

## Action Plan for the implementation Strategy for fight against corruption (2009-2014)

Specific measure	Date of performance	Responsible institution	Indicators of implementation	Indicative budget (BAM)
<b>1. Capacity building Agency for the Prevention of Corruption and coordination of Fight Against Corruption</b>				
1.1 Development and adoption of a legal framework for the Agency for the prevention of corruption and coordination of fight against corruption (hereinafter Agency); for coordinating the implementation state strategy for Fight Against Corruption (hereinafter the Strategy), for the Agency programs for prevention and education.	Until January 2010. – Adoption the Law June 2010.	Council of Ministers BiH, Parliamentary Assembly BiH (hereinafter PS BiH), Agency for the prevention and coordination in fight against corruption	Adopted Law on Agency for the prevention and coordination in fight against corruption. Adopted ordinances of the Agency, the bylaws on the coordination of the implementation of the Strategy and about prevention and education, and published in the Official Gazette.	
1.2 Providing material preconditions for the Agency's work, including but not limited only to the following: office space, an earmarked budget.	December 2010.	Council of Ministers BiH	Office of the Agency has been established; budget has been provided from the paragraph in the budget which was provided for the establishment of new institutions.	
1.3 Employing the personnel of the Agency with the aim to enable the beginning of effective and professional work.	June 2010.	Agency, PSBiH, ADS	The Director and Deputy have been appointed as well as other key personnel and support personnel .	
1.4 Establish effective training programs to increase the competence of personnel of the Agency so as they can carry out their duties in an efficient and professional manner.	December 2010.	Agency for the prevention and coordination in fight against corruption	Existence and implementation of training programs; Percentage of personnel of the Agency has successfully completed their training.	
1.5. Adopt the Code of Conduct of the Agency and define standards of conduct for the personnel of the Agency.	December 2010.	Agency for the prevention and coordination in fight against corruption	The Code of Conduct of the Agency has been adopted and published in the Official Gazette.	
1.6 Develop and adopt all relevant guidelines standard working procedures and guidelines for the personnel of the Agency.	December 2010.	Agency for the prevention and coordination in fight against corruption	All relevant guidelines, standard operating procedures and guidelines for employees of the Agency were drafted and adopted. Certain guidelines, for which it would be appropriate, would be available via web site of the Agency.	
1.7 Strengthening the process of training within the Agency with the aim to guarantee the creation of a strong organizational culture based on values which are specified in the Code of Conduct	December 2011.	Agency for the prevention and coordination in fight against corruption	The process for training the personnel of the Agency has been established; the existence of an organizational culture within the Agency has also been established.	
1.8 Assessment and monitoring of the implementation of the Strategy; proposing necessary changes in consultation with all interested parties.	December 2011.	Agency for the prevention and coordination in fight against corruption	„Report on the assessment of the implementation of the Strategy“ has been compiled; proposals were submitted to the Council of Ministers to introduce the necessary amendments of the Strategy.	

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1.9. Drafting and the implementation of the Action Plan against corruption by areas.	June 2011.	Competent authorities at the state and entity level and Brcko Distric (hereinafter referred to as BD)	Plans of action against corruption have been adopted and implemented. The Agency receives reports on the implementation of individual plans.	
1.10. Ensure for the Agency to be a body with the highest degree of confidence in the fight against corruption.	December 2012.	Agency for the prevention and coordination in fight against corruption	The number of reports of doubts on corruption is increased; Confidence in the Agency is high which is seen in public opinion polls; There is a better quality of applications received by the Agency; There are no serious objections to the Agency's way of work.	
1.11. The Agency coordinates the implementation of action plans in order to effectively fight against corruption and the prevention of corruption by areas.	June 2011.	Agency, competent ministries at the state and entity level and BD BiH	The Agency receives annual reports on the implementation.	
1.12 The Agency is able to design and implement cutting-edge programs for the prevention of corruption and educational programs to raise public awareness in the fight against corruption.	December 2012.	Agency, Council of Ministers BiH	Defined and implemented programs for the prevention and education.	
<b>2. Prevention of corruption</b>				
2.1. Develop and adopt a program of modernizing the public sector in order to strengthen the public sector in BiH, so as the same one would be able to carry out its function in a more effective, reliable and predictable way.	November 2010.	Council of Ministers BiH, Agency, Office of the coordinator for Public Administration Reform	The Council of Ministers BiH has adopted the program of modernizing the public sector.	
2.2 Analysis of the implementation of the laws on Freedom of Access to Information in all institutions at all levels in BiH.	August 2010.	Agency, all ministries and other authority institutions at all levels	All public institutions at all levels possess and have analyzed their procedures for Freedom of Access to Information. Reports were sent to the Agency and the Council of Ministers.	
2.3. Establish open communication channels in institutions at all levels of government in BiH with the aim of encouraging clients or public officials to report on corruption (an indicative list of communication channels may include sealed boxes for transport, Helpline for special purposes, a certain E-mail address).	July 2010.	Agency, all ministries and other authority institutions at all levels	Sealed boxes for mail, Helpline for special purposes, a certain E-mail address for registration by individuals – including the possibility of anonymous complaints.	
2.4 Draft regulations / procedures on protection of people	December 2010.	Agency, Council of Ministers BiH	Drafted regulations / procedures on protecting people	

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who are warn of corruption and policy institutions of government which will guarantee that no public official or a client of public administration , who reports irregularities with good intention, will be punished.			who are warn of corruption.	
2.4. Conduct examination of BiH citizens in order to identify areas in which the appearance of corruption is mostly expected.	July 2011.	Agency, Council of Ministers BiH	Prepare a detailed analysis of all regulatory regimes in the country in cooperation with all holder interests.	
2.6. All institutions at all levels in BiH should prepare their own plan of action against corruption.	July 2010.	Agency, all ministries, authority institutions at all levels	Plans have been adopted. The Agency receives annual reports on the implementation.	
2.7 Modernization of the administration through the introduction of a model of e-Government and e-Governance in order to minimize interaction of citizens and administration and to simplify internal administrative procedures.	December 2012.	Council of Ministers BiH by competent ministries	Documents that initiate measures of modernization were drafted. An agreement about the recommendations was reached; The document has been published.	
2.8 Adoption of regulations related to lobbying, including the obligation of lobbyist for their registration as well as to speak up on their employers for whom they lobby, with what means and with what intent.	December 2012.	Agency, Council of Ministers BiH	Draft Law on lobbying has been prepared, adopted by the Council of Ministers and submitted to the Parliament BiH.	
2.9 Introduction of mandatory declaring of all legal persons who participate in public procurement procedures.	October 2011.	Agency, Public Procurement Agency	The list of legal persons has been adopted and published in the Official Gazette BiH and on the website of the Agency.	
2.10 Inspection bodies should become a key point for cooperation with the Agency.	January 2011.	Agency, Council of Ministers BiH, inspection bodies	Contacts within government institutions have been defined; Contact persons daily cooperate with the Agency.	
2.11 A review of the efficiency in implementing the legislation to prevent corruption in the courts.	December 2012.	Agency, competent Ministry of Justice, VSTV	The report on effectiveness has been prepared along with the recommendations for improvements.	
2.12 Capacity development within authority institutions at all levels in BiH for the purpose of carrying out the plans for fight against corruption.	December 2011.	Agency, all ministries, authority institutions at all levels	Capacities have been set up and are fully used.	
2.13 Introduction of the system for a systematic review of risks within individual areas, with which the areas, where there is a certain risk of corruption, are identified.	December 2011.	Agency, all ministries, authority institutions at all levels	Methodology was developed – Managing the risk of corruption / Plans integrity; The system of risk assessment of corruption has been tested.	

<p>2.14 All authority institutions at all levels should establish a system risk management of corruption/ Plans integrity, with the aim of setting departments / positions, which are more vulnerable to corruption, and to set up appropriate measures so as to reduce / eliminate these deficiencies .</p>	<p>May 2012.</p>	<p>Agency, all ministries, authority institutions at all levels</p>	<p>All institutions of public administration start with elaboration and implementation of the risk management reports of corruption / Plans integrity.</p>	
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2.15 Developing appropriate indicator systems of corruption with which the uniformity of standard risk assessment / Plans integrity would be ensured.	December 2012.	Agency, all ministries, public institutions at all levels	On the basis of the report on risk management of corruption / Plans integrity, indicators of corruption have been developed. The indicators have been published on the website of the Agency.	
2.16 Developing appropriate indicator systems of corruption with which the uniformity of standard risk assessment / Plans integrity would be ensured.	December 2013.	Agency	The methodology of integrity testing has been adopted and tested.	
2.17 Organize a series of seminars and workshops with economic operators with the aim of identifying areas and practices that hinder efficient market business operation which should be eliminated.	December 2010.	Agency in collaboration with relevant authority institutions at all levels, and educational institutions	Ten seminars were organized on various locations in BiH with a view to identifying areas of interest and practices in the field of business rules that should be eliminated.	
2.18 Conduct a research of business environment in BiH in order to identify areas where the appearance of corruption is mostly expected.	December 2010.	Agency, competent ministries	The survey among business subjects in BiH with a view to identifying areas in which corruption could most easily occur; The results of the survey were disseminated.	
2.19 Introduce examinations with the aim to identify rules and procedures that are to the business environment mostly difficult to accomplish, and to assess the costs fulfilling the conditions.	June 2011.	Agency, competent ministries	The survey was conducted; The results of research were widely disseminated.	
2.20 Each institution at all levels in BiH should develop a catalogue of its administrative procedures with an emphasis on processes relating to private companies.	December 2010.	All ministries and other public institutions at all levels	Catalogues of administrative procedures for each ministry and public institutions are available, with emphasis on processes related to business.	
2.21 Adopt the Code of Conduct for public service in accordance with the best European examples, with the goal of setting uniformity standards of conduct of public service in BiH.	January 2011.	Agency, Council of Ministers BiH	The Code of Conduct for public service has been adopted as mandatory for all employees in public services at all levels in BiH.	
2.22 Develop guidelines for the implementation of the Law on Freedom of Access to Information in authority institutions at all levels and to carry out the necessary personnel training.	March 2011.	Agency, authority institutions at all levels in BiH	The guidelines have been developed and published, and available to the public. Access to the personnel for information is provided in each institution; the number of rejected requests for information is increased and the claim information is increasing.	
2.23 Develop individual programs for the prevention of corruption in authority institutions at all levels, which will reflect priorities strategy.	October 2011.	Agency, authority institutions at all levels in BiH	Each authority institution at all levels in BiH has developed a program for the prevention of corruption; Each authority institution at all levels in BiH has nominated a person responsible for implementing, monitoring and inspection programs.	

2.24 Establish a legislative and legal framework for people protection, which points on irregularities in carrying out the public duties (informers).	December 2011.	Council of Ministers BiH, PS BiH	The legislative and legal framework for protection of people, who warn of corruption, has been established.	
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2.25 Adopt the training programs for the prevention and fight against corruption in public institutions.	February 2011.	Agency, Council of Ministers BiH	The training programs for public officials have been declared mandatory by the Council of Ministers BiH or by each ministry or any other public institution.	
2.26 Conduct a detailed analysis of the regulatory regime in the country and based on analysis abolish unnecessary procedures and to simplify to the highest level the existing procedures of registration, publishing, licensing and approving the registration documents in order to have restricted opportunities for corruption. Carry out the registration and control in advance where possible (ex-ante control) rather than ex-post controls.	December 2012.	Council of Ministers BiH, relevant ministries	Number of regulatory regimes is reduced, the business environment is liberalized.	
2.27 Adopt the necessary legislatives that would ensure the supervision of issuing certificates, licenses and other registration documents made by the Parliamentary Assembly in BiH, only after the independent assessment.	December 2011.	Council of Ministers BiH	The draft law was presented to the Parliamentary Assembly BiH to ensure that the new regulatory regimes are to be introduced only by the Parliamentary Assembly BiH and only after an independent impact assessment regulations and based on consultations with the holders of interest. The same draft law can also be used to revoke the laws that are inconsistent with it.	
2.28 Implement the overall organizational and functional audit of public administration in BiH.	January 2014 – July 2014.	Council of Ministers BiH, Office of the coordinator for Public Administration Reform	Number of administrative structure and state officials is decreasing.	
2.29 Identify weak points within the structure of the public administration in BiH in terms of corruption.	January 2013.	Agency, competent ministries, Office of the coordinator for Public Administration Reform	Weak points are identified.	
2.30 Conduct detailed researches concerning corruption in the public administration and develop a strategy to fight against corruption in the sector.	January 2014.	Agency	Research conducted; Introducing the relevant institutions with the results of the research.	
2.31 Introduce a new and modern system for assessing the work efficiency for public services and associate it with a monthly payroll for public officials.	January 2013.	Agency, Council of Ministers, ADS, competent Ministry of Finance	A new modern system for assessing the work efficiency for public officials has been introduced and associated with their monthly payroll.	
2.32 Introduce effective mechanisms for e-Government and e-Governance.	January 2014.	Agency, Council of Ministers	E-Government and e-Governance are introduced at all levels of authority.	

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<b>3. Education, training and public awareness</b>				
3.1 Assess training needs of public officials to develop the necessary training.	November 2010.	Agency	Assessment of training needs in this area of public administration was conducted; Legal documents required for creating the infrastructure for training were drafted and submitted to the Council of Ministers BiH.	
3.2 Create necessary conditions within the framework of the Agency and relevant educational institutions in order to develop curriculum, pedagogical materials and tools, and educate trainers to deliver training in integrity / fight against corruption / ethics for public officials.	September 2010.	Agency	All necessary legal documents have been adopted; Funds for the development of curriculum, pedagogical materials and tools have been provided, as well as the training for educators so, that they can deliver the training in integrity / ethics for public officials.	
3.3 Design interactive and affordable training materials for public officials (online content, interactive video material).	January 2011.	Agency	Devised and distributed interactive, affordable training materials for the establishment of competence of public officials (online content, interactive CD / DVD, video etc.)	
3.4 Assess the need for training programs in fight against corruption for primary and secondary schools and universities.	December 2011.	Agency, Ministry of Education, universities	A training need assessment in primary and secondary schools and universities was conducted. Legal documents, required for creating the infrastructure for training, were drafted and submitted to the competent authority.	
3.5 Organizing test courses - both in the form of seminars for officials in high positions and for those in the group of high risk of corruption as well as on-line for the rest of the public officials.	December 2011.	Agency	Three tests of the course were organized in the form of five-day seminar for officials in high positions and for public officials who work in high-risk environment.	
3.6 Improve the strategy of public communication for the education of wider public groups about dangers that corruption brings, about means to fight against corruption as well as individual responsibility of every citizen.	July 2011.	Agency, Public Relations Office	The strategy of public communication has been developed, adopted and tested.	
3.7 Improve public relations strategy (PR) for the purpose of ensuring that each authority institution, at all levels, has pro-active relationship with the media.	December 2011.	Agency, Public Relations Office	A model of PR strategy was upgraded and tested.	
3.8 Introduce periodic trainings for journalists in the field of investigative journalism.	January 2011.	Agency, Association of Journalists	The curriculum and training program was introduced and tested.	
3.9 Additional need of assessment for	July 2011.	Agency	Training needs assessment have been carried out -	



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services for the purpose of introduction of necessary changes in infrastructure or training programs, depending on the results of test courses.			one for the entire public administration, and evaluation of spectral requirements.	
3.9 The beginning of the implementation of comprehensive training for public officials in BiH.	December 2011.	Agency	Training systems are available for all public officials in BiH, including training programs, tools training, training the educators and infrastructure. Trainings are conducted at all levels of public authorities in the sector of public administration in BiH.	
3.11 Introduce mandatory training programs in the field of ethics and fight against corruption in primary and secondary schools and universities.	February 2011.	Agency, Ministry of Education, universities	At least one training program in the field of ethics and fight against corruption was introduced for primary and secondary schools and universities in the test phase for each level of the educational system.	
3.12 Implement and assess the strategy of public communication for the education of wider public groups about risks that corruption brings, about means to fight against corruption as well as individual responsibility of every citizen concerning this problem.	January 2011.	Agency, Public Relations Office	The strategy of public communication was devised and tested, and its implementation has begun. Mechanisms of monitoring and evaluation have been established.	
3.13 The beginning of the training for journalists in cooperation with their professional associations.	January 2011.	Agency, Public Relations Office	At least 6 trainings were held; Mechanisms of monitoring and assessment have been established.	
3.14 All public officials in BiH will undergo at least one training in the fields of ethics and fight against corruption on the basis of the adopted programs that will be regularly evaluated.	End of 2014.	Agency	Systems for training were provided for all public officials in BiH, including training programs, tools training, training the educators and infrastructure; Mechanisms of monitoring and assessment have been established and used.	
3.15 All primary and secondary schools and universities in BiH should introduce training programs concerning ethics and fight against corruption in their curriculum.	Until the end of 2014.	Agency, Ministry of Education, universities	All primary and secondary schools and universities in BiH, in their curriculum, have introduced subjects relating to trainings in ethics and fight against corruption.	
3.16 Programs of public education should become an integral part of editorial policy and programs' scheme of public broadcasters.	Until the beginning of 2015.	Agency, public broadcasters in BiH, Public Relations Office	The strategy of public communication is fully implemented; A regular monitoring and assessment including finishing programs was carried out.	
<b>4. Law enforcement</b>				
4.1 Increase the effectiveness of all law enforcement agencies in BiH, through adequate financing, equipping and training.	December 2010.	Agency, Council of Ministers BiH, Ministry of Internal Affairs	The need for financing, equipping and training activities to meet the same were established.	

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4.2 Evaluation of the use of special investigative actions in cases of corruption in order to assess their effectiveness.	December 2010.	Ministry of Internal Affairs, Council of Ministers BiH	Apparent increase in the use of special investigative actions in cases of corruption.	
4.3 Introduction of specialized training for employees of law enforcement agencies involved in the fight against corruption, as well as for prosecutors and judges in the field of corruption and confiscation of illegally acquired assets.	December 2010.	Agency, Ministry of Justice, Ministry of Internal Affairs, Council of Ministers VSTV and Training Centers for judges and prosecutors and the Judicial Committee BD	Specialized training courses were introduced for police officers, prosecutors and personnel of the Agency involved in checking corruption, and for judges in the field of corruption and confiscation of illegally acquired assets.	
4.4 Complete the harmonization of criminal legislation in BiH with international standards.	December 2011.	Agency, Ministry of Justice, Ministry of Internal Affairs, Council of Ministers BiH	Criminal legislation has been harmonised with international standards and have ratified international treaties / conventions.	
4.5 Proposing various procedures to improve investigative actions for more efficient prosecution of corruptive offences.	December 2011.	Agency, Ministry of Justice, Ministry of Internal Affairs, Council of Ministers, competent Prosecutor's Office	The analyses were implemented; Law enforcement agencies have been informed of the results and proposed measures.	
4.6 Improve the provisions relating to the procedures of agencies in order to prevent the abuse of authorisation by the personnel of these agencies.	December 2011.	Agency, Ministry of Justice, Ministry of Internal Affairs, Council of Ministers, Prosecutor's Office	The analyses were implemented; Law enforcement agencies have been informed of the results.	
4.7 Improve procedures and applicability of the provisions of the laws dealing with confiscation of illegally acquired assets and rights.	September 2012.	Agency, Ministry of Justice, VSTV	The legislation improved.	
4.8 Adopt procedures that allow the establishment of public registers of legal persons and responsible persons within legal persons who are involved in corruption.	March 2011.	Agency, Ministry of Justice, competent ministries in the field of economy, Council of Ministers BiH	The legislation adopted.	
4.9 Adopt procedures for the protection of persons who point to irregularities in the prescribed procedures.	December 2011.	Agency, Council of Ministers BiH, competent ministries	The legislation on the protection of these persons was adopted.	
4.10 Audit of the existing legislation relating to the organization and authority of law enforcement agencies, prosecutors and courts, and if necessary, adoption of additional laws and procedures for their effective functioning.	December 2014.	Agency, Ministry of Internal Affairs, Ministry of Justice, Council of Ministers, Prosecutor's office and courts in BiH	A comprehensive review, approval and / or further development of the legislation was conducted, relating to the organization and powers of agencies, law enforcement agencies, prosecutors and courts, with the aim of specifying the next steps.	

4.11 Introduction of additional procedures in the selection, with additional reaffirmation, for candidates applying for positions which are important in detection as well as for competent positions.	December 2014.	Agency, Ministry of Internal Affairs, Council of Ministers, Police Academy	Additional procedures have been introduced and applied.	
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<b>5. Coordination and implementation of the Strategy</b>				
5.1 Drafting a publication for formulating anti-corruption policy in ministries and other public institutions at all levels.	August 2010.	Agency	There was an agreement between all the institutions involved about availability of copies of publications for formulating policy against corruption.	
5.2 Performing coordination and supervision of the implementation of the Strategy.	End of the period of the Strategy implementation – 2014.	Council of Ministers BiH, Agency, institutions responsible for implementing the Strategy	Successful implementation of the Strategy; Timely response on the discrepancy in implementation and finding solutions, as well as the exercise of necessary changes.	
5.3 Develop a system for coordination of the activities in the fight against corruption, including: <ul style="list-style-type: none"> <li>At the state level - representatives of all relevant institutions</li> <li>At the entity and BD BiH level – government representatives of the entities and BD BiH</li> <li>At the local level – each authority will be required to develop its own anti-corruption policy as well as to devise and initiate mechanisms for its monitoring and evaluation.</li> </ul>	December 2010.	Agency	The document of the draft system for the coordination work policies was adopted, agreed upon and approved by the holders of interest.	
5.4 The Agency will develop special procedures for consultation with NGOs and professional business associations on issues relating to the implementation of the Strategy.	December 2010.	Agency	Procedures for consultation with NGOs and business associations on issues relating to the implementation of the Strategy are available, coordinated and agreed with the holders of interest.	
5.5 The Agency will arrange for at least quarterly once a meeting with all relevant institutions to implement the Strategy.	End of the period of the Strategy implementation – 2014.	Agency	Meetings with representatives of relevant institutions were held.	
5.6 The publication for developing a system of formulating policy work in authority institutions at all levels will be introduced as a tool for compulsory usage.	January 2011.	Agency, Council of Ministers BiH	The publication ( developed in 2010 ) after the test phase, is introduced as a tool for compulsory usage by authority institutions at all levels.	
5.7 The system of coordination of the activities will be set up in all public institutions in BiH, with amendments where necessary.	February 2012.	Agency, Council of Ministers BiH	All elements of the system of coordination policy work have been established. .	
5.8 Procedures, developed by the Agency for consultation with NGOs and professional business associations on issues relating to the implementation of the Strategy, will become operational.	March 2012.	Agency, Council of Ministers BiH	All developed and tested procedures have been set up and are operational.	

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5.9 The Agency will collect information on implementation strategies from all institutions.	End of the period of the Strategy implementation – 2014.	Agency	Departments are staffed, equipped and operational.	
5.10 An assessment of execution of the Strategy and Draft Project for a new Strategy will be carried out and presented to the Council of Ministers and the Parliamentary Assembly BiH.	End of the period of the Strategy implementation – 2014.	Agency	An assessment of the Strategy was conducted. The new Strategy has been drafted and presented to the decision makers.	

**General indicators for monitoring process:**

- Progress report on evaluation of the European Commission GRECO
- Corruption Perception Index Transparency International (Corruption Perception Index)
- The Index reports of Nations in Transition Freedom House-a (Nations in Transition)
- Menagement Indicators of the World Bank
- Other international indicators.
- Degree of the implementation of measures from the Action Plan

