

OECD Anti-Corruption Network for Eastern Europe and Central Asia

Work Plan 2020



The Work Plan 2020 was adopted at the 25th Steering Group meeting of the ACN held via Zoom on 28 May 2020.

The Secretariat has prepared this document based on the outline of the Work Programme 2020-2024, endorsed by the Steering Group at its 24th meeting in March 2019. This is a transition document to the ACN New Work Programme 2020-2024, which is due to be discussed and adopted at the meeting of the ACN Steering Group in Spring 2021 in Paris.

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1 High-Level and Steering Group Meetings

High Level Meeting

The ACN High Level Meeting was scheduled for March 2020, as a part of the OECD Integrity Week, but it was cancelled due to the COVID-19 crisis. It is proposed to hold the High Level meeting during the Integrity Week in March 2021. The Summary Report “Anti-Corruption Reforms in Eastern Europe and Central Asia, Achievements and Challenges, 2016-2019” that was prepared for March 2020 meeting will thus be disseminated using IT communication tools, such as video presentations by the ACN Secretariat and video interviews with the key anti-corruption figures of the region. The ACN National Coordinators and partners will be able to use these presentations as soon as they become available, the report will also be published on-line in electronic version.

Steering Group

The ACN Steering Group meeting was scheduled for March 2020, back-to-back with the High Level Meeting, but it was also cancelled. This meeting was expected to adopt ACN Work Programme for 2020-2024. The Secretariat proposes to postpone the adoption of the Work Programme until the next physical meeting of the Steering Group provisionally scheduled for March 2021. Until then, the Secretariat will be guided by this Work Plan to be discussed and adopted by the Steering Group in a virtual meeting on 28th May 2020.

2 Istanbul Anti-Corruption Action Plan

5th Round of Monitoring

Moldova's Accession

On 26th March 2020, Mr Ruslan Flocea, Director of the National Anti-Corruption Center of Moldova wrote to the OECD Secretary General expressing country's desire to join the Istanbul Anti-Corruption Action Plan (IAP). The Secretariat invited the ACN Steering Group to review this application through the written procedure and to welcome Moldova as the 10th member of this peer review programme, in addition to Armenia, Azerbaijan, Georgia, Kazakhstan, Kyrgyzstan, Mongolia, Uzbekistan, Ukraine and Tajikistan.

Regarding the financial implications of Moldova's joining of this programme, the budget of the new Work Programme includes necessary expenses, and the European Commission is willing to finance these expenses as a part of the voluntary contributions to the ACN. Moldova will also be invited to provide its annual fees, as other ACN members.

Monitoring Tool

The Secretariat has prepared the draft **performance indicators** for the 5th round of monitoring under the Istanbul Action Plan. This was achieved in cooperation with the Expert Working Group at the end of 2019 and through written consultations with the ACN Steering Group in February-March 2020. The performance indicators were revised considering the received comments. The revised draft of the performance indicators will be presented to the Steering Group for preliminary endorsement for the pilot monitoring at its virtual meeting on 28th May 2020.

The Secretariat will further develop other elements of the Monitoring Tool, including the draft **guide for the indicators**, the **monitoring methodology** (including standard questionnaire with sources of evidence, schedule, model agendas of on-site and plenary meetings). All these documents related to the 5th round of monitoring will be combined in one **Monitoring Tool** and will be tested during the pilot monitoring round during 2020 as proposed below. After the pilot monitoring, the Secretariat will make any necessary changes in the Monitoring Tool and will present it to the ACN Steering Group for the adoption at the next plenary meeting, proposed below.

Pilot

Given the complexity of the new monitoring methodology, and following the good practice of similar initiatives, e.g. implemented by SIGMA, the Secretariat proposes to conduct a pilot monitoring round before launching the 5th round of monitoring for all participating countries. The purpose is to test the indicators in practice and to improve them further before rolling them out for all countries and for the whole time period of the 5th round.

It is proposed to run the pilot round for Armenia, Azerbaijan, Georgia, Moldova and Ukraine, due to the availability of funds for this work in 2020 for these countries only. The pilot will involve all stages of the

monitoring, including the questionnaire, *virtual* on-site, draft report, monitoring plenary to adopt the reports and their publication. The results of the pilot will be used to fine-tune the Monitoring Tool.

The main difference between the pilot and the full-scale 5th round of monitoring will be that the reports will be stand-alone and the scoring from the pilot report will not be used as basis for the annual monitoring that will follow during the 5th round.

The Secretariat proposes to launch the pilot monitoring in summer 2020: send the monitoring questionnaire to the countries in June 2020 and visit them with *virtual* on-sites in September-October 2020, via Zoom, MS Teams, WebEx, Skype or other channels.

Monitoring Plenary

The meeting will review and adopt the pilot reports. The Steering Group meeting that will be organized back-to-back will review, update and adopt the Monitoring Tool based on the experience of the pilot. It will also adopt the ACN Work Programme 2020-2024. The timing and format of the plenary will depend upon the pandemic situation. The Secretariat has provisionally scheduled the plenary meeting for March 2021 to be held as a part of the OECD Integrity Week.

Proposed Schedule for the Pilot Monitoring

Date	Action
Summer 2020	<i>Questionnaire sent to the monitored countries</i>
September/October 2020	<i>Replies to the questionnaire received</i>
October/November 2020	<i>On-site visits</i>
December 2020	<i>Draft reports</i>
March 2021	<i>Monitoring plenary to adopt the pilot reports</i>
Spring 2021	<i>Publication of the reports</i>

Training on Performance Indicators

It will be important to provide a training on the new methodology for the 5th round of monitoring to the National Coordinators and stakeholders involved in monitoring, including non-governmental partners. This training can be provided in a physical meeting (if pandemic conditions allow) or as a virtual event. The training can be provided immediately after the completion of the pilot, and can be organised in coordination with the training for all ACN countries that will also be using Key Performance Indicators (see below) for annual regional anti-corruption outlooks.

3 Regional Dialogue

Key Performance Indicators

Since 2017, the ACN Annual Activity Reports include data on selected anti-corruption indicators. Starting 2020, these indicators will be substituted by **Key Performance Indicators (KPIs)** that will be developed on the basis of performance indicators for the 5th round of monitoring. Annual KPI data will be collected from the ACN countries not participating in the peer review.¹ Data on IAP countries will be drawn from monitoring reports.

The ACN proposes to pilot KPIs in summer 2020 (collecting 2019 data) review them and present for adoption at the Steering Group meeting that will take place back-to-back with the next monitoring plenary, or through a written procedure if the physical meeting is not possible due to the pandemic. The pilot results can be included in the ACN Activity Report for 2019.

Questionnaire

The Secretariat will develop a standard questionnaire and send it to the countries that do not undergo the pilot monitoring. The questionnaire for the pilot data collection will be sent out in July for 2019 data to be collected by mid-September. This work will use as much as possible the data collected for the Competitiveness Outlook for South East Europe by another directorate of the OECD² that includes a chapter on Anti-Corruption policy largely based on anti-corruption performance indicators developed by the ACN. Data collection for KPIs will be annual, thus it is important that the ACN countries integrate KPIs in their annual statistical reporting systems and methodologies.

Regional Outlook Report

Regional Outlook Report will be prepared using the KPI data collected through a standard questionnaire described above and the data from the monitoring reports. The aim is to produce the first Regional Outlook for March 2021 and to disseminate it during the OECD Integrity Week, as well as UNCAC related events.

¹ These will include Central Asia as well in 2020, since they will not be part of the pilot monitoring in 2020.

² Global Relations Secretariat (GRS) South East Europe team is preparing a new addition of the Competitiveness Outlook that includes a chapter on Anti-Corruption Policy and is largely based on anti-corruption performance indicators developed by the ACN. The answers to the questionnaire collected in the framework of this work will be used by the ACN where possible not to duplicate the efforts by respective countries.

Proposed Schedule for Regional Outlook

Date	Action
July 2020	<i>KPI Questionnaire for the pilot sent out</i>
Autumn 2020	<i>Replies received</i>
March 2021	<i>Launch of the First Regional Outlook Report (tbc)</i>

Report on selected deliverables of 20 Deliverables for 2020 for Eastern Partnership (EaP)

The EU requested the ACN to conduct an assessment of compliance with the selected deliverables of [20 Deliverables for 2020](#) for the Eastern Partnership. The report will analyse the state of play of implementation of Deliverable 9 (rule of law / anti-corruption mechanisms) and the relevant aspects of Deliverable 10 (key judicial reform) and 11 (public administration reform) for EaP countries: Azerbaijan, Armenia, Georgia, Moldova and Ukraine. Subject to the timeline to be decided in coordination with the EU, this report will be based on already available data, collected through the ACN monitoring programme as reflected in the key forthcoming publication *Anti-corruption Reforms in Eastern Europe and Central Asia Progress and Challenges, 2016-2019*³, or it may as well draw on the results of the pilot monitoring.

Civil Society Contacts

The ACN Secretariat will continue active engagement with civil society as its working method for its various activities, including peer review, regional dialogue and Law Enforcement Network (LEN). The ACN will update its civil society contact list and invited them to take part in trainings on related methodologies (peer review, matrix, KPIs) for their better engagement in the activities foreseen by the new Work Programme 2020-2024. In the framework of the EU4Integrity Programme to be launched in 2020, the ACN will closely cooperate with the Open Government Partnership and its civil society community to create synergies and reinforce the efforts. Among others, such cooperation will support the IAP monitoring as well as thematic regional activities, such as Matrix of High Level Cases.

³ The information about Belarus and Moldova is incomplete in the Summary Report as they are not covered by the monitoring programme. Subject to Moldova's cooperation additional information may be requested that could feed into the report.

4 Law Enforcement Network

Survey COVID-19

Following the example of the OECD Working Group on Bribery in International Business Transactions (OECD WGB), the ACN Secretariat initiated a brief Survey to assess the impact of the pandemic on the work of law enforcement professionals, including the change of priorities or relocation of resources and new cases related to the pandemic. The survey is aimed at assisting the ACN countries in addressing the challenges by identifying and sharing good practices.

Matrix of High Level Cases

The ACN Secretariat is developing the draft methodology for the Matrix of high-level corruption cases, a database on the allegations, investigations, prosecutions and sanctions in such cases, modelled after the OECD WGB Matrix of foreign bribery cases. This tool will help strengthen enforcement actions in the region through more comprehensive analysis, facilitation of international cooperation, as well as capacity building.

Civil society is expected to play an important role in the development of the Matrix, the ACN Secretariat will develop a toolkit on how to identify and submit cases for the Matrix, and will deliver a training using this toolkit to the civil society representatives. The training can be delivered in the second half of 2020 or in the beginning of 2021, through a physical or virtual meeting in cooperation with the OGP.

Thematic Studies on High Level Corruption

As a part of the horizontal thematic work focused on high level corruption, the Secretariat will develop a study on high-level corruption identifying best practices and common problems and providing regional recommendations. The first volumes of the study will be discussed at the 2020 LEN meeting. In addition, the Secretariat will explore the interest of ACN countries for another study on law enforcement aspects of corruption in grand infrastructure projects. In case of support and available resources, the study will be prepared and presented to the LEN meeting in 2021.

On-line Communication Platform and LEN Contact List

The Secretariat has updated the contact list of Law Enforcement Network and created an online communication platform for information sharing. It plans to further work on creating secure channel for direct and secure communication among law enforcement practitioners.

Next Meeting

The 2020 ACN LEN meeting is scheduled for December 2020 in Bosnia and Herzegovina (*tbc*). This meeting will launch the new the Matrix of high-level corruption cases. The meeting will also follow-up on some of the key issues that were addressed in the past, including the independence of prosecutors, illicit assets etc.

5 Business Integrity

Survey

The Secretariat will launch preparations for the second Business Integrity survey (the first survey was conducted for the 2016 Thematic Study “Business Integrity in Eastern Europe and Central Asia”) as soon as the funds are available (through EU and EBRD, see below). The survey will use the same methodology and the questionnaire to ensure the comparability of results. The aim will be to include more respondents than last time. National Coordinators will be invited to assist these efforts by circulating on-line questionnaires to relevant partners in the government and in the private sector. The results of the survey will be used for an updated Study on Business Integrity that will provide a baseline for BI activities under the new Work Programme. These activities will be conducted remotely and should not be hampered by the pandemic related restrictions.

Technical Seminars

The new Work Programme envisages technical capacity building seminars to be provided by the Secretariat on demand to the individual countries. Preparations for these seminars will start as soon as funding is available. Preparatory activities can be implemented in the remote mode and include drafting of guidelines for the countries that will explain how to apply for such seminars, what issues these seminars can address, and what should be provided by the host. It will also be possible to send these guidelines to the countries in the second half of the year, and to collect their applications.

The actual technical seminars can be delivered in the second half of the year, or as soon as the working conditions permit the organisation of physical meetings. Besides, the Secretariat will explore the possibility of conducting some of these activities in the remote mode.

Regional Forum

Participants from the ACN region were invited to the Global Business Integrity Round Table that was scheduled during the OECD Integrity Week, but was cancelled due to the pandemic crisis. This event can take place in during the next year’s Integrity Week.

6 Anti-Corruption at Sectoral and Local Level

Sectors

The ACN work on corruption prevention has been streamlined under the new Work Programme, and will focus on the development of model methodologies to help anti-corruption practitioners in the region deal with corruption problems in selected sectors and at the local level. The ACN will focus on integrity in education and hold a policy discussion roundtable to address corruption risks in education system and necessary reforms tackle these risks and build resilience to corruption (in 2021).

Considering the new realities of pandemic and increased vulnerability of the health sector that requires the concerted response, the ACN Secretariat will explore the work on the sector subject to the interest to the interest of its members and availability of funds.

Local level

ACN has developed a thematic study on Prevention of Corruption at Local Level to be launched soon. In continuation of the thematic seminars held on the topic in cooperation with UNDP, OSCE and RAI, ACN will work with the UNDP to organize a webinar (or a seminar if the conditions allow) in September 2020 to disseminate the study.

7 Country Projects

Ukraine

OECD is implementing *Supporting Energy Sector Reform in Ukraine* Project funded by the Government of Norway to provide Ukraine with policy analysis, recommendations and capacity-building activities aimed at reforming this sector. The anti-corruption component of the project is implemented out by the ACN and includes a) in-depth anti-corruption review of the energy sector; b) capacity building activities to support selected SOEs in strengthening their compliance programmes; c) building law enforcement capacity to detect, investigate and prosecute corruption in the energy sector.

In 2020, the ACN will carry out anti-corruption review of the sector. The draft review will follow the methodology of the monitoring, including the questionnaire, on-site visit and the draft report. In addition a typology will be produced together with the practical guidelines and trainings for detectives, investigators and prosecutors.

Another country project on Ukraine focused on law enforcement capacity building is funded by Bureau of International Narcotics and Law Enforcement Affairs, US Department of State (US INL). Under this project law enforcement training will be carried out (in person or virtual depending on the circumstances) and a guideline will be produced in 2020.

Uzbekistan

Country project on Uzbekistan, funded by Bureau of International Narcotics and Law Enforcement Affairs, US Department of State, was scheduled to end in August 2020. Pandemic and new anti-corruption developments in the country that may lead to establishing a new anti-corruption agency, prompted a non-cost extension of the project till the end of 2020.

The Secretariat will aim to adapt the implementation of the remaining activities of the project to the new working methods in consultation with the beneficiaries. Some activities will be conducted virtually. The focus of the project will also be shifted to the new priorities of the government of Uzbekistan. The following activities are planned (some of them are subject to the removed restrictions): law enforcement training sessions, development of a law enforcement training manual, study visit to Romania's law enforcement agency, analysis of anti-corruption provisions of laws such as draft Criminal Code and Criminal Procedure Code. The project will also aim to support the beneficiaries in deciding on a conceptual framework related to establishing an anti-corruption agency.

Funding

The funding for the new Work Programme 2020-2024 of the ACN will be ensured by the following means: OECD core funding, voluntary contributions from OECD members, annual fees by ACN members as well as co-financing of activities by members and partners. It is expected that the EU voluntary contribution will fund the part of the ACN Work Programme for EU Eastern Partnership countries in 2020-2023, US INL is providing funding for the regional work in 2020 and the funding for Central Asia is forthcoming. The EBRD grant for business integrity is under preparation, the government of Norway is funding the energy project in Ukraine and US INL is funding law enforcement projects in Uzbekistan and Ukraine. ACN countries will be invited to contribute annual fees and co-finance activities, such as LEN meeting. The ACN will closely cooperate with the Open Government Partnership in the context of the EU voluntary contribution and will continue exploring joint activities with UNDP, RAI, OSCE and other partners.

The Secretariat will also continue reported to the current donors and to the ACN Steering Group, and fundraising for the new Work Programme 2020-2024.

9 Communications

The ACN Secretariat will aim to adapt its communications to the current circumstances. For example, several ACN publications that had to be launched during the ACN meetings, including the Summary Report, will be launched virtually. The ACN Secretariat will explore various communication options, in line with the OECD communication practices during the pandemic, including brief videos to present publications, webinars for the ACN community and for a wider public, etc. The ACN will continue updating its website and will also draft a communication strategy for the Work Programme 2020-2024 and present it to the Steering Group for the adoption. A detailed Communications Plan will be developed as a part of the Work Programme for 2020-2024.

10 Summary of Activities

2020	IAP monitoring	Regional Policy Dialogue	Peer Learning
April	Revised indicators	Information session for National coordinators	LEN Questionnaire
May		Steering Group (virtual)	
June		Draft KPIs	
July	Questionnaire for the pilot	Draft KPI Questionnaire	
August			
September	Pilot on-sites (virtual)		Local level seminar with UNDP (<i>tbc</i>) BI Training (<i>tbc</i>)
October	Pilot on-sites (virtual)	Data for KPIs collected	
November	Monitoring plenary, <i>tbc</i> Training on indicators	Steering Group meeting	Draft study on high level corruption
December			Matrix LEN meeting in BiH (<i>tbc</i>)
2021	IAP Monitoring	Regional Policy Dialogue	Peer Learning
January			
February			
March		High Level and Steering Group meeting Regional Outlook	