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Analysis of the situation in the field of education of youth and the general public in terms of the dangers and negative impact of corruption in BiH

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Introduction

Citizens consider Bosnia and Herzegovina as highly corrupt state

According to the Transparency International Corruption Perceptions Index (TI) for 2019, Bosnia and Herzegovina ranks 101st out of 180 countries, with a score of 36 on a scale from 0 to 100, which is the worst score since 2012 since the Corruption Perception Index (CPI) is based on the existing methodology. This result shows the long-term stagnation and collapse of the democratic system.

BiH dropped 11 places compared to last year and together with Kosovo took the 101st position. Of the countries in the region, the best placed is Croatia, which still fell by three places and holds the 63rd position, Montenegro and Serbia received the same rating as in previous years and take the 66th and 91st position, respectively, and Northern Macedonia with 93. fell to 106th place and holds the worst position in the region. According to the report, irregularities in the conduct of elections, laws in the field of financing political parties and election campaigns contributed the most to such a large decline in BiH, which did not enable citizens the right to free and fair elections. BiH is thus one of the countries that, due to the constant increase of the most serious forms of political corruption, are not able to provide their citizens with basic human rights.

Similar results of the perception of corruption are in other, somewhat earlier research. The media in BiH, but also in the region, very often cited data from Gallup's research from 2018, in which 94 percent of citizens believe that BiH is an extremely corrupt country, as an example that depicts a bad social situation. Also, in the research of Media Initiatives among the young population¹, the vast majority, 76 percent of respondents, believe that BiH society is largely corrupt, 24 percent think it is partially corrupt while only 1 percent believe it is not. The results are a statistical confirmation of narrative responses where the majority of respondents stated that the state is corrupt in all segments, and even that corruption has become a way of life.

The perception of corruption is the personal impression of citizens on the situation in their country. So, although there are various variables, it is difficult to empirically measure the amount of corruption and the number of corrupt acts because it is a criminal activity that is done in secret. But the fact that a huge number of citizens think they live in a highly corrupt state is devastating for any society. They feel this on a series of their own examples and following the socio-political reality through the media. Essentially, the feeling of the population that all the levers of society are conditioned by various forms of corruption shows the necessity of action in the fight against this plague. It is particularly worrying that the setback is ongoing, although in the last five or six years the international community has been investing significant funds and supporting project activities of both public and non-governmental organizations to raise awareness of the harmfulness of corruption and the fight against corruption.

¹ YOUTH AND ATTITUDES TOWARD CORRUPTION, Media Initiatives (2017)
<https://mediaplaninstitut.files.wordpress.com/2017/06/analiza-mladi-i-korupcija.pdf>

Great influence of political parties and organized crime on the judiciary ² requires priority action. Unfortunately, according to a report by Transparency International, the initiative of civil society organizations to conduct detailed vetting of all judicial office holders was ignored. In their opinion, this is also part of the broader problem of the lack of implementation of the EU Strategy for the Western Balkans.

One of the major obstacles to fighting corruption in Eastern Europe and Central Asia is the *captive state*, where powerful individuals or groups have taken control of government decision-making and used corruption as means of circumventing justice.

The possibility of ethnic veto in such conditions hinders numerous processes, including the fight against corruption, because in the behavior of political factors, but also in the perception of citizens, "**yours**" and "**ours**" appear, both political advocates and "protectors" of national interests and in areas culture, science, sports, and even crime. The channel of captivity connects political parties, economic entities and the judiciary, either for direct economic reasons or to stay in power, which also has a strong economic generation.³

In the research of Media Initiatives ⁴ by surveying the question in *which sector in your opinion is the most corruption*, by far the most - 78 percent of the answers, were given to *political relations*. As it can be seen in the open answers, the respondents mean from employment in public services on a party basis, all the way to the activity of politicians in various criminal activities in all spheres of the state.

In later research of the same organization through in-depth interviews ⁵ with representatives of the NGO sector, journalists and local authorities, one of the indicative indicators is that there is a great desire to combat corruption, but also that journalists and representatives of the NGO sector believe that the government, with its illegal actions and conscious lack of desire to act (in cooperation with the persecution) is a key lever of corruption. On the other hand, representatives of local authorities claim that corruption occurs at higher levels and not in their communities or that even if something happens, they are not in a position to know or do something about it.

All interlocutors agreed that Bosnia and Herzegovina is a deeply corrupt state. Most local officials and officials believe that corruption is much more prevalent at higher levels of government. However, interlocutors from the NGO sector and the media, as well as the results of some research conducted in BiH, claim that local authorities are most susceptible to corruption, because they are much closer to ordinary citizens.

Most of the interviewees believe that corruption is most present in the sphere of employment, primarily politically generated, as well as public procurement (tenders). However, everyone pointed out that there is no social area, not even the level of government, where there is no corruption.

²<https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/bosnia-and-herzegovina/>

³ Research report: ELEMENTS OF CORRUPTION AT THE LOCAL LEVEL AND POSSIBILITIES OF PREVENTION, Media Initiatives (2019) <https://mediaplaninstitut.files.wordpress.com/2019/03/izviestaj.pdf>

⁴ YOUTH AND ATTITUDES TOWARD CORRUPTION, Media Initiatives (2017) <https://mediaplaninstitut.files.wordpress.com/2017/06/analiza-mladi-i-korupcija.pdf>

⁵ Research report: ELEMENTS OF CORRUPTION AT THE LOCAL LEVEL AND POSSIBILITIES OF PREVENTION, Media Initiatives (2019) <https://mediaplaninstitut.files.wordpress.com/2019/03/izviestaj.pdf>

Bosnia and Herzegovina has a solid legal framework for the fight against corruption, but it, like legislation in other segments of society and the economy, is not implemented due to the complexity (division) of the state, politicization, but also the fear of retaliation. Even at the local level, even if there are internal procedures in local self-government units (LGUs) for reporting irregularities, citizens do not use it, the interviewed local officials stated.

Representatives of non-governmental organizations and media believe that the **basis of corruption in BiH is the connection between politics, ie political parties and public companies, and an inefficient judicial system**. All interviewees pointed out that there is no doubt that corruption is politically generated and politically motivated. Many have expressed doubts that it is possible in such social circumstances of partocracy and political (and even ethnic) attachment through all spheres of life, to effectively defeat corruption. The interlocutors are in favor of breaking up such a public (state) structure, but also state that people in political and public economic positions are bound and protect each other.

A special problem in BiH is the belief that can be seen through research, various appearances at conferences dealing with social issues, but also in informal conversations with citizens, that the **judiciary is not independent and that its main actors are politically appointed, although there are procedures and bodies that should make this impossible**. Every day in public discourse it is heard that prosecutors work poorly, that cases are "stacked in drawers", that politics protects its highest actors and that indictments for corrupt crimes are often politically motivated for the sake of political reckoning, and not the interest of the community to punish those responsible and combat corruption.

Unfortunately, most of the interlocutors in the mentioned research do not have concrete solutions on how this political and even criminogenic connection can be broken. Some emphasize the necessity of social connection and mobilization of citizens. There are also examples from some parts of BiH where individuals have left the "system", and scandals have come to the light, but fears have been expressed that the fight against corruption at the local level could be stopped by the higher levels.

However, one of the interlocutors for this analysis, **Marko Antonio Brkić**, head of the Office for Quality of the University of Herzegovina, which also deals with issues of corruption in education, believes that the problems with which it is auctioned in public are the consequences, not the cause of corruption.

„The biggest obstacle towards corruption is ethical insensitivity - lack of moral awareness. **Political immorality and divisions in BiH are mostly consequences, not the cause of the emergence and dominance of corruption in society**. The reason is that in our country corruption is traditionally 'understood' and 'accepted' as inevitable. **Awareness of ethical principles, of moral education, of standards of common values - is lacking**. And one of the key reasons why it is missing is that awareness is relativized. Unacceptable actions can be eliminated if the built consciousness – for the beginning - would determine social actions. Awareness development is a systematic process, and in order to achieve it well, it would have to be accompanied by political and social will that directs all available resources to the same goal, "said Marko Antonio Brkić.

Social consciousness, and thus morality, is built. The basis is family upbringing where children are passed on different attitudes, beliefs, knowledge and skills. What has been "built in" since childhood, sociological and psychological research shows, will be completely changed only in a small number of cases. Integrity in the family environment should be developed and understood in accordance with current social contexts. Also, **integrity should be developed systemically and through education and media discourse, because for decades, and especially in the age of digitalization where we are online most of our waking life, the media "shapes" us.** Even when we are educated enough to evaluate different contents, that is, have media literacy. **The non-governmental sector, which has become an institution in transition countries, is a corrective of the government and its activities help in educational processes and a significant source of information to the media.**

Research methodology

Citizens' awareness of the dangers and negative impacts of corruption on the lives of citizens is one of the key elements in the process of raising citizens' readiness to oppose corruption and they must be informed and educated about these issues. Among other ways, primarily systemic education, education can be conducted in the educational process, through the activities of civil society organizations (CSOs) and through media programs, primarily public broadcasters, building programs concerning the public interest and the so-called socially responsible topics.

Therefore, these three segments of society - systemic education (at the level of primary and secondary education), media production and the activities of the non-governmental sector are the focus of this analysis. Their proper and professional work is the driving force of every society, and the applicability of the proposed solutions is the basis for change. And all that returns in the long run to the early phase of family upbringing, which is the foundation of "morality".

The analysis was predominantly made by analyzing the content of documents (laws, strategies, research studies on corruption in BiH, media content and media perceptions of the public, engagement of the NGO sector; curricula and manuals from the educational process; public reports of anti-corruption institutions, which can be obtained on request or posted on the website).

For the purposes of this report, a survey was conducted using a survey with closed and open answers sent to anti-corruption bodies in BiH (13), entity and cantonal ministries of education in BiH (13), pedagogical institutes in BiH (9) and radio and TV editorial offices of public services in BiH (6).

The combination of collected data created three key segments of the report - Education, NGOs, Media, all in the light of anti-corruption activities, which are presented informatively with empirical data and explanations of the context in BiH. Behind each of the thematic segments are conclusions with recommendations that can serve as a guide in further activities in the field of combating corruption through educational, organizational and communication (media) activities.

SYSTEMIC EDUCATION ON INTEGRITY AND CORRUPTION IN BIH

Institutional structure of education in Bosnia and Herzegovina

Due to the complexity of the state system of Bosnia and Herzegovina, the education system in BiH is almost completely decentralized⁶. According to the Dayton Peace Agreement, education is the responsibility of the entities / cantons or counties. According to Article III.3.a of the Constitution of Bosnia and Herzegovina⁷ all competencies and functions, which are not explicitly assigned to Bosnia and Herzegovina and its institutions, fall within the competence of the entities, which is the case with education. The education system is under the full and undivided jurisdiction of the Republika Srpska entity, ten cantons in the Federation of Bosnia and Herzegovina entity and the Brčko District of Bosnia and Herzegovina. Each of the twelve units has a ministry of education, education laws, the education budget, determines education and textbook policy, as well as all other rights and obligations arising from the mandate of the competent education authority, responsible for the organization and functioning of education in its area of responsibility. At the level of the Federation of Bosnia and Herzegovina, the Federal Ministry of Education and Science performs the role of coordination of the Ministers of Education and Science in the Federation of BiH.

Table with an overview of the main functions of education by levels of government⁸:

Functions by levels	State	RS/Brčko district	Federation	Canton
Creating and coordinating educational policy	Development of framework laws and a common core curriculum for primary and secondary education	Drafting laws for primary and secondary education in line with the framework law. Law drafting and strategy for higher education	Coordination of drafting laws for primary, secondary and higher education	Drafting laws for primary and secondary education in line with the framework law. Law drafting and strategy for higher education
Curriculum development (NPP)	Development of a common core curriculum	Development of a school curriculum in accordance with the common core	Coordination of school curriculum development	Development of a school curriculum in accordance with the common core

Education in Bosnia and Herzegovina is organized into four basic levels:

- Preschool education
- Elementary education
- Secondary education
- Higher Education

⁶ A decentralized education system is not necessarily negative; The US as well as some countries in the region also have this kind of education system.

⁷ BiH Constitution http://www.mvp.gov.ba/dobro_dosli_u_bih/drzavno_uredjenje/ustav_bih/?id=261

⁸ Excerpt from the table of main functions. Functional Review of Public Administration in the Education Sector in Bosnia and Herzegovina: Final Report. IBF International Consulting and the British Council, Sarajevo, 2005. p.45.

Ministry of Civil Affairs of Bosnia and Herzegovina ⁹ as the body responsible for performing assignments and tasks within the competence of Bosnia and Herzegovina, initiated the adoption of four framework laws and one special in the field of education, namely:

- Framework Law on Preschool Education in Bosnia and Herzegovina,
- Framework Law on Primary and Secondary Education in Bosnia and Herzegovina,
- Framework Law on Secondary Vocational Education and Training in Bosnia and Herzegovina,
- Framework Law on Higher Education in Bosnia and Herzegovina, as well as
- Law on the Agency for Preschool, Primary and Secondary Education.

The adoption of these laws in Bosnia and Herzegovina has created the necessary legislative framework for the implementation of education reform, but also created an opportunity to harmonize this area with the standards and criteria that apply in the Member States of the European Union.

At the level of Bosnia and Herzegovina, three education agencies have been established: the Agency for Preschool, Primary and Secondary Education (established by the Law on the Agency for Preschool, Primary and Secondary Education), the Agency for Higher Education Development and Quality Assurance, and the Center for Information and Document Recognition in the field of higher education (established by the Framework Law on Higher Education in Bosnia and Herzegovina).

In addition to agencies at the level of Bosnia and Herzegovina, entity and cantonal ministries, there are nine pedagogical institutes / institutes for education (one in the Republika Srpska, two in the Herzegovina-Neretva Canton and one each in the Sarajevo Canton, Tuzla, Zenica-Doboj, Una-Sana , Bosnian-Podrinje Canton of Goražde and Brčko District of BiH), which have the competence for professional monitoring of educational institutions, also including the development of curricula, affirmation of new approaches and methods in the educational process, organizing training of teachers and school principals and performing other activities within its jurisdiction.

In the Republika Srpska, the Institute for Adult Education and the Agency for Accreditation of Higher Education Institutions of the Republika Srpska have been established.

As part of the institutional framework, advisory bodies in the field of education have also been established:

- Conference of Ministers of Education in Bosnia and Herzegovina;
- Rectors' Conference of Bosnia and Herzegovina and
- Council for General Education in Bosnia and Herzegovina.

⁹Until 2002, the Ministry of Civil Affairs of Bosnia and Herzegovina and the Ministry of Communications and Transportation of Bosnia and Herzegovina operated as the Ministry of Civil Affairs and Communications of Bosnia and Herzegovina. Following the 2002 general elections in Bosnia and Herzegovina, the two ministries began operating separately.

Strategic framework

In the field of education, Bosnia and Herzegovina has adopted a number of strategies that define different levels of education, among which we highlight the most important strategic documents:

Strategic directions for the development of preschool education in Bosnia and Herzegovina, which is also the first strategic document for this type of education in Bosnia and Herzegovina:

- Strategy for the development of secondary vocational education and training for the period 2007-2013;
- National Action Plan for the Recognition of Qualifications in Bosnia and Herzegovina,
- Basics of the qualification framework in Bosnia and Herzegovina;
- Strategic Platform for the Development of Adult Education in the Context of Lifelong Learning in Bosnia and Herzegovina, for the period 2014-2020;
- Principles and standards in the field of adult education in Bosnia and Herzegovina (2014);
- Learning Strategy on Entrepreneurship in Education Systems in Bosnia and Herzegovina in the period 2012-2015;
- Action Plan for the development and implementation of the Qualifications Framework in Bosnia and Herzegovina for the period 2014-2020;
- Priorities for the development of higher education in Bosnia and Herzegovina for the period 2016-2026.
- Platform for the development of preschool education in BiH for the period 2017 - 2022.
- Seven strategic documents for further implementation of the Bologna Process in Bosnia and Herzegovina:
- Recommendations for the implementation of quality assurance in higher education in Bosnia and Herzegovina;
- Implementation of the framework of higher education qualifications in Bosnia and Herzegovina;
- Standards and guidelines for quality assurance in higher education in Bosnia and Herzegovina;
- Framework for higher education qualifications in Bosnia and Herzegovina;
- Diploma Supplement Model for Bosnia and Herzegovina;
- User manual for the Diploma Supplement Model and
- Strategic directions of education development in Bosnia and Herzegovina with the implementation plan 2008-2015.

In addition to the above strategic documents, the Agency for Preschool, Primary and Secondary Education as an independent administrative organization in the field of preschool, primary and secondary education, established at the level of institutions of Bosnia and Herzegovina¹⁰, drafted a document that is crucial for anti-corruption education - **Common Core** defined on learning outcomes as part of the reform process of improving the quality of education, in accordance with

¹⁰<https://aposo.gov.ba/bs/o-agenciji/>

the Law on the Agency, the Agency's Strategic Plan, framework laws on education and strategic directions of education in BiH¹¹.

This document includes the Common Core of Comprehensive Development Programs for Preschool Education, the Common Core Curriculum Defined on Learning Outcomes (LPPP) for eight educational areas, and the Guidelines for the Implementation of the Common Core in Curricula Defined on Learning Outcomes and Guidelines for the implementation of the LPPP for the cross-curricular and cross-curricular area defined on learning outcomes. After the transition to a nine-year system of primary education throughout Bosnia and Herzegovina and the analysis of curricula, there was a need for improvement in terms of focusing on learning outcomes, as well as harmonization with European standards.¹²

The common core defined on the learning outcomes is a fundamental document that determines the direction of development of educational systems in Bosnia and Herzegovina, from the preschool level to the completion of secondary education. Precisely this document in the part of the Cross-Curricular and Interdisciplinary Area is focused on the development of typical cross-curricular competencies: social and civic competencies, as well as self-initiative and entrepreneurial competencies. It includes three basic ones: **career orientation, anti-corruption and entrepreneurship**. The cross-follicular area with its wholes is characterized more than the others by the following elements:

The objectives of this area cannot be related to only one subject, but require curriculum linkage and interdisciplinary connection:

- Promote teamwork and access to cross-curricular content and cross-curricular teachers;
- They refer to key competencies that by themselves cannot be related to only one subject.¹³

Curricula in Bosnia and Herzegovina

There are three curricula in Bosnia and Herzegovina - Curriculum for primary schools in the Republika Srpska, the Framework Curriculum of the Federation of BiH, and the Curriculum for teaching in the Croatian language. Three different curricula are the result of legally prescribed competencies within education - in the RS, education is at the entity level and is managed by the line ministry through the Republic Pedagogical Institute of the RS. In the Federation of BiH, education is the responsibility of the cantons. The Institute for Education from Mostar takes care of all schools that work according to the curriculum for teaching in the Croatian language, and the cantons in which Bosniaks are the majority use the Framework Curriculum of FBiH which is adjusted, changed and supplemented.

The curriculum in the form of a single document does not exist - it is more a sum of subject syllables, the contents are repeated and overlapped within the same or more subjects during

¹¹<https://aposo.gov.ba/hr/publikacije/zajednicka-jezgra-definirana-na-ishodima-ucenja/>

¹² Common core defined on learning outcomes in Bosnia and Herzegovina: common core of complete development programs for preschool education: common core curricula for education in primary and secondary schools / [editor Marija Naletilić]. - Mostar: Agency for Preschool, Primary and Secondary Education, 2018, p. 5

¹³ Guidelines for the implementation of the LPPP for the cross-curricular and cross-curricular area; <https://aposo.gov.ba/sadrzaj/uploads/Smjernice-za-kroskurukularno-2.pdf>, p. 8

several grades, or the entire educational cycle, the curriculum language is administrative and formal, and the curriculum itself is not designed so encourages problem solving and deeper study of content. It is characterized by extensiveness and a superficial approach to the subjects of study, requiring children to move from one content to another without deeper analysis, according to the expert analysis of the project "Transparency Curriculum, Accountability Curriculum". Textbook policy is not the same either - in the RS, textbooks are published by the Institute for Textbooks and Teaching Aids and there is only one textbook for one subject in the entire Republika Srpska, while in the Federation of BiH some subjects have more proposed textbooks and the teachers can recommend one to use.

The situation is further complicated by the competition procedure for selecting textbooks. The most complex situation is with textbooks used in schools where classes are conducted according to the Framework Curriculum of the Federation of BiH. The Federal Ministry of Education and Science is announcing a competition for the selection of textbooks. Publishers with encrypted manuscripts apply for the competition. Publishers also pay a five-member textbook review team that, in accordance with the prescribed form that is the same for textbooks in all subjects, evaluates the submitted manuscripts, ranks them and in accordance with applicable policy, approves the number of textbooks that can be used in teaching.¹⁴

When it comes to the Federation of BiH, special problems occur in the so-called. mixed (ethnic - Bosniaks and Croats) cantons (SBK and HNK). In this context, a very complex problem is the emergence of the so-called "Two schools under one roof." In addition, the curricula have different contents, which makes it difficult for possible transitions from school to school, and students are forced to take differences in subjects. In schools where classes are taught in Croatian, teachers can choose textbooks offered by several publishers. Part of the textbooks was created for the needs of primary schools in Croatia, and in the BiH edition they are adapted to the current curriculum. Competence for the adoption of curricula is prescribed in the framework laws on education, especially for primary and secondary education, and with a special framework law for higher education.

Institutional approach to anti-corruption education

FBiH

There are no elements of anti-corruption education in the framework curriculum for nine-year primary education. No elements of content related to this topic were noticed in the cantonal curricula. Curricula for grades 6-9 of primary schools in Sarajevo Canton, Tuzla Canton and curricula available through the Institute for Education in Mostar were analyzed.

In the curriculum for high schools in Sarajevo Canton, in the subject Culture of Religions, for the second grade, in Part III Ethics - Moral Charity and Religion, training on the topic: Introduction - Ethics and Religion where Bribery is Mentioned.

In the Croatian language curriculum for Gymnasium schools in Bosnia and Herzegovina, anti-corruption education can be seen in three places:

¹⁴<https://boljadrzava.org/reforma-sektora-obrazovanja/>

In the field of social sciences and humanities, the learning outcomes state in Chapter VI Political System, Citizens and Human Rights that students will discuss and explain why bribery (corruption) is harmful to society.

In the curriculum of Catholic religious education for the third grade, in the third thematic unit Love for God and neighbor - the foundations of Christian morality in the fourth curriculum Evil and sin, the proposals for methodological processing state which cannot be agreed); look for examples of attempts to shift the blame to another or to society; selected (dia) films to show the impact of evil and the spread of evil in the world (violence, negligence, corruption...) "

In the curriculum of Catholic religious education for the fourth grade, in the third thematic unit Human Work and Creativity in the fourth teaching topic Business Ethics, it is stated in the proposals for methodical processing "to analyze the causes and consequences of corruption; analyze the reasons for recognizing the necessity of ethics in the economy (and politics); find an ethical code of economic conduct on the Internet; inquire about Christian organizations that promote a fair exchange of goods between the so-called. Third and First World; collect data and make a presentation about illegal workers from the poorer parts of our environment and the desirable Christian attitude towards them; look for seminar programs in meeting houses and question them with regard to the topic of ethics in economics and politics; visit the Center for Social Doctrine of the Church and inquire about the areas of its activity; inquire about the goals, projects and mode of operation of Croatian Caritas. "

There are no elements of anti-corruption education in the Democracy and Human Rights curricula.

Thus, the topic of corruption, "in traces", is mainly found in religious topics and debates, which shows the traditionalism of the education system and maladaptation to the current social context.

Republika Srpska

There are no elements of anti-corruption education in the national curriculum for primary education and upbringing. The analysis of curricula showed only one place training on ethics in the part - **Curriculum for Orthodox religious education** (Module 2 - technical schools - four-year education), subject Orthodox religious education, as an optional subject, education on: Ethics .

There are no particularly prominent elements of anti-corruption education in the secondary school curriculum. However, the following elements related to the training of students on the topic of ethics have been identified in the curricula:

In the curriculum for the subject of history; direction: sociolinguistic and general; fourth grade, in the topic: 4. The Yugoslav Kingdom from 1918 to 1941, in part the terms mention, among others, corruption, agrarian reform, general suffrage, centralism, etc.

In the curriculum for the first grade of all directions, within the subject Islamic religious education, in the topic: The path to man, the terms morality, ethics, good, evil, repentance were noticed.

In the curriculum for the third grade of high school (natural sciences and mathematics), in the curriculum of the subject History, in the topic World between the two world wars, in the section Concepts, corruption is treated as a concept.

In the curriculum for the fourth grade of high school in the thematic area I - Sociology, Topic IV: Culture and Society, the training of the concept of ethics - philosophy of morality was noticed, as well as the training on the topic of Socrates' ethics. The part of the training on the topic of Philosophy of the New Age includes the topic of German classical idealism - it answers three questions: (1) "What can I know" - "Critique of the pure mind"; (2) "What should I do?" - "Critique of the practical mind" (Ethics) as well as "Critique of the practical mind" or "Ethics" - based on free will ", and the highest moral law is a categorical imperative.

In addition to the above, it is important to note that the Curricula for secondary schools for the professions: Forestry and wood processing; Agriculture and Food Processing; Geology, mining and metallurgy; Mechanical engineering and metalworking; Electrical engineering; Chemistry, non-metals and graphics; Textiles and leather; Traffic; Catering and Tourism; Economics, law and trade; Health care; Other activities include the subject Ethics. By the way, students choose between Religious Education and Culture of Religion in the first grade of high school. Both subjects indirectly contain elements of ethics, and based on the claims of teachers at various conferences on the fight against corruption, the modality and intensity of processing ethics depends on the person who teaches, which is another proof that systematically and methodologically this area is not fully regulated.

In case the student has chosen Religious Education, he / she studies it for four years. If he did not choose Religious Education, then in the first and second grade he studies the Culture of Religions, and in the third and fourth grade Ethics.

Obligations defined in strategies and action plans and their fulfillment

FBIH

Anti-corruption strategy 2016-2019. The Federation of BiH envisages the development and introduction of ethics and integrity programs in educational institutions. These measures are formally, automatically taken over from **APIK**¹⁵ **strategies, without considering the actual competencies and possibilities of implementation.** Namely, the development of curricula, and thus the development, introduction and implementation of curricula of ethics and integrity in educational institutions in the Federation of BiH is in the exclusive competence of the cantonal levels of government (the Constitution of the Federation of BiH gives education and science to the cantons). . Therefore, the Anti-Corruption Team of the Government of the Federation of BiH is already in the Action Plan for the implementation of the Strategy 2016-2019. notes that this activity is not within its competence and that it is unenforceable:

“Act No. 06-38-8-3660 / 17 dated 14 September 2017. The Anti-Corruption Team was informed about the following: Regarding the development of a harmonized plan and program of ethics and integrity for application in educational institutions in the Federation of BiH, ie coordination of activities on introduction of a harmonized plan and program of ethics and integrity for application in educational institutions in the Federation of BiH. The curriculum for a nine-year primary school in the Federation of BiH does not provide for the study of this topic within a special subject. As

¹⁵APIK

an independent subject, Ethics exists in secondary schools where the curriculum in the Croatian language is implemented, as an alternative subject to religious education.”

Anti-Corruption Strategy and Action Plan 2016-2019. The Federation of BiH also envisages measure 1.5.3.2. - *Develop a Program of Measures to Combat Corruption in Higher Education in the Federation of Bosnia and Herzegovina*. This measure has been implemented.

“In 2012, the Federal Ministry of Education and Science developed a 'Program of Measures for the Prevention of Corruption in Higher Education in the Federation of Bosnia and Herzegovina: Transparency, Legality and Compliance with Procedures for Better Higher Education', which contains 66 specific measures implemented by the Ministry of Education. and cantonal), higher education institutions, student organizations, state audit, cantonal courts, the Agency for Development of Higher Education and Quality Assurance of BiH. In addition to the measures themselves, the document also presents guidelines that would be a guide for good practice "- said the Federal Ministry of Education and Science (FMON) at the request of the author of this analysis.

"In addition to the above, it is important to state that the Federal Ministry of Education and Science, as an internal act, has developed a General Anti-Corruption Plan, in accordance with the objectives and measures contained in the Action Plan for Implementing the Anti-Corruption Strategy BiH 2009-2014" - states the Federal Ministry of Education.

Republika Srpska

Action plan for the implementation of the anti-corruption strategy in the Republic of Srpska 2018-2022. within the strategic goal "Raising the awareness of citizens and the public" envisages measure 5.1.6. - Implement trainings and lectures for employees, pupils and students on the manner, means, legal and institutional framework for the fight against corruption, as well as developing awareness of corruption, its harmfulness and the need to fight corruption in educational institutions of different levels of education in order to build proper basics for future generations.

According to the Action Plan, the implementation of this measure is the responsibility of the RS Ministry of Education and Culture, the RS Ministry of Justice, the RS Ministry of the Interior and non-governmental organizations, and as indicators of implementation it is stated:

- A plan and program of anti-corruption trainings in educational institutions has been developed
- A Number of educational institutions in which trainings were implemented
- Anti-corruption education in the school system of Republika Srpska with the aim of reducing corruption in the education sector introduced

The latest publicly available data on the implementation of the anti-corruption strategy of the Republic of Srpska dates from November 2017 and refers to the Information on the implementation of the Anti-Corruption Strategy 2013-2017.¹⁶ There is no information in this document related to the introduction of anti-corruption education. The Ministry of Justice of the

¹⁶Information on the implementation of the Anti-Corruption Strategy in the Republic of Srpska 2013-2017, Government of the Republic of Srpska, link: <https://e-vijecenarodars.net/wp-content/uploads/2018/03/Informacija-o-realizaciji-Strategije-za-borbu-protiv-korupcije-2013-2017.pdf>

Republika Srpska, which is functionally in charge of the implementation of the Action Plan for the implementation of the anti-corruption strategy in the Republika Srpska 2018-2022, did not respond to the survey questionnaire. The Ministry of Education and Culture of the Republika Srpska did not answer the questions asked by the authors of this analysis whether it has developed a program of ethics, integrity and anti-corruption training in educational institutions, whether some form of anti-corruption education has been introduced in the school system.

The answers to the questionnaire were sent by the Republic Pedagogical Institute of the Republic of Srpska. They confirmed that they had recommended a training program for students in the field of ethics, integrity and corruption prevention and that it was carried out as an extracurricular activity within the projects (but it is not stated which ones). Also, the survey states that they are familiar with the curricula "Ethics and anti-corruption" developed by the Infohouse association, but that they have not recommended it to schools in the RS. No reason is given.

Cantonal level

The general framework for the fight against corruption in BiH is defined by APIK strategies and action plans, so almost all measures envisaged at the BiH level, including measures related to the introduction of ethics and integrity programs in educational institutions, are automatically lowered to the cantonal level. Most cantonal strategies and action plans for the fight against corruption have a defined strategic goal "Development, introduction and harmonization of programs of ethics and integrity in the educational process."

Concrete action measures for the realization of this strategic goal vary in shades from canton to canton, but all are essentially reduced to three key activities:

- Conducting research with the aim of determining the basis for the development of adequate programs of ethics and integrity
- Development of adequate programs of ethics and integrity in all educational institutions with the aim of strengthening the moral values of society
- Introduction of adequate programs in the field of ethics and integrity in educational institutions with the aim of strengthening moral values

The institutions responsible for the direct implementation of these measures are the cantonal ministries of education, and indirectly the cantonal anti-corruption teams as the bodies functionally responsible for coordinating, implementing and monitoring the implementation of anti-corruption strategies and action plans as a whole.

The authors of this analysis conducted a survey of cantonal ministries of education and pedagogical institutes and a survey of cantonal anti-corruption teams in order to determine the position of this topic of education and general familiarity of ministries with existing curriculum.

The results of the survey as a whole show:

- - Most cantonal ministries state that a training program on ethics, integrity and corruption has been introduced in the education system, mainly through classes of the departmental

community and the subject Democracy and Human Rights, but generally do not provide exact data on the number of schools, number of classes, and by whom. the anti-corruption program is implemented in the program / curriculum

- Most cantonal anti-corruption bodies have not carried out activities related to the introduction of ethics, integrity and anti-corruption programs in the education system, and as the most common reasons they state that they are not a professional body, that they do not have capacity, and that the initiative should come from higher authorities.

Canton Sarajevo

Anti-Corruption Strategy of Sarajevo Canton 2018 - 2019¹⁷. and the Action Plan for its implementation do not envisage measures in the field of anti-corruption education. The Office for the Fight against Corruption and Quality Management, which is the competent body for the implementation of anti-corruption measures in KS, did not answer the question whether it implemented measures related to the introduction of ethics and integrity programs in the education system and whether they would be ready for more intensive conducting additional activities for the introduction and implementation of training / curricula in the field of ethics and integrity in primary and secondary schools.

In response to the survey for the purposes of this analysis, the Educational and Pedagogical Institute of Sarajevo Canton states that through the Ministry of Education, Science and Youth of Sarajevo Canton they recommended the introduction of ethics, integrity and anti-corruption programs in the education system through Pilot projects, and it was implemented in class through project activities.

The Educational and Pedagogical Institute of KS states that it is familiar with the existence of the curriculum and manual "Ethics and Anti-Corruption" for primary and secondary school students, which were developed by the Infohouse Association, but it is not implemented in primary and secondary schools. **When asked about the reasons for not implementing the curriculum and manuals in schools, the Educational and Pedagogical Institute answered: "It did not come to life to a sufficient extent, there were not enough available capacities or support."**

Zenica-Doboj Canton

Action plan of the Government of Zenica-Doboj Canton for the fight against corruption 2017-2019¹⁸ provides for three measures in the field of anti-corruption education:

- Develop and coordinate activities on the introduction of a harmonized plan and program of ethics and integrity in educational institutions in ZDK
- Implementation of the harmonized plan and program of ethics and integrity in educational institutions in ZDK
- Ensure public promotion of the harmonized plan and program of ethics and integrity in educational institutions in ZDK.

¹⁷ Anti-Corruption Strategy of Sarajevo Canton 2018-2019, Official Gazette of Sarajevo Canton No. 19, link: https://vlada.ks.gov.ba/sites/vlada.ks.gov.ba/files/strategija_za_borbu_protiv_korupcije_ks_2018-2019_sn_24.pdf

¹⁸ Action plan of the Government of Zenica-Doboj Canton for the fight against corruption 2017-2019, link: file:///C:/Users/ugcrm/Downloads/Akcioni_plan_Vlade_ZDK_za_borbu_protiv_korupcije_2017_2019.pdf

The institutions responsible for the implementation of these measures are the ZDK Government Anti-Corruption Team and the ZDK Ministry of Education. According to the data from the Report on the Implementation of the Action Plan for the Fight against Corruption¹⁹ these measures have been implemented.

The program of ethics, integrity and anti-corruption was introduced in the school system of Zenica-Doboj Canton as a regular curriculum through the implementation of classes of class communities, confirmed the Pedagogical Institute of Zenica. In response to the inquiry of the author of this analysis, the Pedagogical Institute states that the program of ethics and integrity is implemented in all primary and secondary schools under the jurisdiction of the Pedagogical Institute Zenica, and is implemented through the application of curricula and manuals "Ethics and Anti-Corruption" Infohouse associations within the project "Curriculum for transparency, curriculum for accountability".

Tuzla Canton

Anti-corruption program in the Tuzla Canton 2016-2019²⁰ with the accompanying Action Plan recognizes education as an area of special importance in the fight against corruption, and envisages the implementation of the following activities:

- Participation in conducting research on young people's views on corruption, with the aim of establishing the basis for the development of harmonized programs of ethics and integrity
- Participation in the development of harmonized programs of ethics and integrity in all educational institutions in BiH, with the aim of strengthening the moral values of society
- Participation in the introduction of harmonized programs in the field of ethics and integrity in educational institutions in BiH, with the aim of strengthening moral values.

The competent institution for implementation is the Ministry of Education, Science, Culture and Sports of Tuzla Canton. The ministry did not respond to a question about whether it had developed and implemented a program of ethics, integrity and anti-corruption education in the school system.

In response to the inquiry, the Corruption Prevention Team of the Government of Tuzla Canton stated that it did not carry out any activity / measure related to the introduction of ethics and integrity programs in the education system in order to strengthen the moral values of society.

The team states that it is familiar with the existence of the curriculum and manual "Ethics and anti-corruption", which were developed by the Infohouse Association. They also state that they are ready to intensify additional activities for the introduction and application of training / curricula in the field of ethics and integrity in primary and secondary schools, **and to the question: "What, in your opinion, would be crucial for more intensive implementation and application of**

¹⁹Conclusion on the adoption of the Report on the implementation of the Action Plan for the Fight against Corruption, Government of ZDK, link:

file:///C:/Users/ugcrm/Downloads/Zakljucak_o_usvajanju_lzviestaja_o_provo%C4%91enju_Akcionog_plana_za_borbu_protiv_korupcije_1.pdf

²⁰ Anti-corruption program in the Tuzla Canton 2016-2019 with Action Plan, link:

http://www.vladatk.kim.ba/Vlada/Novosti_2016/Program_borbe_protiv_korupcije_TK-a_2016-2019_sa_Akcionim_planom.pdf

training / curricula areas of ethics and integrity in primary and secondary schools? ", answered: " Number of trained staff for the implementation of such activities / measures, decisions on this at the level of the ministry or pedagogical institute".

Central Bosnia Canton

Central Bosnia Canton Anti-Corruption Strategy 2015-2019²¹ recognizes the field of education (together with the field of culture) as one of the risk areas for corruption, and as one of the strategic goals defines: Plan activities to develop moral and social values in children, with the long-term goal of educating society against corruption. However, the **introduction of ethics and integrity programs in the education system is not explicitly planned as an obligation.**

The Corruption Prevention Team, in response to a questionnaire from the authors of this analysis, states that it encountered a problem in implementing activities related to the introduction of ethics and integrity programs in the education system in order to strengthen the moral values of society.

"There is a lack of readiness to introduce and implement such programs, there is a lack of educated staff to implement such activities / measures, there is no information whether there is a willingness of teaching staff, we also have information for readiness to make decisions at the ministry or other government body." - stated in Tim's answer.

The Anti-Corruption Team states that it is not familiar with the existence of the manual "Ethics and Anti-Corruption", and that they are ready to intensify additional activities for the introduction and implementation of curricula in the field of ethics and integrity in primary and secondary schools. They see as key factors for the application of the curriculum:

"Greater readiness for the introduction and implementation of such programs, a larger number of educated staff for the implementation of such activities / measures, decisions on this at the level of the ministry or some other governmental body."

- It is important to note that public institutions and the authorities in the Central Bosnia Canton view anti-corruption measures in the education sector in a very specific way. Namely, through the Anti-Corruption Strategy 2015-2019, the following have been set as strategic goals:

- Increasing the transparency of the allocation and use of public funds to cultural and educational institutions,
- Elimination of subjectivity and opportunities for corruption in the selection of excursion and excursion providers for students,
- Ensure transparency and objectivity of enrollment in preschool institutions, high schools and colleges,
- Providing professional and financial support to projects implemented by student organizations in activities on the topic of fighting corruption,
- Intensify inspection and professional-pedagogical supervision, as well as audits of financial operations of educational institutions,
- Regulate the issue of textbook policy

²¹ Central Bosnia Canton Anti-Corruption Strategy 2015-2019, link:
file:///C:/Users/tatja/Downloads/Strategija%20za%20borbu%20protiv%20korupcije%202015.-2019_.pdf

No cantonal strategy has anti-corruption measures defined in this way. This is about looking at the needs of the Cantons based on possible or actual cases of corruption, and not formally taking measures from higher levels without critically looking at the context, needs and possibilities for realization, which was done by mostly all cantons.

Bosnian-Podrinje Canton of Goražde

Action Plan for the Fight against Corruption of the Government of the Bosnian - Podrinje Canton of Goražde 2016 – 2020²² provides for a needs assessment activity for anti-corruption training programs in primary, secondary schools and universities, but not for an explicit activity for the introduction and implementation of this program. The Action Plan also states that the planned activity has been implemented: *"An assessment of training needs for the fight against corruption in primary and secondary schools and universities has been conducted. Based on the assessment, the introduction of training programs for the fight against corruption in primary, secondary and higher education institutions was initiated."*

The Body for Prevention and Fight against Corruption of the Bosnian-Podrinje Canton of Goražde did not answer the question of the author of this analysis whether it carried out any activity / measure related to the introduction of ethics and integrity programs in the education system and whether they would be ready for more intensive implementation. additional activities for the introduction and implementation of training / curricula in the field of ethics and integrity in primary and secondary schools.

The Ministry of Education, Youth, Science, Culture and Sports of the Bosnian-Podrinje Canton of Goražde and the Pedagogical Institute of Goražde, in response to a question from the authors of this analysis, state that the **program of ethics, integrity and anti-corruption training was introduced into the school system in both semesters in all primary and secondary schools in the area of BPK Goražde**. They also state that they are aware of the existence of the curriculum and manual "Ethics and Anti-Corruption" for primary and secondary school students, which were developed by the Association Infohouse, and when asked whether this curriculum is implemented in schools, they answer in the affirmative.

Herzegovina-Neretva Canton / County

Strategic anti-corruption documents of the Herzegovina-Neretva Canton / County are not publicly available.

The anti-corruption team of the Herzegovina-Neretva Canton / County did not answer the question whether and what measures regarding anti-corruption education are contained in the strategy and action plan for the fight against corruption, whether they implemented any activities regarding the introduction of ethics and integrity programs in the education system. would be willing to engage in this segment. Neither the Ministry of Education nor the Pedagogical Institute responded to the inquiry.

²² Action Plan for the Fight against Corruption of the Government of the Bosnian-Podrinje Canton of Goražde 2016-2020, Government of the BPK, link: <http://www.bpkg.gov.ba/media/images/2016/12/Akcioni-plan-za-borbu-protiv-korupcije-za-period-2016-2020.-godina-Vlade-BPK-a-Gorazde.pdf>

West Herzegovina Canton / West Herzegovina County

The anti-corruption strategy of the West Herzegovina County is not publicly available.

The Commission for the Prevention of Corruption of the West Herzegovina County did not answer the author's question whether and what measures regarding anti-corruption education contain strategic documents, whether they implemented any activities regarding the introduction of ethics and integrity programs in the education system, and whether they would be ready to engage. this segment.

In response to the inquiry, the Ministry of Education, Science, Culture and Sports of the West Herzegovina County states that it has not developed a program of ethics, integrity and anti-corruption training in educational institutions, nor has it introduced any form of anti-corruption program into the school system. In the answers to the survey, they state that they are familiar with the existence of the curriculum and manual Ethics and anti-corruption, but that they are not used.

When asked what are the reasons for not implementing the curriculum and manual Ethics and anti-corruption in schools, answer:

"We are familiar with this manual. Some of the contents contained in this Handbook were studied in schools in the West Herzegovina County even within certain subjects before its adoption. In order to implement the Curriculum in Ethics, Integrity and Anti-Corruption Behavior more easily and efficiently, we believe that it would be good to analyze which topics of that Curriculum are already an integral part of valid curricula and which are not. This can be done more easily and quickly in counties where the Curriculum and Handbook have already been fully implemented, as they have knowledge of what is repeated in that Curriculum and Handbook in relation to the teaching units of the current School Curriculum.

Once this has been determined, propose that what is not studied according to the valid curricula be included in the study and propose to the competent education authorities a curriculum of content in Ethics, Integrity and Anti-Corruption Behavior, which would be studied as part of the class. or extracurricular activities, taking care that the scope and content are appropriate for the age of the students and that they are not extensive (prescribe the number of hours per year), because students are already quite burdened with teaching materials. "

The response of the ministry is very indicative and it can be read that the ministry does not know (or does not want to know) that it is responsible for implementing the measures it proposes, ie the ministry is responsible for analyzing and determining the Curriculum and its possible changes. regarding the introduction of teaching units on ethics, integrity and anti-corruption education.

Canton 10 / Hercegbosna County

Anti-Corruption Strategy of Hercegbosna County (HBŽ) 2016-2019²³. defines goals in the field of education:

- Development, introduction and harmonization of ethics and integrity programs in the educational process

²³ Strategija za borbu protiv korupcije Hercegbosanske županije 2016-2019, link: <http://www.vladahbz.com/sadrzaj/dokumenti/vlada/STRATEGIJA%20-%20KORUPCIJA.pdf>

- Encouraging ethical behavior among children and youth through the support of extracurricular projects of the civil sector
- Action Plan for the Implementation of the Anti-Corruption Strategy of Hercegbosna County 2016-2019²⁴ explicitly defines activities in the field of education:
- Conduct research on youth views on corruption, with the aim of establishing the basis for the development of compliant ethics and integrity programs
- Develop compliant programs of ethics and integrity in all educational institutions in HBŽ, with the aim of strengthening the moral values of society
- Introduce compliant programs in the field of ethics and integrity in educational institutions in HBŽ, with the aim of strengthening moral values.

The institutions responsible for the implementation of these measures are the Ministry of Science, Education, Culture and Sports of the HBŽ and the Team for the Prevention of Corruption of the HBŽ. There are no publicly available data on the implementation of these measures. Neither the Ministry nor the Team for the Prevention of Corruption responded to the survey of the authors of this analysis whether, in what way and to what extent they implemented activities related to the development and introduction of anti-corruption education in the school system of the canton.

Posavina Canton / Posavina County

The Anti-Corruption Strategy in Posavina County and the Action Plan for its implementation 2016-2019 do not envisage measures related to the introduction of ethics and integrity programs in the education system. In response to the author's inquiry, the Anti-Corruption Team states that they have not carried out any activities in the field of anti-corruption education, and that they are not even ready to engage in this regard. As a reason, they state that they do not have the status of a professional body.

The Ministry of Education, Science, Culture and Sports states in its answers to the survey that it has developed a program of ethics, integrity and anti-corruption training in educational institutions.

"The program of ethics and anti-corruption education has been introduced in all preschool, primary and secondary schools in the Posavina County, and is being implemented in primary schools in grades 1-5 and subject teaching in grades 6-9, in secondary schools in grades 1-9. 4 classes in accordance with the curriculum are taught by teachers within the subject (cross-curricular) as lessons to raise students' awareness of the importance of ethics and anti-corruption in the education system and the environment "- said in response to the author's analysis.

The Ministry also states that it is familiar with the curriculum and manual Ethics and Anti-Corruption. "In the Posavina County, the Curriculum and Manual" Ethics and Anti-Corruption "is implemented in seven (7) primary schools and in three (3) secondary schools. The curriculum and manual "Ethics and Anti-Corruption" is implemented as a lesson in the subject of Politics,

²⁴ Action Plan for the Implementation of the Anti-Corruption Strategy of Hercegbosna County 2016-2019, link: <http://www.vladahbz.com/sadrzaj/dokumenti/vlada/Akcijski%20plan%20za%20provedbu%20Strategije%20za%20borbu%20protiv%20korupcije%20HBZ.pdf>

Economy, Democracy and Human Rights in secondary schools and in the subject of Nature and Society in primary schools ", they state in their response.

Una-Sana Canton

Action plan for the implementation of the Anti-Corruption Strategy of Una-Sana Canton 2017-2019²⁵. envisages the measure of introducing programs in the field of ethics and integrity in educational institutions in the USC with the aim of strengthening moral values. According to the Action Plan, the institutions in charge of this activity are the Working Body of the Government of the USC for the Fight against Corruption and the Ministry of Education, Science, Culture and Sports of the USC.

The working body of the USC Government for the Fight against Corruption did not answer the question whether they carried out activities in the field of anti-corruption education, and whether they are ready for intensified activities towards introducing ethics and integrity programs in the education system of Una-Sana Canton.

In response to the survey, the Pedagogical Institute of Una-Sana Canton (USC) states that the program of ethics, integrity and anti-corruption education was introduced into the school system in the form of activities through the subject **Democracy and Human Rights** and implementation of Civitas projects. In response to a question from the author of this analysis, the USC Pedagogical Institute states that they are familiar with the existence of the curriculum and manual Ethics and Anti-Corruption, that it is implemented "in several high schools such as Bihać Mixed High School and Velika Kladuša High School", within the subject Democracy and human rights and class community classes.

Brčko district BiH

Anti-Corruption Strategy 2018-2019 of Brčko District BiH ²⁶ aims to promote a culture of integrity, transparency and accountability in the education system of the Brčko District of BiH, and the Action Plan for the implementation of the strategy ²⁷ also envisages specific activities:

- Develop and coordinate activities on the introduction of a harmonized plan and program of ethics and integrity in educational institutions in the Brčko District of BiH with the aim of strengthening moral values
- Ensure public promotion of the harmonized plan and program of ethics and integrity in educational institutions in the Brčko District of BiH with the aim of strengthening moral values

²⁵Action Plan for the Implementation of the Anti-Corruption Strategy of the USC 2017-2019, link:

<http://vladausk.ba/v4/sadrzaj/radno-tijelo-vlade-za-borbu-protiv-korupcije/14>

²⁶Anti-corruption strategy 2018-2019. Brcko District, link: <http://fzobrcko.ba/file/strategija-za-borbu-protiv-korupcije-20182019-godina/1032>

²⁷Action plan for the implementation of the anti-corruption strategy in the Brčko District of BiH 2018-2019., link:file:///C:/Users/tatja/Downloads/Akcioni_plan_sprovodjenja_strategije_borbe_protiv_korupcije-ba.pdf

- Application of the harmonized plan and program of ethics and integrity in educational institutions in the Brčko District of BiH with the aim of strengthening moral values.

The institutions in charge of implementation are the Commission for Prevention of Corruption and Coordination of Anti-Corruption Activities of the BD BiH, the Government of the BD BiH and the Department of Education. Neither the Commission nor the Department of Education answered the question whether and to what extent the activities for the development and implementation of the plan and program of ethics and integrity in educational institutions in the Brčko District have been implemented.

Existing programs / curricula on ethics and anti-corruption

Within the project "Curriculum for Transparency, Curriculum for Accountability", an advisory group was formed consisting of representatives of five institutions, namely the Agency for Preschool, Primary and Secondary Education (APOSO), the Agency for Prevention of Corruption and Coordination of the Fight against Corruption (APIK), The FBiH Ministry of Education and Science (FMON), the RS Ministry of Education (MORS) and the Brčko District Government Education Department. The advisory group had a significant role in planning project activities, which also referred to the development of curricula, ie, educational and methodological content that will be used in project schools. With the project application and the project plan, it was initially planned to introduce a compulsory subject on anti-corruption and ethics in primary, secondary schools and faculties. Through a series of discussions and consultations with members of the advisory group, an assessment of the needs for anti-corruption training programs for primary and secondary schools, as well as a more detailed acquaintance with the specifics of education systems in BiH, the advisory group concluded that due to a number of factors compulsory subject in primary, secondary schools and faculties in the way it was initially planned as a cross-curricular topic. The most significant limitations (factors) that are taken into account as the reason for the impossibility of introducing a compulsory subject are:

- saturation of educational institutions with projects related to the introduction of various new contents and subjects in the curricula;
- curriculum overload that limits the possibilities for introducing new topics and contents into the existing curriculum and prevents the introduction of new separate subjects in the curriculum;
- overburdening of the teaching staff, ie the norm that has been established for each individual teacher / teacher / professor and which is violated by each introduction of a new subject;
- fixed structure of the curriculum at the universities in Bosnia and Herzegovina, which can be disrupted by the introduction of additional content;
- the complex structure of the education system in Bosnia and Herzegovina, which hinders universal access to educational institutions and levels of government throughout the country;
- overload of students with already existing educational content.

Curricula and manuals

Within the project "Curriculum for Transparency, Curriculum for Accountability", the Association "Center for Media Development and Analysis", as the main implementer of the project, in partnership with the Association INFOHOUSE and the Youth Communication Center has prepared and published the following manuals:

- „Ethics and Anti-Corruption: Curriculum and Handbook 1-4. primary school class ”; authors: author team of the project ²⁸ “Curriculum for transparency, curriculum for accountability”, year: 2015.
- „Ethics and Anti-Corruption: Curriculum and Handbook 5-9. primary school class ”; authors: project team of the project "Curriculum for Transparency, Curriculum for Accountability", year: 2015
- "Ethics and Anti-Corruption: Curriculum and Handbook for Secondary Schools"; authors: author team of the project "Curriculum for Transparency, Curriculum for Accountability"; year: 2015
- "Ethics and Anti-Corruption: A Curriculum for Universities and a Handbook for Working with Students"; author: author team of the project "Curriculum for Transparency, Curriculum for Accountability", year 2015.

Two years after the practical application of the manual and the implementation of pilot classes in primary, secondary schools and universities, within the project "Who is still afraid of corruption? We don't!", Funded by the United States Department of State, in 2017 the Infohouse Association, in cooperation with the Center for Media Development and Analysis and the Youth Communication Center, published amended editions of the manual:

- "Ethics and Anti-Corruption: Curriculum and Handbook for Preschoolers"; authors: Nina Ninković and Vanja Elezović, year: 2017
- “Ethics and Anti-Corruption: Curriculum and Handbook 1-5. primary school class ”; amended edition; authors: Nina Ninković and Vanja Elezović, year: 2017
- “Ethics and Anti-Corruption: Curriculum and Handbook 6-9. primary school class ”; amended edition; authors: Leila Hamzagić-Kovačević, Samela Alagić, Nermin Kadribašić, year: 2017
- "Ethics and Anti-Corruption: Curriculum and Handbook for Secondary Schools"; amended edition; authors: Vera Kelava, Aleksandar Draganić, Ljubinka Dragojević, Slobodan Golubović, year: 2017.

These manuals are designed as part of a package for educational and pedagogical staff, and are based on a common core curriculum for cross-curricular and cross-curricular areas defined on learning outcomes - a component of anti-corruption, and established by APOSO. In terms of content, the manuals are conceived through several units: *Preface, Curriculum, Teacher's Manual, Teaching Unit Proposals, School Project Proposals, Student Project Activity Proposals*

²⁸The author's team of the project implies the participation of qualified, highly educated staff for the development of the manual (representatives of all three organizations as well as experts: teachers, pedagogues, representatives of pedagogical Institutes, etc.). Most external authors wanted to remain anonymous to the public, but the names and their qualifications are known to the project team and publisher.

The Curriculum section offers the following chapters / information / knowledge in terms of content:

- The concept, forms, causes and consequences of corruption
- Why it is important to learn about corruption and anti-corruption
- Context - how children at a certain age think
- List of contents / topics to be covered by education
- Objectives of education in the field of ethics and anti-corruption
- Expected learning outcomes
- List of teaching units that can include content in the field of ethics and anti-corruption
- Methods
- Didactic-methodical notes for teaching staff

The *Teacher's Manual* section contains a list of elaborated suggestions for working with students. This section offers a detailed description and suggestions for the implementation of school lessons on ethics and anti-corruption, including methods, tools, time course of school lessons, etc. Curricula "Ethics and anti-corruption" offer stimulating and effective learning concepts, and allow teachers a creative approach and extracurricular process, and activating the independent work of students. Through curricula, teaching staff are offered the opportunity to help students understand and adopt important norms of behavior with the support of parents.

Part *Proposals for school projects* and part *Proposals for project activities of students* offers creative proposals for anti-corruption activities of students, which can be implemented at the level of individual classes, at the school level, with the involvement of parents and similar. The proposals are designed a way as to provide space for pedagogical and teaching staff for an individual approach.

All teaching units within the curriculum have the form of teaching preparation, and this is one of the most appreciated elements of the manual by teachers, because it allows much easier implementation in practice, even without special additional preparation. This is one of the key elements of the program that can stimulate the motivation of teachers to implement the program in their classes.

Analyzing the elements of the manual, we come to the conclusion that they contain:

- Clarity of learning content;
- Adaptation of the content to the age characteristics of students;
- Adequacy of recommended teaching methods;
- Realism of defined learning goals / outcomes;
- Measurability of defined learning outcomes;
- Clarity of instructions for the implementation of teaching units;

Implementation of programs in schools

Based on the training they received in the second phase of the project, and based on the Manual and Curriculum Ethics and Anti-Corruption, teachers and professors were tasked to hold a class within the regular curriculum to include anti-corruption education. The aim of the pilot classes

on anti-corruption was to introduce students to the concept, definitions, forms and consequences of corruption; that on the basis of the acquired knowledge they can recognize corruption as a negative social phenomenon, and to develop a critical opinion on the harmfulness of corrupt behavior and actions.

Pilot classes on ethics and anti-corruption were realized within the regular curriculum, in the classes of philosophy, Bosnian, Croatian, Serbian language and literature, pedagogy and class teaching. After the pilot classes, according to the authors of the analysis, the students were evaluated. A total of 432 students, 189 elementary and 164 high school students, 79 students participated in the evaluation, and all of them state that the teacher clearly emphasized the topic of the class. Of the students who participated in the classes, 227 (52.6%) learned about ethics and anti-corruption for the first time in school, while 205 students (47.4%) answered that they had encountered this topic in school classes before. Almost all students (98.6%) find the story of ethics and corruption important and interesting.

When it comes to monitoring and evaluation of teachers in pilot classes, according to the evaluators from the Account network, all teachers clearly identified the name of the topic and the name of the sub-topic that was covered in the class. Also, everyone clearly presented the motivation for the class and clearly announced the goal of the class. The monitored pilot classes were held in the school premises, and the classes covered the new content, with repetition, practice and systematization of the acquired knowledge. In one class, a lesson from the Handbook was covered. The most commonly used teaching methods are a combination of conversation, discussion and presentation, and in addition to them, drawing, written work, independent work and text were used to a lesser extent. The most common forms of work were group and interactive work.

In all monitored classes, the educational, upbringing and functional goals of the class were fully achieved. When it comes to educational goals, the results of the evaluation showed that students learned what corruption and fraud are, and that they know how to recognize corruption. From the aspect of educational goals, classes on ethics and anti-corruption enabled students to develop emotional sensitivity, tolerance, self-esteem, to develop a pleasant atmosphere for work and the skill of recognizing bad actions.

The functional goals of the classes were to introduce students to the topic of ethics and anti-corruption, and to develop students' critical thinking. As stated in the analysis of the Account network, both functional goals have been achieved. Overall, the pilot classes achieved the expected outcome: students can recognize bad actions related to corrupt acts, and the classes introduced them into the conscious avoidance of corrupt acts and their reporting.

The evaluators assessed that the content of the training in all monitored classes fully corresponds to the set goals.

Within the project "*Prevention of Corruption in Education: More Knowledge, More Transparency*" (2016-2019) implemented by the Center for Youth Activism (CROA), as a member of the Anti-Corruption Network Account, a survey was conducted on the effects of anti-corruption education on a sample of 1027 students and 27 teachers from 26 primary and secondary schools in Bosnia and Herzegovina. The results of the research of the attitudes of the teaching staff show that:

- The introduction of anti-corruption classes in children's classes develops critical thinking and a change in awareness of corruption;
- That anti-corruption classes have had a positive effect on changing students' awareness of socially unacceptable behavior,
- That students have acquired new knowledge and skills by participating in anti-corruption classes, and that they react much better to socially unacceptable behaviors
- That anti-corruption classes should be introduced as compulsory content in all schools, through additional compulsory classes in accordance with the school curriculum, through class community classes, through sociology, civic education, democracy and human rights, history
- The results of the research of students' attitudes show:
 - That anti-corruption classes provided students with sufficient knowledge to recognize forms of corrupt and anti-corruption behavior in practical situations,
 - That students believe that the study of anti-corruption should take place within regular classes
 - That students think that it is important for them and their peers to study content in the field of anti-corruption.

However, some research shows that young people do not really believe in the effectiveness of education in the fight against corruption. In the research of Media Initiatives ²⁹, when asked which, in your opinion, is the most effective way to fight corruption, the respondents had the opportunity to comment on the basis of gradation versus the offered answers. Grade 4 was the most and 1 the least effective. The work of prosecutor's offices and courts and the political will to eliminate corruption (60%) had the same percentage of characterization as the most efficient. Another political element had a high percentage - the pressure of citizens and the dismissal of those linked to corruption (53%). The least fours received the answer to the activism of non-governmental organizations (25%). Interestingly, in 14 percent of the answers, the respondents rated as the least effective the possible education in schools about the harmfulness of corruption for society, which is the most of all the solutions offered.

Samela Alagić, pedagogue of the elementary school "Safet-beg Bašagić" from Sarajevo, says that **it is possible to get students interested in the topic of corruption prevention**. In the statement for the project "Knowledge II, corruption OUT" of Media Initiatives in 2018, he points out that teachers should be prepared or attend training for such activities.³⁰.

„As part of the education, I learned that just mentioning definitions or stories about corruption in general means nothing to children. Together with colleagues who expressed and recognized the importance of such education and their application in the school field, I started indirectly to promote the idea of anti-corruption. We started from the youngest, students and classes, through numerous fables and stories whose topics and ideas can be considered corrupt. We

²⁹ MLADI I STAVOVI O KORUPCIJI, Medijske inicijative (2017) <https://mediaplaninstitut.org/2017/06/03/istrazivanje-mladi-i-stavovi-o-korupciji/>

³⁰<https://skolski.ba/samela-alagic-pedagogica-ucenike-je-moguće-zainteresovati-za-borbu-protiv-korupcije/71556/>

found the material in their textbooks, ie teaching contents (curricula - op.aut.). With the older students, we could only use the definitions and everything related to corruption. In particular, we have placed emphasis on corruption in education. We did this through workshops, teaching content, classroom classes, mini projects, surveys, etc. With 9th grade students I did the project 'Corruption in Education' through which we visited numerous organizations and associations, as well as the Agency for Prevention of Corruption at the BiH level. In that way, the students had a clearer picture of corruption and prevention of corruption, which will surely help them deal with corruption and anti-corruption more easily during their further education, and later in life, "said Alagić.

Interlocutor in this research Marko Antonio Brkić, Head of the Office for Organization and Maintenance of Quality of the University of Herzegovina says that education on corruption within the education system is very important, but that the program must be seriously designed and implemented by lecturers, regardless of level of education.

"The program must be made with the necessary level of pedagogical, psychological, didactic and methodological knowledge. This program must be created by experts and implemented by professionals. The program should not be reduced to one subject, but should be extended in an adapted way through all adequate subjects. But most importantly, the school, teachers and the local community need to promote the same values in an authentic way. To live by those standards, not just to talk about it. In that sense, the school must adopt a program of comprehensive education, with special emphasis on goals related to moral education, "says Brkić.

This education manager believes that programs and curricula can be proposed by individuals and organizations outside the state education system, such as the activities of the NGO sector in the production of curricula or manuals, but that authors must be competent in this area, otherwise it would be degradation of the profession and would certainly show flaws in the quality of the program.

Results

According to APIK reports, all strategic programs and activities defined by the Strategy and Action Plan for the Fight against Corruption 2009-2014 and the Strategy and Action Plan for the Fight against Corruption 2015-2019 have been implemented:

Anti-corruption action plan 2009-2014

Activity 3.4. Assess the needs for anti-corruption training programs for primary and secondary schools and universities – implemented

Anti-corruption action plan 2014-2019

Strategic program 4.14. Development, introduction and harmonization of ethics and integrity programs in the educational process and in thematic programs of public broadcasters in BiH

Activity 4.14.1. Conduct a survey on young people's views on corruption, with the aim of determining the basis for the development of harmonized programs of ethics and integrity - implemented

Activity 4.14.2 Develop harmonized programs of ethics and integrity in all educational institutions in BiH, with the aim of strengthening the moral values of society - implemented

Activity 4.14.3. Introduce harmonized programs in the field of ethics and integrity in educational institutions in BiH, with the aim of strengthening moral values - implemented

Activity 4.14.4. Establish cooperation with public broadcasters in BiH in the field of broadcasting programs in the field of ethics and integrity, with the aim of strengthening moral values - realized

Strategic program 4.15. Encouraging ethical behavior among children and young people through the support of extracurricular projects of the civil sector

Activity 4.15.1. Establish cooperation with CSOs working with young people and establish cooperation to promote ethics and integrity, with the aim of strengthening the moral values of society - implemented

Activity 4.15.2. Support existing projects in the field of ethics and integrity, design and implement new projects in order to strengthen the moral values of society - realized

APIK reports state that the measures for the introduction and implementation of education on ethics, integrity and anti-corruption were implemented within the projects "Curriculum for Transparency, Curriculum for Accountability", "More Knowledge for More Transparency", and other NGO projects. In the last, "Third Report on Monitoring the Implementation of the Anti-Corruption Strategy 2015-2019 and the Action Plan for the Implementation of the Anti-Corruption Strategy 2015-2019"³¹ provides information on additional efforts and initiatives made by civil society, public institutions and anti-corruption bodies for more efficient and systematic introduction of ethics and anti-corruption programs in education, as well as certain statistical data.

CRMA, Infohouse and the Youth Communication Center together with APOSO have developed a unique set of anti-corruption curriculum for preschool, primary and secondary education for the introduction of anti-corruption classes on ethics and integrity in the teaching process. APIK addressed Infohouse, for the transfer, use and publication of the document "Transparency Curriculum, Accountability Curriculum" and thus speed up the process of implementing the systematic implementation of this activity.

The project "More knowledge, more transparency" created by the Center for the Development of Youth Activism - CROA, and supported by a small grant of the ACCOUNT project, has the main goal of creating a favorable environment for introducing ethics and prevention in education through cooperation with schools. After public debates on the importance of preventing corruption in education, street performances and teacher education in several cantons, CROA organized with partners: Pilot classes on anti-corruption in schools, Competition for students on ethics and anti-corruption; Final Conference on Anti-Corruption in Education for Professional Staff.

³¹, Third Monitoring Report on the Implementation of the Anti-Corruption Strategy 2015-2019 and the Action Plan for the Implementation of the Anti-Corruption Strategy 2015-2019 ", APIK, October 2018, link: <file:///C:/Users/tatja/Desktop/IPAK%20ISTRA%C5%BDIVANJE/APIK%20izvijestaj.pdf>

APIK initiated against the Federal Ministry of Education to hold a thematic session on the introduction of institutional education on ethics and integrity with the Coordination of Ministers of Education of FBiH as well as with the Conference of Ministers of Education of BiH.

With the support of APIK, Infohouse, together with the leading organization of the sector group for education, held anti-corruption classes in 75 primary and secondary schools in HNK, KS and SBK in FBiH, in the regions of Bijeljina and Trebinje in RS and BD BiH. The introduction of anti-corruption classes was accompanied by an intensive promotional campaign of young people in anti-corruption initiatives.

The ZDK Government team supported Through the project "Who is afraid of corruption yet? We do not!" implemented by the Infohouse Association in cooperation with the Center for Media Development and Analysis and the Youth Communication Center through extracurricular projects, ethics and integrity are included.

The KS Government Anti-Corruption Team cooperated with representatives of international institutions and CSOs, as well as representatives of primary and secondary schools from the KS, HNK, Bijeljina Region and Trebinje Region, with the aim of introducing young people to the forms and consequences of corruption and promoting ethics and integrity and strengthening the moral values of society.

The results of the implementation of ethics and anti-corruption programs in the education system can be monitored through various NGO surveys and program evaluations conducted by civil society. According to available data from several sources, within the project "Transparency Curriculum, Accountability Curriculum", among other things, the following results were achieved:

59 schools were involved in the project activities: 30 primary and 29 secondary. Out of that, 50 from the territory of the Federation of BiH, nine from the territory of the Republika Srpska.

As part of the project activities, trainings were held for teachers and educational staff, so that they could teach students on the topics of ethics and anti-corruption. **One two-day training for 50 primary and secondary school teachers and six one-day trainings for 42 professors at six state universities were conducted.**

Helsinki Citizens' Parliament Banja Luka conducted a survey "Monitoring of anti-corruption policies and practices in educational institutions and institutions in BiH"³², whose one goal was to determine whether the program of ethics and anti-corruption in primary and secondary schools was introduced in accordance with the Anti-Corruption Strategy. The research was conducted on a sample of 82 primary and secondary schools in BiH and showed that in both entities, and even in the cantons where the ministries have ordered the application of the curriculum, the process takes place selectively.

³²Monitoring of anti-corruption policies and practices in educational institutions in BiH, Helsinki Citizens' Parliament Banja Luka, 2018, link: <http://www.account.ba/novost/10273/nerazvijeni-mehanizmi-za-prijavu-korupcije>

Conclusions and recommendations for authorities, pedagogical institutes and schools

The fact is that the topics and contents of ethics and anti-corruption are either completely absent or are very rarely treated in curricula, as well as in teaching in primary and secondary schools at all levels of government in BiH. This is the case despite the fact that there are curricula and manuals³³ in the field of ethics and anti-corruption for all levels of education, anti-corruption content is not sufficiently represented at any level of education in BiH with the exception of higher education institutions that directly deal with corruption such as the Faculty of Criminology, Criminalistics and Security Studies, Law, Economics and Faculty of Political Sciences. Of the many reasons for the underrepresentation of ethics in the educational process, these are the most important:

- non-existence of a "political decision", ie a decision of governments and / or ministries of education
- lack of awareness of the importance of ethical education and upbringing of children and youth
- Insufficient pressure from the public, media and civil society to introduce ethics in the educational process
- weak position of pedagogical institutes for imposing the introduction of ethics in the educational process.

Anti-corruption content is poorly represented in the media, especially in children and youth shows, which could serve as an alternative form of anti-corruption education.

In a small number of schools, which were mainly covered by projects of civil society organizations and special state projects, part of the educational and pedagogical staff was trained to apply the Curriculum, ie work on the topic in the field of ethics and anti-corruption. The lack of clear selection criteria for participation in the education of teaching staff within schools has affected the difficulties in implementing programs in teaching areas that are not related to anti-corruption education, so it was difficult for project participants to link anti-corruption content with the content of subjects. Also, the Pedagogical Institute of RS did not recommend Curricula and Infohouse manuals for use in schools of Republika Srpska.

Therefore, based on the analysis of the content of documents, primarily research studies, the attitudes of project participants and social analysts, and the analysis of the projects themselves and the responses of state institutions, it is necessary to act in three strategic directions.

In the first place, it is necessary to induce political will and action in order to make the introduction of certain forms of anti-corruption education mandatory in all primary and secondary schools in BiH. Whether these will be special subjects or sets of lessons within existing subjects should be decided by the authorities on the basis of expert opinions of the relevant anti-corruption and educational institutions / bodies. In parallel with this process, teacher education should continue, with better coordination than in the previous period. In addition to existing,

³³ Ethics and Anti-Corruption: Curriculum and Handbook 1-4. primary school class, Author team of the project "Curriculum for transparency, curriculum for responsibility", Center for Media Development and Analysis in partnership with the Association INFOHOUSE and the Youth Communication Center, 2015

already trained staff, they should continue anti-corruption education through sets of lessons within the subjects listed in the analysis, either based on recommended curricula, or based on other sources. Finally, support for these processes needs to be coordinated by civil society organizations and the donor community.

These three strategic directions can be acted upon through four sets of activities, which are also concrete recommendations of this document in that area:

Initiation and promotion of political decision-making on the inclusion of ethics and anti-corruption issues in the educational process

Despite the widespread awareness among the general public and the majority of citizens about the need to raise the level of ethical values among children and youth, the relevant aspects of their education are far from necessary for such upbringing and education. The main reason for this is that the so-called "Political decision" on the introduction of ethical and anti-corruption topics on education and upbringing, and pedagogical institutes do not have a sufficiently independent position to initiate and impose the need for their introduction. For the introduction of such programs in education and upbringing, it is necessary to take the following activities from the following entities:

- APIK should establish a strategic partnership with the Agency for Preschool, Primary and Secondary Education of BiH (APOS0) in terms of defining the need, manner of introduction and content of introducing ethics and anti-corruption topics in the educational process
- In addition to APOS0, APIK should establish a partnership in this field with all relevant civil society organizations active in this field, especially with those who have developed specific curricula and recommendations in this area.
- APIK should officially launch an initiative towards the Council of Ministers of BiH and the Ministry of Civil Affairs of BiH for the introduction of ethics and anti-corruption issues in education based on the Common Core Curriculum developed by APOS0
- APIK should publicly announce the launch of an initiative for the introduction of ethics and anti-corruption topics in curricula and teaching at all levels of government and present a plan for their introduction
- APIK should send a recommendation (or a higher level of the instrument to which it is entitled by law - initiative) to governments and ministries of education at all levels of government to introduce ethics and anti-corruption topics in curricula and teaching. The BiH Council of Ministers should instruct APIK to launch initiatives at lower levels, with the BiH Ministry of Civil Affairs in charge of coordinating activities.
- APIK should issue instructions to anti-corruption bodies at all levels of government to, in cooperation with governments and ministries of education at their level of government, define the manner and content of introducing ethics and anti-corruption topics in curricula and teaching
- APIK should provide support to anti-corruption bodies at all levels of government so that governments and ministries of education at all levels of government make a decision to introduce ethics and anti-corruption issues in curricula and teaching.

Promoting and harmonizing the inclusion of specific content in the field of ethics and anti-corruption topics in the educational process

In addition to making a "political decision" to introduce ethics and anti-corruption education in teaching and education, it is necessary to ensure as high a level of quality and implementation as possible, in order to achieve the desired result - the development of ethical values in children and youth. In addition, it is necessary, as far as possible, to harmonize curricula and the manner of their implementation at all levels of government in order to develop similar ethical and moral principles among children and youth at all levels of government. In order to achieve this, it is necessary to take the following actions:

- APIK should provide support to anti-corruption bodies at all levels of government in the process of defining the manner and content of introducing ethics and anti-corruption topics in curricula and teaching with governments and ministries of education at their level of government
- In the process of curriculum development, it is recommended to take into account already existing curricula and other documents in the field of ethics and anti-corruption that have been developed within the projects of civil society organizations
- In addition to APOS0, in the development of curricula it is recommended to include relevant civil society organizations that are active in this field, especially with those who have developed specific curricula and recommendations in this area.
- o In this process, APIK and the competent education authorities are committed to harmonizing and applying the content of ethics and anti-corruption topics introduced in curricula and teaching (so that no pro-forma is introduced)
- o Also, APIK and the competent education authorities are committed to the quantity and quality of the introduced content as high and high as possible, as well as to consider the possibility of introducing, and ultimately introducing, a special subject of ethics and anti-corruption education.
- If possible, APIK and APOS0 should fight for the right to give an opinion on the proposed curriculum and ways of implementing the content of ethics and anti-corruption teaching before they are adopted and implemented.

Development of manuals and training of teaching staff for teaching in the field of ethics and anti-corruption topics

In addition to the quality of the curriculum, for their effective implementation and achieving the desired effects, it is necessary to prepare a sufficient number of well-trained staff for the teaching and education of children and youth. This will ensure quality of (as harmonized as possible) teaching and education, and identify possible problems and shortcomings and suggest ways to improve. In order to ensure quality staff for teaching and education, it is necessary to take the following steps:

- APIK and APOS0, within possible capacities, should provide professional support to the ministries of education and pedagogical institutes at all levels of government in the process of drafting individual manuals for teaching in the field of ethics and anti-corruption.

- Manuals and training should be designed to enable the best possible and most efficient transfer of ethics and anti-corruption education areas from teachers to students in a way that is acceptable to their age.
- APIK and APOSO should fight for the right to give an opinion on the proposal of the manual for the implementation of content in ethics and anti-corruption teaching before they are adopted and implemented
- Pedagogical institutes (competent ministries if there are no institutes) should conduct training of teaching staff in the field of ethics and anti-corruption education and participate in these trainings at all levels of government
- In the process of organizing trainings, it is desirable that pedagogical institutes cooperate with civil society organizations, especially in terms of providing funding for training, through projects funded by donors from the international community

Supervision of teaching in the field of ethics and anti-corruption issues and improvement of curriculum and teaching methods

Even the best curricula in the field of education cannot achieve the desired results if their implementation is not monitored, problems and shortcomings in implementation are noticed, and both the content and the way of teaching are improved. In order to achieve effective supervision and enable constant improvement of curricula and their implementation, it is necessary to take the following actions:

- Pedagogical institutes should supervise the implementation of teaching in the field of ethics and anti-corruption education in the same way as for other subjects, based on previously established criteria and methods of supervision.
- Pedagogical institutes should compile supervisory reports with clear indications of curriculum weaknesses and teaching methods, along with suggestions for improvement, and submit them to ministries of education and anti-corruption bodies.
- Anti-corruption bodies in cooperation with pedagogical institutes and ministries of education should improve curricula and their implementation and, if necessary, supplement manuals for their implementation and organize additional trainings
- Anti-corruption bodies should include data on the implementation of the curriculum and, within the capacity and expertise of the body (if possible in cooperation with civil society organizations), measure and give an opinion on the effects of the implemented curricula and teaching
- APIK should monitor the reports of anti-corruption bodies in the field of teaching ethics and anti-corruption in education, identify good practices as well as shortcomings, and report to the bodies at all the levels of the government.

NON-GOVERNMENTAL SECTOR IN THE FIGHT AGAINST CORRUPTION IN BiH

An effective and efficient fight against corruption is inconceivable without the involvement of the civil society. The importance of the role of the non-governmental sector is recognized at the highest level, through the United Nations Convention Against Corruption (UNCAC), which in Article 13 explicitly emphasizes the obligation of signatory states to *“take appropriate measures to encourage active participation of individuals and group sectors, such as civil society, NGOs and local community organizations, in preventing and combating corruption, and raising public awareness of the existence, causes and seriousness of corruption and the threat it poses”*.

Bosnia and Herzegovina signed the UN Convention as the most important and first global international legal instrument for the fight against corruption in September 2005, and the obligation to implement it came into force on October 16, 2006, which created legislative preconditions for the participation of non-governmental organizations in the anti-corruption sector.

Results of the NGO sector in the fight against corruption

The results of the NGO sector in the fight against corruption can be evaluated from different perspectives:

- from the perspective of donors and funders of the activities of the NGO sector, ie from the perspective of specific goals defined in each individual project
- from the perspective of public institutions with which the NGO sector works together in the prevention and fight against corruption
- from the perspective of the general public.

Performance evaluations of specific individual programs and projects implemented by NGOs are usually conducted by donors of these projects. In most cases, these evaluations are of an internal nature and serve as a basis for donors to define new strategies and programs to support civil society. USAID, as one of the largest donors in BiH with the European Commission, and as an international organization that promotes a culture and principles of action oriented towards results, continuously monitors and evaluates the results and effects of its interventions through **MEASURE BiH** - Evaluation Monitoring Support Project. MEASURE BiH researches, analyzes and evaluates the effects of NGO-funded projects funded by USAID. MEASURE evaluation of the impact of the project Anti-corruption network of civil society organizations - ACCOUNT, which in terms of scope and type of activities, and the number of actors involved is one of the most important civil society projects in BiH in the last five years, shows:

- The participation of civil society organizations in the fight against corruption is higher than three years ago
- The quality of participation of civil society organizations in public policy-making processes was significant and resulted in the introduction of anti-corruption legislation and regulations, especially in the areas of public procurement and protection of whistleblowers.

- Civil society organizations submitted 59 proposals for laws and bylaws, of which 33 were accepted by the competent authorities (parliaments and governments)
- Civil society organizations have made 76 recommendations for anti-corruption improvement of legislation
- ACCOUNT legal aid to citizens and whistleblowers is perceived as professional and significant: 61% of respondents believe that ACCOUNT's legal team acts professionally, 55% of respondents believe that ACCOUNT's legal team has prevented further corrupt practices in the public sector, 63 % of respondents recognize ACCOUNT's legal team as the relevant address for reporting corruption
- Citizens trust more the legal support provided to them in the fight against corruption by non-governmental organizations, than public institutions, which they consider politicized.

The results of the non-governmental sector in the fight against corruption can in a way be monitored through various reports of public institutions. The Agency for Prevention of Corruption and Coordination of the Fight against Corruption (APIK) monitors the implementation of strategies and action plans for the fight against corruption, in which it also notes the activities of non-governmental organizations. The Anti-Corruption Strategy 2015-2019 and the accompanying Action Plan define five strategic goals, which should be realized through 226 activities. Analysis of the last, "Third Monitoring Report on the Implementation of the Anti-Corruption Strategy 2015-2019 and the Action Plan for the Implementation of the Anti-Corruption Strategy 2015-2019"³⁴, which evaluates the implementation of 217 measures, shows that 209 measures have been implemented ("implemented" means: fully implemented, partially implemented, implementation in progress, continuously implemented), and the non-governmental sector participated in the implementation of 100 measures. Observed by areas / strategic goals, the performance of the NGO sector and programs implemented through international support is as follows:

Strategic goal 1 - Establishment and strengthening of institutional capacities and improvement of the normative framework for the fight against corruption, implies the implementation of 48 activities. All 48 activities were implemented, and 30 activities were implemented with the support and participation of the non-governmental sector and through programs funded by international donors (IPA, TAK, PARCO, Justice in BiH, ACCOUNT, Analitika, etc.)

Strategic goal 2 - Development, promotion and implementation of preventive anti-corruption activities in the public and private sector, includes the implementation of 71 activities. 63 activities were implemented, of which 28 with the support or participation of the non-governmental sector and through NGO programs funded by international donors (ACCOUNT, CIN, TI, FOD, AcroSS). Unrealized activities are the responsibility of the legislative bodies, the Council of Ministers of BiH, the Audit Office, inspection bodies, etc.

³⁴ „ Third Monitoring Report on the Implementation of the Anti-Corruption Strategy 2015-2019 and the Action Plan for the Implementation of the Anti-Corruption Strategy 2015-2019 “, APIK, October 2018.

Strategic goal 3- Improving the efficiency and effectiveness of judicial institutions and law enforcement agencies in the field of anti-corruption, includes 37 activities, of which 36 have been implemented. prosecutors' offices, ministries of the interior and law enforcement agencies.

Strategic goal 4 - Raising public awareness and promoting the need for participation of the whole society in the fight against corruption, includes 45 activities. 44 activities were implemented, of which 39 with the direct participation of the NGO sector and NGO projects (ACCOUNT, AcroSS, PARCO, MATRA, BIRN, CCI, TI BiH, etc.)

Strategic goal 5 - Establishment of effective mechanisms for coordination of the fight against corruption, and monitoring and evaluation of implementation, implies the implementation of 18 activities, and all of them have been implemented. All activities are functionally under the exclusive competence of APIK and the anti-corruption body.

The results of the NGO sector can also be viewed from the perspective of the general public. MEASURE-BiH conducts the Citizens' Perceptions Survey in Bosnia and Herzegovina (NSCP-BiH) in order to analyze trends and general attitudes of BiH citizens on various topics - government, rule of law, corruption, media, social inclusion, youth, including civil society organizations . According to the data of these surveys, the public perception of the NGO sector and its effects is not optimistic. In the NSCP 2018 survey³⁵, 31% of citizens believe that NGOs advocate their own interests, not the interests of citizens; 27% of citizens believe that NGOs have no influence on the government, and 43% believe that they have some influence at some levels of government. Relatively pessimistic perceptions of young people towards the NGO sector were also shown in the research of Media Initiatives ³⁶. When asked in the survey which is the most effective way to fight corruption, the respondents chose the work of prosecutor's offices and courts and the political will to eliminate corruption as the most effective (60%). Another political element had a high percentage - pressure from citizens and dismissal of those linked to corruption in the elections. The least effective was the activism of non-governmental organizations, only 25%.

In another study ³⁷ Media initiatives, journalists, local government representatives and NGO activists were asked how much the activism of NGOs can contribute to the prevention or reduction of corruption. In principle, most of the answers support the work of the NGO sector in this field, which is not surprising because most respondents are from this sphere of social activity, as well as journalists who traditionally turn to the NGO sector, especially the activist sector, whose information they regularly use. Most of the interlocutors believe that the NGO sector is a corrective to social events, but that its scope is still limited due to the support of the majority public, which is quite inactive and disinterested. Some pointed out that the current authorities mostly make the party control, in addition to the executive and legislative, which is implied, the judiciary in order to amortize the danger of being prosecuted for corrupt practices, and that independent media and the NGO sector should point to that public. There was also a negative

³⁵ National Survey of Citizens' perceptions in Bosnia and Herzegovina 2018: Findings report, MEASURE BiH, mart 2019

³⁶ Mladi i stavovi u korupciji, Medijske inicijative (2017) <https://mediaplaninstitut.files.wordpress.com/2017/06/analiza-mladi-i-korupcija.pdf>

³⁷ ELEMENTS OF CORRUPTION AT THE LOCAL LEVEL AND POSSIBILITIES OF PREVENTION, Media Initiatives (2019) <https://mediaplaninstitut.files.wordpress.com/2019/03/izvjestaj.pdf>

attitude towards the NGO sector based on the fact that it also to some extent represents support for politics, both opposition and those in power.

Dženana Aladžuz, director of the Infohouse organization from Sarajevo, which has been implementing anti-corruption projects for many years, believes that the problem is not the ignorance and inefficiency of the NGO sector for poorer results in fighting this scourge, but the extremely inefficient and trapped party, ethnic and existential system in BiH.

„The biggest problem in the country, which makes the fight against corruption extremely difficult, are political parties that hold the judiciary and citizens in their hands. The judiciary because they put their followers at the head, and the citizens because they keep their existence in hand through employment. Let's not forget the element of corruption in the political parties that actually rule BiH, and not government institutions, and the unwillingness of the international community to stop cooperating with corrupt government representatives. "Perhaps our greatest success as an NGO, and even a network of organizations, is that the Law on the Protection of Corruption Reporters in RS was adopted with many of our amendments, but until it is seriously implemented, success is not complete," Aladzuz told the study.

Mirhunisa Bektaš, an NGO activist who was especially engaged in the Account network, believes that the government is doing everything to achieve a negative perception of the NGO sector among citizens.

„When civil society organizations began to seriously monitor the work of the government, especially budget spending, and demand greater allocations for those areas for which they are responsible, the authorities perceived this as a threat to their survival. Their activities went in two directions: one was direct harassment and disparagement of NGOs that spoke publicly about the non-transparency of government work and their links to criminal groups, and the other was much more subtle and, unfortunately, more effective. And that is that the authorities have formed their own NGOs that promote their ideology, "Bektas told Interview.ba³⁸

Cooperation of the NGO sector with public institutions and mutual NGO cooperation

Relations between the non-governmental sector and public institutions in the prevention and fight against corruption are mutually conditioned and can be assessed as ambivalent to the greatest extent or in the largest number of cases. On the one hand, public institutions have an obligation to cooperate with the non-governmental sector, since strategies and action plans for prevention and fight against corruption at all levels of government in BiH explicitly prescribe the obligation of the public sector to enable participation of civil society organizations in adoption and implementation processes. anti-corruption activities. Cooperation based on obligation or pressure, in principle, is initially doomed to failure and, as a rule, results in mere satisfaction of the form (formally fulfilled obligation). On the other hand, cooperation based on recognizing the value of civil society and certain comparative advantages of its working methods can bring benefits both to the public sector and to the community as a whole. The relationship between

³⁸<https://interview.ba/interview/item/154-b-mirhunisa-bektas-b-gradanska-hrabrost-je-zaboravljena-vrijednost>

public institutions and the non-governmental sector is largely, if not to the greatest extent, determined by the role in which non-governmental organizations appear. Namely, NGO activities for monitoring the implementation of public anti-corruption policies and assessing their effectiveness (which is one of the key roles of the NGO sector) are usually encountered behind closed doors by public institutions and authorities, or at least ignored. On the other hand, NGO technical support activities to strengthen the capacity of anti-corruption institutions (through the provision of education, training, consulting services, etc.) generally have a better reception by the public sector, but the results of this cooperation have a very short-term effect. , the intensity of anti - corruption activities of public institutions is significantly reduced, and in some cases stopped). So far, a wide range of different forms of cooperation has been recorded in the relations between public institutions and the non-governmental sector.

Through cooperation between the NGO sector and public institutions, numerous projects have been implemented that have resulted in improvements in legislation and institutional capacity to fight corruption in various sectors (the results of cooperation in the field of education are described in detail in the previous chapter on systemic education).

The Anti-Corruption Network of Civil Society Organizations - ACCOUNT and the Agency for Prevention of Corruption and Coordination of the Fight against Corruption (APIK) formalized cooperation in April 2016 by signing a memorandum of cooperation, with the aim of encouraging potential applicants to dare to report corruption. The cooperation was initiated by the fact that APIK has the legal authority and authority to grant the status of protected whistleblower, and the ACCOUNT register of free legal aid through which citizens, including employees of state institutions, can report corrupt acts.

The Infohouse Association, as a member of the Account, in cooperation with APIK, has developed two online educational training models whose contents relate to the development of integrity plans and protection of whistleblowers in public institutions in BiH. Training models have been developed in accordance with APIK guidelines and integrity improvement measures. The training is intended for 23,000 civil servants in 72 state institutions, and is available free of charge on the APIK website.

The relationship between the NGO sector and government institutions is largely defined by the specificity of the topic. Topics and activities that, either directly or indirectly, can have an effect on positions of political power are, as a rule, closed to the influence of the NGO sector. In this sense, it is an indicative example of the reform of the institutional and legislative framework for the prevention of conflicts of interest. Since 2015, Transparency International BiH has been actively participating in the process of amending the law on conflicts of interest at all levels of government. In 2016, TI BiH presented proposals for amendments to the Law on Conflict of Interest in BiH Government Institutions, which relate to expanding the circle of persons to whom the regulation applies, ie extending the application of the law from narrow application to elected, appointed officials and advisors to all public officials. function, which includes all elected, appointed and appointed persons in all institutions, establishments, enterprises and bodies established by the authorities.

TI BiH also proposes that the competence for the application of this law be transferred from the Commission for Deciding on Conflict of Interests of BiH, which is mostly composed of

representatives of the Parliament, ie political parties, to APIK. Through its activities, TI BiH also advocates the extension of restrictions on the engagement of public office holders in private companies, in order to prevent the practice of public officials being owners or having a financial interest in companies that do business with the state; a ban on performing multiple functions, regardless of the level of government; the obligation to submit reports on financial and property status on an annual basis, as well as the establishment of verification of the accuracy of data in the reports and the publication of the register of office holders and their assets; increase fines and introduce additional sanctions, such as dismissal; etc. TI BiH proposes similar solutions through amendments to the Law on Conflict of Interest in the authorities of the Federation of BiH. These anti-corruption legislative reform proposals have not been accepted by institutions and authorities.

Sources of donations - the fight against corruption is supported by international donors, not by funds of various levels of government in BiH

The participation of public institutions and authorities in the prevention and fight against corruption is declarative, sporadic, without concrete, effective and sustainable results. Although there is an appropriate institutional framework and formal assumptions, a lack of political will significantly blocks the institutional fight against corruption. Public institutions and the government demonstrate a lack of political will to fight corruption on several levels:

- through impunity for perpetrators of corruption
- by denying funding to anti-corruption institutions
- through political appointments of heads of anti-corruption institutions and bodies
- through a lack of political will for anti-corruption reform of existing legislation
- through a lack of political will to adopt the missing laws relevant to the fight against corruption
- **by denying funding to civil society and non-governmental organizations implementing anti-corruption projects**
- **by limiting the participation of civil society and non-governmental organizations in the processes conducted by public institutions by denying funding to the media that report on the problem of corruption.**

The source of donations and funding for the fight against corruption in Bosnia and Herzegovina is the international community. The international community uses various financial instruments and various mechanisms to support the fight against corruption through:

- direct financial and technical support to public institutions for the fight against corruption
- financing of anti-corruption programs implemented by non-governmental organizations (independently and / or through cooperation with public institutions).

The two largest international anti-corruption donors in BiH are the European Union (EU) and the United States (USA) through the government agency USAID.

The EU provides support for the implementation of EU policies in various areas - public administration, judiciary, energy, social development, democracy and human rights ... to the adoption of which BiH is committed to entering the EU integration process. In its activities, the

EU relies on various financial instruments, the most comprehensive of which is the Instrument for Pre-Accession Assistance (**IPA**). Prevention and fight against corruption projects are not explicitly in the focus of EU interventions in BiH, but are located in the "Democracy and Human Rights" sector, which covers a wide range of topics - from sustainability of civil society, through media freedoms, rights of marginalized groups, to good governance. Within the EU sector "Democracy and Human Rights", there is a line of support to civil society through IPA funds and a line of support provided through the European Instrument for Democracy and Human Rights (EIDHR). Within both IPA and EIDHR public calls for funding of NGO activities, the fight against corruption is mentioned only as one of the areas of action. Namely, in order to receive IPA support, the topic of the fight against corruption is in "competition" with the topics of media freedoms, freedom of expression, the rights of marginalized groups, youth activism, education, youth employment, and the like. Data on contracts awarded to civil society under the IPA program show the following:

Under the 2015 IPA program, four programs were funded, with a total value of 2,096,443.80 euros, and all four had elements of preventing and fighting corruption, strengthening transparency and accountability. Funded programs: BASE - Building Accountability and Systems in the Elections; AcroSS - Integrity Building and Strengthening AntiCorruption Practices in the Security Sector; Integrity through Justice: Independent civil society monitoring and assessment of judicial response to corruption; Empowering Civil Society in Fight Against Corruption: Monitoring Fiscal Transparency

Under the 2016 IPA program, eight programs were financed, with a total value of 2,355,435.22 euros. There were no civil society anti-corruption projects.

Nine projects were financed within the IPA program 2018, with a total value of EUR 3,932,684.85. One civil society program deals with the problem of corruption - the project "Treatment of unhealthy health care system in BiH", which is supported in the amount of 498,900.00 euros.

"Curing the Unhealthy Health System in Bosnia and Herzegovina" is a project implemented by Transparency International BiH (TI BiH) and the Center for Civil Initiatives (CCI). The project plans to improve the legal regulations and practices of health care institutions in building a system of prevention of corruption, with a focus on public procurement, conflicts of interest, human resource management and financial management. Also, it is planned to develop and establish a model of a transparent electronic waiting list for patients for health services (key operations and examinations for which the longest wait is currently).

The **EIDHR** budget for the period 2014-2020 is € 1,332,752,000 and is mainly channeled through civil society organizations whose projects are selected through open public calls. According to the data on awarded contracts, the EIDHR has financed a total of 15 projects during the last four grant award cycles (2015-2018), with a total value of EUR 3,535,365.68. No project had elements of fighting corruption.

Through IPA, the EU also finances and implements projects of direct support to public institutions.

The United States, largely through the United States Agency for International Development (**USAID**), and through the US Embassy's Small Grants Program in BiH, continuously provides

support to fight corruption through various support programs for institutions and non-governmental organizations.

When it comes to the NGO sector, extremely large funds have been invested in two projects. The Anti-Corruption Civic Organization Unified Network (ACCOUNT) was funded by USAID in two multi-year phases (2012-2015; 2015-2019). ACCOUNT was launched in 2012 as a network of non-governmental organizations, institutions and individuals who want to work together to fight corruption in BiH, in order to make the fight systematic, sustainable and with lasting results. Activities focused on advocating for the implementation or improvement of existing legal solutions in the fight against corruption, and a public campaign to raise public awareness of the importance of fighting corruption. In the first phase (2012-2015), ACCOUNT focused on three thematic areas: justice, public procurement and protection of whistleblowers.

In the second phase (2015-2019), ACCOUNT activities were structured through four components:

- Public advocacy for the implementation of anti-corruption legislation that will protect whistleblowers and prevent or sanction corrupt behavior in the sectors: public procurement, employment in the public sector, health, education;
- Monitoring and research on corruption in the sectors of public procurement, employment, health, education and protection of whistleblowers
- Strengthening public awareness through targeted media campaigns and investigative journalism
- Providing legal assistance to whistleblowers and victims of corruption.

“Supporting Citizens in the Fight against Corruption” is a five-year project (2019-2024) funded by USAID and implemented by the NGO Centers for Civil Initiatives (CCI), Transparency International BiH and the Center for Media Development and Analysis (CRMA). This \$ 7 million project aims to increase citizen participation in the fight against corruption, and according to the implementers, all project activities are designed and engineered to encourage strong and sustainable anti-corruption activism throughout the country and at all levels of government. The project targets five sectors particularly vulnerable to corruption and / or important for the fight against corruption (conflict of interest, public procurement, whistleblower protection, misuse of state resources in election campaigns and e-government), and includes activities to monitor and advocate anti-corruption reforms. grants will support NGOs and informal groups of citizens to work on tackling concrete anti-corruption initiatives at the local level.

In addition to the EU and USAID, large funds have been invested in anti-corruption projects by various United Nations agencies (UNDEF, UNDP...) and European governments individually. It is evident that international donors have directed huge funds to state and NGO anti-corruption projects. In the last eight years, much more than in the post-war and transitional thematic areas such as reconciliation, the media (their development and professionalism) and various ranges of human rights.

Recommendations for the efficiency of the NGO sector

1. Positioning the NGO sector in the general public

The so-called broader public is generally not sufficiently informed about the activities of NGOs and the perception of civil society in BiH is related to the already widespread, partially accepted, so-called category of "foreign" or "Soros mercenaries", which is significantly contributed by media presentation of NGOs, in relation to editorial policy instructed by the holder of power or the money. This primarily applies to organizations that rely on Western funds to promote social change and human rights. The long-term character of the authorities in BiH, and even in the region, is based on firm national policies that balance between traditional values and the dosed acceptance of European standards. In this interspace, the efforts of development of NGOs are seen as oppositional action and a blow to power. This results in the refusal of cooperation of state factors and part of the media with NGOs, but also of systematic and individual attempts to discredit and intimidate such organizations. Individuals and organizations that represent views that deviate from the views of the government and the majority of public opinion regarding national / state issues are most affected. Members of ethnic minorities in a certain territory are particularly affected, but, even to a greater extent, the majority who think differently. Therefore, it is necessary to direct the actions of the management and representatives of the NGO sector in the following directions:

1.1. In the public appearances of NGO representatives, emphasize the corrective role of the non-governmental sector for the socio-political community.

The generally accepted view that non-governmental organizations must be "in the service of citizens" should be expressed cautiously because there are large differences in the attitudes of citizens as well as the danger of generalizing the term "social interest". Bosnia and Herzegovina has deeply divergent national interests and, in addition, each region and municipality has its own interests. The fight against corruption with the development of the economy is one of the few common interests, which makes it difficult to position and manage these topics, but NGOs must act in different spheres of interest and for the interests of different actors involved in corruption. The messages that are presented must be strategically considered in order to amplify the positive effects and minimize the negative ones.

In public appearances, as well as in the overall work of NGOs in the fight against corruption, it is advisable to do everything possible to avoid imposing negative stereotypes on NGOs and to keep in mind and use the following advantages of the NGO sector:

- NGOs have the expertise and experience to propose, advocate and assist institutions in preventing and combating corruption, resulting from previous work on such and similar projects
- Despite the criticism and comments of the structures in power at a certain moment, most NGOs have enough credibility and independence to be able to contribute to the fight against corruption
- Based on previous experience and independence, NGOs can provide concrete and useful ideas for the fight against corruption, advocate for them and implement them through forward thinking.

- Most NGOs have enough enthusiasm and courage to embark on a demanding fight against corruption and in this process to be more than a good ally of institutions

Due to the support they have from the international community, some NGOs have respectable capacities that can be of great help in the fight against corruption.

1.2. Involvement of a larger number of citizens in the activities of NGOs

The role of NGOs in the fight against corruption is not only to implement donor-funded projects, but also to educate the general public about the damage caused by corruption, as well as about the possibilities for fighting it, through their work, activities, attitudes and proposals. Therefore, it is necessary to bring the activities of NGOs as close as possible to the citizens in order to spread their views and proposals as widely as possible among them. One of the ways is to involve a wider circle of citizens in the activities of NGOs, especially young people who are eager for knowledge and work experience that they will need in the future. Research shows ³⁹ that young people are ready to volunteer in the NGO sector for various reasons and one of the most important is the acquisition of skills and references that they will need to apply for jobs. In addition to young people, with the right approach and adequate topics for NGO actions and activities, the involvement of middle-aged and elderly citizens can be expected, which would further strengthen support for activities and contribute to their popularization.

Therefore, it is necessary to provide a wider range of opportunities for part-time and voluntary engagement of citizens, especially those from municipalities where activities take place because they know better the contexts of the local environment and show the involvement of community citizens, not "some who came from abroad." The following positive results can be achieved by involving a larger number of citizens:

- Bring the activities of NGOs and the benefits of such engagements closer to the local population and adapt the activities to local circumstances and mentality
- Encouraged civic activism in local communities, which is very important in smaller communities where there are no anti-corruption NGOs
- The possibility for reducing the current crucial influence of politicians on the attitudes of citizens would be improved, creating space for their more independent and objective attitudes

An opportunity would be created to support future activities of NGOs in the field of prevention and fight against corruption both in larger cities and in local communities.

1.3. Focus the performances of NGOs towards the target public, and especially towards the media as the main broadcasters

³⁹Youth and attitudes in corruption, Media initiatives (2017) <https://mediaplaninstitut.files.wordpress.com/2017/06/analiza-mladi-i-korupcija.pdf>

As mentioned earlier, NGOs need to educate the general public about the harm caused by corruption, as well as about the possibilities to fight it, because NGOs, together with the media, are the most important factor that can convey this to the general public. Therefore, it is necessary for NGOs to appear in the media and in public as often as possible and to objectively comment on events related to corruption and propose measures on how to prevent, detect and prosecute it. Appearing in public, especially in debate shows, carries both challenges and possible risks for NGOs to be criticized and especially to be labeled as politically connected in such situations.

Therefore, it is necessary that every appearance in the media, statements for them, press releases or messages in campaigns conducted by NGOs are well thought out and prepared, and in the process the following important things should be taken into account:

- Only members of NGOs who are sufficiently expert in the field of anti-corruption, who can deal with issues for complex phenomena such as corruption, should go public
- In addition to expertise, the skills of coping in public appearances are very important, especially in debate shows in which politicians or representatives of the administration participate.
- It is advisable to talk about irregularities in public appearances, ie to criticize the actions and not the individuals who did it, in order to avoid possible legal consequences
- As a possible exception, ie direct appointment of persons who have committed irregularities, this can be done if there are sufficient arguments and evidence for the claim
- It is necessary, with the criticism of irregularities, to make proposals on how such a situation should be corrected with, as much as possible based on laws and other bylaws.

2. Cooperation of the NGO sector with public institutions and the media and mutual NGO cooperation

Non-governmental organizations, especially those with higher incomes and the number of people, have in their activities networking and the need to promote their work as well as point out problems through communication with the media. Also, cooperation with the authorities is necessary, because development projects, including the fight against corruption, cannot achieve systemic success if the legislative, executive and judicial branches do not create a better legislative framework and its implementation. However, the findings we have presented in this report, along with data from various researches and experiences in this field, insist on the following recommendations:

2.1. Involvement of the authorities as partners in projects for a specific set of activities.

Many organizations report that authorities and public institutions are not ready for concrete cooperation in anti-corruption projects. In essence, since public authorities are often the target group of these projects, and also the subject of findings and potential criticism arising from the project, it is not uncommon for public institutions to be insufficiently prepared to cooperate with NGOs in the fight against corruption. However, this does not mean that such a relationship cannot be changed if the subject and manner of cooperation as well as the goal of the project and its products are clearly agreed before the start of cooperation and clearly defined in the

relevant memorandum of cooperation. In cooperation with public institutions, the NGO sector should have three main directions in animation for cooperation:

- To convince politicians and institutions that the activity of NGOs is not aimed at criticizing the government and institutions, but at improving the legislative framework and work on the prevention and fight against corruption
- Cooperation with NGOs contributes to the openness and reputation of public institutions among citizens, the international community and can generate a higher level of support from both citizens and the international community
- Cooperation with NGOs can raise the level of expertise in public institutions and supplement existing human and financial resources for the prevention and fight against corruption.

2.2. Strengthening cooperation among related NGOs.

The mutual cooperation of NGOs is visible primarily through project networks, of which the Account network has been the most active in recent years. However, outside of projects, this cooperation is not always present. NGOs fight for financial survival and position with donors, sometimes behave opportunistically, perceive each other as competition. In the period from 2017 to 2019, a set of anti-corruption projects was implemented, which were separately supported by the European Union, USAID and UNDEF. Involving more NGOs in anti-corruption activities leads to an increased positive impact on political parties, public institutions and the general public and should be applied whenever possible despite certain obstacles such as the development of competition and the unwillingness of some NGOs to share with other related organizations.

In such cooperation, it is necessary that:

- Roles are properly identified and divided in accordance with the expertise and experience of individual organizations, as well as that mutual relations, rights and obligations are clearly defined in the Memorandum of Cooperation
- In forming such coalitions or associations, it is necessary to avoid organizations that may have a political affiliation or a problematic reputation in the public or with donors.
- In the case of certain misunderstandings or differences in attitudes in the coalition, it is necessary to overcome this in a way that will not harm the activities or reputation of the NGO sector.

2.3. Communication with the media

The media are the most important channel for conveying the views of NGOs in general and especially when it comes to the fight against corruption and therefore there is a need for good and developed relations between NGOs and the media. Such relations must be principled, based exclusively on professional relations in the interest of objectively informing the public and free from any other potential interests. In doing so, NGOs must carefully prepare appearances and statements for media that are politically connected or have an insufficiently professional editorial policy, due to the possibility of being abused. In this sense, it is extremely important that NGOs avoid sensationalist media, especially tabloids that target NGOs in search

of information on corruption scandals, and cooperation with such media does great damage to the reputation of NGOs.

NGOs should develop particularly close professional relationships with the media and journalists who have proven integrity, professionalism and objectivity, as well as a commitment to objective information on corruption issues. Such journalists and media have information that can be very useful for NGOs and their activities, it is desirable to achieve principled and professional cooperation in the exchange of information, while respecting legal regulations and ethical norms.

When appearing in programs or giving statements to the media, whether they are media with a professional editorial policy or not, the following principles are recommended:

- It is advisable to talk about irregularities in public appearances, ie to criticize the actions and not the individuals who did it, in order to avoid possible legal consequences
- As a possible exception, ie direct appointment of persons who have committed irregularities, this can be done if there are sufficient arguments and evidence for the claim
- It is necessary, with the criticism of irregularities, to make proposals on how such a situation should be corrected, based as much as possible on laws and other bylaws.

THE ROLE OF THE MEDIA: BALANCING BETWEEN PUBLIC AND COMMERCIAL INTERESTS

After the end of the war in 1995, Bosnia and Herzegovina, thanks to the fact that it was greatly influenced by the international community, primarily the United States and the European Union, which led the peacekeeping and state-building process, passed modern media legislation and achieved great media pluralism. Neither physical attacks on journalists, nor even political pressures were frequent, so **BiH was highly ranked in terms of media freedoms in the period from 2002 to 2010, according to Reporters Without Borders**. However, the positive ratings reflected the existence of formal regulations and the absence of open pressures. So called indirect pressures that affect the content of the media have existed continuously, and due to the deteriorating economic and political situation in the country in the last five years, are experiencing a boom.

Many media analysts claim that media freedom is absolute in BiH. There is almost no area that, at least in some parts of BiH, is not completely open to various considerations, criticism and praise. However, deep divisions of the public, ie public opinion, ethnically and territorially, do not have a content constant. **What is suitable for criticism in one part of the country is not in another**. Depending on the political views on history or the ethnicity of the actors in the event, it depends on who and from which part of the country will criticize someone. Everyone has their national favorites and their view of history as well as the future of the country. And that is also revealed through media content in the topic of corruption.

Internet, the most popular medium in BiH

Research by media organizations shows that professional media on the Internet and social networks, primarily in the field of private users / posts, are the most important channel in informing citizens in Bosnia and Herzegovina. The key problem is that the production and distribution of information on the Internet is deprofessional, which is mostly contributed by social networks that have become an indispensable and (in) credible source of information, especially among the younger generations. As a platform that offers a wide range of entertainment and communication, the Internet has been dominant for about 15 years. But in the last five years, it has also become the most common source of information, primarily among young people

In the Media Plan Institute's 2019 survey in Sarajevo, Banja Luka and Mostar on the media habits of citizens, the majority of respondents indicated that they mostly follow the media on the Internet, as many as 42 percent. In second place are social networks, 30 percent, followed by television 17 percent. If we combine these first two results, because social networks are also a medium on the Internet, then we have an impressive data on the popularity of the Internet of as much as 72 percent as a platform⁴⁰. Television has been behind the Internet for several years, according to various researches, primarily as an information channel. There is an obvious feeling

⁴⁰ Research: Media habits, affinities and media perception WEB MEDIA DOMINATION, THE MOST POPULAR ENTERTAINMENT AND SPORTS CONTENT (2019), Media plan institute <https://mediaplaninstitut.files.wordpress.com/2019/12/istrazivanje-upotrebe-medija.pdf>

among most respondents that they are constantly active and informed in the media through mobile phones.

A similar result was recorded in 2017 among the young population. Research on Media Initiatives also empirically shows the dominance of the Internet in information. Over 70 percent of young people said they get the most information online. Of that, 35 percent through informative, professional and entertainment sites on the Internet, and 37 percent to get the most information through social networks. From the communication point of view, this is a startling fact, although expected based on current trends, because social networks are an informal, deprofessional form of communication in which there are no rules of traditional journalistic credibility, and therefore no responsibility.⁴¹ In third place in terms of information use is television (21 percent), while radio and newspapers with three or four percent at the bottom.

The affinities of young people show the total defeat of traditional media. Looking at age, the youngest group (16-19 years old) is mostly informed through social networks, while the third age group (24-27) uses television more to inform in the other two age groups, respectively. However, it is still less than social networks.

International donors, especially USAID, also reacted to these media trends by investing huge sums in supporting the production of content that speaks about the fight against corruption in the Internet media. New web media have grown that produce the so-called socially responsible topics, of which the fight against corruption is one of the key contents.

In a survey of journalists from BiH conducted by the Helsinki Committee for Human Rights and the web magazine Žurnal and CRMA at the end of 2019⁴², 39 percent of journalists answered that they had experienced pressure several times, while 14 percent of journalists stated that "the pressure in their work is constant". However, there were also 35 percent of journalists who said they had never experienced pressure. 12 percent state that they have experienced pressure only once. To summarize, we see that more than half of the journalists surveyed, 53 percent, often experience pressure. This confirms the trends emphasized by journalists' associations and international media organizations, that BiH is a country where media freedoms are increasingly under attack.

In 23% of cases, according to the respondents, political parties and their representatives are the ones who put the most pressure on journalists. In second place are representatives of the executive and legislative branches (15%) and 11% of criminals. Advertisers, according to respondents, were the ones who put pressure in six percent of cases. Interestingly, in three percent of cases, the surveyed journalists marked NGOs as exerting pressure, which is even more than stated for representatives of the judiciary (2%). A very high percentage of 27 percent is the "other individuals" category. Most did not say who the "others" were, but one open answer stated that it was the owner of the media. It is a worrying fact that in only 27 percent of cases,

⁴¹Youth and attitudes in corruption (2017), Media Initiatives <https://mediaplaninstitut.files.wordpress.com/2017/06/analiza-mladi-i-korupcija.pdf>

⁴²Freedom of speech and public interest. Helsinki Committee for Human Rights, Center for Media Development and Analysis (2019) https://helcommrs.org/images/docs/Sloboda%20govora%20i%20javni%20interes_Helsin%C5%A1ki%20odbor_zurnal.pdf

according to the respondents, the media completely stood behind its journalists who experienced pressure. 20 percent said they did not stop at all, and 53 percent said it was only partial. This indicates a situation that often media managements, both programmatic and proprietary, have policies and interests to follow, and that often journalists, if they “jump out” of the set matrices, remain stranded. Essentially, this is another empirical proof that a significant number of media outlets are not independent and that they balance quite a bit between the political and economic groups they target or are their target audience. Numerous analyzes of the content of Media Initiatives and the Media Plan Institute show that, depending on the commitment of the media, their reporting angles or interlocutors from close political and ethnic groups. In that sense, when asked if you think that there is journalistic solidarity in BiH, 67 percent of respondents answered that it exists only between journalists and the media who are on a similar political line. 28 percent of journalists answered that there is no journalistic solidarity at all, and only five percent believe that there is journalistic solidarity.

However, the fact that journalists are aware of the harmfulness of corruption and consider it the greatest devastation for BiH society is also shown by the fact that the largest number of respondents chose state corruption in all segments as the general cause of attacks on journalists (44 percent). In second place is the poor legal and professional system of journalists (26%). The ethnic and political divisions of BiH society have been cited by 16 per cent of journalists as the main cause of pressure on the media.

Media campaigns and motivating the production of media content about corruption

In addition to its own media production, which in terms of information reveals examples of corruption in BiH and through debate and other socio-political shows, including educational, discusses this topic and strengthens public awareness of the harmfulness of corruption for the community, part of the media was support and information and a promotional channel for the governmental and non-governmental sector in anti-corruption campaigns. Probably the strongest and most accepted media campaign was within the project "Capacity building for the fight against corruption in the structures of the BiH civil service" developed and implemented by PARCO in cooperation with APIK and other institution.

As stated in the IPAK report ⁴³ on Anti-Corruption Campaigns ⁴⁴ As part of the project to support the processes of democratic stabilization and public administration reform in BiH, a communication campaign "Report corruption!" was carried out in 2016 and 2017. throughout BiH, with the full support of the Public Broadcasters BHRT, RTVFBiH and RTRS, which broadcast a promotional radio and TV spot free of charge and realized a number of program contents that dealt with this topic. Also, through two direct meetings with journalists, representatives of about twenty media houses in Sarajevo and Banja Luka, the topic of the fight against corruption, research results, and the importance of their role in creating perceptions of the fight against corruption in BiH society. In addition to public broadcasters in BiH, the campaign included other most relevant electronic, printed and online media, all in order for key messages to find their way

⁴³ Project Institutional Support to Anti-Corruption (IPAK)

⁴⁴Anti-corruption and public awareness campaigns on corruption (Zlatko Minić, Sanela Tunović Bećirović, 2019.)

http://ipak.ba/documents/3.1_Output_Antikorupcijske_kampanje_i_kampanje_podizanja_svijesti_javnosti_o_korupciji1574592556.pdf

to the widest audience. According to the report, during the campaign, more than 50 announcements, interviews and special thematic articles and shows on media throughout BiH were realized, including a one-hour live show on BH Radio 1, which was available to all institutions in electronic format for further use. Through paid announcements on portals (klix.ba, radiosarajevo.ba, buka.com, frontal.rs), a total of 7158 downloads of texts were communicated, which communicated key messages from the campaign through banners and advertisements, as well as a video. Materials produced within the campaign (video, radio jingle, press-kit materials for journalists) are still usable through the websites of institutions and other communication channels in order to continuously communicate important messages from the campaign. In this way, continuity of proactive communication with citizens would be achieved, while on the other hand, the awareness of civil servants that it is important to make this information easily accessible would be built, as a kind of reminder of the importance of continuous fight against corruption and transparent communication with the public. The campaign aimed to raise public awareness of the importance of reporting corruption, as well as to raise awareness that corruption is an unacceptable form of behavior.

Part of the non-governmental sector within the framework of anti-corruption projects tried to encourage and encourage the media and journalists to report professionally on corruption in various ways. Thus, within the project Anti-Corruption Network in Bosnia and Herzegovina (ACCOUNT), in the period from 2012 to 2019, the awarding of the journalistic prize for the best reporting on corruption was organized.

In the mentioned period, over 400 submitted works (written report, videos, multimedia, etc.) were evaluated by an expert jury and a total of 16 awards were given. Awards were given for the best written, video, audio and multimedia reports on corruption. Journalist awards consist of recognition and a monetary amount of 1,000 KM.

Most of the awarded works are from online media, mostly those that are significantly funded by the international community, but from the point of view of public service journalism, it is commendable that in this period the awards were given to three journalists of the public Federal Television and a journalist of public BH Radio1. shows that these public services have produced quality investigative stories that treat corruption.

What is the attitude of the audience towards the content in these campaigns? In a survey conducted among young people in BiH on attitudes towards corruption conducted by Media Initiatives ⁴⁵, most believe that the best way for the media to better inform and strengthen the awareness of citizens to fight corruption is to publish more quality and clear content in dailies and on websites and newspapers (42%). Even half as many are those who believe that specialist TV shows and youth programs are needed where this issue would be presented in a clear and youth-friendly way. Although in last place, but still a significant percentage, are those who believe that the media in the fight against corruption can not help too much (17%).

⁴⁵Youth and attitudes in corruption, Media initiatives (2017) <https://mediaplaninstitut.files.wordpress.com/2017/06/analiza-mladi-i-korupcija.pdf>

In the Media Plan Institute survey from 2019 ⁴⁶ it turned out that citizens in the media "often follow" the largest percentage of entertainment and film, and then sports content. However, in the category of gradation "I follow from time to time", the largest percentage was recorded in stories about ordinary people, world events, and crime and corruption. Therefore, citizens are moderately interested in the topic of corruption, ie the fight against it, and it is probably possible to raise the interest of the public with a professional and interesting approach.

Despite the Law on Freedom of Access to Information, it is difficult for journalists to obtain data relevant to corruption.

In the research of Media Initiatives ⁴⁷ most interlocutors from the media and the NGO sector believe that the biggest problem in investigating the facts and contexts concerning corruption is the availability of information. Although Bosnia and Herzegovina was the first country in the region to adopt the Law on Freedom of Access to Information (FOIA), albeit under pressure from the international community, interlocutors from the media believe that it is not implemented or only selectively implemented in the sense of providing only information that does not sensitivity and importance, especially in relation to cash flows.

On the other hand, representatives of local authorities claim that they regularly provide information to the media and other interested parties, because it is their legal obligation. However, one interviewed, otherwise high-ranking local official, said that he "heard that sometimes information was not provided in his municipality", and he believes that it was out of party interests.

More than half of the institutions in Bosnia and Herzegovina do not respect that law, the analysis of the Center for Media Development and Analysis showed. During a survey on media funding, requests for information received about 55 percent of responses, which included institutions at various levels of government.

Transparency International conducted the survey ⁴⁸ which included ministries at all levels as well as municipalities, which is a sample of 280 public institutions, 80 at the level of Republika Srpska, 191 of the Federation of Bosnia and Herzegovina and 9 of Bosnia and Herzegovina. Public institutions were asked for information on end users and the amount of funds allocated in 2016 and 2017 to non-profit organizations (non-governmental, sports, trade union organizations, foundations, etc.), political parties, businesses, religious communities and individuals, and on the basis of grants, subsidies, scholarships, patronage and sponsorship, and one-time financial assistance (eg for education, health care, etc.). The results of the research show that 63.7% of the total number of covered institutions in the Republika Srpska, 69.2% in the Federation of Bosnia and Herzegovina, and 90% at the level of BiH submitted their response to TI BiH within the legally prescribed deadline. But, the result is incomparably worse when public companies are

⁴⁶ Research: Media habits, affinities and perception of the media DOMINANCE OF WEB MEDIA, THE MOST POPULAR ENTERTAINMENT AND SPORTS CONTENT, Media plan institute (2019)
<https://mediaplaninstitut.files.wordpress.com/2019/12/istrazivanje-upotrebe-medija.pdf>

⁴⁷ ELEMENTS OF CORRUPTION AT THE LOCAL LEVEL AND POSSIBILITIES OF PREVENTION (2019), Media Initiatives
<https://mediaplaninstitut.files.wordpress.com/2019/03/izvjestaj.pdf>

⁴⁸ SURVEY ON THE APPLICATION OF THE LAW ON FREEDOM OF ACCESS TO INFORMATION, Transparency International (2018)
<https://ti-bih.org/wp-content/uploads/2018/09/istrazivanje-2018.pdf>

observed. Only 40 percent of public companies in the Republika Srpska and only 27 percent in the Federation of BiH submit answers within the set deadline, and 37 percent of cases in which the procedure lasts longer than a month, although the legal deadline is 15 days⁴⁹.

Milkica Milojevic, a longtime journalist from Banja Luka and former president of the Association of BH Journalists, said at a media meeting in Sarajevo in 2019 that the topic of pressures on the media and journalists was not always relevant. the quality of those responses. "Unfortunately, the form is often filled in, and that information is useless to journalists because it was selected," said Milojevic.

⁴⁹Even after the court ruling, BiH institutions do not provide information <https://www.media.ba/bs/magazin-novinarstvo/ni-nakon-sudske-presude-bh-institucije-ne-dostavljaju-informacije>

Recommendations for public broadcasters services

Strengthening educational programs for children and youth

Law on the Public Broadcasting System of Bosnia and Herzegovina ⁵⁰ relatively generally prescribes a socially responsible role: “The basic task of public service broadcasters is to truly inform the public about political, economic, social, health, cultural, educational, scientific, religious, environmental, sports and other events by promoting diverse and credible information, encouraging democratic processes, ensure adequate representation of impartial news and programs on current events, at prime time and at other times, informative, cultural, artistic, educational, children's, sports and entertainment programs, and that the highest quality programs are available to the public in Bosnia and Herzegovina“. Law on Radio-Television of Republika Srpska ⁵¹ pays more attention to program obligations, and in the section "Program Principles" briefly states - "RTRS program includes information, culture, education, entertainment and sports“.

The European practice of public service broadcasters is to develop programs that should offer the growing population objective, quality programs that will contribute to additional education in various social spheres. Members of the management boards of public services, directors and editors since their establishment point out that in addition to information, the educational function of public services is crucial. However, due to the constant complex socio-political situation in the country, domestic production of educational programs was relatively modest. Therefore, in accordance with the data and views presented in this report and the overall activity of both the government and the education system and the NGO sector, it is necessary that:

Public service broadcasters should develop and produce an educational program that would address integrity issues

Programs should be broadly set and should address traditional principles of honesty, ethics and attitudes towards the community, but also new contexts. This primarily includes the unlimited possibility of communication and abuse on the Internet, as well as issues of integrity in the digital age. In this sense, it is necessary to develop issues of media literacy adapted to children of that age. The issue that has only been partially addressed in the education and media system for the youngest for only a few years is also the issue of corruption. We believe that corruption does not need to be addressed separately, it might be uninteresting and burdensome for the youngest viewers, but combining the topic with the facts of the new social age in terms of respect and development of ethics and honesty towards new social challenges would educate and attract children. Due to the media affinities of young people, including the youngest ones, it is necessary to adapt these shows for viewing on mobile devices as well.

Good media practice insists that such programs be a combination of different forms in order to attract and retain the attention of the youngest viewers (debate talks, journalistic / educational offs, short field examples, various visual elements such as drawings, charts ...). In case these

⁵⁰ Zakon o Javnom radiotelevizijskom sistemu Bosne i Hercegovine http://www.rtvbih.ba/loc/template.wbsp?wbf_id=25§ion=info

⁵¹ Zakon o Radio-televiziji Republike Srpske <https://www.paragraf.ba/propisi/republika-srpska/zakon-o-radio-televiziji-republike-srpske.html>

programs have a TV host, it is necessary for him/her to be close and interesting to children in terms of behavior, because at the youngest age the issues of media credibility have a different perception.

Since the establishment of the Public Broadcasting System of BiH, part of the content has been ordered from independent productions, so that it is possible to order such programs from external producers on a commercial basis. However, some non-governmental organizations receive money for RTV production through projects, so it is possible to take over professional (both program and technical) programs that treat the field of integrity. However, it is necessary to establish cooperation in which the editors could give producers advice and suggestions on what content they want as well as suggestions for their processing, which would create trust, but also ensure higher quality.

Production of professional articles on corruption within news programs

From the point of view of the media, any topic that emphasizes the development of society, democratic values and equality, is a socially responsible topic. Richard Sambrook, a former BBC editor and professor of journalism from Cardiff, said at a reception for representatives of public service broadcasters from BiH in London in 2012 that socially responsible topics can be very numerous and different. "It's not just important news, **it's a way of thinking about the world.** That you want to change something for the better, but to use professional rules ", said Sambrook. He pointed out that the **public service must be the leader of such an approach because it is often the most watched media that is currently financed from the funds of citizens.**⁵²

Students at the Department of Communication at the Faculty of Philosophy in Mostar, with the co-author of this text, who worked as a professor of journalism, had the task of listing socially responsible topics on which journalists should write stories. It was detected for BiH context of 30 topics on which a majority consensus was reached. Among other things, these are: issues of ecology, employment, economic development, interethnic reconciliation, regional cooperation, fight against corruption, women's rights, issues of children with disabilities, exodus of young people from the country, pronatality policy, rights of national minorities with special emphasis on Roma, activities of non-governmental organizations, and pressures on the media and non-governmental organizations. Therefore, based on the findings stated in this report and studying the role and practice of public services, we propose:

Public service broadcasters should provide greater and better representation of content on the detection of corruption, prevention of corruption and the fight against corruption in central news programs

According to ratings, Central dailies are the most watched / listened to programs on public RTV services. In accordance with the most common forms, lengths of shows and the number of content, it is necessary to put more focus on the topic of corruption. On average, the number of TV reports in a half-hour diary without a sports column is 8 or 9, with the same number of other forms. Given the intertwining of corruption with all segments of society and action, it is not excessive to expect that every day at least one content talks about some aspect of corruption. If daily events do not impose this topic, certain content should be downloaded from other

⁵² Mediji i javne politike – između proklamovanog i prakse (2020), ured. Gruhonjić, D, Drašković, B, Filozofski fakultet Novi Sad

programs of that media. With a good editorial assessment, take care that the dynamics and actors and sources are not identical and unique points of view, which could open doubts about the bias of the service. Particular care must be taken to ensure that the contributions are clear and that the various offenses and actions are explained in simple language.

Public service broadcasters should ensure strengthening of the investigative journalism in special socio-political programs

Public services have their own documentary information-political shows in which cases of suspicion of corruption are revealed and controversial actions of BiH political and economic actors are clarified. It is crucial to continue and further develop this practice. The selection of the topic, its processing (angle) and selection are a prerequisite for reporting on socially responsible topics. The starting point of engaged journalism is that public opinion can be influenced. It is also necessary that editors and journalists, even when they have a desire for change, must present it only with respect for traditional journalistic postulates. It is necessary to insist that supplementary sources, such as various analysts and representatives of the NGO sector, should not only be like-minded, but also that interlocutors should be commentators from options that are not in line with media editorial policy.

Working with state anti-corruption bodies and the non-governmental sector in this area

Public services use both political factors and representatives of the NGO sector as sources of information. Sarajevo-based public service dailies, state-owned BHT and federal FTV, cover significantly more than RTRS issues in which the NGO sector participates⁵³. In addition to numerical indicators, there is a much bigger difference in the field of topics of the recorded examples. BHT and FTV attach great importance to issues of political activism and the activities of the NGO sector to change socio-political relations, the work of executive and legal bodies as well as other government institutions. Part of the views expressed in these articles are often criticisms of the government and its actions and effects. Therefore, the newsrooms of the RTV service should:

- Make more use of data obtained by the non-governmental organizations dealing with the prevention of corruption (especially through research) or to follow the conferences of NGOs where corruption is discussed, because it is in one place a range of sources that can be used in daily and thematic (research) production.
- The source of information are the bodies working on the prevention of corruption, of which there are as many as 14 at different levels (state, entities, district). A certain number of these bodies have never been mentioned in the programs. These bodies, at least those that are active, should be more frequent sources of information in correlation with those they are supposed to control.

Representatives of political parties, parliamentarians and ministers are important sources of information on corruption. Intensify their presence in the programs with journalistic insistence on concrete answers on how to solve corruption problems

⁵³ INFORMATIVE COVERAGE OF NGO SECTOR ACTIVITIES, WOMEN'S RIGHTS AND ROMA ISSUES, Media plan institute (2019) <https://mediaplaninstitut.files.wordpress.com/2019/04/izvijestavanje-o-nvo-zenskoj-i-romskoj-tematici.pdf>

FINAL REVIEW

The foundation has been created, knowledge multiplication and stronger institutional cooperation are necessary

Corruption is a stumbling block in the development and progress of Bosnia and Herzegovina, and all analyzed activities, systemic and alternative education, the activities of the non-governmental sector and media production, are an important link in the process of its suppression. This is primarily reflected in the actions of projects aimed at incorporating the themes of ethics and anti-corruption into the foundations of society and public opinion, and these foundations are education and the media. It is encouraging that there is interest, at least verbal, from all parties involved in the fight against corruption.

Training of a larger number of educational and pedagogical staff in schools that were involved in the project for the application of the Curriculum and work on topics in the field of ethics and anti-corruption increases the possibility of their engagement in multiplying this model in other schools in their environment. A base has been created for new projects where it would be desirable to engage the NGO sector as an initiator and mediator. Numerous trainings were attended by participants from various academic fields, from social, legal, economic and criminal, and this provided a multiperspectival approach to the problem of corruption and viewing this problem from multiple angles. This approach allows trained teachers to more easily transfer knowledge to their colleagues in other schools who have not been able to participate in projects.

Anti-corruption education in BiH is in its infancy and the way to change awareness and nurture the concept of civic activism among children and youth is a natural way to shape and stimulate the construction of generations more resistant to the challenges of negative phenomena that will be important social actors in the future. The ambitions for change in society that are placed before project initiatives, civil society organizations, teaching staff, the management of educational institutions and the students themselves, students and parents, must be realistic, workable and contextually applicable. On several occasions through various researches we have seen that the best results are achieved when the material of ethics and anti-corruption is explained through fables (animals, heroes from comics and children's cartoons) or older students through examples from everyday life. An additional lever of interest and perception of the presented data and ethical criteria are "exits" from schools for study visits to institutions or media where students get acquainted with issues, procedures and receive data from operationally engaged people, which creates additional authority in education and education is extremely important for positive perception.

The media have, according to many theorists, the role of gatekeepers, gatekeepers who open only some information. Lance Bennett, an American media theorist, believes that the role of a gatekeeper is crucial for maintaining the system of government. By regulating the flow of public information, the media hold enormous power in the social system. *"Just imagine what strength you would have if you could control **who** speaks in every situation, **how long** that speech will be,*

*how convincingly it will be presented and what it could say. People would call you a tyrant or a dictator*⁵⁴.

Despite the growing focus on deprofessional communication and (semi) information through social networks, professional journalists still play the role of gatekeepers and insisting on their professionalism is key to instilling social values. Although in the last six years, which is largely a time model of this analysis, the media have not had continuous success in strengthening the revolt against corruption or activism by legal means (protests, petitions, change of government in elections), the revelation of some scandals has led to public outrage. all parts of BiH, which partially disrupted the circle of ethnically exclusive attitudes.

But regardless of these occasional "sparks", it is obvious that the citizens are too passive and that a strong anti-corruption front is needed that would import both the authorities and the media and the NGO sector and the citizens. Also, there is a greater attitude through various public opinion polls that citizens promote corruption by being willing to give or give bribes. However, such behavior is a response to extortion, ie the unique attitude of citizens that various public services are corrupt and that a tradition has been created that something can be accelerated or achieved if money is given.

Bosnia and Herzegovina has major problems that are fertile ground for a number of collateral phenomena, including corruption. The fight against corruption should be a constant action of the education system, the NGO sector and the media. The transition in BiH, which has been going on for 30 years, and which was further slowed down by the war, will not be completed soon. But raising awareness of morality, ethics and corruption should not be given up. The link between the NGO sector and the media and their cooperation with the authorities, or the pressure on the authorities to make corrections in order to create a fairer society, must be a line of resistance. The changes that have taken place in the second half of this decade show that despite all the problems, it is possible to make changes and create a basis for the next steps.

⁵⁴Bennett, W Lance (1988), *News: Politics off Illusion*, London, Longman