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THE WORKING GROUP FOR DRAFTING THE TEXT OF THE NATIONAL STRATEGY FOR COMBATING CORRUPTION

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CHAPTER I: BACKGROUND

Corruption is a social manifestation equally corrosive in developed and less developed countries. The problem of corruption in societies making a transition from authoritarian regimes is bigger and more difficult, as new demands dictate numerous tasks that have to be achieved whilst the funds and means for their realisation are still undeveloped or insufficient.

The first task is establishing of a state ruled by law. Corruption destroys the essence of the state and thus its suppression to a level of acceptability pursuant to standardised scale of the world we live in, is a requisite without which the state cannot survive nor be identified as a state ruled by law.

United Europe has defined the values – of historical heritage and confirmed in practise – that it is committed to and has adopted as criteria. States aspiring to become its part must clearly display that in internal matters and in communication with others adhere to such values. If these societies intend to integrate in these trends, the battle against corruption must be an organised and lengthy process. Therefore, this battle must attain the form of defined measures for its prevention and suppression.

Despite the fact that certain important anti-corruption legislation has been passed, the fight against corruption did not achieve the desired results during the past three years. A small number of corruption cases was prosecuted, which is disproportionate with the number of such instances publicly suspected and indicated.

Numerous assessments of international organisations substantiate that corruption is one of the more severe problems and that measures to date in addressing corruption have been insufficient. Successful combating of corruption is one of the factors that is appreciated in the process of ascension to the European Union, as well as in assessing the harmonisation with Council of Europe standards. Assessment of the Group of states against corruption of the Council of Europe (GRECO), that is expected in 2005, will be important for evaluation of the success of the institutional and legislative framework, and for evaluation of the applied anti-corruption strategy.

Public opinion perceives corruption as deeply-rooted and widely spread and noxious manifestation, that is verbalised as a problem but is not efficiently addressed. The National Strategy on combating corruption has the objective to formulate and recommend measures that in the short-, mid- and long-term will contribute in suppression of corruption.

Since corruption manifest itself where a) opportunity and b) interest is present, the strategy of the fight against corruption focuses on both these factors – opportunity must be removed through systemic reforms, and motives eliminated through preventive measures that increase the risk at stake whilst reducing gain.

The National strategy on combating corruption of the Republic of Serbia includes three key elements: a) efficient enforcement of anti-corruption legislation, b) prevention, that includes elimination of opportunities for corruption and c) raising the awareness and education of the general public aiming at public support of the society for implementing of

the anti-corruption strategy. All these elements of the Strategy are equally important and must, therefore, be applied concurrently and in co-ordination. This would achieve their mutual support and, consequently, their aggregate effect would be stronger not only in the public sector but throughout society.

Recommendations of the Strategy for combating corruption will be specified in the Action Plan that shall envision particular activities, actors tasked with their undertaking and the time-frame for realisation.

The belief in the rule of law in government institutions, with easy access to justice and simple and transparent proceedings, may be achieved by consistent implementation of the Strategy and Action Plan without exceptions and their timely harmonisation with identified problems.

1. Definition of corruption

Corruption is a relationship based on abuse of authority in the public or private sector with the aim to acquire gain for oneself or another.

2. International standards

2.1. Achieved international standards

The following international agreements have been ratified:

- UN Convention against trans-national organised crime;
- Criminal Law Convention on Corruption of the Council of Europe;
- CoE Convention on laundering, seeking, seizure and confiscation of proceeds of a crime.

The following international treaties have been signed:

- UN Convention Against Corruption.

Participation in initiatives to combat corruption:

- Group of states against corruption (GRECO);
- CoE Program against corruption and organised crime in Europe (PACO);
- CoE Program against corruption and organised crime in Southeast Europe (OCTOPUS);
- Stability Pact Anti-corruption Initiative for Southeast Europe (SPAI);
- Elected Committee of Experts of the Council of Europe for evaluation of measures for prevention of money laundering (MONEYVAL);
- Southeast Europe Co-operation Process (SEECF);
- International Chamber of Commerce Program for fight against corruption.

2.2. Future essential standards

The following international agreements have to be ratified:

- UN Convention against Corruption;
- Civil Law Convention on Corruption of the CoE;
- Additional Protocol to the CoE Criminal Law Convention on Corruption.

3. Goals

The goal of the National Strategy for combating corruption is reducing corruption and attaining of a high level of anticorruption culture in Serbia through achievement of the following direct and general objectives:

- 3.1. lasting and long-term elimination of opportunities for occurrence and developing of corruption;
- 3.2. establishing of legislative and institutional framework for prevention and suppression of corruption;
- 3.3. consistent establishing of accountability for unlawful activities;
- 3.4. establishing adequate ethical standards;
- 3.5. efficient application of internationally established standards in this field;
- 3.6. transparent financing of political parties and elections;
- 3.7. prevention of conflict of interest in the public sector;
- 3.8. lawful, responsible and professional enforcement of decisions;
- 3.9. increasing functional efficiency of law enforcement bodies and oversight institutions;
- 3.10. purpose-oriented reform of public administration;
- 3.11. open and transparent proceedings related to planning and use of budget funds, and public control of use of budget funds;
- 3.12. training and assistance to the private sector in implementing effective and autonomous anti-corruption measures;
- 3.13. assistant to media in realising their role in the fight against corruption;
- 3.14. prompting citizens and the civil society to get effectively involved in the fight against corruption;
- 3.15. co-operation and raising general awareness on the rights and duties of government authorities, civil society and citizens in respect of corruption;
- 3.16. joining the international fight against corruption.

4. Current situation

Corruption represents a serious social problem. This contention is supported by the views of citizens, declared priorities of political parties and analysis of international organisations. The proportions of corruption cannot be determined, since relevant statistical data fails to offer reliable basis for drawing of conclusions. Thus, when assessing the spreading of corruption public opinion polls and analysis of perceived corruption are used, conducted on qualified sample.

The fight against corruption is mainly treated as an issue of promoting a lawful and institutional framework. Adopted legislation remains unimplemented to large degree and institutions encounter significant obstacles in their work. Dissatisfaction of the general public with the speed and quality of changes and unstable political scene represent factors

that hinder successful achievement and long-term implementation of anti-corruption programs. One of the main problems is that some anti-corruption measures were adopted prior to adoption of a strategic document on long-term and sustainable concept of the fight against corruption and, hence, were insufficiently compatible.

Some forms of corruption are punishable by current criminal legislation. In addition to the standard forms of accepting and giving bribes and «criminal offences of corruption», introduced into the legal system in 2001, there is a number of others that may contain the element of corruption. According to statistical data for the period 2000-2003, criminal offences with the element of corruption account for 4-5% of the overall number of reported criminal offences. Approximately 15 of these charges resulted in convictions. Based on data from other sources, an impression is reached that these criminal offences have a high so-called «dark prevalence of criminality». The problem in uncovering corruption is that only participants in the prohibited activity have cognisance of the criminal offence and, consequently, have no interest in reporting it.

During the past several years citizens place corruption as the fourth most important problem in the society (after poverty, unemployment and general crime). Public opinion polls indicate that citizens consider corruption in Serbia widespread, and that this viewpoint is based to lesser degree on personal experience and more on preconceptions and stories of others. These researches show that a large number of citizens do not report even cases of “small” corruption, of which they have direct knowledge.

It is even more difficult to find reliable data on profusion of “big scale” corruption. Such corruption is indirectly related by data obtained by research of the perception of corruption by foreign businessmen and risk analysts. According to one such analysis (Corruption Perception Index – CPI, Transparency International), Serbia and Montenegro are in the group of highly corrupt countries (in 2004 they ranked 97 of 145 countries, with a 2.7 index on the scale from 0 to 10, where highly corrupt are those with an index under 4). During the past four years a certain improvement was made in relation to the 1.3 index from the year 2000.

a) Causes of corruption

Economic: structure and transformation of ownership, excessive state intervention in the economy, disrespect of market rules, poverty

Political: constitutional crisis, manner of functioning of political parties, uncertain statehood status, long-term international isolation, existence of informal power centres, absence of consensus on strategic goals of development of the country.

Legal: non-application or selective enforcement of regulations, legal gaps, unharmonised statutory regulations.

Institutional: absence or dysfunction of institutions, insufficient co-ordination in institutional functioning, staffing inadequacy and insufficient equipping, existence of incompetent institutions.

Historical: the system of social values at cross-roads, legacies of wars in the former Yugoslavia, lack of professionalism, customs.

á) Consequences of corruption

- Reduced GNP;
- Decrease in foreign and domestic investments;
- Increase of cost of functioning of the state;
- Endangerment of market economy;
- Undermining of democratic institutions;
- Increased indebtedness of the country;
- Expansion of organised crime;
- Destruction of moral values of the society;
- Distrust of citizens in state institutions;
- Causing apathy in the general public.

5. Presumptions of the Strategy

- Political will;
- Respect of liberties and rights of citizens;
- Reality, durability, consistency, step-by-step approach and co-ordination in realising of the Strategy;
- Comprehensiveness and uniform application of the Strategy in respect of types and subjects of corruption;
- Balance of preventive and repressive measures;
- Supervision and accountability for implementing of the Strategy;
- Periodical evaluation of achieved results and harmonisation in view of needs;
- Co-operation between the public and private sectors, civil society and citizens.

CHAPTER II: SYSTEMS AND FIELDS

1. THE POLITICAL SYSTEM

The political system, which in its widest sense comprises the legislative and the executive and political parties on whom formulation of the legislative and executive policy depends, has a decisive role in the fight against corruption. The success of that fight depends to large extent on the resolve and ability of factors of the political system to confront corruption. Therefore, existence and stability of political will, adoption and enforcement of relevant regulations and policy at this level represent the starting points of the National Anti-corruption Strategy.

At the same time, the political system is frequently the source of some of the most dangerous forms of corruption. Lack of harmonisation between constitutional norms and legislative solutions on election of MPs, unresolved conflict between the public and private interests, incomplete transparency in the work of government authorities and political parties, inadequate control of the role of money in politics, demagogic low salaries of the highest officials and treatment of corruption cases in light of political showdowns and not as criminal offences, present a significant obstacle not only for the realisation of the role of

the political system in fighting corruption but also for attainment of social consensus and confidence of citizens in respect of implementing the necessary reforms in the society.

- Dedication of government authorities of the Republic of Serbia for quicker ratification of international instruments in the field of combating corruption, by the organs of the State Union of Serbia and Montenegro;
- Strengthening co-operation of government authorities of member republics of the State Union in combating corruption;
- Enhancing publicity and transparency in the work of government authorities;
- Timely publishing of detailed reports regarding voting and other MPs' activities;
- Increasing efficiency and effectiveness of the oversight function of the National Assembly;
- **Introducing elements of direct election (by name) of MPs into the election system;**
- Establishing clear and objective criteria for evaluation of Government's efforts in combating corruption;
- Ensuring adequate remuneration for officials with consistent determination of accountability for poor performance in discharge of office;
- Adoption of standards of integrity in highest government bodies;
- Introducing the requirement for government authorities to respond within statutory deadline to relevant questions from anti-corruption bodies;
- Introducing the obligation of public authorities to periodically submit reports on implementation of anti-corruption measures from their purview;
- Introducing a ban on partisan activity for certain categories of officials;
- Developing regulations on prevention of conflict of interest in discharge of public office;
- Harmonisation of the constitutional status of MPs and the manner of their election;
- Limitation of immunity regarding appearance and statements given in discharge of public office (material immunity);
- Developing regulations on financing of political parties;
- Introducing the obligation for the Government to publish decisions on appointment and dismissal with and explanation of meeting the appointment criteria or reasons for dismissal;
- Ensuring constant control of mutual harmonisation of regulations and consistency from the viewpoint of combating corruption;

- Enacting of law on lobbying and ensuring transparency in lobbying;
- Limitation of passive electoral right for persons effectively convicted for criminal offences with element of corruption.

2. JUDICIARY AND POLICE SYSTEM

The state within the judicial bodies and the police, even after the changes of 2000, has not essentially changed. Independence, impartiality, efficiency and accountability of these institutions is a prerequisite for creating a state ruled by law, and their strengthening the country's primary task. Despite current legislative measures directed at prevention and sanctioning corruptive behaviour, the problem of corruption still exists. This is indicated by public opinion, phenomena that with a degree of probability indicate that the issue in question is corruption, and a small number of uncovered and prosecuted corruption criminal offences against judicial and police employees.

- The legal definition of corruption;
- Enactment of Police Act and relevant by-laws;
- Increasing the number of police officers engaged in combating corruption;
- Providing relevant expertise and constant specialisation of staff engaged in combating corruption;
- Providing adequate salaries and work conditions;
- Eliminating political criteria for selection of police staff to the advantage of professionalism;
- Ban on political activity of police officers;
- Enhancing internal and external control of police work and ensuring institutional efficiency;
- Consistent implementing of police accountability in cases of infringement of law;
- Eliminating of influence of political structures on actions in pre-trial criminal proceedings;
- Amending the Criminal Procedure Code with the objective of more effective uncovering and prosecution of criminal offences with corruption element;
- Transforming the status of investigative judge;
- Material investment in modernisation of the criminal police;
- Protection of persons reporting corruption ("whistle blowers") and witnesses;

- Specifying statutory regulations on application of special investigation measures;
- Expanding use of special investigative measures for criminal offences with corruption element.

- Establishing independent and specialised institutions to provide expertise in criminal proceedings;
- Introducing accountability of legal entities for criminal offences;
- Introducing a list of legal entities convicted of criminal offences and their elimination from public tenders;
- Consistent application of regulations on mandatory confiscation of benefits deriving from corruption;
- Change in the burden of proof in asset seizure;
- Forming of a separate organisational unit for managing temporarily seized, frozen and confiscated assets;
- Amending procedural regulations with the objective of prevention of their abuse by parties in proceedings;
- Introducing additional limitations for persons effectively convicted for criminal offences with corruption element.

- Establishing clear and common election criteria for nomination of judges and holders of public prosecution office (hereinafter “holders of judicial office) and their dismissal;
- Introduction of disciplinary accountability of holders of judicial office;
- Introducing preventive measures and controlling mechanisms for prevention of conflict of interest for holders of judicial office;
- Ban on political engagement of holders of judicial office;
- Ensuring adequate income and working conditions for holders of judicial office;
- Adopting and integrity plan in courts and prosecution;
- Passing of a code of conduct of holders of judicial office, with mandatory regulation of the ban on corruptive behaviour and ensuring its effectiveness;
- Mandatory advanced professional training of holders of judicial office;
- Analysis of the work of bodies engaged in uncovering, prosecution and trial;
- Establishing tenure of office for holders of judicial functions;

- Mandatory periodical evaluation of the work of holders of judicial office based on predetermined criteria;
 - Practical training of holders of judicial office for conducting pre-trial criminal proceedings;
 - Monitoring of complaints against holders of judicial office, particularly in cases with corruption element;
 - Mandatory subsequent review of prosecution decisions not to instigate or discontinue proceedings for criminal offences with corruption element, or in cases of procrastination of criminal proceedings.
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- Autonomy of judicial budget;
 - Accelerating of court proceedings;
 - Mandatory publication of effective court decisions in criminal cases with corruption element and organised crime cases;
 - Ensuring effective enforcement of court verdicts;
 - Suppression of corruption within court administration.
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- Analysis and amending of regulations on the State Advocate.

3. PUBLIC ADMINISTRATION SYSTEM

Implementing of the legal framework in the battle against corruption is not possible without active participation of public administration bodies. Flawed regulations and experience acquired by state administration employees enable in some cases of arbitrary decision-taking may constitute a source for corruption. Therefore, upgrading of statutes, precise regulation of the scope of rights and transparent procedures are an essential prerequisite to avoid corruption in this area. It is necessary to introduce a clear and effective principle of personal accountability of public administration and public services staff for lawful, efficient and quality work.

- Implementing of the Strategy for public administration reform;
- Establishing administrative courts;

- Improving regulations governing the areas of : the Government, public agencies, general administrative procedure, administrative disputes, the Ombudsman, public administration, public servants and salaries of public servants, public services;
- Improving co-operation of public administration organs in combating corruption;
- Review of the scope and need for discretionary powers of government and public officials;
- Consistent application of the principles of work of public administration: depolitisation, professionalism, rationalisation, modernisation and the principle of open government, as well as review of the job classification in all public administration bodies, pursuant to the above principles;
- Establishing mechanisms guaranteeing impartial, objective and apolitical selection of staff and their promotion;
- Ensuring adequate salaries and working conditions of public servants and government employees;
- Establishing an efficient system of control and accountability of civil servants;
- Protection of civil and public servants who refuse to obey unlawful instructions and orders of their superiors;
- Adoption of an integrity plan in government and public services;
- Passing of a code of conduct of public and civil servants, with mandatory regulation of the ban on corruptive behaviour and ensuring its effectiveness;
- Regulating rules on prevention of conflict of interest, on engaging in political and public activities, receiving gifts and protection of official information;
- Establishing mechanisms for reporting unlawful and unethical work of civil and public servants and mechanisms for protection of “whistle blowers”;
- Consistent control of application of regulations on the manner of payment of administrative fees;
- Defining and implementing measures to simplify procedures for exercising the rights of citizens before public administration bodies and local self-government organs, with primary objective of obtaining documentation in one place;
- Single statutory regulation of criteria for determining the degree of confidentiality of documents and procedures for their safe-keeping;
- Interconnecting of the IT systems of the Tax Administration, Public Payment Directorate, Customs Administration, the Republic Pension and Disability Insurance Fund, and the Ministry of Internal Affairs as a single information network of public administration organs;
- Introducing the principle of rotation of public servants on jobs susceptible to corruption;

- Regular training and advanced professional education of public and civil servants regarding novelties within their purview.

4. PUBLIC FINANCE SYSTEM

Public finance and budget spending constitute approximately 45% of the GNP. Hence, planning, collection, disbursement and control of public finance is exposed to risk of corruption with serious consequences. Enactment of the Budget System Law, the Public Procurement Act, reforms in the customs and tax systems, lead towards creating a less corruptive ambient. Flaws in the legal framework and belated application of particular new legislative regulations present a serious problem. Absence of adequate control mechanisms is particularly visible.

- Consistent adherence to the principle of comprehensiveness of the budget, and elimination of non-budgetary funds;
- Completing of a single system of managing the accounts of budget spending units;
- Unification of accounting and budget classification and chart of accounts plans;
- Establishing mechanisms for evaluation of appropriateness of spending unit needs in planning of the budget;
- Introducing efficient control of borrowing and establishing direct link with planned inflow of money;
- Transforming of the provisional Treasury account in the permanent Treasury account;
- introducing a modern IT system in the Treasury and Public Payment Administration;
- Enhancing transparency in spending budget funds;
- Enhancing current regulations on Treasury operations;
- Creating a Supreme Auditing institution;
- Establishing efficient control of budget execution by the legislative;
- Creating material and legislative conditions for efficient discharge of budgetary inspection and audit tasks;
- Organising budget inspection and auditing at local level;
- Introducing a system of internal financial control of all budget spending units and mandatory social insurance organisations, in accordance with European standards;
- Increase in the number of specially-trained staff for financial control and auditing;

- Obligatory access to information relating to planning and execution of the budget.
- Harmonisation of tax regulations with EU regulations;
- Introducing synthetic personal income tax and self-taxing of entrepreneurs' income;
- Transfer of competencies for local tax administration to local level;
- Reducing the number of forms of taxes;
- Improving tax collection efficiency in the Republic of Serbia;
- Strengthening the Tax Administration's internal control service and establishing external control;
- Automatisatation of tax procedure by introducing an IT system with single data base;
- Further modernisation of Tax Administration that includes transfer from functional to client organisation.
- Consistent application of task and job division and rotation of customs service staff;
- Developing customs methodology;
- Automatisatation of customs proceedings by introducing a contemporary IT system with single data base;
- Establishing links with custom services of other countries with the objective of information exchange.
- Establishing an efficient mechanism for control of appropriateness and justifiability of planned procurement;
- Establishing control mechanisms for procurement realisation;
- Ensuring autonomy and independence of the Commission for protection of rights from the executive branch.

5. ECONOMIC SYSTEM

Prevention of corruption within the field of economy requires special measures, both due to interdependence of the economy and other sectors and because of corruptive habits within itself. The Serbian economy is in a specific situation because of long-term crisis and due to current reform processes.

- Limiting the role of the state in the economy in respect of establishing basic rules for fair competition, freedom of contracting, creating a business-friendly environment and regulating larger-scale market disruptions;
- Rectifying lack of congruousness and contradiction between individual systemic economic regulations (Law on Economic Entities, Securities Act and Economic Entities Registration Act)
- Enhancing transparency of privatisation processes and proceedings;
- Creating an independent privatisation oversight body;
- Education and informing of citizens of their rights in potential privatisation processes and the overall effects of privatisation;
- Developing a clear and effective competition policy;
- Establishing mandatory internal control in the public sector;
- Instituting independent external accounting audit of the of the largest economic entities;
- Strengthening independence and professionalism of specialised auditing institutions and the Accounting and Audit Commission;
- Strengthening a comprehensive, consistent and up-to-date book keeping system, in accordance with international bookkeeping standards;
- Introducing integrity plans for economic entities;
- Implementing a ban on obtaining tax relief for payment of funds for unlawful purposes;
- Passing a Code of Ethics and establishing mechanisms for its implementation;
- Creating reliable mechanisms within companies for employees wishing to report corruption and ensuring their security;
- Active promotion of the code of good business practise of the International Chamber of Commerce;
- Abolishing provisions of receiving of gifts as a manner of financing of agencies with public authority;
 - Improvement of corporate management.

6. MEDIA

As far as corruption is concerned, the media share the fate of the society, rendering objective informing senseless and preventing public scrutiny of social activities. Also here professional war is under temptation to acquire unlawful gain through reprehensible barter. In relationship established through corruption both parties acquire gain while the society, which is supposed to be served by the media, sustains damages. Damage is not easily rectifiable, thus prevention of corruption due to the effect of anticorruption awareness raising is deemed very important.

- Separation of the advertising function and information function within the media activity;
- Transparent insight into media ownership and prevention of monopoly therein;
- Transparency of financial transactions of the media;
- Developing regulations on the status, rights and operation of the media with the objective to create conditions for their independent work;
- Ensuring autonomy and independence of the Republic Broadcasting Agency Council;
- Introducing a common code of ethics for journalists, with mandatory regulation of the ban on corruptive behaviour and ensuring its effectiveness;
- Ensuring independence of journalists in professional duties with consistent implementation of accountability for violation of the journalists' code of ethics,
- Enhancing regulations on accountability for public statements;
- Preventing discrimination in the relations of public authorities towards the media;
- Implementing the principle of incompatibility of journalist work and political activity;
- Permanent education of journalists on the forms of improper influence on their work, on forms of corruption, on investigative journalism, and their protection;
- Providing effective mechanisms for legal protection of journalists in cases of unfounded denial of information;
- Providing adequate sanctions for media influence peddling.

7. CIVIL SOCIETY AND THE PUBLIC IN THE FIGHT AGAINST CORRUPTION

No effort of the public authorities, international organisations or civil society organisations in suppression of corruption will be effective over time if the general public does not support these efforts. The citizens are part of the anticorruption strategy but also its objective. This strategy has as its goal to change the culture where corruption is accepted or tolerated. The citizens must understand that they are the ones who, through

exercising their electoral right, may control and “punish” the incumbents in office with whose ethics or results they are dissatisfied, and/or “reward” those who were honest and diligent.

NGOs have to earn their legitimacy through openness, courage and quality of their actions. They can successfully act in the anticorruption battle but may also themselves become the source and means of corruption. These organisations transact their activities within an inadequate legal and social environment which hinders their successful work, creates dependence on donors and represents an obstacle for effective control of the quality and propriety of their work.

Guilds and professional associations may frequently observe issues related to corruption more quickly and better than public authorities, or the typical forms of corruption that makes the work of their members more difficult. Consequently, their role is to uphold and promote the level of ethics among members and sanction unacceptable behaviour. The majority of professional associations do not possess the prerequisites to realise their role in fighting corruption, whilst those discharging public authority are exposed to the danger of abusing their monopolistic status for corruption.

The issue of ownership transformation in sports organisations that realise large income is not regulated which, together with potential improper influence by political structures, opens the possibility to suspect corruption.

- Implementing continued awareness raising campaign among citizens regarding corruption and how to combat it;
- Introducing programs of basic education on corruption in all educational institutions;
- Informing citizens on undertaken anticorruption measures and effects thereof;
- Consistent enforcing of regulations on free access to information of public importance;
- Providing effective legal protection in cases of unfounded denial of information;
- Introducing reliable mechanisms for submitting of complaints by citizens and the obligation of public authorities to respond to them within statutory deadlines;
- Including of citizens associations in the activities of public authorities in combating corruption;
- Promoting the work of professional associations in fighting corruption
- Reform of legislation in the field of citizens associations;
- Granting budgetary funds and tax relief to citizens associations based on clear criteria in a transparent procedure;
- Ensuring full transparency of financial transactions of the work of citizens associations;
- Control of spending of budgetary funds granted to citizens' associations;

- Introducing and application of ethic rules in citizens' associations;
- Timely informing of citizens' associations on the possibility to obtain funds from the budget;
- Selection of relevant model for privatisation of the larger sports organisations.

III CHAPTER: STRATEGY IMPLEMENTATION

The law to be prepared by the Ministry of Justice and the Anticorruption Council in co-operation with the Council of Europe shall establish an autonomous and independent body with the following competencies:

1. Implementing of the Strategy and Action Plan
2. Enforcing of regulations from the field of conflict of interest resolution for officials in all branches of the government
3. Control of implementation of regulations governing financing of political parties and election campaigns
4. Monitoring the work of bodies engaged in the battle against corruption.
5. Developing integrity plans in the public sector

The above law will regulate the status and competencies of the independent body for combating corruption and its relations with the Anticorruption Council.

All organs engaged in combating corruption whose competencies are to be taken over by the new body shall continue to operate, unless otherwise provided under the new law.