial sector improved -- Capacity of law enforcement and criminal justice sector authorities to trace financial flows improved. - Operational procedures for management of seized assets developed in line with good comparative practices.**	**MONEYVAL evaluation and compliance reports; EU Progress Report; Official reports and statistics of relevant authorities; Action progress reports and final report.**	**Ability of beneficiary institutions to absorb action assistance; Active interagency participation in trainings and designing of methodologies.**																																									
2.1.	**Expected results**	**Inputs/Actions**	**Deliverables**	**Beneficiary Institutions**	**Target groups**	**Means**	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	Regulation governing non-financial supervision improved	2.1.1. Harmonised and reviewed legal framework (Primary and secondary) on supervision of non-financial instituions (Bar Association, Notary Chamber, Directorate for Games of Chance and Directorate for Inspection)	Assessment of the legal framework for supervision of DNFBPs Assistance for the working groups on amendments of relevant legisation	Ministry of Justice, Notary Chamber, Bar Association, Directorate for Games of Chance and Directorate for Inspection	Ministry of Justice, Notary Chamber, Bar Association, Directorate for Games of Chance and Directorate for Inspection	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Study/Technical Paper – Cost of up to 2 workshops/seminars – Cost of publication – Translation/interpretation					s				f																														
2.2.	**Expected results**	**Inputs/Actions**	**Deliverables**	**Beneficiary Institutions**	**Target groups**	**Means**	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	Online games of chance and ML/TF risks regulated	2.2.1. Recommendations on improved AML/CFT regulatory framework of online gambling entities	Assessment of the legal framework and recommendations for improvement Guidelines for risk-based supervision of gambling entities Training on tracing of financial flows through online gambling websites	Directorate for Games of Chance and Directorate for Inspection	Directorate for Games of Chance and Directorate for Inspection	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Study/Technical Paper – Cost of up to 2 workshops/seminars – Translation/interpretation					s								f																										
2.3	**Expected results**	**Inputs/Actions**	**Deliverables**	**Beneficiary Institutions**	**Target groups**	**Means**	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	Risk based supervision tools for high-risk non-financial sectors developed	2.3.1. Avaialble tools for sectoral risk assessments in high-risk DNFBPs as identified by the National Risk Assessment.	Developed sectoral risk assessments for real estate construction, lawyers, notaries,	Notary Chamber, Bar Association, Directorate for Games of Chance and Directorate for Inspection	Notary Chamber, Bar Association, Directorate for Games of Chance and Directorate for Inspection	– Project team – STC (incl. int. travel and per-diems) – Technical paperl – Cost of up to 4 workshops – Translation/interpretation								s				f																										
		2.3.2. Capacity building for high-risk DNFBP supervisors in conducting on and off-site inspections	2 trainings	Notary Chamber, Bar Association, Directorate for Games of Chance and Directorate for Inspection	Notary Chamber, Bar Association, Directorate for Games of Chance and Directorate for Inspection	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Technical paper/training material – Cost of up to 2 trainings – Translation/interpretation												s			f																						
2.4	**Expected results**	**Inputs/Actions**	**Deliverables**	**Beneficiary Institutions**	**Target groups**	**Means**	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	IT analytical capacities of the Financial Intelligence Unit strengthened	2.4.1 Available operational and IT solutions for FIU	Technical paper - design of software Development of software Purchase of the hardware Training for use of the software	FIU	FIU	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Up to 1 technical paper – Cost of up to 2 trainings – Cost of development of software – Translation/interpretation				s							f																										
2.5	**Expected results**	**Inputs/Actions**	**Deliverables**	**Beneficiary Institutions**	**Target groups**	**Means**	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	National ML/FT risks identified and mitigation measures introduced	2.5.1. Available analytical and operational support for AML/CFT National Risk Assessment (NRA) and mitigation Action Plan	Technical paper - recommendations for improvement of draft NRA;	FIU	FIU	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Technical Paper – Translation/interpretation						s	f																													
		2.5.2. Support provided to the inter-agency dialogue on development of the NRA and Action Plan	Workshop on finalization of NRA and Action plan	FIU	FIU	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Cost of up to 1 workshop – Translation/interpretation								f																											

2.6	Expected results	Inputs/Actions		Deliverables	Beneficiary Institutions	Target groups	Means	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
	FIU regulatory and operational framework built	2.6.1.	proposals for relevant legal and sublegal acts regulatings status of FIU in line with international standards available;	Legal opinion on the AML/CFT Law Legal opinion on LIRM Technical paper on mechanisms for implementation LIRM	FIU, MFA	FIU, MFA	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Up to 4 technical papers/guidelines – Cost of up to 4 workshops – Translation/interpretation			s						f																													
		2.6.2.	FIU staff trained on processing and forwarding obtained financial data	Trainings for use of analytical tools, processing and presentation of obtained information	FIU	FIU	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Cost of up to 2 workshops/seminars											s			f																							
		2.6.3.	Integrity and protection of data exchange ensured;	Guidelines on data exchange with other FIUs and with other state bodies Recommendations for strengthening of internal methodologies and procedures of work (internal procedures on analytics, international cooperation, suspicious transactions)	FIU	FIU	– Project team – STC (incl. int. travel and per-diems) – STC (local) – Technical Paper – Cost of 1 training – Translation/interpretation															s					f																	
		2.6.4.	Mapping of V round evaluation - roadmap	Assessment of preparedness for V round Drafting of the roadmap for V round	FIU	FIU	– Project team – STC (incl. int. travel and per-diems) – Technical paper – Cost of 2 workshops – Translation/interpretation										s					f																						
								5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
							SC Meetings																																					
							Start-Up Conference																																					
							Inception Report																																					
							Annual Progress Report																																					