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Sixth Progress Report

of the IPA Project

"Support to implementing anti-corruption strategies in Bosnia and Herzegovina"
for the period April 15th– July 14th 2020

This Interim Report is a document intended for internal use in the IPA project "Support to implementing anti-corruption strategies in Bosnia and Herzegovina" (EuropeAid/139068/DH/SER/BA).

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Project summary sheet

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Date of contract start:	January 15 th 2019	Project office contacts:	Radnička 23, Sarajevo Tel: 033830 646
Date of contract finish:	January 14 th 2021	Contracting Authority:	Delegation of the European Union to Bosnia and Herzegovina
Contract no:	2018/401-880	EUD contacts:	Skenderija 3a, 71000 Sarajevo, BiH T:+387 (0)33 254 714 E:Johannes.HINTZEN @eeas.europa.eu
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Abbreviations:

AC	Anticorruption
ACS	Anticorruption Strategy
AP	Action Plan
ACB	Anticorruption bodies (at the level of entities, BD BiH and cantons)
APIK	Agency for prevention of corruption and coordination of the fight against corruption
BD BiH	Brčko District BiH
BiH	Bosnia and Herzegovina
EU	European Union
EUD	Delegation of the European Union to Bosnia and Herzegovina
FBiH	Federation of BiH
NKE	Non-key experts
IE	Incidental expenditures
IP	Inception Phase
IPAK	Institucionalna podrška antikorupciji (Institutional Support to Anti-Corruption)
IR	Inception Report
IPA	EU Instrument for Pre-Accession Assistance
JNKE	Junior non-key expert
NGO	Non-Governmental Organization
PT	Project Team
PSC	Project Steering Committee
RS	Republika Srpska
SNKE	Senior non-key expert
TL	Team Leader
ToR	Terms of Reference
TO	Technical Offer

Summary of the Project

This is the Sixth Progress Report for the period January 14th April 15th 2020 of the two-year IPAK





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Project "Support to the Implementation of Anti-Corruption Strategies in Bosnia and Herzegovina" (BiH) which is funded by the European Union from the Instrument for Pre-Accession Assistance (IPA). Value of the Project is 658.250 EUR and it is implemented by Consortium led by European Consulting Group LLC (RS), consisting of Bureau for Institutional Reform and Democracy – BIRD GmbH (DE), INCOM Business Consultants Ltd. (GR), Ecorys Netherland B.V. (NL), DCS d.o.o. (BA).

The Project provides assistance to anticorruption bodies and institutions at all levels of government in BiH to raise the fight against corruption in the country at a higher and more engaged level.

According to the Terms of References (ToR) of the Project, main beneficiaries of the Project are 14 anticorruption bodies at all levels in BiH, State Investigation and Protection Agency (SIPA), Public Administration Reform Coordinators Office of BiH, Audit office of the institutions of BiH, Commission of the BiH Parliamentary Assembly for monitoring of work of APIK, Commission on Conflict of Interest of the BiH Parliamentary Assembly, as well civil society organisations active in preventing and fighting corruption, media and media organisation active in investigating and informing the public about corruption cases and companies and business associations at the level of entities, Brčko district and cantonal level.

Through the three components, the project provides assistance at all levels of government to:

- Improve implementation of their anti-corruption strategies (ACS) and action plans (AP)
- Improve monitoring of implementation of anti-corruption strategies and action plans
- More efficiently curb corruption in institutions that are particularly prone to corruption
- Improve existing anti-corruption strategies and accompanying action plans
- Improve and harmonize anti-corruption legislation in the country
- Give recommendations for preparation of BiH ACS and AP plan for the period 2020-2024
- Increase the level of transparency and ethics in the work and conduct of public institutions
- Improve the system for receiving and acting upon the citizens' reports for corruption
- Harmonize the activities of non-governmental organizations in the fight against corruption
- Improve the preparation and implementation of integrity plans in public institutions
- Improve the system for implementation of integrity plans and prevention of conflicts of interest
- More actively involve the private sector and business associations in the fight against corruption
- Encourage and enhance communication of anti-corruption institutions with media and public
- Increase citizens' understanding impact of corruption and readiness for reporting of corruption
- Establishment traditional, annual award for "Contribution to the fight against corruption".

Project background

BiH has a status of potential candidate for EU membership with serious set of obligations for reforms required to advance in the EU accession process, where design and implementation of anticorruption





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policies is an important criterion. The reasons for insufficient results in prevention and fight against corruption in the country are various and include obstacles imposed from the complex administrative structure of the country, lack of political and administrative will, as well as insufficient pressure from general public, civil society, media and business sector for positive changes in the fight against corruption.

The fragmented and complex governance system, split between different administrative units - 143 municipalities, two entities, one separate district, and, in the case of Federation of BiH - ten cantons, as well as federal state structures influences negatively coordinated prevention and fight against corruption and produces evident lack of responsibility, transparency and accountability at all levels of government.

But, despite all obstacles, one can say that BiH has all prerequisites for serious and more tangible anticorruption results, since the legislation is in place, APIK is staffed and budgeted up to the level to deliver concrete work, majority of the citizens demands improvement of rule of law and the CSOs are willing to contribute in that process. The only remaining component is creation of serious political will and its transfer to the institutions mandated to prevent and combat corruption, for the start of needed improvement of the rule of law in the country.

Current anticorruption situation in BiH

Current anticorruption situation in BiH can't be detached from the overall political and social situation in the country, which influences decisive political will for fight against corruption although there is increasing and determined encouragements from international community as well as public demand and pressure for advanced and more tangible results in the prevention and the fight against corruption. In the last two reporting periods, there is one development in the reporting period that is favourable for growth of corruption – acting of the executive power at all levels in BiH in the situation of COVID-19 pandemic, which decrease the transparency of functioning of institutions and provide possibilities for decreased accountability and responsibility of institutions. Objective need for quicker, sometimes urgent procurements needed for protection of the health of the citizens and making the decisions about that without sufficient monitoring could result with misuse of power and increase the corruption. Another source of corruption might be unequal distribution of a financial help to the business based on nepotism, cronyism as well as possible corruption in the usage of funds and goods received from the international community.

Although the pandemic situation has a negative influence to needed more decisive political and administrative will for the fight against corruption as well as tangible and noteworthy advance in this scope, there are ongoing developments that have a potential to improve the situation. The most important among them are:

- New BiH ACS and AP 2020-2024, which (if prepared and implemented properly) could have significant impact on the sectorial approach in the prevention and fight against corruption,





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improve detection and repression of corruption and improve cooperation and coordination of work of ACBS. In addition, the new BiH ACS and AP 2020-2024 should have decisive influence for the preparation of more advanced and more engaged new ACSs and APs in the FBiH and BD BiH. All levels of government have their own ACS and /or APs (in the cases when there is no ACS in place there is AP for that level of government (most of them linked to the BiH ACS and AP).

According to the answers provided by the ACBs to the questionnaire of IPAK Project within the research in the Activity 1.1 and 1.3, almost all of the ACBs are implementing only measures from the ACS and AP on their level of government, only some of them are doing so with the measures from the BiH ACS and AP. That significantly increases the importance of the ACS and AP on other levels and high need of harmonisation of the ACSs and APs on all levels in BiH, otherwise the prevention and fight against corruption will become even more fragmented and less effective.

- Ongoing initiative for increased competencies, position and capacities (so called *professionalization*) of ACBs at all levels should be a base for their more tangible and concrete activities and results in the prevention and fight against corruption. If prepared and conducted properly, the *professionalization* of ACBs should turn them from existing *commission type* of bodies (almost all of them are of that kind currently) into a centres of coordination of prevention and fight against corruption.

ACBs have significant difference in the capacities, structure, competencies, support from their governments and parliaments as well as, to certain extent - commitment to work on prevention and fight against corruption. This unfavourable situation is clearly identified both by APIK and the Project Team and was addressed in the preparation of the BiH ACS and AP 2020 – 2024 as well as appropriate initiative of APIK towards the professionalization of the ACBs and assurance of adequate resources and independency of the ACBs.

But, besides being a challenge, the pandemic situation and especially post pandemic period could be also a chance for improvement of the prevention and fight against corruption due to the effects that it will have on the public opinion. Pandemic situation and its effects have serious potential to swerve the focus of attention of the citizens to personal security and need for protection of their health and related weaknesses of the system in the country. One could expect that citizens' dissatisfaction from malfunction not only of the health system, but of the whole system of administration in general, which is very often linked with the corruption of all types and additionally could increase their disapproval of corrupt behaviour. In the same time, it could significantly increase demands of the citizens for more determined prevention and fight against corruption as a prerequisite for building more efficient system that will produce public goods and take care of the life of the citizens.



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Planned activities for the reporting period

Based on activities stipulated in the ToR and TO, as well as on the inputs from the stakeholders during the Inception Phase (IP), the Project Team (PT) defined a detailed timetable of activities for the whole duration of the Project as well as the indicative timing of the events to be organized within the Project. In the implementation of planned activities in the reporting period, the PT was working according to the planned timetable, with high level of flexibility, mostly to adjust to the pandemic conditions, committing most of time and resources on following activities:

Component 1: Status update on anticorruption strategies, related action plans and assessment of legal framework at all levels of government in BiH

- Activity 1.2 Improvement of the fight against corruption in institutions particularly prone to corruption
 - Task 1.2.1 Identification of institutions particularly prone to corruption
 - Task 1.2.2. Identification of mechanisms that can prevent corruption in these institution and assessment of presence and functioning of these mechanisms
- Activity 1.8 Consolidation, harmonization and streamlining of anticorruption legal framework at all levels
 - Task 1.8.2 Assessment of BiH anticorruption legal framework against that standards, recommendations for achieving standards
 - Task 1.8.3 Recommendations for consolidation, harmonization and streamlining of anticorruption legal framework at all levels

Component 2: Development of ethic infrastructures in public services and standards on ethic and integrity for the business sector in BiH

- Activity 2.1 Improvement of preparation and implementation of integrity plans in public institutions
 - Task 2.1.1 Identification of institutions obligated to prepare integrity plans and methodologies for that purpose
 - Task 2.1.2 Assessment of methodologies for preparation of integrity plans and state of their preparation
- Activity 2.2 Support enhancing of transparency and ethics infrastructure in public services at all levels
 - Task 2.2.1 Assessment of legislature and capacities for transparency, ethics infrastructure and e-government
 - Task 2.2.2 Assessment of level of implementation of transparency, ethics infrastructure and e-government
- Activity 2.4 Development of integrated standards to mitigate risk of corruption originating from private sector





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- Task 2.4.1 Identification and establishment of cooperation with relevant and active business organizations
- Task 2.4.2 Assessment of the up-to-date involvement of private sector in the prevention of corruption
- Task 2.4.3 Recommendations for improvement of the role of private sector in prevention of corruption
- Task 2.4.4 Development of integrity standards to mitigate risks of corruption originating from private sector

Component 3: Enhanced capacities for communication on anticorruption issues and awareness raising campaign targeting citizens to counter corruption

- Activity 3.3. Delivery of trainings for communication on integrity, anticorruption, interaction with the media and awareness raising
 - Task 3.3.4 Advocacy on integration of training modules in the official training curricula for civil servants
- Activity 3.5. Preparation and launch awareness-raising campaign targeting citizens to counter corruption and establishment of AC “Good Practice Award”
 - Task 3.5.1 Design and preparation of awareness raising campaign targeting citizens to counter corruption and report corruption
 - Task 3.5.4 Support to organization of the first “Good Practice Award” for promotion of AC practices.

Completed activities in the reporting period

Most of envisaged activities in the reporting period were implemented as planned, despite the limited possibilities for direct communication with the Project beneficiaries and impossibility to organise events, such trainings, workshops and conferences due to the pandemic situation. During the whole reporting period, the Project Team organised its work according to the limitation due to the pandemic conditions, in order to secure as much as possible timely and smooth implementation of the Project. Work was organised in a manner agreed with the Program Manager from the EUD for the previous reporting period and was based on the following:

- The Team Leader will stay in the BiH in order to coordinate the work and organise the work of the Project’s office in accordance with prescribed security measure
- To keep communication with EUD, beneficiaries and short term experts through the distanced means of communication (telephone, mail, Skype, Viber, Whatsapp)
- Postpone the activities which requires gathering of the people, like meetings, trainings, workshops, conferences, project steering committees





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- To concentrate work and efforts in the preparation of the materials and outputs of the projects in order to be ready to organise events once the situation is normalised
- To intensify engagement of short term experts in order to prepare as much as possible materials and outputs of the Project
- To be ready for intensified organisation of events after the end of pandemic situation, whenever (and if) that becomes possible
- To be ready for organisation of a web-based trainings, workshops, conferences, if the pandemic situation is not resolved soon.

By these adjustments of implementation of the activities, the Project Team considers that the activities of the Project could be completed on time and with the same quality as it was planned, except organization of events that envisages physical gathering of people. This way of organisation of the work of the Project Team in the second half of this reporting period brought some changes in the implementation of the activities, but still most of planned activities were implemented.

In more details, in this reporting period, the PT completed the following activities:

Activity 1.2 Improvement of the fight against corruption in institutions particularly prone to corruption

In the reporting period, the Project Team has:

- Created comprehensive list of institutions at all levels of government in BiH particularly prone to corruption, based on the international and regional experience of vulnerability to corruption
- Identified and analysed preventive measures from anticorruption strategies and action plans at all levels in BiH related to identified public services particularly prone to corruption
- Published call for experts on the web site of the Project and identified candidates for short-term experts (STE) that will work on the activities envisaged within the framework of this Activity.

Activity 1.8 Consolidation, harmonization and streamlining of anticorruption legal framework at all levels

In the reporting period, the Project Team (with approved STE) has:

- Fine-tuned analysis, conclusions and recommendations for harmonisation of relevant AC laws at all levels in BiH with the international standards and streamlining for consistency among them
- Prepared final analysis, conclusions and recommendations for harmonisation of relevant AC laws at all levels with international standards and streamlining for consistency among them

Component 2: Development of ethic infrastructures in public services and standards on ethic and integrity for the business sector in BiH

Activity 2.1 Improvement of preparation and implementation of integrity plans in public institutions

In the reporting period, the Project Team has:





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- Identified and analysed of existing methodologies for preparation of integrity plans, looking for room for their improvement and harmonization
- Identified presence and clarity of provisions from ACSs and APs at all levels in BiH that envisage preparation of integrity plans, looking for possibility to improve the provisions regarding that
- Assessed capacities and expertise of ACBs at all levels in BiH for preparation of methodologies for preparation and implementation of integrity plans and needs for improvement of this scope
- Published call for experts on the web site of the Project and identified candidates for short-term experts (STE) that will work on the activities envisaged within the framework of this Activity.

Activity 2.2 Enhancing transparency and ethics infrastructure in public services at all levels

In the reporting period, the Project Team has:

- Identified relevant international standards that regulate measures for transparency, ethic infrastructure and e-government
- Prepared draft check-list on the basis of the international standards against which current situation in the transparency, ethic infrastructure and e-government will be measured
- Identified provisions from ACSs and APs at all levels in BiH envisaging measures for transparency, ethic infrastructure and e-government
- Published call for experts on the web site of the Project and identified candidates for short-term experts (STE) that will work on the activities envisaged within the framework of this Activity.

Activity 2.4 Development of integrated standards to mitigate risk of corruption from private sector

In the reporting period, the Project Team (with approved STE) has:

- Identified business associations, private companies as well as academia experts, CSOs activists and journalists active in the prevention of corruption in private sector
- Identified and analysed previous activities on prevention of corruption in private sector (analysis, reports and recommendations) to build up upon them
- Prepared a questionnaire for identification of current situation with prevention of corruption in the private sector and assessment of up-to-date engagement of the private sector in the scope
- Prepared draft Recommendations for improvement of the role of private sector in prevention of corruption and prevention of corruption related to the private sector.

Activity 2.5 Advocacy for adoption of integrated standards and delivery of trainings for business, public stakeholders and NGOs in this scope

In the reporting period, the Project Team (with approved STE) has:

- Prepared wide identification of possible stakeholders for support for adoption of integrity standards for private sector and public companies
- Started the preparation of recommendations for adoption of integrity standards and TNA for trainings on advocacy for adoption of integrity standards

Component 3: Enhanced capacities for communication on anticorruption issues and awareness raising campaign targeting citizens to counter corruption





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Activity 3.3. Delivery of trainings for communication on integrity, anticorruption, interaction with the media and awareness raising

The Project Team proceeded with communication with the agencies in charge of civil servants at all levels where they exist, advocating integration of the outputs of the Project from this activity to be included in the official training curricula for civil servants.

Activity 3.4 Empowering media and civil society to educate public at large about the dangers and negative impact of corruption at the life of citizens

Within this Activity, the Project Team (with STE) has:

- Assessed previous activities and current situation in the following fields:
 - o Inclusion of ethics and integrity in the educational progress at all levels of education
 - o Programs or other forms of inclusion of ethics and integrity at the public broadcasters
 - o Campaigns and projects of CSO on ethics and integrity and negative impact of corruption
 - o Provisions of ACSs and APs at all levels that envisages of ethics and integrity in education
 - o Existence of content of ethics and integrity in curricula for all levels of education
 - o Possibilities for improvement and increasing the level of ethics and integrity in curricula
 - o Provisions of ACSs/APs at all levels that envisages ethic and integrity on public broadcasters
 - o Current existence of content of ethics and integrity at the programs of public broadcasters
 - o Willingness of public broadcasters to broadcast programs of public interest public
 - o Reasons for the insufficient presence of ethics and integrity at public broadcasters.

On the basis of that, the STE guided by the PT, has prepared questionnaires which were distributed to ministries of education, pedagogical institutes and public broadcaster at all levels regarding abovementioned issues.

Answers on the questionnaires were used for preparation recommendations:

- For inclusion of ethics and integrity in the educational process
- For inclusion of ethics and integrity at the public broadcasters
- For campaigns and projects of CSO on ethics and integrity.

In order to facilitate implementation of these recommendations, preparation of the training needs analysis and curriculum for the training in these scopes is under preparation, which will be used for the training as soon as organisation of such events will be allowed.

Activity 3.5. Preparation and launch awareness-raising campaign targeting citizens to counter corruption and establishment of AC "Good Practice Award"

In the reporting period, the PT has prepared the final concept and detailed communication strategy of awareness raising anticorruption campaign and submitted it for approval to the EUD, which decided to put on hold campaign and to re-assess whether the campaign is needed under the current circumstances in country, especially in the law enforcement and justice sector in BiH. Another challenge for the implementation of the campaign is the fact that it will overlap with political parties' campaign for the local elections. Having in mind arguments in favour and against the campaign in



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current circumstances, there is a need for a decision of the EUD and PSC whether there is going to be a campaign or not.

The Project Team proposed that, if there is a decision for cancellation of the campaign, unused incidental costs to be used for other activities which would be implementable and more useful for the beneficiaries.

As for the establishment of “Good practice award” there is a final decision that it is cancelled and the Project Team, in consultations with the ACBs proposed its replacement with creation of a web portal/platform for internet presentation of the anticorruption bodies, their competencies, work and achievements. The Project Team informed ACBs about this idea, asking their opinion from them, seven (out of 11) ACBs replied, six of them agreed with the idea (three unconditionally, three agreed if there is a support regarding the administration), one proposed to postpone the decision for after pandemic situation. The decision on the web portal/platform is to be made by the EUD and PSC and it will depend on the guarantees for its sustainability and capacity and willingness of the ACBs to maintain it.

Cross-cutting issues

In this reporting period, the Project Team has been engaged in the following crosscutting and visibility activities of the Project:

- Organization of the Sixth Project Steering Committee Meeting

The Sixth Project Steering Committee Meeting was organized and held via Skype conference call (due to the pandemic conditions), on May 12th 2020

Fully completed activities up-to-date

During 18 months of implementation of the Project, out of 18 planned activities, the Project Team has fully completed the following 11 activities:

- 1.1 Improvement of timely and punctual implementation of ACSs and APs at all levels in BiH
- 1.3 Strengthening capacities for accurate and efficient monitoring of implementation of ACSs and APs at all levels
- 1.4 Improvement of existing ACSs and APs and recommendations for next ACS and AP of BiH
- 1.5 Delivery of trainings for implementation of ACSs and APs and monitoring of implementation of ACSs and APs at all levels
- 1.6 Facilitation of coordination and synergy of CSOs activities in the fight against corruption
- 1.7 Support to establishment of anticorruption network in institutions and citizens reporting system at all levels
- 1.8 Consolidation, harmonization and streamlining of anticorruption legal framework at all levels, except organization of the Conference to present findings and recommendations
- 3.1 Preparation of model of AC communication strategy based on existing ones and on major awareness-raising campaigns





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- 3.2 Enhancing capacities for communication on integrity, anticorruption and awareness raising and interaction with the media
- 3.3 Delivery of trainings for communication on integrity, anticorruption, interaction with the media and awareness raising
- 3.4 Empowering media and civil society to educate public at large about the dangers and negative impact of corruption at the life of citizens, except organization of the Conference to present findings and recommendations.

Conference from the Activity 1.8 and the training from the Activity 3.4 will be organized as soon as the pandemic situation is resolved and organizing of such events will be allowed by the local regulation and/or decision of the EUD.

Pending Activities

Activities on which the Project Team has been working in this period and are pending in the different phases of their implementation are the following:

- Activity 1.2 Improvement of the fight against corruption in institutions particularly prone to corruption
- Activity 2.1 Improvement of preparation and implementation of integrity plans in public institutions
- Activity 2.2 Enhancing transparency and ethics infrastructure in public services at all levels
- Activity 2.3 Support to enhancement of transparency and ethics infrastructure in public services
- Activity 2.4 Development of integrated standards to mitigate risk of corruption from private sector
- Activity 2.5 Support to adoption of integrated standards to mitigate risk of corruption from private sector
- Activity 3.5 Preparation and launch awareness-raising campaign targeting citizens to counter corruption and establishment of AC "Good Practice Award"

Planned activities for the next reporting period

In the next reporting period, depending on the development of the pandemic situation and the working conditions related to it, the Project Team will work on the following Activities:

Activity 1.2 Improvement of the fight against corruption in institutions particularly prone to corruption

The Project Team will propose candidates for STE and after their approval, the following tasks will be implemented:

- Preparation of check list for reviewing of prevention measures in public institutions in BiH, based on international standards (Conventions of UN, OECD, CoE, EU and GRECO recommendations)





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- Analysis of completeness and quality of preventive measures against the check list of relevant international standards (Conventions of UN, OECD, CoE, EU and GRECO recommendations)
- Systematization of collected data in comprehensive list of public services indicating presence or absence of preventive measures and their quality for every level respectively
- Prepare Recommendations for improvement quality of preventive measures in public services, enhancement of their implementation and resources needed for their proper implementation

Activity 2.1 Improvement of preparation and implementation of integrity plans in public institutions

The Project Team will propose candidates for STE and after their approval, the following tasks will be implemented:

- Assessment of capacities and level of expertise for preparation and implementation of integrity plans in the institutions, as well as responsible person (body or unit) for monitoring of implementation as well as written procedures and reports on implementation
- Identification of obstacles and challenges in preparation and implementation of integrity plans in the ACBs and institutions, as well as possible ways to overcome them.
- Preparation of Recommendations for improvement and harmonization of methodologies for preparation of integrity plans as well as Recommendations for improvement of capacities for preparation and implementation of integrity plans at all levels
- Preparation of a Raw model of methodology for preparation of integrity plans in order to foster harmonization of the methodologies at all levels in BiH and to improve their overall quality by providing example for well-designed integrity plan

Activity 2.2 Support enhancing of transparency and ethics infrastructure in public services at all levels

The Project Team will propose candidates for STE and after their approval, the following tasks will be implemented:

- Identification of absence, shortcomings, inconsistencies in the legislature that regulate transparency, ethic infrastructure and e-government at all levels in BiH
- Preparation of assessment of current situation with transparency, ethic infrastructure and the role of e-government at all levels in BiH
- Preparation of Recommendations for improvement of transparency, ethic infrastructure and implementation of e-government in three major fields – legislature, capacities and overcoming the obstacles in these scopes.

Activity 2.3 Support to enhancement of transparency and ethics infrastructure in public services

- Selection of institutions for support in implementing of recommendations on transparency, ethics infrastructure and e-governance





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- Models for codes of ethics/conduct, rules for conflict of interest management and procedures for establishment and work of ethics board
- Preparation of Plan for support in implementing of recommendations on transparency, ethics infrastructure and e-governance
- Delivery of assistance in implementing of recommendations on ethics infrastructure ethics, infrastructure and e-governance
- Identification of issues related to transparency, ethic infrastructure and e-governance to be included in the PARCO's activities

Activity 2.4 Development of integrated standards to mitigate risk of corruption originating from private sector

- Development of integrity standards to mitigate risks of corruption originating from private sector
- Organization of national-wide conference on integrity standards and their implementation (if and when the pandemic situation allows organization of such an event)

Activity 2.5 Advocacy for adoption of integrated standards and delivery of trainings for business, public stakeholders and NGOs in this scope

- Preparation of Recommendations for adoption of integrity standards and TNA for trainings on advocacy for that
- Organization and delivery of training on advocacy for adoption of integrity standards for private and public companies (if and when the pandemic situation allows organization of such an event)
- Preparation of a plan for Support for adoption of integrity standards for private and public companies.

Activity 3.5 Preparation and launch awareness-raising campaign targeting citizens to counter corruption and establishment of AC "Good Practice Award"

Implementation of the anticorruption "Good practice Award" faced different and serious challenges for implementation as described in the previous reports and the decision whether to modify these activities or to cancel its implementation is to be made by the EUD and PSC.

In the next reporting period, there is a need for the final decision by the EUD and the PSC on the Award, with the following options being on disposal:

- Award to be replaced by establishment of a web portal/platform for presentation of the ACBs
- Establishment of the Award or replacement activities to be cancelled.

In the next reporting period, there is a need for the final decision by the EUD and the PSC on the Campaign, with the following options being on disposal:

- Preparation of new concept and organization of the Campaign as it was planned
- Downsizing the campaign and implementation of smaller scale, targeted campaign





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- Implementation of the campaign to be cancelled and funds to be used for other activities.

Issues requiring attention

Every project is based on certain assumptions and faces risks (identified in the TO and updated in the IP) during the implementation and they need to be reviewed and updated constantly in the implementation of the Project. In this regard, the following issues requires attention in the forthcoming period:

- Implementation of the activities in the pandemic conditions

Among other needs for adjustment to the implementation of the Project, the most complex decision to be made is the one on the organization of events that require gathering of participants, such as trainings, workshops, conferences etc.). While in this reporting period, when strict recommendations and rules were in power not allowing organization of such events, there is a trend in easing the restrictions that might allow them. Since the Project Team cannot independently make a decision whether such events could be organized and take the responsibility for the risk of spreading the COVID 19, there is a need for a decision in this scope by the EUD and PSC.

- Improvement of capacities and position of the ACBs (so-called *professionalization*)

In the next reporting period (but also in general) the particular attention should be paid to the process of the improvement of capacities and position of the ACBs (so-called *professionalization*), since it will be of vital importance for the future fight against corruption. Namely, the IPAK Conference from June 13th 2019 has initiated the processes of professionalization of ACBs at some levels, but there is a possibility for different and not productive outcomes since that process is not synchronized enough. Therefore, there is a need for support and harmonization of ongoing activities, otherwise, if there is no support and guidance of the professionalization process, it is very likely that the following negative consequences would appear:

- Significant differences would arise among the ACBs with regards to their position, capacities and competencies, which will make coordination and cooperation difficult.
 - The regulation of their work as well as obligations for cooperation and coordination among them and with APIK will be ambiguous and, most likely, jeopardized.
 - Those potential differences and inefficiencies would be much more efficiently prevented with project-based organized support and guidance, rather than mitigated and resolved later after decision on the design of the ACBs had already been taken.
- Preparation of the ACSs and APs on other levels of government

All levels of government have an obligation to prepare ACS and AP for the next five-year period (except the RS where there is ACS and AP adopted, valid until the end of 2022) but due to the current situation and capacities of the ACBs which are to prepare the ACSs and APs, there is a need for





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support and guidance of that processes. If the ACBs are left to prepare ACSs and APs alone, without support and guidance of the process, it is very likely that the following negative consequences would appear:

- There is a real possibility that most of the ACBs will opt for *lightweight versions* of ACS and AP, in order to implement them easier and without significant risk
- There is a real possibility for variation in the content from one ACS and AP to another and without necessary harmonization, significant discrepancies among them could appear
- The fight against corruption in BiH will become even more fractioned, not enough harmonized and consequently - less efficient that it has been thus far.
- Need for intensified anticorruption activities in the pandemic and post-pandemic situation

Pandemic situation will swerve the attention of citizens to weaknesses of the whole administrative system in the country, which are often linked with the corruption and could be reason for additional disapproval of corrupt behaviour. One can expect that the prevention and fight against corruption will not disappear from the focus of interest of the citizens because of the pandemic situation, at a contrary – it could become even more important after the end of pandemic situation because:

- Economy will suffer significant damage and there will be a need for as quick and as high economic recovery and economic growth as possible, where the corruption is one of the most important obstacles for economic recovery and growth
- In order to respond to pandemic situation most of the transitional countries temporarily concentrated the power in the governments and by that decreased the control over the public procurement and performance of the institutions, which is very favourable for corruption
- Economic crisis which will follow the pandemic situation will affect the financial capacity and jeopardize the solvency of the companies, which be even more oriented towards doing business with the budgetary institutions as safer payer, increasing the corruption pressure
- As a result of pandemic crisis, rate of unemployment will increase and, because of “safe salaries” in the budgetary institutions, will create a situation in which employment in them will be even more desirable than before and increase the influence of political parties and political corruption.