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Fifth Progress Report

of the IPA Project

"Support to implementing anti-corruption strategies in Bosnia and Herzegovina"
for the period January 14th– April 15th2020

This Inception 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 Fifth 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 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





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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.

Despite that encouragements and demands, there is still no 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, 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, 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





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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.

Beside these positive, there is one development in the reporting period that is favourable for growth of corruption – state of emergency due to the pandemic of coronavirus, 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.

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 has serious potential to swerve the focus of attention of the citizens to personal security and need for protection of their health, but, in the same time brings to their attention all weaknesses of the whole system in the country. One could expect that certain malfunctions of the health system during the pandemic will bring into the public focus shortcomings 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 this reporting period. The Project Team had to be flexible due to the specifics of the pandemic situation and to implement not only planned activities, but also to start implementation of some activities planned for the later period, in a way explained in the section *Completed activities*. That approach resulted in earlier start of the activities from Component 2 which are related to identification of the short term experts and initial analysis in the Activities 2.1, 2.2 and 2.4. In the reporting period, 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
 - o Task 1.2.1 Identification of institutions particularly prone to corruption
 - o Task 1.2.2. Identification of mechanisms that can prevent corruption in these institutions and assessment of presence and functioning of these mechanisms
- Activity 1.7. Support to establishment of anticorruption network in institutions and citizens reporting system at all levels
 - o Task 1.7.1 Assessment of status of anticorruption network and citizens reporting system in the institutions at all levels
 - o Task 1.7.2 Recommendations for establishment, competencies and work of AC network in the institutions
 - o Task 1.7.3 Country-wide workshop on recommendations for anticorruption network and citizens reporting system
- Activity 1.8 Consolidation, harmonization and streamlining of anticorruption legal framework at all levels
 - o Task 1.8.1 Identification of international standards that BiH anticorruption legal framework at has to comply with
 - o Task 1.8.2 Assessment of BiH anticorruption legal framework against that standards, recommendations for achieving these standards

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





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- 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 as trainings, workshops and conferences due to the pandemic situation. Starting from March 15th the Project Team has swiftly adjusted the work according to the new situation with the pandemic, in order to secure as much as possible timely and smooth implementation of the Project. In order to do so, the Project Team, in cooperation with the Program Manager from the EUD has agreed on the following actions:

- 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 measures
- To keep communication with EUD, beneficiaries and short term experts through the distanced means of communication (telephone, mail, Skype, Viber, Whatsapp)
- Postpone or to organise on distance the activities which require physical gathering of the people, like meetings, trainings, workshops, conferences, project steering committees
- 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, most probably starting in September 2020
- To be ready for organisation of web based trainings, workshops, conferences, if the pandemic situation is not resolved until September.

By these adjustments of implementation of the activities and with close communication and swift administrative and decision making support from the EUD, **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 the organisation of the trainings, workshops, conferences and similar events that require gathering of people, which depends on the pandemic situation.** This way of organisation of the





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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:

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

The Project Team has identified and analysed public opinion polls, reports, analysis, recommendations of international organisations (EU, GRECO, TI etc.) related to public services particularly prone to corruption and identified public services in BiH that are particularly prone to corruption. Needed preventive measures stipulated in the ACSs and APs at all levels in BiH all ACSs related to identified public services particularly prone to corruption are identified. Preventive measures identified were analysed both regarding their completeness and quality against the relevant international standards, anti-corruption documents and, particularly regarding the recommendations from EU and GRECO.

The PT is preparing list of documents, measures and standards that ought to be in place for the public services particularly prone to corruption based on international documents (Conventions of UN, EU, OECD, CoE) and best practices in the transitional countries. That set will be used as a tool and check list in reviewing of completeness and quality of the prevention measures in public services in BiH particularly prone to corruption and a base for preparation of a questionnaire for that review.

In addition, the Project Team has prepared detailed and comprehensive ToRs for the senior and junior short term experts (STE) that will work on implementation of this Activity, published call for applications at the Project's web site and identified candidates for STE.

Activity 1.7. Support to establishment of anticorruption network in institutions and citizens reporting system at all levels

The Project Team has analysed current situation in the establishment of the focal points for the anticorruption network in the institutions as well as of the citizens reporting system (possibilities and ways for reporting corruption) at all levels in BiH. In order to do that, the Project Team prepared two respective questionnaires (one on focal points and on the citizens reporting system) and send it to all ACBs. On the basis of the answers from the ACBs and consultations with the beneficiaries, the Project Team prepared draft versions of the Recommendations for improvement in these scopes.

Findings of the analysis and draft Recommendations in both scopes were presented on a workshop organised in Goražde on February 21st 2020 Workshop which gathered representatives of ACBs and institutions in charge for corruption reports and provided possibility to:

- Present findings of the Project Team on current situation of the network(s) of contact persons (so-called *coordinators*) of ACBs in institutions at their level of government



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- Present findings of the Project Team on current situation of the possibilities for reporting corruption to ACBs and institutions at all levels of government in BiH
- Present draft Recommendations for improvement of the network(s) of contact points in the institutions and possibilities for reporting corruption at all levels in BiH
- Discuss and identify possibilities for improvement of the draft Recommendations and input in the preparation of the final Recommendations in these scopes.

Workshop was organised as one-day event in an interactive way, providing sufficient time and possibility for discussion on the draft Recommendations and input in their final version as well as for networking among the anticorruption bodies. At the workshop, particular attention was paid to:

- Regarding the anticorruption network in the institutions

Number of contact points (so-called *coordinators*) of the ACBs and their position in the institutions, their competencies, expertise and experience, as well as the means the frequency of communication between ACBs and *coordinators*. In addition, the motivation and way of defining the obligation for work of the *coordinators*, as well as the trainings for them in order to increase the efficiency of cooperation with them was discussed.

- Regarding the citizens reporting systems

Competencies of ACBs to receive the citizens' corruption reports, procedures for dealing with the reports, the role of the ACBs in that process as well as communication and cooperation of ACBs with the institutions in charge to deal with the reports were reviewed. Also, procedures of the institutions in charge to receive and deal with the corruption reports were discussed especially in the scope of their coordination, sharing data and analysis of the data on the corruption reports were discussed. Due attention was paid to the implementation of the provisions of the laws for protection of whistle blowers and its importance for the decision of the citizens to report corruption.

On the basis of the input from the participants, final Recommendations for improvement of the network(s) of contact points in the institutions and possibilities for reporting corruption at all levels in BiH are in the process of preparation and will be delivered to all ACBs at all levels in BiH.

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

The Project Team has prepared detailed and comprehensive ToRs for the senior and junior short term experts (STE) that will work on implementation of this Activity, published call for applications at the Project's web site, identified candidates for STE and upon the approval from the EUD engaged them.

In cooperation with the short term experts, the Project Team has implemented the following activities for consolidation, harmonization and streamlining of anticorruption legal framework at all levels:

- Identification of provisions from relevant international conventions, recommendations, reports on BiH etc. that contain standards that have to be applied in the BiH AC legislation





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- Identification and analysis of previous relevant assessments of anticorruption legislature in BiH and their findings of harmonization with the international standards to build upon them
- Preparation of the list of all relevant laws that regulate prevention and fight against corruption, as well as other laws important laws in this scope at all levels in BiH
- Preparation of check list of all relevant standards which will be used in the later analysis of presence and quality of the provisions in the BiH legislature at all levels
- Checking the compliance of relevant BiH AC laws against the international standards, using the checklist, looking for presence and quality of provisions that regulate these standards
- Checking consistency of laws that regulate the same scope at respective levels in BiH and identification of important inconsistency among them that needs streamlining
- Preparation of list of relevant AC laws at all levels in BiH that needs harmonisation with the international standards and streamlining for consistency among them
- Preparation of Recommendations for harmonisation of relevant AC laws at all levels in BiH with the international standards and streamlining for consistency among them, that will describe the law and article(s) that needs improvement and/or streamlining, need for that and way of the proposed improvement and/or streamlining.

By this, all tasks from this Activity except the organisation of country-wide Conference for presentations of findings and Recommendations for consolidation, harmonization and streamlining of anticorruption legal framework at all levels are implemented. The Conference will be organised as soon as the pandemic situation is resolved and organizing of such events will be allowed.

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

Within this Activity, the Project Team has prepared Terms of References for STE and plan for guidance of the work of the STE, identified them and will submit request for approval for their engagement from the EUD.

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

Within this Activity, the Project Team has prepared Terms of References for STE and plan for guidance of the work of the STE, identified them and will submit request for approval for their engagement from the EUD.

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

Within this Activity, the Project Team has prepared Terms of References for STE and plan for guidance of the work of the STE, identified them and will submit request for approval for their engagement from the EUD.

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.

Agency for civil servants of the FBiH welcomed proposed the module for training that IPAK Project has proposed, pointing out that plan for trainings in 2020 can't be changed for the moment but the Agency is willing to include this training in the plan for 2021. The Agency proposed and the IPAK Project accepted the proposal that inclusion of the training module should be discussed in the period for October-November 2020 when plans for 2021 will be prepared .

The Agency expressed interest in preparation of the online module, which should be prepared by the IPAK Project, but the Project doesn't have capacity and resources to produce such module in addition to the fact that it is not envisaged in its ToR. Besides that, the Project has produced the script for online module and offered experts' support (for both communication and anticorruption) in case the Agency decides to prepare the module itself or if secure support from other sources for this purpose.

Advocacy for Agency for civil servants of the RS is still pending both via direct communication with the Agency and through the ACB of RS and member of the PSC from RS who assists the Project Team to get the meeting with the leadership of the Agency.

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

The Project Team has analysed previous major and relevant public awareness campaigns, identified sensitisation issues, prepared detailed call for offers, invited 14 relevant PR/advertising agencies, evaluated offers using analogy of PRAG procedures. In transparent procedure and with approval from the EUD, the agency (VIA media) which will prepare and implement the awareness raising campaign was chosen and the NoR from the Program Manager for has been approved.

The campaign will be based on the following approach (messages are provisional, to be developed with the creative input from the agency):

- Motivational stage will be carried along the messages:
 - o "your silence is a gold for somebody"
 - o "break the chain of corruption".
- Demystification of the ACBs with video and audio clips in which heads or members of the ACBs will present in person achievements and competencies as well as invite citizens to join the fight against corruption





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- Preparation of six video (four for the “your silence is a gold for somebody” and “break the chain of corruption” and two for the “demystification of the ACBs” aspects) of the campaign
- Preparation of four audio clips (two for the “your silence is a gold for somebody” and “break the chain of corruption” and two for the “demystification of the ACBs” aspects) of the campaign
- Production of the content for digital media that should be used for campaigning on portals and social media
- As high as possible outreach of the campaign with well-prepared media plan, distributing airing in the most efficient and cost-effective manner.

The Project Team has worked with the VIA Media on adjustments and fine tuning of the messages, materials and media plan of the campaign in order to prepare detailed Plan for the production and implementation of the campaign, which will be submitted to the EUD for approval. The next steps for implementation of this part of Activity are:

- Detailed description of video and audio clips, designs of printed materials will be submitted to EUD for approval
- Detailed plan for implementation of the Campaign (with media plan) will be submitted to EUD for approval
- After the approval of the products and plan for implementation of the Campaign, production of the products will start
- Production will be done under our strict guidance and control, to make sure that it is done in accordance with approved ones

EUD and IPAK Project, in close cooperation with the PSC will decide together when the Campaign could start (depending on decreasing of the pandemic situation), which is to be discussed at the PSCM on May 12th2020.

- Task 3.5.4 Support to organization of the first “Good Practice Award” for promotion of AC practices.

In the previous and this reporting period, the PT faced challenges that prevented this Activity to be implemented as envisaged in the TO and IR, despite all the efforts invested both by the PT and the Delegation of the EU to BiH. These challenges still remain, although the Project Team has implemented all activities as they were planned – preparation of draft criteria and procedures for establishment and selection of “Good anticorruption practice” and established a Working Group (WG) for that purpose. The WG, consisting from representatives of APIK, ACT FBiH, ACC RS, prominent CSOs and journalists assessed and approved the draft proposals of the Project Team on the concept, procedures and criteria and decide at the workshop organised for that purpose. But, right before the announcement of the award in the media, despite mutually agreed and approved criteria and procedures, one by one, the four relevant CSOs with different type of excuses (mainly related to the credibility of the award) has left the WG.

Since it was clear that the “Good practice award” can’t be established as planned, in close cooperation with the Program Manager, alternative implementation was designed by simple adding





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selection of best student's anticorruption ideas on existing APIK contest for best youth painting and literature anticorruption works. This idea was rejected by APIK, with explanation that the Agency does not have enough capacities to dedicate time and resources for that purpose, despite the fact that even representatives of EUD supported this idea and that the Project Team offered to assist the Agency in that process.

As the last idea for replacement "Good anticorruption practice award" the Project Team proposed and Program Manager approved it is to create 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 Project Team is convinced that the ACBs will eventually accept the idea, especially because the Project Team is in communication with the OSCE that might support maintenance and updating the web portal/platform. In making the decision on this issue the sustainability of the web portal-platform will be of crucial importance, therefore the IPAK Project sees the possibility for short or medium term sustainability in three ways - 1) training of the ACB representatives to post items on the web site, through easy-to-follow instructions and user-friendly web site administration 2) securing the payment of its hosting for longer period of time 3) At last, but definitely not at least - direct support from OSCE Mission which is still not committed or defined.

Since this Activity has taken way more time, efforts and resources than planned, there is a need for as quick as possible decision by the PSC and EUD whether to proceed with the preparation of the web portal/platform or to cancel the implementation of this activity.

As additional activity, not envisaged in the ToR and IR, as upgrade of the Activity 3.5. and Activity 1.4., on request of the EUD and PSC, the Project Team has prepared analysis of the current situation of the ACBs at all levels. This analysis is prepared to give more detailed input needed for improvement of capacities and position (so-called *professionalization*) of ACBs initiated by the Standards for that purpose which were approved at the high level Conferences organised by the IPAK Project on June 13th 2019 and December 9th 2019.

For that purpose, the Project Team prepared comprehensive questionnaires regarding the position, competencies, resources, frequencies of the meetings, motivation as well as challenges that ACBs are facing with regarding their work. On the basis of the answers from the ACBs and consultations with the beneficiaries, the Project Team prepared draft versions of the Recommendations for improvement of the position, work and resources of the ACBs.

Cross-cutting issues

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

- Organisation of the Fifth PSCM, held on February 20th 2020





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The Fifth PSCM was organised and held in the Conference room of the Delegation of the EU to BiH Sarajevo on February 20th 2020.

- Participation at the Coordination meeting of the ACBs that Mission of OSCE to BiH organised
In the reporting period, the IPAK Project has strengthened already very good cooperation and coordination of the activities with the Mission of OSCE to BiH, by inclusion of the Project Team in the Coordination meetings of ACBs that OSCE organises on a quarterly basis.

- Cooperation with USAID's Monitoring and Evaluation Support Activity II (MEASURE-BiH).

Also, in the reporting period, the Project Team established cooperation with the Monitoring and Evaluation Support Activity II (MEASURE-BiH) which consulted IPAK Project on the possible future activities of USAID in the scope creation of a tools for measure the corruption in the country.

Fully completed activities up-to-date

During 15 months of implementation of the Project, out of 18 planned activities, the Project Team has completed the following 8 activities, with remaining provision of assistance to beneficiaries in these areas (which depends on the request of the beneficiaries for such assistance) which is envisaged throughout the whole duration of the Project:

- Activity 1.1 Improvement of timely and punctual implementation of ACSs and APs at all levels in BiH
- Activity 1.3 Strengthening capacities for accurate and efficient monitoring of implementation of ACSs and APs at all levels
- Activity 1.4 Improvement of existing ACSs and APs and recommendations for next ACS and AP of BiH
- Activity 1.5 Delivery of trainings for implementation of ACSs and APs and monitoring of implementation of ACSs and APs at all levels
- Activity 1.6 Facilitation of coordination and synergy of CSOs activities in the fight against corruption
- Activity 1.7 Support to establishment of anticorruption network in institutions and citizens reporting system at all levels
- Activity 3.1 Preparation of model of AC communication strategy based on existing ones and on major awareness-raising campaigns
- Activity 3.2 Enhancing capacities for communication on integrity, anticorruption and awareness raising and interaction with the media

Pending Activities

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





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Within this Activity, the Project Team has prepared Request for approval of engagement of STE and, after the approval will continue with implementation of the planned tasks.

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

Within this Activity, the Project Team has prepared Request for approval of engagement of STE and, after the approval will continue with implementation of the planned tasks.

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

Within this Activity, the Project Team has prepared Request for approval of engagement of STE and, after the approval will continue with implementation of the planned tasks.

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

Within this Activity, the Project Team has prepared Request for approval of engagement of STE and, after the approval will continue with implementation of the planned tasks.

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

The Project Team will proceed with the only remaining obligations from this Activity which is the Task 3.3.4 - Advocacy on integration of training modules in the official training curricula for civil servants (communication and advocacy with the Agency for civil servants of the RS).

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

Within this Activity, the Project Team will proceed with the fine tuning of the messages, materials and media plan of the campaign in order to prepare detailed Plan for the production and implementation of the campaign, which will be submitted to the EUD for approval. The next steps for implementation of this part of Activity are:

- Detailed description of video and audio clips, designs of printed materials will be submitted to EUD for approval
- Detailed plan for implementation of the Campaign (with media plan) will be submitted to EUD for approval
- After the approval of the products and plan for implementation of the Campaign, production of the products will start
- Production will be done under our strict guidance and control, to make sure that it is done in accordance with approved ones
- Task 3.5.2 Implementation of upgraded "Good Practice Award" for promotion of best AC practices in a way that will be decided in close cooperation with the EUD

Within this Activity, after the final decision of the EUD and PSC whether the web portal/platform for presentation of the ACBs will be replacement for the "Good anticorruption practice award" or the whole Activity will be cancelled, the Project Team will proceed accordingly. If the decision on the web portal/platform is positive, the Project Team will proceed developing the concept and preparation of





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the web portal/platform and will proceed communication with the Mission of OSCE for their plans to support it.

Planned activities for the next reporting period

In the next reporting period, depending on the development of the pandemic situation, in addition to the pending activities, the PT will work on the following Activities of the Project:

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

After the approval of the engagement of the STE, the Project Team will continue with implementation of the following planned tasks:

- Create 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
- Identify and analyse preventive measures from the anticorruption strategies and action plans at all levels in BiH all ACSs related to identified public services particularly prone to corruption
- Prepare a check list for reviewing of prevention measures, based on international standards (Conventions of UN, OECD, CoE, as well as EU and GRECO recommendations)
- Analyse completeness and quality of preventive measures against that check list (Conventions of UN, OECD, CoE, as well as EU and GRECO recommendations)
- Systematise the 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

After the approval of the engagement of the STE, the Project Team will continue with implementation of the following planned tasks:

- Identification and analysis of existing methodologies for preparation of integrity plans, looking for room for their improvement and harmonization in cooperation with PARCO and other public servant institutions
- Review the anticorruption strategies (ACSs) and action plans (APs) at all levels, looking for presence and clarity of provisions that envisage preparation of integrity plans, looking for possibility to improve the provisions regarding that
- Assessment of capacities and expertise of anticorruption bodies (ACBs) at all levels for preparation and implementation of methodologies for preparation and implementation of integrity plans and needs for improvement of this scope
- 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.





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- 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 Enhancing transparency and ethics infrastructure in public services at all levels

After the approval of the engagement of the STE, the Project Team will continue with implementation of the following planned tasks:

- Identification of relevant international standards that regulate measures for transparency, ethic infrastructure and e-government
- Preparation of check-list on the basis of the international standards against which current situation in the transparency, ethic infrastructure and e-government will be measured
- Identification of provisions from ACSs and APs at all levels in BiH envisaging measures for transparency, ethic infrastructure and e-government
- 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 2.4 Development of integrated standards to mitigate risk of corruption from private sector

After the approval of the engagement of the STE, the Project Team will continue with implementation of the following planned tasks:

- Identification of business associations and private companies active in the prevention of corruption as well as academia experts, CSOs activists and journalists active in the prevention of corruption in private sector
- Identification and analysis of previous activities on prevention of corruption in private sector (analysis, reports and recommendations) to build up upon them
- Preparation of questionnaire for identification of current situation with the prevention of corruption in the private sector and assessment of up-to-date engagement of the private sector in prevention of corruption
- Preparation of draft Recommendations for improvement of the role of private sector in prevention of corruption
- Preparation of the draft Code of ethics/conduct for prevention of corruption in private and public companies in BiH.

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





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After preparation and approval of the final concept and detailed description of awareness raising campaign, the Project Team and the EUD will decide when the campaign will start with the implementation. Once the EUD approves the concept, messages and products of the campaign it will be implemented according to the media plan which will be prepared in a way to provide as high as possible outreach.

If the decision on the web portal/platform is positive, the Project Team will proceed developing the concept and preparation of the web portal/platform and will proceed communication with the Mission of OSCE for their plans to support it.

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:

- 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 synchronised enough. Therefore, there is a need for support and harmonisation 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 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





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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 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 a 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 obstacle 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.