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Support to Anti-Corruption Efforts in Kosovo (SAEK)

Project Document

- CDP Outcomes:**
- CDP Outcome 2.1: *“Institutions responsible for delivering public services and social justice are accountable and responsive to rights holders”.*
 - CDP Outcome 2.2: *“Key civil society actors increasingly influence the accountability of governance for public services and social justice”.*
 - CDP Outcome 3.1: *“Target Municipalities have local governance mechanisms in place promoting human rights based development”*
- Expected KPAP Outcome:** KPAP Outcome 2: *“By 2015, rule of law institutions are more efficient, transparent, gender responsive and accountable”.*
- Project Outputs:**
1. Capacity of the Kosovo Anti-Corruption Agency (KAA) to monitor and prevent corruption in selected institutions, key service areas and municipalities increased.
 2. Civic engagement in strengthening transparency and accountability increased and access to information at the local level enhanced through social media.
 3. The ability of the judiciary to fight corruption internally and externally is increased.
- Implementing Agency:** United Nations Development Programme (UNDP)
- Executing Agency Output 2:** InternewsKosova (I/KS)
- Partners:** Kosovo Anti-Corruption Agency (KAA), Kosovo Institute of Public Administration (KIPA), Kosovo Judicial Council (KJC), Kosovo Prosecutorial Council (KPC), Office of Disciplinary Prosecutor (ODP), Kosovo Judicial Institute (KJI), Kosovo Police (KP), Office of Good Governance (OGG), Kosovo Judges Association (KJA), Kosovo Association of Municipalities (KAM), Ministry of Local Government Administration (MLGA), European Union Rule of Law Mission in Kosovo (EULEX), Council of Europe (CoE), European Union Office (EUO), United Nations Office on Drugs and Crime (UNODC), United Nations Children’s Fund (UNICEF), Balkan Investigative Reporting Network (BIRN), NGO Lens and CREATE Company.

Outline

The project *Support to Anti-Corruption Efforts in Kosovo* (SAEK) is expected to have a positive impact on reducing the level of corruption in Kosovo by strengthening monitoring and oversight mechanisms of institutions to perform in an efficient, transparent, accountable, and gender sensitive manner. The project will ensure greater transparency and accountability of those institutions responsible for delivering public services and create the necessary requirements for more participatory governance at the local level.

Limited participation of citizens in fighting corruption and monitoring government decision making are other focus issues to be innovatively addressed by this project. Through the use of modern communication tools, such as social media, web2.0 and mobile phone technologies, this project will harness the creativity, innovativeness and collaborative attitude of citizens interested in achieving a political change regardless of ethnicity, gender or physical disabilities. By enabling stronger participation of citizens and strengthening social accountability mechanisms, UNDP will allow citizens to fight corruption directly and demand more transparency from public decision makers.

SAEK takes an innovative and holistic approach towards anti-corruption by focusing both on the “supply-side” and the “demand side” of democratic governance and taking into consideration different levels of intervention, working directly with central government authorities, local/municipal actors, civil society and the citizens themselves.

UNDP will adopt a human rights based approach to this anti-corruption project as well as a systemic capacity development focus addressing the policy dimensions, organizational systems and individual level of skills and knowledge. SAEK will complement the commitment made at the government level to fight corruption by working closely with a wide range of stakeholders from the public sector and building on the strategic alliances UNDP has already established with various Kosovo authorities, international actors and civil society organizations (CSOs).

Programme Period: 2011 - 2015

Programme Component: Governance

Project Title: *Support to Anti-Corruption Efforts in Kosovo* (SAEK)

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Phase II - End Date 30.04.2016

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Total allocated resources:

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Phase II: 1,977,300 Euro

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1) Background and Situation Analysis

Kosovo is faced with many of the same corruption issues found in most developing societies which have suffered from totalitarianism in the past and/or have gone through civil conflicts. The corruption patterns found today in Kosovo are a strongly related to its recent history. Post-conflict Kosovo was marked by two trends which would bear considerable influence in later stages. Firstly, the war created new interest groups which entered the political and business scene; and secondly, the immediate period after the conflict was a legal and rule of law vacuum while the UN administration sought to establish itself on the ground. These two sets of events have left heavy traces on Kosovo's rule of law infrastructure.

Current circumstances and processes, which are characterized by transitional socio-economic difficulties and armed conflict consequences, have created favourable conditions for corruption. Unemployment is high, whereby the state attempts to reduce unemployment by generating employment in the public sector and creating an unreasonably high number of public employees earning low salaries. Research conducted by international development actors, including UNDP, show that the primary cause for corruption in Kosovo are the low salaries of the officials in the public sector.

The *2012 Feasibility Study for a Stabilisation and Association Agreement between the European Union and Kosovo*, released in October 2012, states that Kosovo has made some progress on tackling corruption by improving its legislative framework¹. This is an encouraging development; however, the problem of corruption continues to harm the lives of thousands of people. The Progress Report has highlighted that further strengthening the independence and efficiency of the judiciary, police and other law enforcement bodies is necessary for fighting corruption in Kosovo. Furthermore, it has been assessed that civil servants are still affected by political interferences and corruptive practices and that the capacity to investigate corruption and the level of expertise remains limited. Also the lack of transparency in the relationships between politicians, private civil servants, civic leaders, their families and businesses creates a closed environment where opportunity exists and corruption pressure is high.

The Progress Report also identified a range of gaps and weaknesses in "inter-institutional cooperation and coordination, and a lack of support and commitment by the senior leadership in all public institutions". The report further recommends simplifying the institutional set-up for the fight against corruption to avoid overlapping responsibilities. Cooperation between the enforcement and judicial authorities needs to be improved to make them more efficient and effective, and improve the reliability and comparability of statistics in this area. The *Kosovo Democratic Institute (KDI) Assessment of Institutional Integrity* also explains that the collaboration among the Kosovo Anti-Corruption Agency (KAA), the prosecution, the media and civil society organisations (CSOs) needs to be improved further².

According to the *Corruption Perception Index* released by *Transparency International (TI)*, Kosovo is ranked in 112th place out of 183 countries and territories around the world. One of the most worrisome facts is the decrease of citizen's trust towards public institutions due to high levels of corruption. According to TI's *Global Corruption Barometer*, a significant number of people in Kosovo stated that bribes are requested for the provision of public services³. At the same time, most citizens consider the government efforts to combat corruption to be ineffective.

¹ *Feasibility Study for a Stabilisation and Association Agreement between the European Union and Kosovo*, p.10.

² *KDI Assessment of Institutional Integrity 2011*, p.247. The assessment was published under the UNDP Kosovo Partnership for Anti-Corruption project 2009-2011.

³ *Global Corruption Barometer 2010*, Transparency International, p.45.

The Bribery Report issued by the *United Nations Office on Drugs and Crime (UNODC)* in 2011⁴ identifies that only 5.5% of those who experience corruption in Kosovo actually report the incident. People do not report bribery because they perceive it to be useless as nobody would care (35%), they receive a benefit from it (18%), it is a common practice (14%) or because they give bribes voluntarily as a sign of gratitude (14%). Furthermore, the report also states that the main purposes of paying bribes in Kosovo are to speed up a procedure (37%), to finalize a procedure (14%) and to receive better treatment (8%).

According to UNDP's latest *Public Pulse Report* of October 2012⁵, citizens consider corruption the third largest problem Kosovo is facing today, after unemployment and poverty. UNDP's report also highlights, that citizens perceive large scale corruption mostly in the Privatization Agency of Kosovo, the Kosovo Energy Corporation, courts and hospitals⁶.

Nepotism is also an issue which plagues Kosovo's public sector. The employment of relatives in senior positions is widespread and decision-making is centralized and controlled. Employment opportunities in public and state sectors are heavily politicized. Family ties and bribes remain key factors for employment in public sector. Education and professional experience are not considered as key factors for employment in public sector agencies. Political interference and nepotism in reappointments, reassignments and dismissals are very common. Strict adherence to transparent procedures of recruitment, transfer, evaluation, upgrading, behaviour and dismissal of civil servants from work are determined as priorities for Kosovo.

Also state tenders are frequently said to be predetermined because of nepotism, frustrating foreign investors. Traditional lending and business practices tend to favor personal connections and nepotism over creditworthiness.

Corruption problems at the central government

There are significant secondary driving factors which contribute to reducing the level of corruption in Kosovo. The presence of few strong CSOs working on anti-corruption through well targeted projects, led by enthusiastic leaders, have shown positive impact in the past. Working towards EU integration has also proven to be a strong incentive to seriously address this phenomenon also in neighbouring countries.

Nevertheless, lack of political will to strengthen rule of law institutions is still considered one of the major contributing factor to the high level of corrupting in Kosovo. The *2012 Feasibility Study for a Stabilisation and Association Agreement between the European Union and Kosovo* states that high-level political support needs to be ensured in support of the work in the fight against corruption. Concerns are also raised about discrepancies between the public officials' assets declared and their actual revenue, and the significant breaches of procurement rules.

Anti-corruption measures have not been top of the agenda during the initial post-conflict phase in Kosovo. In recent years, the government of Kosovo has however declared the fight against corruption one of its top priorities. On 11 January 2012, under the chairmanship of the Prime Minister Hashim Thaçi, the government has adopted the *Strategy and Action Plan against Corruption* for 2012-2016, asserting that combating corruption was, is and remains also for the future among the main priorities of the Kosovo Government and all its institutions. The *Kosovo Anti-corruption Agency (KAA)*, the Prime Minister's Office, respective ministries, independent institution, civil society, media and international

⁴ Corruption in Kosovo: *Bribery as Experienced by the Population*, UNODC

⁵ UNDP Kosovo *Public Pulse Report*, October 2012 p.11.

⁶ UNDP Kosovo *Public Pulse Report*, October 2012 p.12.

experts from the European Council have been involved in this plan and have actively participated in drafting the strategy and the action plan. For the period of 2012-2016, these documents provide details and concrete objectives to prevent and combat corruption in Kosovo. By adopting this strategic document, the Government claims to fulfil one of the main challenges foreseen by the European Commission for Kosovo's EU integration.

SAEK activities have been designed around the KAA Anti-Corruption Strategy for 2012-2016 as well as the KAA Anti-Corruption Action Plan 2012-2016 to ensure project buy-in and highest commitment from the government to participate and facilitate the implementation of the project activities.

It was also Prime Minister Hashim Thaci who founded in 2010 an *Anti-Corruption Task Force* within the *Special Prosecutors Office of Kosovo (SPRK)*⁷ tasked to specifically fight high-profile corruption cases, unlike municipal and district prosecutors who have the responsibility of dealing with lower scale corruption cases. The Task Force has 12 members, including 7 prosecutors and 5 representatives from the *Regional Police Directorates for Economic Crimes and Corruption*. However, the arrest of the lead prosecutor of this body on 2 April 2012 on suspicion of corruption, demonstrates that establishing such bodies is not sufficient to reduce corruption.

As an additional sign of political commitment, the current President of Kosovo, Ms. Atifete Jahjaga, has established the *National Anti-Corruption Council* in February 2012 to increase cooperation and coordination among the Kosovo institutions. Within the framework of one of its ongoing projects, UNDP Kosovo has placed a Strategic Advisor within the Office of the President providing insights and recommendations on a variety of issues, including anti-corruption.

Also the reviewed *Kosovo Public Administration Reform Strategy 2010-13*, adopted by the Government in 2010, specifies as one of its key objectives to directly address anti-corruption through strengthening ethics and transparency (Theme 3) in public administration. UNDP is supporting this process and will capitalize on the fruitful partnerships and results it has generated throughout the SAEK project (Component 1 and Component 4).

The Kosovo Police also established the *Directorate against Economic Crime and Corruption*. Inspection departments have been set up in many authorities and institutions to address and monitor corrupt and criminal behaviour within the organization itself. The UNDP projects *Kosovo Small Arms Control Initiative (KOSSAC)* and *Women's Safety and Security Initiative (WSSI)*, throughout the past years, have built far-reaching partnerships with the Kosovo Police and act as main advisor to the Ministry of Internal Affairs. SAEK will take advantage of this asset and ensure that the Kosovo Police is integrated in all its activities to the furthest extent possible.

The project will continuously seek to ensure that the Kosovo government contributes to the project, financially or through in kind contributions, to demonstrate clear commitment and ownership of the authorities in the process and not give the impression that SAEK is a donor driven intervention.

Corruption problems within the judiciary

Although the *Kosovo Judicial Council (KJC)* and *Kosovo Prosecutorial Council (KPC)* are responsible for ensuring the independence and impartiality of judges and prosecutors⁸, corruption within the judicial system is often observed. According to the *UNDP Public Pulse Report*, 44% of the population perceives

⁷ SPRK is a prosecution office dealing with very serious crimes and criminal offenses, which include corruption. SPRK is composed of Kosovo and EULEX prosecutors and headed by a EULEX prosecutor.

⁸ KJC is also mandated to ensure that the Kosovo courts are independent, professional and impartial.

large scale corruption in courts⁹. Also the progress reports of the European Commission state that law enforcement and judicial authorities need to be more pro-active in this area and that there is a concern about transparency in court services. Moreover, security issues hamper judges and prosecutors to perform freely and that affects them conducting their independent work.

To address this issue, the *Office of the Disciplinary Prosecutor* (formerly the Judicial Inspection Unit) was established as the responsible institution for inspection, audit and disciplinary investigations within the Kosovo justice system. The *Office of the Disciplinary Prosecutor* (ODP) deals with investigations of complaints addressed against judges, lay-judges and prosecutors and it presents recommendation to the KJC and KPC for imposing disciplinary measures. However, as newly established body, the ODP, amongst others, lacks capacity, proper information and knowledge management tools, and internal strategy documents for disciplinary investigations. Citizens also need to be made aware about the mandate of the ODP, being the relevant authority to submit cases of corruption and misconduct in the judiciary.

Corruption problems within the local government

Limited participation of citizens in local decision making and weak, non-transparent municipal governance are a major concern for effective local governance in Kosovo.

The UNDP Kosovo 2012 MOSAIC Report analyzes whether Kosovoans feel that representatives of their municipality take into account their opinions and considerations while deciding on issues concerning the municipality. On average across Kosovo, 50% of respondents perceive that their municipal representatives take their opinions into consideration to some extent, 6% perceived that the municipal authorities pay special attention to their residents' opinions and considerations, and 38% perceived that the municipal authorities take no consideration of their opinions and considerations.

In addition, 34% of the citizens are dissatisfied with services that respective municipalities provide¹⁰ and 30.1% of the population perceives corruption in local governments¹¹.

Public Administration Reform

The reviewed *Public Administration Reform Strategy of Kosovo*¹² was adopted by the Government in 2010. It outlines objectives of the public administration reform at the central level and identifies mechanisms to monitor and implement the Strategy within a mid-term period of 2010-2013. One of the objectives of the *Public Administration Reform Strategy* 2010-13 is to directly address anti-corruption through strengthening ethics and transparency (Theme 3)¹³.

Social Media and Anti-Corruption

Social media has become an important tool to affect change and transform politics around the world. It seems the world is becoming more democratic and reflective of the will of ordinary people. With more people now able to access, create and distribute information, ideas are spreading faster, pushing the boundaries of freedom of expression and opening up new possibilities for change and reform.

⁹ *Public Pulse Report, October 2012*, p.12.

¹⁰ *Ibid.* p.50

¹¹ *UNDP Public Pulse Report, October 2012*, p.12.

¹² The new Public Administration Reform Strategy has established a mechanism to coordinate, assess and monitor the implementation of the Strategy. The Inter-Ministerial Public Administration Reform Committee (IC-PAR) is responsible of the mechanism, which is chaired by the Deputy Prime Minister.

¹³ The objectives of the Public Administration Strategy are directly related to all the public administration sectors organised around three main institutions comprising a coordination triangle for the implementation of the Strategy: The Office of the Prime Minister, the Ministry of Public Administration and the Ministry of Economy and Finance.

Perhaps one of the greatest benefits of social media for government's relationship with citizens is the way in which it helps strengthen democracy. It has the potential to be a powerful catalyst for democratization. Today, social media has become useful for a surprisingly wide range of purposes, including election monitoring, fighting drug cartels, tackling human trafficking, enhancing political accountability and fighting corruption.

The figures for the use of internet and, in particular mobile penetration, as well as the overall demographics of Kosovo indicate that social media can indeed be seen as an important vehicle in advancing the anti-corruption agenda. Kosovo is listed ahead of many countries in the European Union in the percentage of internet users and is even considered to be a leader in the region for the use of the internet.

In light of these circumstances, UNDP and its executing partners, a consortium of organizations lead by *InternewsKosova* (I/KS) and including *Balkan Investigative Reporting Network* (BIRN), *NGO Lens* and *CREATE Company*, have developed the Web-based Platform "www.kallxo.com"¹⁴ which provides every Kosovo citizen with an opportunity to proactively engage in fighting corruption. This innovative and groundbreaking civil society approach to tackle corruption, allows virtually everyone in Kosovo to become a "publisher" and freely report even minor corruption cases. It gives citizens the opportunity to voice concerns, share observations online and make these visible to the public, using multiple communication channels, such as social media, SMS and the web.

By visualizing and mapping reported corruption cases in the World Wide Web, the platform allows citizens to publicly speak out and make their unfiltered voices heard. It also raises the awareness amongst citizens on the level and form of corruption occurring in Kosovo. Ideally, this will allow responsible stakeholders to take collective and appropriate counter measures.

2) Approach and Proposed Methodology

Corruption strikes at the heart of democracy by corroding rule of law, democratic institutions and public trust in leaders. For the poor, women and minorities, corruption means even less access to jobs, justice or any fair and equal opportunity. If corruption produces negative consequences for political and socio-economic development, then effective anti-corruption projects will have important political and socioeconomic benefits. The dividends of anti-corruption are increasingly well documented. Countries whose dimensions of governance have improved have seen corresponding improvements in their quality of life – sustained growth, higher incomes, reduced poverty, increased literacy, etc.

UNDP addresses the costs of corruption to development by developing pro-poor policies, supporting increased public participation in decision-making, and monitoring of budgets, public services and infrastructure development by mainstreaming anti-corruption in its current work and other development processes.

To ensure cost-effective project interventions and considerable return on investment, SAEK has been designed based on lessons learned and tested practices which have lead to significant benefits in similar political and socio-economic contexts such as the ones in Kosovo.

A thorough needs assessment was performed with the Kosovo Anti-Corruption Agency (KAA) and relevant judicial bodies to ensure that relevant needs and requirements are properly addressed. SAEK is

¹⁴ The Albanian word "kallxo" means in English "tell" or "inform". The trilingual (English, Albanian and Serbian) platform, the corresponding Facebook Website and Google Adds are illustrated in ANNEX I on pages 9-11.

also based on current government strategies and action plans as well as up-to-date progress reports formulated by international organizations and institutions, including UN agencies and EU, as well as CSOs.

The project document also incorporates findings from an assessment mission conducted by UNDP's *Bureau for Crisis Prevention and Recovery* (BCPR) and the UNDP *Bratislava Regional Centre* (BRC) in May 2010. The BCPR/BRC Team had concluded that addressing entrenched corruption in a fragmented and instable institutional environment like the one in Kosovo requires a comprehensive approach that would promote transparency and accountability of the public administration at the central and local level, would increase integrity and effectiveness of the judiciary and would enable citizens and CSOs to function as watchdogs over corruption and mismanagement in public services.

SAEK will also build a series of anti-corruption interventions on the basis of the existing UNDP Rule of Law (RoL) project. The RoL project is already addressing indirectly the issue of corruption and constitutes a good base for a more streamlined approach to fighting corruption.

Enhancing efficiency and effectiveness of the local administration was identified as one of the priorities for SAEK. UNDP, through its project *Support to Decentralization in Kosovo* (SDK), has already successfully supported the implementation of the decentralization agenda to promote effective local governance and established a relation of trust and cooperation with the Ministry of Local Governance Administration (MLGA).

SAEK will take an innovative and holistic approach towards anti-corruption by focusing on different levels of intervention, working directly with central government authorities and local/municipal actors ("supply-side") as well as civil society and the citizens themselves ("demand side").

As such, the project also addresses the differentiation between different levels of corruption. By developing activities involving high level public institutions from the judiciary and the executive branch as well as lower level grassroots organizations and citizens, it supports the prevention, detection and investigation of both grand corruption (which involves substantial amounts of money and usually high-level officials) and petty corruption (which involves smaller sums and typically more junior officials).

Grand corruption will be addressed by enhancing the capacity of the judiciary to investigate and prosecute corruption as well as by supporting the KAA in strengthening accountability and transparency within the political sector, local government, and central administration (see below Component 1 and 3).

Petty corruption will be targeted by addressing directly the CSOs and citizens themselves. Though modern information and communication technologies, CSOs and citizens will be provided with the tools to voice their concerns and address issues related to petty corruption. Web-based tools and technologies will allow every citizen to report every form of corruption, misconduct, or conflict of interest (see Component 2 below).

The project's objective of strengthening institutional transparency, accountability and integrity, with a particular focus on empowering citizens and access to information is organised around the following components and activities:

Component 1:

Capacity of the Kosovo Anti-Corruption Agency (KAA) to monitor and prevent corruption in selected institutions, key service areas and local administration increased.

UNDP Kosovo has been active in the area of anti-corruption since 2004. The initial project “Kosovo Transparency Initiative” (KTI) aimed at enhancing transparency and accountability in public services. One of the major outcomes of the project was the establishment of the *Kosovo Anti-Corruption Agency* (KAA), as the first independent governmental agency in Kosovo equipped to deal with corruption issues.

The KAA was designed according to the model of independent, multi-task anti-corruption agencies based on a classic three-pronged approach: investigations, prevention, and education. This approach was understandable at a time when Kosovo had neither a corruption prevention nor specialized anti-corruption body. But the situation changed since the establishment of the aforementioned *Special Prosecutors Office of Kosovo* (SPRK), which is mandated to fight high-profile corruption cases, as the primary responsibility for dealing with ordinary corruption cases belongs to municipal and district prosecutors. Accordingly, KAA needs to switch to a full preventive model and needs assistance in this complicated and sensitive modernization process.

The *Kosovo Partnership for Anti-Corruption* (KPAC) project, which was implemented by UNDP Kosovo from August 2009 to March 2011, provided expert advisory services to the KAA in the area of conflict of interest, supported the improvement of legislations and manuals related to anti-corruption, conducted an assessment on institutional integrity and implemented awareness raising activities at the local level. Ties across the larger Balkan area were established and strengthened, providing grounds for a sustainable anti-corruption network at the regional level. KAA staff was equipped with mostly technical assistance regarding the implementation of the *Law on Conflict of Interests*.

SAEK takes the outcomes and recommendations of the previous UNDP KPAC Project into account and addresses corruption issues in a wider and deeper scope. KPAC’s capacity development activities aimed to provide KAA staff with technical expertise on issues related to conflict of interest. However, the project did not support the KAA in implementing the legislations and manuals which KPAC assisted to prepare.

Activities implemented under Component 1 will be focusing on strengthening the capacities of the KAA to become an effective external control mechanism for ethics, integrity and efficiency of the public administration. As identified as a priority by the EC in its Progress Reports, the project will also focus on enhancing active partnership and stronger collaboration and coordination amongst relevant stakeholders on anti-corruption issues, particularly amongst the KAA, prosecution and law enforcement.

SAEK Component 1 will focus on building the capacity of the KAA and providing the agency with the necessary tools to properly fulfil its corruption prevention role, with a specific focus on asset declaration and conflict of interest.

Capacity development activities will involve, but are not limited to, the following areas:

- Conflict of interests, gift declaration and asset declaration;
- Implementation of the Code of Ethics and disciplinary procedures;
- Technical skills in investigation and information gathering;
- Working with other public and CSO stakeholders on anti-corruption.

Interventions will be focusing on three levels:

1. The institutional level

2. The sector level
3. The municipal/local level

Level1:

Level 1 will identify, together with relevant stakeholders, key agencies and institutions, such as line ministries (particularly in public procurement and tendering procedures), customs (export/import) and tax administration, which are considered corrupt or extremely vulnerable to corruption and political interference from criminals and corrupt politicians.

The Anti-corruption Action Plan 2012-2016 highlights specific measures to be taken to prevent corruption in these areas. During the preparatory phase, the project will analyze how these measures can be put in place and how transparency e.g. in public tendering (through e-platforms) can be enhanced to prevent corruption.

The project will develop integrity management systems which envisage including actions that each institution will implement, including merit-based and competitive civil servant recruitment, mandatory conflict of interest disclosure for all procurement officials, and rigorous policies on the acceptance of gifts, in addition to specific initiatives tailored to each institution.

In previous years, improved structures have been created for the implementation of financial management and control, and independent units have been set up for internal audit. In order for the above-mentioned institutions to carry out their duties to a high quality, continuous improvement of capacities is needed.

Level2:

Level 2 will focus on three different service sectors highly affected by corruption in Kosovo, namely the health, education and energy sectors. Research shows that these sectors are highly exposed to corruption in Kosovo. Although corruption in the Kosovo Privatization Agency is also perceived by Kosovo citizens to be highly corrupt, SAEK will not directly address this sector, due to its complex political nature and the incalculable risks involved.

SAEK will initially conduct sector specific integrity vulnerability assessments to understand on how corruption manifests itself and where corruption risks exist in these sectors in order to devise strategies to address the underlying governance and anti-corruption bottlenecks. UNDP has a wide ranging experience in developing tools and good practices to map corruption risks, develop strategies and sustain partnerships to address challenges and tackle corruption in sectors. This course of action takes forward UNDP's agenda to develop approaches to address corruption in different sectors.

Based on the corruption risk assessments, the project will develop integrity management systems, in collaboration with relevant government ministries/actors and CSOs, to deter, prevent and curb corruption in the selected focus service areas as well as developing measurable monitoring and evaluation (M&E) instruments for enforcement of the proposed integrity systems.

Level3:

Level 3 will focus on the municipal level and examine operative procedures of local institutions in specific sectors and identify gaps that provide opportunities for corruption. In total, five (5) target municipalities will be selected based on a thorough analysis and consultation process with relevant stakeholders, including but not limited to the Ministry of Local Government Administration (MLGA), the Association of Kosovo Municipalities (AKM), and relevant development actors. The specific sectors to be

analyzed will be determined in consultation with the selected municipalities, service providers and civil society.

The identified vulnerabilities and gaps in all 5 target municipalities will be verified through a participatory process including public authorities and civil society to develop appropriate responses. Jointly developed new solutions are expected to improve the integrity concept and shape the way services are planned, managed and regulated at the local level in a more transparent, accountable and professional manner. The end result will be the adoption of integrity plans in the 5 target municipalities and tools to monitor and evaluate the plans centrally and at the local level.

Addressing corruption at the local level is an advantage for creating a systematic and practical strategy of cooperation among civil society and a local government that is able to be more responsive to the needs, requests and demands of individuals or groups in the community. Practical strategies for combating corruption at the local level can address the pervasive incentives of the institutions through a participatory process of institutional reforms. SAEK interventions at the local level are designed without putting the focus on corruption itself, but by allocating municipal resources in a more equitable manner for reform. In order to prioritize areas of reform, the local government and civil society will use participatory working groups whose tasks will be to identify the problems and pervasive incentives at the municipal level (e.g. lack of information, accountability, low salaries, too much discretion, complex regulatory frameworks, nepotism, etc.).

Once the problems are identified, civil society and local government will propose innovative ways to address these problems and suggest reforms (see also SAEK Component 2). The process of implementation will be periodically monitored and evaluated.

The issue of transparency and efficiency are strategic entry points for addressing local government reform. These issues are also key features in enhancing public sector credibility and legitimacy. Increasing public sector credibility can create a positive image of the municipality and enable citizens and government to more effectively govern, utilize resources, provide services, and increase the community's overall quality of life. Political commitment is indispensable and a crucial condition for achieving comprehensive institutional reforms and, in particular, for creating accountable and transparent systems and curbing corruption. Developing and successfully implementing an integrated framework to fight corruption at the municipal level is likewise impossible without political commitment.

Component 2:

Civic engagement in strengthening transparency and accountability increased and access to information at the local level enhanced through social media.

The most typical accountability mechanism is an election, whereby citizens can continue to vote for those who adequately represent and respond to their needs and/or punish those who do not. But elections are often an extremely indirect and less effective accountability mechanism, as they do not allow citizens to evaluate government performance on a more regular basis.

Traditionally, efforts to address issues of accountability have focused on improving and/or strengthening the "supply-side" of democratic governance. As such, the different branches and levels of government play a role in ensuring political checks and balances. Similarly, administrative procedures and internal controls, auditing requirements (both internal and external), and law enforcement (through comptrollers, courts and the police) have been used as top-down means and approaches to improve accountability.

More recently, increased attention has been paid to improving the “demand side” of democratic governance. That is, strengthening the voice and capacity of citizens to directly demand greater accountability from public officials and service providers. The emphasis in this approach is in actors outside the State, comprising checks and balances on governmental actors within all three branches of government and at national, regional, and local levels. It involves civil society and non-governmental organizations, as well as an independent media, watchdog organizations, and influential think-tanks and/or research organizations. As such, initiatives to enhance the ability of citizens and stakeholders to engage with public officials and policymakers in a more informed, direct and constructive manner have been getting more attention and support. This reflects a growing shift to democratic governance issues related to public policy making, empowerment and citizen participation, all of which form the basis for social audit.

Based on the lesson learned from the above mentioned, already established, Web-based Platform “www.kallxo.com”, SAEK Component 2 now intends to expand the initial pilot initiative and create accountability mechanisms where citizens organize and mobilize to evaluate or audit government’s performance and policy decisions. The project rests on the premise that when government officials are watched and monitored, they feel greater pressure to respond to their constituents’ demands and have fewer incentives to abuse their power.

SAEK will focus on developing the necessary social media, web2.0 and mobile phone technology for citizens to report and voice their concerns on pressing issues related to municipal public services and social accountability. The project will also play an essential role to stimulate municipal debates amongst citizens, civil society organisations and the municipality.

The implementing partner of this component, InternewsKosova, together with its partners, have established communication channels through which people can report corruption cases also through more traditional means, for example telephone or personal meetings. This ensures that also people who are not able to use the internet or a mobile/smart phone can denounce corruption cases which are then followed up by the www.kallxo.com team. Therefore, the project couples innovative and modern ways of communication with more traditional ones.

At the local policy level, Component 2 aims to enhance access to information to increase government accountability to citizens and reduce opportunities for corruption to take place. It will promote multiple communication channels, such as social media, SMS and the web to widen the outreach of selected municipalities, make them more responsive to citizens’ needs and increase their communication and interaction with Kosovo citizens.

Within the framework of this component, SAEK also intends to identify, together with media partners, “Anti-Corruption Champions” or role-models to raise awareness and promote the exemplary work of certain individuals, municipalities/mayors, government bodies or institutions in the field of transparency and accountability. These “Champions” are expected to lead by example and their work shall be promoted through various means, including social/new media and traditional media.

The project will also work with local media partners to produce video features and broadcast TV shows to increase civic engagement and social responsibility. The TV shows will be broadcasted throughout Kosovo and aim to also raise the awareness of citizens on the negative consequences of corruption. Visibility of the donor will be guaranteed, if deemed appropriate.

UNDP well recognizes that creating more civic engagement in decision making and enhancing government transparency and accountability require a complex change management process in which technology, if used effectively, can only be an enabling tool, but not a driving force. Indeed, one of the key challenges of this project will be to demonstrate to municipal authorities and citizens the benefits of using social media and raise their awareness on the opportunities of using these tools. A critical question is also whether citizens have the skills, capacity and tools to effectively monitor and evaluate their governments and decision-makers. Because UNDP is aware of such risks, the project will put in place mitigating measures that can help - at least partially - reduce the resistance it is going to face.

To avoid the risk of misusing the web-platforms and mobile phone systems to falsely report and discredit individuals, organizations or other target groups, the project will establish a "Research Unit", solely responsible for following-up citizens' reports and verifying the correctness of the information submitted. The "Research Unit", composed of a team of experienced journalists, researchers and lawyers, will be in charge of analyzing and classifying reported corruption cases. Only upon full verification of the case submitted, it is published online and made visible to the public. Once verified, the unit will also be responsible for providing anti-corruption and rule of law institutions with the relevant information to allow these to follow-up on the reported corruption cases.

The initiative will be informed by the approach that has proven to be most successful in terms of social media platform development, namely rapidly prototyping based on clearly defined problems and challenges involved. The emphasis will be on developing as fast and as cheaply as possible a basic prototype for stakeholders to provide input into, and add functionalities based on end user feedback. If the prototype is successful, it can be scaled up. This approach has the major advantage of lowering risks and costs by helping to identify very early the obstacles that might prevent adoption by users.

In order to promote transparency and accountability in the municipalities, the project will work closely with the *Ministry of Local Government Administration (MLGA)* to improve the reporting and accountability lines between national and local level.

Component 3:

The ability of the judiciary to fight corruption internally and externally is increased.

SAEK Component 3 will increase the ability of the judiciary to fight corruption within and outside the judicial system.

The project will support the *Office of the Disciplinary Prosecutor (ODP)* in strengthening its internal capacities and mechanisms for inspection, audit and disciplinary investigations to discipline judges, lay-judges and prosecutors. SAEK will support the strengthening of the ODP in presenting recommendations to the KJC and KPC for imposing disciplinary measures.

In collaboration with the KJC and KPC, SAEK will also work with the judiciary on their ability to investigate and prosecute cases of corruption externally (i.e. outside the judiciary) and involve major capacity assessment and development activities, implemented in partnership with the EU (i.e. EULEX), international organizations and institutions (amongst others UNODC and the *International Anti-Corruption Academy*¹⁵), public institutions (including the *Kosovo Judicial Institute* and KIPA) as well as

¹⁵ The *International Anti-Corruption Academy (IACA)* is a joint initiative by the *United Nations Office on Drugs and Crime (UNODC)*, the Republic of Austria, the European Anti-Fraud Office (OLAF) and other stakeholders. IACA is a pioneering institution that aims to overcome current shortcomings in knowledge and practice in the field of anti-corruption. The Academy functions as an independent centre of excellence in the field of anti-corruption education, training, networking and

relevant CSOs. Prosecutors need to improve investigation techniques to efficiently process corruption cases submitted by the KAA and other sources. Trainings will include technical topics, such as special investigative techniques and financial investigations of corruption offences (including modules on money laundering and asset recovery).

Capacity development activities for judges and prosecutors will be carefully assessed, structured and coordinated in order not to duplicate trainings already delivered by external agencies and donors. To this end, the project will develop structured training curricula and ensure that the correct prosecutors and legal officers are assigned to attend the trainings. The trainings provided will be focused and practical and involve the appropriate number of prosecutors and legal officers. As a result, the project will also support the establishment of training and information management tools which shall remain available to relevant institutions as a legacy of the project.

The project will further strengthen cooperation among judges, prosecutors and the KAA for a better coordination of investigations of administrative offences that may contain elements falling under the criminal justice system, but also activities such the production of anti-corruption policies and guidelines. SAEK will elevate the efficiency of the overall work of KJC and KPC to best utilize skills and knowledge that are acquired through the activities.

Throughout its implementation, SAEK Component 3 will be interlinked with UNDP Kosovo's ongoing and well-established Rule of Law (RoL) project, which supports legal education in Kosovo in cooperation with several local partners. Together with the *Kosovo Judicial Institute* (KJI), the project supports the *Initial Legal Education Program* (ILEP), designed for training of aspiring judges and prosecutors, and the *Continuous Legal Education Program* (CLEP), designed for specific training of judges and prosecutors in office.

Capacity building interventions, implemented within the framework of SAEK Component 3, will build on the established structures, experiences and fruitful partnerships created throughout the RoL project and provide a holistic approach to judicial reform in Kosovo. Integrating the aspects of judicial integrity into legal education programs will establish an independent and effective justice system that provides transparent and objective recourse.

Component 4:

Ethics and transparency of public administration improved through Implementation of Theme 3 of Public Administration Reform Strategy.

SAEK Component 4 is fully financed by the government of Norway through UNDP Kosovo's *Capacity Development Facility* (CDF) project and will have any financial implications on SAEK. Therefore, the bellow formulated Results and Resources Framework (RRF) as well as the Annual Work Plan (AWP) do not reflect SAEK Component 4 (total funding available: 1,184,200 Euro; duration: November 2011-December 2015)

The problem of low salary scales in the public sector as one of the main reasons for the high level of corruption in Kosovo will be addressed through this Component 4, which supports the implementation of Theme 3 of the strategy on Public Administration Reform (PAR) focusing on ethics and transparency in public administration by providing assistance to the Office of Good Governance/OPM in (i) drafting of the new ethical code for civil staff, (ii) developing a draft plan for public integrity, (iii) designing an

cooperation, as well as academic research. It pursues a holistic approach which is international, inter-disciplinary, inter-sectoral, integrative and sustainable.

annual survey to assess the public opinion on the service the administration offers, and (iv) providing trainings on ethics and transparency in public administration.

The revised PAR Strategy of Kosovo, adopted by the Government in 2010, outlines the objectives of the reform at the central level and identifies mechanisms for monitoring and implementing the strategy during the period of 2010-2013. The revised strategy contains a total of twelve (12) objectives, among which the third is Ethics and Transparency.

The PAR Action Plan 2012-2014 has further developed specific objectives and activities in the field of ethics and transparency. Sub-objective 3.3 is: "Drafting normative acts and periodic public opinion survey on ethics and transparency in public administration".

UNDP Kosovo is supporting the following specific objectives of the PAR Action Plan 2012-2014, including the below indicated actions:

3.3.1. Assess the level of implementation of anti-corruption and integrity legislation¹⁶:

1. Amend existing legislation (mandatory integrity plans for all public institutions, regulating lobbying and lobbyists, regulating whistle blowing protection);
2. Draft guidelines and methodology for integrity plans.

3.3.2 Assess the quality of implementation of anti-corruption and integrity legislation in the following fields:

1. Conflict of interest;
2. Incompatibility of functions;
3. Restriction on business;
4. Assets declaration;
5. Depolitization.

UNDP Kosovo is conducting the above assessment with the aim of improving the implementation of existing laws and regulations.

The second main objective of UNDP's intervention under Component 4 is to support administration bodies, municipalities and other public entities in preparing tailored made integrity plans.

More concretely, this will involve:

1. Drafting guidelines and methodologies for the preparation of integrity plans;
2. Providing advice on strengthening integrity and preventing corruption in the public sector;
3. Conducting a training of trainers programme to those responsible for designing institutional integrity plans.

Additional objectives and activities of UNDP's CDF project include:

- Strengthening responsibilities and accountability in public administration, taking into consideration the Law on Civil Service and normative acts which derive from this Law.

¹⁶ Relevant laws include:

- Law no. 04/L-051 on Prevention of Conflict of Interest in Discharge of Public Functions;
- Law no. 04/L-050 on Declaration, Origin and Control of Property of Senior Public Officials and on Declaration, Origin and Control of Gifts of all Public Officials.
- Law No. 03/L-111 on Rights and Responsibilities of the deputy, and
- Law No. 03/L-159 on the Kosovo Anti-Corruption Agency.

Sub-Activities:

- *Drafting and publishing of a new code of conduct for civil staff;*
- *Organizing training activities on increasing awareness of civil staff on ethics and transparency in Public Administration.*

- Drafting normative acts and periodic surveys related to ethics and transparency in public administration.

Sub- Activities:

- *Evaluating the implementation of legislation for integrity and anti-corruption;*
- *Conducting an annual survey of the public opinion related to the services offered by Public Administration.*

Through its activities to strengthen responsibilities and accountability in public administration, SAEK Component 4 will support and contribute, in particular, to SAEK Component 1.

Component 4, in its efforts to address issues of accountability on the “supply-side” of democratic governance, will set the basis for Component 1, which aims to ensure political checks and balances in key branches and levels of government. The administrative procedures and normative acts which are being looked into within SAEK Component 4, will contribute to Component 1 in its means and approaches to improve accountability.

The implementation of the administrative regulations, public integrity plans and codes of conduct for civil staff, currently formulated within the framework of SAEK Component 4, will be monitored and coordinated by the KAA, in partnership with CSOs, as a result of the interventions of SAEK Component 1.

The training activities and evaluations of relevant legislations implemented in SAEK Component 4 will also provide the necessary basis for SAEK Component 1, which supports the KAA in developing and coordinating integrity management systems, in partnership with CSOs, to monitor income and property of public officials and associations.

3) Partnerships, Coordination and Knowledge Management

The project will take advantage of the unique role that UNDP can credibly play as a facilitator between governments and CSOs in effectively developing partnerships both at the grassroots and policy level and enabling the “triangulation” of citizen’s, CSOs and government.

In the course of past and ongoing anti-corruption projects, building strategic partnerships has demonstrated to be crucial for ensuring impact and sustainability of interventions. Getting the buy-in from different public bodies, amongst others the KAA, Prosecutors Office, KPC, KJC, ODP, Kosovo Police, and others will be a key component of the project to guarantee long-term results.

UNDP’s preferential access to the government, has allowed SAEK to be designed in full compliance with national capacities, priorities and strategies. The long-standing partnership with public sector stakeholders will guarantee high level political commitment and endorsement.

With the aim of strengthening more active partnership amongst key stakeholders and endorse stronger collaboration on corruption issues, the project envisages creating a *Knowledge Management System* (KMS) comprised of focal points from the public and private sector, civil society organisations, media, and academia. Establishing a KMS will be a key component of the project to allow responsible stakeholders in the respective government to take collective and appropriate counter measures.

Anti-corruption knowledge management systems are bodies established to collect, centralize and disseminate information on corruption in a systematic way. This contributes to generating knowledge, promoting good practice and effective interventions as well as facilitating innovative anti-corruption initiatives.

Given the nature, range and complexity of anti-corruption interventions, a KMS brings together a wide range of stakeholders of various profile, background and expertise. Of particular interest to the donor community is the opportunity KMS offer to promote knowledge re-use, improve donor coordination and reduce or eliminate the duplication of efforts. Another key function of KMS is to document successes and failures, publish results of field work and research, disseminate experiences and lessons learnt. It systematizes in some ways project knowledge, with the view to assessing impact and documenting interventions that work or don't work. It builds global knowledge on activities and practices that are otherwise scattered and difficult to access. Such interventions also aim at building the capacity of the various stakeholders by equipping them with the skills, tools and information that they need to hold those in power accountable for their decisions and behaviour. At another level, it promotes the production and generation of new knowledge as people take advantage of available information.

One of the risks related to KMS, which SAEK will have to take into consideration, is the possible resistance to knowledge sharing among stakeholders to overcome. The issue of confidentiality may play a role and limit the extent to which agencies are prepared to share their experience. Organisations and individuals may also be reluctant to share their knowledge out of fear to reduce their monopoly of expertise and comparative advantage on the development "market".

In addition to building a national KMS and working with local stakeholders, UNDP will also maintain close partnership with the *European Union Rule of Law Mission in Kosovo* (EULEX), which assists the Kosovo authorities, judicial authorities and law enforcement agencies in their progress towards sustainability and accountability. EULEX has already expressed the organizations full support to the project. SAEK Component 1 and Component 3 are designed to complement and support EULEX's and EU interventions through corruption prevention elements. EULEX is currently running a public information campaign to increase awareness of the reporting line of the KAA and, within the framework of SAEK Component 2, has already been involved in working group sessions regarding social media for anti-corruption.

The project will also envisage strengthening its collaboration with other international actors to synchronize project activities, take advantage of common resources and avoid duplication of efforts. To do so, SAEK will be carried out in close coordination with other projects addressing relevant issues, implemented by other local and international agencies, bilateral donors, including the European Union Office (EUO), Council of Europe (CoE), OSCE, UNKT partner agencies and international NGOs.

Of particular relevance for SAEK are the following projects:

- The SDC project *Local Governance and Decentralization Support* (LOGOS), which contributes to strengthening local governance and decentralization reforms as well as democratization and citizen participation in target municipalities of Kosovo. The expected project outcome is that selected partner municipalities are more accountable, transparent, equitable and effective in local governance and able to deliver key services to satisfy all citizen groups.
- The CoE *Project against Economic Crime in Kosovo* (PECK), funded by the European Union, which is currently conducting an assessment of anti-corruption measures on the level of compliance of

applicable regulations and practices with European standard. The assessment will provide recommendations available on regulatory, institutional, and policy-related areas.

- The EU *Kosovo Judicial Council and Kosovo Prosecutorial Council Project*, which aims to develop and strengthen the independence, performance, professionalism and efficiency of the KJC and KPC up to European level. Through this project the KJC and KPC will be assisted in developing a functional system of appointment, evaluation and discipline for Judges/prosecutors. The KPC and KJC will be assisted to develop new procedures for recruitment, transfer and promotion of judges/prosecutors.
- The EU twinning project *European Cooperation for Stronger Municipalities*, which intends to support all municipalities in advancing their administration towards a more effective and efficient service delivery and dialogue with citizens.
- The British Embassy project *Strengthening Anti-Corruption Policies and furthering EU Integration in Kosovo*. The British company RIPA International is providing its expertise to the *Kosovo Judicial Institute* (KJI) to empower existing and upcoming Kosovo judges, prosecutors and police with the knowledge and skills to become committed and competent promoters of anti-corruption policies. The aim is to develop an expert faculty resource group within the KJI to ensure anti-corruption expertise is put into practice.
- The upcoming UNKT programme *Youth Participation and Empowerment in Kosovo*, which will be jointly implemented by UNDP, UNV, UNICEF and UNFPA. It will address the multiple challenges faced by Kosovo's young women and men by supporting the *Ministry of Culture, Youth and Sport* in implementing the *Law on Empowerment and Participation of Youth* and the corresponding *Kosovo Youth Strategy and Action Plan 2010-2012* (KYSAP).
- The aforementioned UNDP Kosovo *Rule of Law* (RoL) project, which supports legal education in Kosovo in cooperation with several local partners. Together with the *Kosovo Judicial Institute* (KJI), the project supports the *Initial Legal Education Program* (ILEP), designed for training of aspiring judges and prosecutors, and the *Continuous Legal Education Program* (CLEP), designed for specific training of judges and prosecutors in office.
- The UNDP Kosovo project *Social Media for Innovative Local Empowerment* (SMILE), which aims to strengthen the voice of the youth in local governance and foster youth participation in public decision making and municipal governance monitoring through social media tools. On the other hand, the project seeks to utilize social media tools to strengthen the outreach mechanisms of a selected number of Kosovo municipalities, making local governance institutions more responsive to youth.
- Finally, the project will also extensively benefit from the support of the UNDP *Bratislava Regional Centre* (BRC) which will facilitate coordination and synergies with similar initiatives in the Western Balkans and the Europe and CIS region in terms of expertise and guidance. It will be able to rely on regional knowledge and lessons learned which might be applicable also to Kosovo.

UNDP strongly promotes itself as an organization which relies on internal knowledge management. Sharing and building on international good practices from the region and around the world is one of the key advantages of UNDP *vis a vis* other development actors. In the context of Kosovo, UNDP will be implementing the interventions of this project taking into consideration the tested experiences, good

and bad practices as well as lessons learned from countries in the region, including but not limited to the following anti-corruption projects implemented in Serbia, Macedonia and Montenegro:

- UNDP Serbia has recently implemented 2 anti-corruption projects:

1. *Enhancing Anti-corruption Efforts in Serbia*

At national level, the project develops whistleblower protection mechanisms, to support the *Serbian Anti-corruption Agency (ACA)* in the development and enactment of the required regulations. At local level, the establishment of efficient mechanisms for combating corruption includes the piloting of the concept of citizens' charters, which are codes of conduct for municipal authorities, and setting up an index for measuring accountability and transparency at sub-national level, drawing on innovative comparative experience in the region. At the same time, the project introduced measurement indicators and assessment tools, enabling the ACA to play a more active role in the reporting processes related to the implementation of UNCAC and to the EU accession process. The concept within this project integrates human rights into the anticorruption agenda, by introducing innovative tools designed to reduce the discriminatory effects of corruption at both the national and local level.

2. *Strengthening Accountability Mechanism in Public Finance*

The purpose of the project is to support the establishment of effective public finance accountability mechanisms in Serbia and to enhance preventive and investigative facets of the public spending cycle through capacity development activities in three public institutions: the Public Procurement Office (prevention), the Commissioner for Information of public importance and personal data protection, and the State Audit Institution (post factum and investigative). The project develops capacities at system level by establishing channels of coordination between the three institutions. It also strengthens the capacity of the media and civil society organizations to actively participate in the enhancement of accountability and transparency processes so as to become a permanent part of monitoring and control mechanisms. An additional aspect of the project is creation of a regional community of practices to exchange knowledge, experiences, and best practices among relevant institutions primarily in South-East Europe.

- UNDP Macedonia's project: *Fighting Corruption to Improve Governance*

The project aimed to address the root causes and potential consequences of non-transparent practices, enhance civic control in the fight against corruption and reinforce corruption control at local level. The project developed the Methodology for Measuring the Index of Responsibility, Transparency and Accountability at local level was developed – enabling the assessment of local government's vulnerability to corruption. In partnership with the Association of Local Self Government Units, UNDP supported the creation of a Code of Ethics for Local Officials – to ensure that local authorities are more responsible towards the citizens. The Code of Ethics has already been adopted by all 84 municipalities. Several other key knowledge documents were produced, such as manuals and guides for administrative procedures in urban planning, communal activities, financial management and free access to information. Over 250 civil servants received specialized trainings in the areas of administrative procedures, urban planning, communal activities and financial management. UNDP also supported the development of the State Programme for Prevention and Repression of Corruption 2011-2015 and the sectoral Action Plans. Thanks to this, sectoral integrity systems were successfully put in place and cross-sectoral partnerships and coalitions were promoted.

- UNDP Montenegro’s project:
The two-year project aimed to contribute towards effective implementation of anti-corruption initiatives, by building a partnership between the Directorate for Anticorruption Initiatives within the Government of Montenegro (DACI), local civil society organizations and business sector, as well as by raising public awareness and strengthening the capacity of civil society organizations to participate in the implementation of the national anti-corruption policies in the country. This project facilitated the completion of two assessments of the integrity and capacity of the judiciary system and the local-self governance. Currently, two more researches focusing on the integrity of the health sector and the state administration are ongoing, supported by a subsequent two-year project which aimed to provide support in the implementation of the National Action Plan to combat corruption and organized crime.

Lastly, UNDP Kosovo’s **Policy, Research, Gender and Communications (PRGC) Team** supports projects by advocating for key development issues through research, data analysis, publication of knowledge products, provision of expertise, public debates, innovation and pilot-projects that feed into project development. The team provides support for gender mainstreaming and incorporating gender issues into the project initiation as well as monitoring and evaluation activities. The team coordinates communication and advocacy for sustainable human development, gender issues and Results-Based Management (RBM) in strategic fashion given the challenging environment and development context of Kosovo. In order to increase the level of efficiency, effectiveness and consistency across the office and projects, the PRGC Team provides support to projects throughout its cycle (from idea, design, to implementation monitoring and evaluation) and also will provide advisory services for advocacy and communication.

4) Stakeholder assessment

In every development project, there are certain restraining and driving factors which contribute the success or failure of the planned interventions.

In Kosovo, a significant driving factor is the ongoing European Union accession process and, more concretely, the conditions specified in the feasibility study for a *Stabilization and Association Agreement* (SAA) and the Visa Liberalization Roadmap. The Kosovo government is in urgent need to demonstrate concrete results and specific evidence in the fight against corruption if the European integration and visa liberalization process is to move forward. CSOs and the international community is closely monitoring this process and demanding more concrete action from the relevant institutions.

The following table provides an overview of the roles of the most relevant stakeholders and their contributions to the project:

Stakeholder	Interest in/commitment to project	Capacity for change (and possible contribution to project)	Actions of project to strengthen capacity of stakeholder
Kosovo Anti-Corruption Agency (KAA)	Beneficiaries and target group of the project; interest in increasing technical capacities to fulfill its mandate and better positioning itself vis-à-vis other government and civil society stakeholders.	Strong potential and urgent need to strengthen the capacities of the KAA to become an effective corruption control mechanism.	Developing technical capacity and providing the KAA with the necessary tools to prevent and detect corruption in specific sectors, institutions and the local level.

			Facilitating improved collaboration and information flow amongst relevant stakeholders.
Kosovo Institute of Public Administration (KIPA)	<p>Beneficiaries and target group of the project; interest in increasing its capacity to provide adequate trainings to civil servants and institutions of public administration.</p> <p>Bears responsibility for professional development of civil servants to establish an effective and responsible public administration as well as support the process of EU integration.</p>	<p>Potential to implement and coordinate training activities.</p> <p>Willingness to work with relevant national institutions and donors to address shortcoming and avoid any overlapping of training activities.</p>	<p>Trainings will be, whenever possible, provided by KIPA and will remain, as a legacy of the project, with the institute. KIPA will be trained to deliver future capacity building to relevant Kosovo institutions.</p> <p>Depending on the level of expertise of KIPA related to anti-corruption issues, the project will provide substantive training to KIPA to create a sustainable “training for trainers” scheme.</p>
Judicial Institutions (ODP, KJC, KPC, KJI, KJA) and Ministry of Justice (MoJ)	<p>Beneficiaries and target group of the project; interest in increasing capacity of the judiciary to fight corruption internally and externally.</p> <p>Corruption in the judiciary is perceived to be very high and there is an urgent need to address the issue.</p>	<p>Strong capacity development needs. Willingness to learn and better cooperate with other relevant institutions from the executive branch.</p>	<p>Strengthening capacities and mechanisms for inspection, audit and disciplinary investigations to discipline judges, lay-judges and prosecutors. Strengthening capacities of the judiciary on their ability to investigate and prosecute cases of corruption externally. Facilitation of improved collaboration and information flow amongst relevant stakeholders.</p>
Office of Good Governance (OGG) within the Office of the Prime Minister	<p>Oversees and advises the ministries in the areas of good governance and develops policies and issues guidelines in relevant areas.</p> <p>Is responsible for reviewing legislation, policies, procedures and practices for compliance with applicable practices of good governance and for making recommendations to the Prime Minister and relevant ministries accordingly.</p>	<p>Potential to support coordination and implementation of project activities and to ensure ministries’ participation and contribution to the project.</p>	<p>Ensuring contribution, collaboration and coordination of relevant stakeholders at the ministry level.</p>
Civil Society Organizations	<p>Beneficiaries and target group of the project; interest in holding government at the national and local level more accountable for its actions and enhance transparency in public decision making.</p>	<p>Strong interest and need to strengthen the capacities of CSOs to perform effectively their function as government “watchdog”.</p> <p>Great potential for</p>	<p>Developing online and mobile phone tools, which provide citizens and CSOs with the tools to engage more actively in social accountability and auditing efforts.</p> <p>Involving CSOs in capacity</p>

		increased use of online and mobile phone tools to mobilize citizens to contribute to anti-corruption efforts and monitor government performance and decision making.	development activities and facilitate collaboration and information flow amongst relevant stakeholders.
Ministry of Local Government Administration (MLGA)	Supports municipalities in providing responsive services to the citizens, monitors municipality performance and activities of elected officials.	Could support project implementation and coordination within the target municipalities and contribute to replicating project activities in additional Kosovo municipalities.	Ensuring collaboration and information flow amongst relevant stakeholders at the local level. Involving MLGA in activities at the municipal level to ensure coordination at the national and local level.
Kosovo Association of Municipalities (KAM)	Serves as a coordination body between local and central government and strengthens cooperation amongst municipalities.	Could support project interventions at the local level and ensure scaling-up of project activities to other Kosovo municipalities not targeted through the project.	Supporting coordination between local and central government and strengthening cooperation amongst municipalities. Involvement in project will need to be defined further.
Media	Partly beneficiaries of the project; plays a strong role in promoting transparency and investigating corruption.	High potential in supporting project activities, ensuring long-term impact of interventions and contributing to visibility of the project.	Ensuring continued dialogue with media and involve representatives in project activities to the furthest extent possible.
European Union Rule of Law Mission in Kosovo (EULEX)	Assists Kosovo authorities, judicial authorities and law enforcement agencies in fighting corruption and enhancing accountability.	Although, from the perspective of the citizens, EULEX plays a controversial role in Kosovo, it can support project interventions and coordination amongst anti-corruption bodies.	Defining areas of collaboration and coordination.
International training academies and institutes (e.g. International Anti-Corruption Academy)	Through education, research and cooperation, aim to overcome shortcomings in knowledge and practice in the field of anti-corruption.	High potential in supporting project activities, providing expertise where needed and ensuring long-term impact of interventions.	Defining areas where support is needed from training academies and institutes and seek their involvement in the project.
Other international organizations and donors (e.g. CoE, EUO, UNODC, UNICEF)	Also implementing projects which are relevant and where collaboration is necessary.	Synergies between the projects should be achieved through coordination.	Organizing frequent exchange and coordination meetings to ensure activities do not overlap, but build on each other.

5) Project Results and Attribution

SAEK Results

Impact¹⁷: *Reduced level of corruption in Kosovo and enhanced accountability and transparency of public institutions.*

- **Indicator:** # of positions Kosovo has moved up in the Transparency International- Corruption Perception Index.

Outcome¹⁸: *By 2015, rule of law institutions are more efficient, transparent, gender responsive and accountable.*

- **Indicator:** % of public that favourably perceive that the rule of law and security institutions are effective.

Outputs¹⁹: 1. *Capacity of the Kosovo Anti-Corruption Agency (KAA) to monitor and prevent corruption in selected institutions, key service areas and municipalities increased.*

2. *Civic engagement in strengthening transparency and accountability increased and access to information at the local level enhanced through social media.*

3. *The ability of the judiciary to fight corruption internally and externally is increased.*

Output targets²⁰:

- **Target for Output 1:** *Sustainable integrity and oversight systems are established in selected institutions, key service areas and at the local level, providing the KAA an enhanced role to monitor and prevent corruption.*
- **Target for Output 2:** *Sustainable social media mechanisms and mobile phone applications have been established at the national and local level, allowing citizens to play an increased role in determining municipal decision making and demanding accountability as well as supporting local governments to communicate more openly and directly with citizens.*
- **Target for Output 3:** *Judicial bodies have enhanced mechanisms for disciplining judges and prosecutors and increased capacities for investigating and prosecuting corruption.*

¹⁷ Ultimate benefits of target population.

¹⁸ Medium-term change in development situation.

¹⁹ Products and services (tangible/intangible) delivered and provided by the project.

²⁰ More specific targets for each project year are outlined below in the Results and Resources Framework (RRF).

6) Results and Resources Framework (RRF)

<p>Intended Outcome as stated in the Kosovo Programme Action Plan (KPAP) Results and Resource Framework:</p> <ul style="list-style-type: none"> ○ KPAP Outcome 2: “By 2015, rule of law institutions are more efficient, transparent, gender responsive and accountable”. 				
<p>Outcome indicators as stated in the UNDP Kosovo Programme Action Plan Results and Resource Framework:</p> <ul style="list-style-type: none"> ○ Indicator KPAP Outcome 2: % of public that favourably perceive that the rule of law and security institutions are effective. 				
<p>Partnership Strategy: Kosovo Anti-Corruption Agency (KAA), Kosovo Institute of Public Administration (KIPA), Kosovo Judicial Council (KJC), Kosovo Prosecutorial Council (KPC), Office of Disciplinary Prosecutor (ODP), Kosovo Judicial Institute (KJI), Kosovo Police (KP), Office of Good Governance (OGG), Kosovo Judges Association (KJA), Kosovo Association of Municipalities (KAM), Ministry of Local Government Administration (MLGA), European Union Rule of Law Mission in Kosovo (EULEX), Council of Europe (CoE), European Union Office (EUO), United Nations Office on Drugs and Crime (UNODC), United Nations Children’s Fund (UNICEF), Balkan Investigative Reporting Network (BIRN), NGO Lens and CREATE Company.</p>				
<p>Programme Title and ID (ATLAS Award ID): Support to Anti-Corruption Efforts in Kosovo (SAEK) - 00068654</p>				
INTENDED OUTPUTS	OUTPUT TARGETS FOR (YEARS)	INDICATIVE ACTIVITIES	RESPONSIBLE PARTIES	INPUTS ²¹ (in EURO)
<p>Output 1 Capacity of the Kosovo Anti-Corruption Agency (KAA) to monitor and prevent corruption in selected institutions, key service areas and municipalities increased.</p> <p>Baseline:</p> <ul style="list-style-type: none"> • Integrity risk levels in selected institutions to be evaluated in 2013; • According to the perceptions 	<p>Specific Targets (year 1):</p> <ul style="list-style-type: none"> • Corruption risk assessment in selected institutions conducted; • Corruption risk assessment in key service areas conducted; • Corruption risk assessment in five municipalities conducted; • <i>Knowledge Management System</i> developed. 	<p>1) Strengthened partnership and collaboration amongst relevant stakeholders on integrity issues.</p> <ul style="list-style-type: none"> ○ Conduct a baseline assessment on the degree of collaboration between relevant stakeholders, including anti-corruption bodies, police, and international organizations, to determine a clear baseline and terms of reference for knowledge management; ○ Develop and maintain a <i>Knowledge Management System</i> (KMS) including relevant focal points from anti-corruption and rule of 	UNDP	4,000 €
			UNDP	16,000 €

²¹ All financial inputs under all 3 outputs include project staff costs, project running costs and 7% UNDP overhead.

<p>of Kosovans, the top institutions with prevailing large scale corruption are: Privatization Agency (49%), the Kosovo Energy Corporation (47%), courts (44%) and hospitals (43%) (Public Pulse Report, October 2012);</p> <ul style="list-style-type: none"> • Corruption risk assessment in key service areas to be conducted in 2013; • Corruption risk assessment in five municipalities to be conducted in 2013; • 30.4% of the population perceives corruption in local governments (UNDP Public Pulse Report, September 2011). <p>Indicators:</p> <ul style="list-style-type: none"> • % increase of cases related to conflict of interest and asset declaration which were brought to investigation and conviction; • % of annual decrease of citizen's perception of high level corruption in key service sectors; • % increase of corruption cases identified and brought to investigation and conviction at the local level. 	<p>Specific Targets (year 2):</p> <ul style="list-style-type: none"> • Integrity management systems developed within key institutions; • Integrity management systems developed for key service areas; • Local M&E integrity plans developed; • At least 3 capacity development activities implemented. <p>Specific Targets (year 3):</p> <ul style="list-style-type: none"> • KAA integrity and oversight systems in place; • M&E instruments in place to enforce integrity and oversight systems at the local level and within key service areas; • At least 3 capacity development activities implemented. 	<p>law institutions, international organizations, civil society, private sector and others to strengthen more active partnership and endorse stronger collaboration on corruption issues at the local and central level.</p> <p>2) Enhanced technical capacities of the KAA to become an effective external control mechanism for integrity management, asset declaration and conflict of interest within selected institutions.</p> <ul style="list-style-type: none"> ○ Support the KAA in evaluating risk levels to identify public institutions most vulnerable to corruption and integrity violations; ○ Develop capacities of the KAA to monitor and coordinate, in partnership with CSOs, the implementation of administrative regulations, public integrity mechanisms and codes of conduct within the identified institutions; ○ Support the KAA in developing and coordinating integrity management systems, in partnership with CSOs, to monitor income and property of public officials and associations. <p>3) Developed capacities of the KAA to monitor and prevent corruption in key service areas.</p> <ul style="list-style-type: none"> ○ Conduct a corruption risk assessment in key service areas, namely health, education and energy, to map corruption risks and identify and systematically prioritize bottlenecks; ○ Support the KAA in developing integrity management systems, in collaboration with relevant government ministries/actors and CSOs, to deter, prevent and curb corruption in the focus service areas; ○ Develop measurable monitoring and evaluation (M&E) instruments for enforcement of the proposed integrity plans. <p>4) Enhanced understanding of the KAA and local</p>	<p>UNDP</p> <p>UNDP</p> <p>UNDP</p> <p>UNDP</p> <p>UNDP</p> <p>UNDP</p>	<p>10,000 €</p> <p>120,000 €</p> <p>105,000 €</p> <p>90,000 €</p> <p>100,000 €</p> <p>100,000 €</p>
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		governments about corruption risks at the municipal level.		
		<ul style="list-style-type: none"> ○ Conduct integrity risk assessment in five municipalities to identify the factors of corruption and integrity at the local level. ○ Verify the identified vulnerabilities through a participatory process not only with public sector actors, but also other sectors, particularly civil society. ○ Based on identified needs, design new policy measures and tools for local governments, the KAA and CSOs to identify, prevent and curb corruption, including local integrity plans. ○ Develop measurable monitoring and evaluation instruments (M&E frameworks) for enforcement of the proposed integrity systems at the local level. 	UNDP	60,000 €
			UNDP	20,000 €
			UNDP	55,000 €
			UNDP	40,000 €
				720,000 €
INTENDED OUTPUTS	OUTPUT TARGETS FOR (YEARS)	INDICATIVE ACTIVITIES	RESPONSIBLE PARTIES	INPUTS
<p>Output 2</p> <p>Civic engagement in strengthening transparency and accountability increased and access to information at the local level enhanced through social media.</p> <p>Baseline:</p> <ul style="list-style-type: none"> • Approx. 1000 corruption cases were reported on www.kallxo.com from April 2012 to April 2013; • 50% of Kosovans perceive that their municipal representatives take their opinions into consideration to some extent, 6% perceived that the municipal 	<p>Specific Targets (year 1):</p> <ul style="list-style-type: none"> • Target municipalities have established at least one social media platform to tackle at least one identified business problem. • 30% annual increase of percentage of citizens using www.kallxo.com to report corruption. • At least one innovative social media solution and mobile phone application has been developed to engage citizens in social accountability efforts. <p>Specific Targets (year 2):</p>	<p>1) Enhanced capacities of three target municipalities in utilizing modern information and communication technology mechanisms to enhance their public outreach and increase access to services for citizens.</p> <ul style="list-style-type: none"> ○ Organizing sensitization and information sharing workshops in the target municipalities to introduce up-to-date social media technologies and ICT solutions to give clear incentives to municipality staff to introduce such tools. ○ Conducting a participatory situation analysis to identify the key business problems faced by the target municipalities and providing technical assistance in formulating an action plan to tackle these key focus areas through social media and e-governance. ○ Supporting the municipalities in establishing, maintaining and scaling-up innovative social 	<p>UNDP I/KS</p> <p>UNDP I/KS</p> <p>UNDP I/KS</p>	<p>20,000 €</p> <p>12,000 €</p> <p>104,000 €</p>

<p>authorities pay special attention to their residents' opinions and considerations, and 38% perceived that the municipal authorities take no consideration of their opinions and considerations (UNDP Kosovo Mosaic Survey 2012);</p> <ul style="list-style-type: none"> • Approx. 6% of Kosovans think they are very informed about the work of their municipality, 43% are somewhat informed, 28% feel that they are not so informed and 20% think that they are not informed at all (UNDP Kosovo Mosaic Survey 2012); • Additional baseline assessments to be implemented for the first time in 2013 within the framework of this project. <p>Indicators:</p> <ul style="list-style-type: none"> • # of cases reported on www.kallxo.com and % of cases brought to investigation and conviction; • # of decision taken at the central and local level, based on citizens' contributions collected through the developed ICT tools. 	<ul style="list-style-type: none"> • 20% annual increase of percentage of citizens using municipal ICT tools; • 20% annual increase of percentage of citizens accessing and contributing to municipalities' social media platform; • Target municipalities have established at least one additional social media platform based on the lessons learned from year 1; <p>Specific Targets (year 3):</p> <ul style="list-style-type: none"> ○ Sustainable social media mechanisms have been established by target municipalities and will continue to be functional after the project closure; ○ Citizens play an increasing role in determining municipal decision making; ○ Social media solutions are introduced in other municipalities and the national level. 	<p>media and e-governance solutions to tackle the identified business problems.</p> <ul style="list-style-type: none"> ○ Supporting the municipalities in developing and maintaining a user friendly website to simplify interaction with citizens and inform citizens on decisions and accomplishments within local government. <p>2) Strengthened outreach and citizens' engagement capacities of municipalities.</p> <ul style="list-style-type: none"> ○ Identifying lessons learned and good practices on the use of social media and e-governance in similar contexts around the world and conducting a baseline assessment of capacity of municipality staff to utilize such tools. ○ Implementing training activities and providing ad hoc consultation services to municipality staff on effectively using social media and e-governance to tackle identified business problems. ○ Supporting municipalities in organizing outreach activities to citizens through social media, including blogging and tweeting sessions, and SMS. ○ Organize study visits to neighbouring countries, such as Montenegro, to identify lessons learned by previous UNDP projects and facilitate south-south cooperation on related issues. <p>3) Increased citizen involvement in enhancing transparency and accountability through social media.</p> <ul style="list-style-type: none"> ○ Develop a mobile/smart phone application of www.kallxo.com which allows instant corruption reporting also in remote/rural areas of Kosovo; ○ Develop and maintain innovative social media solutions and mobile phone applications which allow, amongst others: (i) simple 	<p>UNDP I/KS</p> <p>UNDP I/KS</p> <p>UNDP I/KS</p> <p>UNDP I/KS</p> <p>UNDP</p> <p>I/KS</p> <p>I/KS</p>	<p>24,000 €</p> <p>16,000 €</p> <p>44,000 €</p> <p>36,000 €</p> <p>12,000 €</p> <p>12,000 €</p> <p>160,000 €</p>
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		<p>reporting of municipal inefficiencies, (ii) collecting and analyzing data from citizens on availability, satisfaction, reliability and quality of public services, responsiveness of service providers, hidden costs and irregularities (iii) monitoring government and municipal performance and expenditures related to development plans, (iv) involving citizens in public decision making and participatory budgeting;</p> <ul style="list-style-type: none"> ○ Develop and maintain social media solutions and mobile phone applications to give citizens and civil society organizations the opportunity to report, in real time, offences during future elections. 	I/KS	13,500 €
		<p>4) Increased awareness of citizens to combat corruption and demand more social accountability.</p> <ul style="list-style-type: none"> ○ Establish a “Research Unit” responsible for following-up citizens’ reports on www.kallxo.com, managing the information flow and taking necessary action to comply with citizens’ expectations. 	I/KS	48,000 €
		<ul style="list-style-type: none"> ○ Organize awareness raising and social mobilization activities through social media and SMS at the national and local level to promote interaction and participation of citizens in addressing corruption issues. 	I/KS	88,500 €
		<ul style="list-style-type: none"> ○ Involve citizens, especially youth, in non-formal social media trainings for active citizenship. 	I/KS	40,000 €
		<ul style="list-style-type: none"> ○ Organize interactive web-sessions that gather citizens, government officials and civil society to exchange ideas and influence corruption related issues and other community-focused topics. 	I/KS	16,000 €
		<ul style="list-style-type: none"> ○ Develop video features and broadcast TV shows with local media partners to increase civic engagement and social responsibility. 	UNDP I/KS	78,000 €

		<ul style="list-style-type: none"> ○ Organize interactive presentations and discussions in schools and universities to increase youth's participation in public decision making and decision monitoring. 	I/KS	8,000 €
		<p>5) Enhanced active partnership and stronger collaboration amongst relevant stakeholders in processing corruption issues.</p> <ul style="list-style-type: none"> ○ Conduct a baseline assessment on the degree of collaboration between relevant stakeholders from different sectors on anti-corruption issues. ○ Capacitate the "Research Unit" to manage the information flow on www.kallxo.com and coordinate follow-up activities with responsible national counterparts. ○ Contribute to the development and maintenance of the <i>Knowledge Management System</i> (see Output 1) by including relevant focal points from civil society, private sector, academia and others to strengthen more active partnership and collaboration amongst stakeholders. 	I/KS	4,000 €
			I/KS	48,000 €
			UNDP	16,000 €
				800,000 €
INTENDED OUTPUTS	OUTPUT TARGETS FOR (YEARS)	INDICATIVE ACTIVITIES	RESPONSIBLE PARTIES	INPUTS
<p>Output 3 The ability of the judiciary to fight corruption internally and externally is increased.</p> <p>Baseline:</p> <ul style="list-style-type: none"> • Weak internal mechanisms in the KJC and KPC for identifying and properly responding to corruption cases within the judiciary (clear baseline to be determined in 2013 within the framework of this 	<p>Specific Targets (year 1):</p> <ul style="list-style-type: none"> • Functional Knowledge Management System developed. • ODP/KPC/KJC needs assessment completed and training curricula determined. • At least 1 training programme implemented on each internal and external corruption investigation. 	<p>1) Enhanced internal capacities and mechanisms of the judiciary for disciplining judges and prosecutors on anti-corruption.</p> <ul style="list-style-type: none"> ○ Support relevant judicial bodies in conducting an internal needs assessment to determine legal, organizational and capacity development needs to investigate and prosecute cases of corruption internally and externally. ○ Organize trainings on identified technical areas to enhance the capacities of the judiciary to address internal disciplinary matters and undertake corruption investigations. 	<p>UNDP</p> <p>UNDP</p>	<p>18,000 €</p> <p>140,000 €</p>

<p>project);</p> <ul style="list-style-type: none"> • 49.7% of the population perceives large scale corruption in courts (UNDP Public Pulse Report March 2011); • Of those people refusing to pay bribes, more than a third refuses to pay judges/prosecutors (UNODC Bribery Report 2011); • Collaboration among KAA, the prosecution, the media and CSOs needs to be improved further (KDI Assessment of Institutional Integrity 2011, p.247). 	<ul style="list-style-type: none"> • ODP office functional. <p><u>Specific Targets (year 2):</u></p> <ul style="list-style-type: none"> • At least 3 training programmes implemented on each internal and external corruption investigation. • Operation manuals and standard operation procedures for the ODP, KJC and KPC drafted. • Number of corruption cases processed by the ODP increased by a minimum of 20%. 	<ul style="list-style-type: none"> ○ Provide trainings to the ODP on increasing personal and institutional integrity for judges, prosecutors and lay judges as well as best practices in the area of prevention of corruption within the judiciary. ○ Provide technical assistance and logistical support to the ODP to enhance their capacity of processing the cases submitted. ○ Support judicial institutions in public visibility and awareness raising activities to position itself <i>vis a vis</i> other organizations and the citizens. <p>2) Increased ability of the judiciary to investigate and prosecute cases of corruption externally (i.e. outside the judiciary).</p> <ul style="list-style-type: none"> ○ Organize trainings, in cooperation with EULEX and other international partners, to provide the judiciary with the pertinent skills to investigate and develop cases for prosecution dealing with corruption. ○ Support judicial institutions in the production and harmonization of relevant anti-corruption policies and guidelines. ○ Support efforts of inspection and auditing of selected government institutions and units. 	<p>UNDP</p> <p>UNDP</p> <p>UNDP</p>	<p>64,000 €</p> <p>70,000 €</p> <p>30,000 €</p>
<p><u>Indicators:</u></p> <ul style="list-style-type: none"> • % increase of corruption cases processed by the ODP submitted to the KJC and KPC for judgement. • % increase of internal and external cases processed by judges and prosecutors and brought to conviction. 	<p><u>Specific Targets (year 3):</u></p> <ul style="list-style-type: none"> • At least 2 training programmes implemented on each internal and external corruption investigation. • At least 2 sub-regional knowledge sharing events organized. • ODP is self-sustaining and self-sufficient. 	<p>3) Enhanced collaboration amongst relevant stakeholders and increased knowledge sharing on judicial integrity issues.</p> <ul style="list-style-type: none"> ○ Conduct a baseline assessment on the degree of collaboration between relevant stakeholders relevant to judicial integrity; ○ Contribute to the development and maintenance of the <i>Knowledge Management System</i> (see Output 1) by including relevant focal points from rule of law institutions and the judiciary to strengthen more active partnership and collaboration amongst stakeholders. 	<p>UNDP</p> <p>UNDP</p> <p>UNDP</p> <p>UNDP</p> <p>UNDP</p>	<p>156,000 €</p> <p>28,000 €</p> <p>90,000 €</p> <p>8,000 €</p> <p>16,000 €</p>

		o Developing a sub-regional mechanism for sharing knowledge and best practices on judicial integrity issues, facilitated by UNDP's Bratislava Regional Centre (BRC).	UNDP	20,000 €
				640,000 €

7) Annual Work Plan (AWP)

EXPECTED OUTPUTS <i>And baseline, indicators including annual targets</i>	PLANNED ACTIVITIES <i>List activity results and associated actions</i>	TIMEFRAME			Responsible Party	PLANNED BUDGET		
		YEAR 1	YEAR 2	YEAR 3		Funding Source	Budget Description	Amount
<p>Output 1 Capacity of the Kosovo Anti-Corruption Agency (KAA) to monitor and prevent corruption in selected institutions, key service areas and municipalities increased.</p> <p>Baseline:</p> <ul style="list-style-type: none"> Integrity risk levels in institutions to be evaluated in 2013; According to the perceptions of Kosovans, the top institutions with prevailing large scale corruption are: Privatization Agency (49%), the Kosovo Energy Corporation (47%), courts (44%) and hospitals (43%) (Public Pulse Report, October 2012); Corruption risk assessment in key service areas to be conducted in 2013; Corruption risk assessment in five municipalities to be conducted in 2013; 30.4% of the population perceives corruption in local governments (UNDP Public Pulse Report, 2 September 2011). <p>Indicators:</p> <ul style="list-style-type: none"> % increase of cases related to conflict of interest and asset 	<p>1) Strengthened partnership and collaboration amongst relevant stakeholders on integrity issues.</p> <ul style="list-style-type: none"> Conduct a baseline assessment; Develop and maintain a <i>Knowledge Management System</i> 	X			UNDP	SDC	Contractual Services; Local Consultants; Grants to Instit. & other Benef.	4,000 €
	X	X	X	10,000 €				
	<p>2) Enhanced technical capacities of the KAA to become an effective external control mechanism for integrity planning, asset declaration and conflict of interest within selected institutions.</p> <ul style="list-style-type: none"> Support the KAA in evaluating risk levels to identify institutions; Develop capacities of the KAA; Support the KAA in developing and coordinating integrity management systems. 	X			UNDP	SDC	Contractual Services; Local Consultants; Hospitality and Special Events; Other Media Costs; Miscellaneous Expenses	120,000 €
X	X	X	105,000 €					
	<p>3) Developed capacities of the KAA to monitor and prevent corruption in key service areas.</p> <ul style="list-style-type: none"> Conduct a corruption risk assessment in key service areas; Support the KAA in developing integrity management systems; Develop measurable monitoring and evaluation (M&E) instruments. 	X			UNDP	SDC	Contractual Services; International Consultants; Local Consultants; Hospitality and Special Events; Other Media Costs; Miscellaneous Expenses	90,000 €
X	X	X	100,000 €					
X	X	X	100,000 €					

<p>declaration which were brought to investigation and conviction;</p> <ul style="list-style-type: none"> • % of annual decrease of citizen's perception of high level corruption in key service sectors; • % increase of corruption cases identified and brought to investigation and conviction at the local level. 	<p>4) Enhanced understanding of the KAA and local governments about corruption risks at the municipal level.</p> <ul style="list-style-type: none"> ○ Conduct integrity risk assessment in five municipalities. ○ Verify the identified vulnerabilities through a participatory process. ○ Based on identified needs, design new policy measures and tools for the local governments to deter, prevent and curb corruption. ○ Develop measurable monitoring and evaluation instruments. 	<p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>UNDP</p> <p>SDC</p>	<p>Contractual Services; International Consultants; Local Consultants; Hospitality and Special Events; Other Media Costs; Travel; Miscellaneous Expenses</p>	<p>60,000 €</p> <p>20,000 €</p> <p>55,000 €</p> <p>40,000 €</p>
<p>Output 2 Civic engagement in strengthening transparency and accountability increased and access to information at the local level enhanced through social media.</p> <p>Baseline:</p> <ul style="list-style-type: none"> • Approx. 1000 corruption cases were reported on www.kallxo.com from April 2012 to April 2013; • 50% of Kosovans perceive that their municipal representatives take their opinions into consideration to some extent, 6% perceived that the municipal authorities pay special attention to their residents' 	<p>1) Enhanced capacities of three target municipalities in utilizing modern information and communication technology mechanisms to enhance their public outreach and increase access to services for citizens.</p> <ul style="list-style-type: none"> ○ Organizing sensitization and information sharing workshops. ○ Conducting a participatory situation analysis and providing technical assistance in formulating an action plan. ○ Supporting the municipalities in establishing, maintaining and scaling-up innovative social media and e-governance solutions. ○ Supporting the municipalities in developing and maintaining a user friendly website. 	<p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>UNDP I/KS</p> <p>UNDP I/KS</p> <p>UNDP I/KS</p> <p>UNDP I/KS</p>	<p>SDC</p>	<p>Grants to Instit. & other Benef.; Contractual Services; International Consultants; Local Consultants; Hospitality and Special Events; Other Media Costs; Travel; Miscellaneous Expenses</p> <p>20,000 €</p> <p>12,000 €</p> <p>104,000 €</p> <p>24,000 €</p>

<p>opinions and considerations, and 38% perceived that the municipal authorities take no consideration of their opinions and considerations (UNDP Kosovo Mosaic Survey 2012);</p> <ul style="list-style-type: none"> • Approx. 6% of Kosovans think they are very informed about the work of their municipality, 43% are somewhat informed, 28% feel that they are not so informed and 20% think that they are not informed at all (UNDP Kosovo Mosaic Survey 2012); • Additional baseline assessments to be implemented for the first time in 2013 within the framework of this project. <p>Indicators:</p> <ul style="list-style-type: none"> • # of cases reported on www.kallxo.com and % of cases brought to investigation and conviction; • # of decision taken at the central and local level, based on citizens' contributions collected through the developed ICT tools. 	<p>2) Strengthened outreach and citizens' engagement capacities of municipalities through social media and e-governance.</p> <ul style="list-style-type: none"> ○ Identifying lessons learned and good practices on the use of social media and conducting a baseline assessment of capacity of municipalities. ○ Implementing training activities and providing ad hoc consultation services to municipality staff. ○ Supporting municipalities in organizing outreach activities. ○ Organize study visits to neighboring countries to identify lessons learned. 	X			UNDP I/KS	SDC	Grants to Instit. & other Benef.; Contractual Services; Local Consultants; Hospitality and Special Events; Other Media Costs; Travel; Miscellaneous Expenses	16,000 €	
		X	X	X	UNDP I/KS		44,000 €		
		X	X	X	UNDP I/KS		36,000 €		
			X		UNDP		12,000 €		
		<p>3) Increased citizen involvement in enhancing transparency and accountability through social media.</p> <ul style="list-style-type: none"> ○ Develop mobile/smart phone applications; ○ Develop and maintain innovative social media solutions and mobile phone applications. ○ Develop and maintain social media solutions and mobile phone applications to report, offences during elections. 	X			I/KS	SDC	Grants to Instit. & other Benef.; Contractual Services; Local Consultants; Hospitality and Special Events; Other Media Costs; Miscellaneous Expenses	12,000 €
		X	X	X	I/KS	160,000 €			
		X	X	X	I/KS	12,000 €			
		<p>4) Increased awareness of citizens on the benefits of using social media to address corruption and social accountability.</p> <ul style="list-style-type: none"> ○ Establish a "Research Unit" responsible for following-up citizens' reports. ○ Organize awareness raising and social mobilization activities. ○ Involve citizens, especially youth, in non-formal social media trainings. ○ Organize interactive web-sessions. ○ Develop video features and TV shows. ○ Organize interactive presentations and discussions in schools and universities. 	X	X	X	I/KS	SDC	Grants to Instit. & other Benef.; Contractual Services; Local Consultants; Hospitality and Special Events; Other Media Costs; Miscellaneous Expenses	48,000 €
		X	X	X	I/KS	90,000 €			
		X	X	X	I/KS	40,000 €			
			X	X	I/KS	16,000 €			
		X	X	X	I/KS	78,000 €			
	X	X			8,000 €				

	<p>5) Enhanced active partnership and stronger collaboration amongst relevant stakeholders in processing corruption issues.</p> <ul style="list-style-type: none"> ○ Conduct a baseline assessment on the degree of collaboration between relevant stakeholders from different sectors on anti-corruption issues. ○ Establish a “Research Unit”, responsible for managing information. ○ Develop and maintain a Knowledge Management System. 	X			I/KS	SDC	Grants to Instit. & other Benef.; Contractual Services; Local Consultants; Hospitality and Special Events; Other Media Costs; Miscellaneous Expenses	4,000 €
		X	X	X	I/KS			48,000 €
		X	X	X	UNDP			16,000 €
<p>Output 3 The ability of the judiciary to fight corruption internally and externally is increased.</p> <p>Baseline:</p> <ul style="list-style-type: none"> • Weak internal mechanisms in the KJC and KPC for identifying and properly responding to corruption cases within the judiciary (clear baseline to be determined in 2013 within the framework of this project); • 49.7% of the population perceives large scale corruption in courts (UNDP Public Pulse Report March 2011); • Of those people refusing to pay bribes, more than a third refuses to pay judges/prosecutors (UNODC Bribery Report 2011); • Collaboration among KAA, the prosecution, the media and CSOs needs to be improved further (KDI Assessment of Institutional Integrity 2011, p.247). 	<p>1) Enhanced internal capacities and mechanisms of the judiciary for disciplining judges and prosecutors on anti-corruption.</p> <ul style="list-style-type: none"> ○ Support relevant judicial bodies in conducting an internal needs assessment. ○ Organize trainings on identified technical areas. ○ Provide trainings on increasing personal and institutional integrity for judges, prosecutors and lay judges. ○ Provide technical assistance and logistical support to the ODP. ○ Support the ODP in public visibility and awareness raising activities. 	X			UNDP	SDC	Local Consultants; International Consultants; Grants to Instit. & other Benef.; Hospitality and Special Events; Travel; Miscellaneous Expenses	18,000 € 140,000 € 64,000 € 70,000 € 30,000 €
	<p>2) Increased ability of the judiciary to investigate and prosecute cases of corruption externally (i.e. outside the judiciary).</p> <ul style="list-style-type: none"> ○ Organize capacity development trainings. ○ Support production and harmonization of relevant anti-corruption policies and guidelines. ○ Support inspection and auditing of selected judicial institutions and units. 	X	X	X	UNDP	SDC	Local Consultants; International Consultants; Grants to Instit. & other Benef.; Hospitality and Special Events; Miscellaneous Expenses	176,000 € 28,000 € 70,000 €

<u>Indicators:</u> <ul style="list-style-type: none"> • % increase of corruption cases processed by the ODP submitted to the KJC and KPC for judgement. • % increase of internal and external cases processed by judges and prosecutors and brought to conviction. 	3) Enhanced collaboration amongst relevant stakeholders and increased knowledge sharing on judicial integrity issues.									
	<ul style="list-style-type: none"> ○ Conduct a baseline assessment on the degree of collaboration between relevant stakeholders relevant to judicial integrity; 	X				UNDP	SDC	Contractual Services; Local Consultants; International Consultants; Hospitality and Special Events;	8,000 €	
	<ul style="list-style-type: none"> ○ Develop a Knowledge Management System. ○ Developing a sub-regional mechanism for sharing knowledge and best practices. 	X	X	X				Other Media Costs; Travel; Miscellaneous Expenses	16,000 €	
TOTAL									20,000 €	2,160,000 €

8) Quality Management for Project Activity Results

OUTPUT 1: Capacity of the Kosovo Anti-Corruption Agency (KAA) to prevent corruption in selected institutions, key service areas and municipalities increased.		
Activity Result 1 (Atlas Activity ID)	Enhanced capacity of the KAA	Start Date: 01.05.2013 End Date: 30.04.2016
Purpose	Develop the capacities of the Kosovo Anti-Corruption Agency (KAA) to perform more effectively in tackling corruption.	
Description	<ol style="list-style-type: none"> 1) Strengthened partnership and collaboration amongst relevant stakeholders on integrity issues. 2) Enhanced technical capacities of the KAA to become an effective external control mechanism for integrity planning, asset declaration and conflict of interest within selected institutions. 3) Developed capacities of the KAA to monitor and prevent corruption in key service areas. 4) Enhanced understanding of the KAA and local governments about corruption risks at the municipal level. 	
Quality Criteria <i>how/with what indicators the quality of the activity result will be measured?</i>	Quality Method <i>Means of verification. What method will be used to determine if quality criteria has been met?</i>	Date of Assessment <i>When will the assessment of quality be performed?</i>
% increase of cases related to conflict of interest and asset declaration which were brought to investigation and conviction.	KAA reports and databases KMS established by SAEK	01.11.2014 & 01.09.2015
% of annual decrease of citizen's perception of high level corruption in key service sectors.	UNDP Public Pulse Reports	01.11.2014 & 01.09.2015
% increase of corruption cases identified and brought to investigation and conviction at the local level.	KAA reports and databases KMS established by SAEK	01.11.2014 & 01.09.2015

OUTPUT 2: Civic engagement in strengthening transparency and accountability increased and access to information at the local level enhanced through social media.		
Activity Result 2 (Atlas Activity ID)	Social media for transparency	Start Date: 12.10.2012 End Date: 30.04.2016
Purpose	Increase the participation of citizens in fighting corruption and enhance access to information through social media.	
Description	<ol style="list-style-type: none"> 1) Enhance capacities of three target municipalities in utilizing modern information and communication technology mechanisms to enhance their public outreach and increase access to services for citizens. 2) Strengthen outreach and citizens' engagement capacities of municipalities through social media and e-governance. 3) Increase citizen involvement in enhancing transparency and accountability through social media. 4) Increase awareness of citizens on the benefits of using social media to address corruption and social accountability. 5) Enhance active partnership and stronger collaboration amongst relevant stakeholders in processing corruption issues. 	
Quality Criteria <i>how/with what indicators the quality of the activity result will be measured?</i>	Quality Method <i>Means of verification. What method will be used to determine if quality criteria has been met?</i>	Date of Assessment <i>When will the assessment of quality be performed?</i>

# of cases reported on www.kallxo.com and % of cases brought to investigation and conviction;	www.kallxo.com, progress reports, and annual reports	01.11.2014 & 01.09.2015
# of decision taken at the central and local level, based on citizens' contributions collected through the developed ICT tools.	ICT platforms, progress reports, and annual reports	01.11.2014 & 01.09.2015

OUTPUT 3: The ability of the judiciary to fight corruption internally and externally is increased.		
Activity Result 3 (Atlas Activity ID)	Increased capacity of judiciary.	Start Date: 01.05.2013 End Date: 30.04.2016
Purpose	Increase the ability of the judiciary to fight corruption internally and externally.	
Description	<ol style="list-style-type: none"> 1) Enhance internal capacities and mechanisms of the judiciary for disciplining judges and prosecutors on anti-corruption. 2) Increase ability of the judiciary to investigate and prosecute cases of corruption externally. 3) Enhance collaboration amongst relevant stakeholders and increased knowledge sharing on judicial integrity issues. 	
Quality Criteria <i>how/with what indicators the quality of the activity result will be measured?</i>	Quality Method <i>Means of verification. What method will be used to determine if quality criteria has been met?</i>	Date of Assessment <i>When will the assessment of quality be performed?</i>
% increase of corruption cases processed by the ODP submitted to the KJC and KPC for judgement.	ODP reports and databases	01.11.2014 & 01.09.2015
% increase of internal and external cases processed by judges and prosecutors and brought to conviction.	KJC/KPC reports and databases	01.11.2014 & 01.09.2015

9) SAEK contribution to UN CDP and UNDP KPAP

The UN *Common Development Plan* (CDP) 2011-2015 focuses and harmonizes the work of the UN Kosovo Team (UNKT), which comprises the different UN agencies, funds and programmes around four Strategic Themes – I Legislative and Policy Frameworks for Social Inclusion; II **Accountability for Delivering on Social Inclusion**; III **Local Participation and Empowerment**; and IV Environmental Health and Protection. These represent the UN Agencies' common priorities and accountability in Kosovo, intersecting closely with other major development efforts. They are the primary areas under which the UNKT will aim to leverage its comparative advantage as a catalyst for development energy, to mobilize wider and more powerful partnerships towards results for Kosovo's people.

SAEK falls under the CDP Strategic Theme #2: "*Accountability for Delivering on Social Inclusion*" and CDP Strategic Theme #3: "*Local Empowerment and Participation*". As such, it will contribute to CDP Impact #2: "*Institutional delivery of public services and social justice enhances social inclusion*" and CDP Impact #3: "*Municipal residents enjoy a greater civic and socio-economic quality of life in target municipalities*".

With regard to CDP Strategic Theme #2, the project will contribute to CDP Outcome 2.1: "*Institutions responsible for delivering public services and social justice are accountable and responsive to rights holders*", with a specific focus on Output 2.1b: "*Public institutions have functioning oversight and transparency mechanisms*" and Output 2.1c: "*Inter-governmental budget allocation and expenditure mechanisms for the social sectors are more efficient and reflect evidence of needs*". The project will also contribute to CDP Outcome 2.2: "*Key civil society actors increasingly influence the accountability of governance for public services and social justice*", with special emphasis on Output 2.2 b: "*Increased participation and oversight of civil society and the media, in particular youth, women and minority groups, is secured in the policy design, drafting, review and feedback process.*"

With regard to CDP Strategic Theme #3, the project will contribute to CDP Outcome 3.1: "*Target Municipalities have local governance mechanisms in place promoting human rights based development*", with a specific focus on Output 3.1a: "*Municipal action plans are informed by consultation with all stakeholders, particularly young women and men and other the excluded groups, during the formulation, implementation and review cycle*" and Output 3.1b: "*Selected municipalities are increasingly child- and youth-friendly*" and Output 3.1d: "*Municipal institutions, with the engagement of the civil society, increase quality, delivery and uptake of social and public services, particularly for poor and excluded groups*".

At the UNDP level, the *Kosovo Programme Action Plan* (KPAP) 2011 to 2015 puts in place the framework for this project mainly through the following Outcome 2: "*By 2015, rule of law institutions are more efficient, transparent, gender responsive and accountable*".

The project however will also contribute to KPAP Outcome 3: "*By 2015, central and local governments more effectively plan, implement and administrate policies which are participatory, gender-responsive and human rights centred.*" It will support KPAP's efforts in the area of democratic governance by ensuring greater transparency and accountability of policy makers, strengthening monitoring and oversight mechanisms and supporting citizens' and civil society participation in decision making. It will further support KPAP in developing capacity to make local-level development more inclusive and participatory.

The bellow table illustrates once gain the contributions of SAEK towards the CDP and KPAP:

SAEK contributions to the UN Common Development Plan (CDP) 2011-2015

Strategic Theme 2 Results Statement	Indicator	Means of Verification
CDP Impact #2: Institutional delivery of public services and social justice enhances social inclusion²²		
UN Outcome 2.1. Institutions responsible for delivering public services and social justice are accountable and responsive to rights holders.	❖ Level of satisfaction of general public with Kosovo institutions in providing service-oriented social justice and public services	UNDP Public Pulse to be used to measure the level of satisfaction
	❖ % public services and social justice that adhere to priorities set out and defined in the MTEF ²³ .	Budget expenditure review (review public expenditure for the social services to better see the government accountability).
	❖ # budgets allocating dedicated funds to address social inclusion/ pro poor and social justice issues.	Desk review of budgets using methodologies on gender-based/HR-based budgeting.
OUTPUTS for Outcome 2.1	Output indicators are tracked as part of ongoing project monitoring. All data will be disaggregated by gender/vulnerable groups as identified in CDP.	
Output 2.1a: Key Institutions, particularly the Statistical Office of Kosovo (SOK), collect utilize and disseminate disaggregated data on social inclusion	❖ # specific reports generated by SOK in disaggregated by key vulnerable groups	Reports strategy papers and guidelines from SOK
	❖ # social inclusion information requested by key institutions to SOK utilizing data management systems.	Tracking of information request to SOK on social inclusion issues.
	❖ Inclusion of information generated by SOK into drafting of policy and legislation.	Desk Review.
Output 2.1b: Public institutions have functioning oversight and transparency mechanisms	❖ # complaints and issues addressed by key oversight and accountability mechanisms.	Desk review of key selected reports from the Ombudsperson Institution, Independent Oversight Board, Kosovo Anti-corruption Agency, Auditor General, Independent Media Commissioner, etc.
Output 2.1c: Inter-governmental budget allocation and expenditure mechanisms for the social sectors are more efficient and reflect evidence of needs	❖ Key Kosovo institutions budgets allocated in a socially inclusive manner.	Desk review of budgets.
UN Outcome 2.2. Key civil society actors increasingly influence the accountability of governance for public services and social justice	❖ Formal mechanisms for consultations are established and functional between civil society and key Kosovo institutions.	Minutes of meeting.
	❖ Civil Society recommendations incorporated into legislation policies strategies towards monitoring of civil society.	Desk Review of civil society reports.
	❖ # consultations of Civil Society Organizations by government on key legislation policy strategies.	Meeting minutes.

²² Through central and local institutions being accountable and responsive

²³ The *Medium Term Expenditure Framework (MTEF)* was decided as the key document

OUTPUT for Outcome 2.2	Output indicators are tracked as part of ongoing project monitoring. All data will be disaggregated by gender/vulnerable groups as identified in CDP.	
Output 2.2 b: Increased participation and oversight of civil society and the media, in particular youth, women and minority groups, is secured in the policy design, drafting, review and feedback process.	❖ # social inclusion issues identified and advocated for by civil society.	TV, forums, working groups, articles, reports.
	❖ # civil society organisations and media engaged in monitoring and oversight.	TV, forums, working groups, articles, reports.
	❖ # media reports covering social inclusion activities.	TV, forums , working groups, articles, reports.

Strategic Theme 3 Results Statement	Indicator	Means of Verification
CDP Impact #3: Municipal residents enjoy a greater civic and socio-economic quality of life²⁴ in target municipalities		
UN Outcome 3.1. Target Municipalities have local have governance mechanisms in place promoting human rights based development.	❖ % citizen satisfaction with quality of public services delivery.	Perception survey
	❖ % vulnerable and excluded groups with basic needs met.	Household survey
	❖ % citizen satisfaction with level of civic engagement within civic administration.	Perception survey Mosaic, HDR, WB, Census, opinion polls
OUTPUTS for Outcome 3.1	Output indicators are tracked as part of ongoing project monitoring. All data will be disaggregated by gender/vulnerable groups as identified in CDP.	
Output 3.1a: Municipal action plans are informed by consultation with all stakeholders, particularly young women and men and other the excluded groups, during the formulation, implementation and review cycle.	❖ # municipal action plans which have established functioning consultative processes/mechanism in place.	Desk review of targeted municipalities for action plan development process
	❖ # issues raised by citizens groups reflected in the action plans.	Calendar of public meetings, list of participants, meeting minutes Partner Reports versus Action Plan Media Monitor Local Community representatives
Output 3.1b: Selected municipalities are increasingly child- and youth-friendly	❖ Implementation of the law and empowerment and participation of youth.	Law action plan, budget.
	❖ Range of and # child and youth friendly initiatives in targeted municipalities.	Certificate awards to municipalities.
Output 3.1d: Municipal institutions, with the engagement of the civil society, increase quality, delivery and uptake of social and public services, particularly for poor and excluded groups	❖ % vulnerable and excluded groups as a proportion of general population using public services who were previously excluded.	School and health clinic records.

²⁴ Quality of life relates to improved provision of quality social/ public services and justice mechanisms, more active civic engagement and increased livelihood opportunities

SAEK contributions to the UNDP Kosovo Programme Action Plan (KPAP) 2011-2015

Programme Component 2: Democratic Governance			
Contributes to UN CDP Strategic Theme 2: Accountability for delivering on social inclusion			
CDP Impact 2: Social Cohesion and equity is advanced through accountable and responsive central and local institutions			
<i>Expected Outcomes</i>	<i>Expected Outputs</i>	<i>Output targets and indicators</i>	<i>Implementing Partners</i>
<p>By 2015, rule of law institutions are more efficient, transparent, gender responsive and accountable</p> <p>Indicator: % of public that favourably perceive that the rule of law and security institutions are effective(2010: 15% 2015: 20%, MoV: Early Warning Report/Public Pulse report).</p>	<p>The judiciary has strengthened internal capacity and mechanisms for anti-corruption and disciplining judges and prosecutors.</p>	<p>Indicator: Number of cases dealt by the KJC Anti-Corruption mechanisms (2011: 5% , 2014: 10%, MoV: KJC data).</p>	<p>Kosovo Judicial Council-KJC</p>
<p>By 2015, central and local governments more effectively plan, implement and administrate policies which are participatory, gender-responsive and human rights centred.</p> <p>Indicator: Percentage of increase of public satisfaction with government services, at the local and central levels (disaggregated by gender) (2009: 56%; 2015: 65%; MoV: Early Warning/Public Pulse Report).</p>	<p>Capacities of local authorities fostered for service delivery, including participatory planning and monitoring and inter-municipal cooperation</p>	<p>Indicator: Level of public perception on satisfaction with information available, transparency and efficiency of public service delivery at the local level (2010: TBC; 2015: improve by 15%; MoV: Kosovo Mosaic)</p> <p>Indicator: Use of inter-municipal cooperation (2010;0; 2012: at least 7 IMC projects implemented; MoV: project reports)</p>	<p>Ministry of Local Government Administration Association of Kosovo Municipalities, Municipalities Kosovo Institute for Public Administration, Cadastre Agency</p>

10) General Risks & Assumptions

1. At the CDP and KPAP level:

The UN CDP for Kosovo and the UNDP KPAP are flexible documents that expects an unsteady and changeable progression for Kosovo's development aspirations. Nonetheless, it does anticipate a standard set of criteria remaining in place:

Assumptions for the CDP and KPAP:

1. **Kosovo's authorities and institutions remain committed to furthering human development in Kosovo, retain the capacity and will to implement measures proposed to this end.** Kosovo's political will and technical capacity are the *sine qua non* of the CDP and KPAP, as indeed for Kosovo's entire development effort.
2. **Security remains sufficiently stable to allow movement of UN staff and implementation of UNKT and UNDP projects.** Insecurity would seriously undermine the implementation of a document geared almost entirely towards the creation of social inclusion, and therefore demands visibility of UN actors without Kosovan society and institutions.
3. **Kosovan society and authorities continue to view the UNKT and UNDP as an impartial and valuable actor in the delivery of recommendations and the implementation of strategies.** The support of Kosovan society in particular is fundamental to achievement of the CPD and KPAP. This support is contingent to a great extent on perceptions of UNKT and UNDP effectiveness, of UNKT and UNDP respect for Kosovan autonomy and to clear indications of UN impartiality.
4. **The international financial climate allows for sufficient financial input into Kosovan development, and international donors continue to be willing to deliver funding through the UNKT and UNDP.** While the CDP and KPAP, as modest and targeted documents, do not require major capital investment, the UNKT's and UNDP's efficacy in Kosovo depends on continued ability to match its recommendations with resources.

These criteria could be undermined in a worst-case scenario by the following developments:

Risks for the CDP and KPAP:

- Inter-ethnic tensions could deteriorate and violence, compromising implementation of UNKT operations;
- Regional political tensions could increase, challenging the perceived impartiality of the UN in Kosovo and undermining relations with ethnic groups within Kosovan society;
- Capacity of Kosovan authorities and institutions could diminish significantly either through migration or corruption, hampering implementation of a development programme; and Another major global financial shock could weaken both the Kosovan economy and the capacity of international donors to fund Kosovan development.

2. At the Programme level:

The Project Management Unit and the UNDP Governance Team will ensure that identified risks will not hinder the effective implementation of the project by ensuring the involvement of all relevant stakeholders in all stages/activities of the project, including decision-making, monitoring and evaluation, as well as engaging in sound, evidence-based advocacy efforts.

PROGRAMME OFFLINE RISK LOG

Programme Title: Support to Anti-Corruption Efforts in Kosovo (SAEK)					Award ID:		Date:		
#	Description	Date Identified	Type	Impact & Probability	Countermeasures/ Mngt. response	Owner	Submitted, updated by	Last Update	Status
1	Ineffective co-ordination between institutions, organizations and authorities.	15.11.2012	Organizational	Lack of functioning co-ordination mechanisms between institutions, organizations and authorities may put obstacles to project implementation. P=3; I=3	One of the key activities of the project will be the development of a knowledge management and coordination system between the actors involved in anti-corruption.	Project Manager	Programme Analyst		
2	High turnover of staff at KAA, ODP, KJC and KPC hinder sustainability and creation of organizational knowledge and capacity building within the institutions.	15.11.2012	Organizational	High turnover makes capacity development efforts less sustainable. P=4; I=4	Providing training mechanisms will involve CSOs and KIPA and will remain, as a legacy of the project, with KIPA and the participating CSOs to deliver trainings to newly appointed staff.	Project Manager	Programme Analyst		
3	Continuation and sustainability of capacity building activities after project completion.	15.11.2012	Environmental	Once the project funding has come to an end, training activities will not be carried out further.	The project will provide full financial support to training activities in the initial stage and gradually decrease such support by requesting more financial contributions from its counterparts.	Project Manager	Programme Analyst		

4	Public authorities, including ministries and municipalities, are not committed to work in close collaboration with KAA.	15.11.2012	Political	There is no sufficient interaction and communication between stakeholders, causing barriers for project implementation. P=2; I=4	Advocacy and lobbying with ministries and municipality to enable active collaboration with KAA.	Project Manager	Programme Analyst		
5	KAA and KJC are not sufficiently committed to contribute to project objectives.	15.11.2012	Environmental	Project activities cannot be implemented in the expected format and might need to be adjusted accordingly. P =2; I=3	Strict selection of focal points which will drive the project activities and continued cooperation and communication with KAA and KJC throughout project duration.	Project Manager	Programme Analyst		
6	Municipal authorities are not committed enough to engage with social media tools (lack of willingness to learn, take ownership and responsibility).	15.11.2012	Political	Activities at municipality level cannot be implemented in the desired form leading to partly achievement of project output. P=2; I=4s	Uninterrupted cooperation and communication with the municipalities to advocate the importance of public outreach and the potential of social media.	Project Manager	Programme Analyst		
7	Municipality is not willing to share relevant information and communicate those to the public.	15.11.2012	Political	Citizens are not sufficiently well informed and not able to adequately participate in municipal decision making or monitoring. P=3; I=4	Continued advocacy with the municipality on the importance and necessity of sharing municipal information with the citizens.	Project Manager	Programme Analyst		
8	New municipal elections cause delays in project implementation.	15.11.2012	Political	Project duration might need to be extended. Newly elected municipal authorities might need to be sensitized towards project goals. P=3; I=4	Close monitoring of election process and potentially change project strategy if necessary.	Project Manager	Programme Analyst		
9	Kosovo citizens are not sufficiently motivated to actively engage in government monitoring and public decision making.	15.11.2012	Environmental	Lack of participation amongst citizens does not create the desired project impact. P=2; I=5	Closely monitor awareness raising activities and guarantee they are appealing and relevant to the target audience. Adapt	Project Manager	Programme Analyst		

					strategy when necessary.				
10	Technical requirements are not sufficiently well functioning and/or used by households and individuals in the target municipalities.	15.11.2012	Environmental	Restricted participation of youth in the project activities. P=2; I=3	Strict selection of municipalities based also on the technical conditions for the use of internet and mobile phones in loco.	Project Manager	Programme Analyst		
11	Social media tools are not yet sufficiently popular in Kosovo to achieve the envisaged results.	15.11.2012	Environmental	Little participation of citizens in the project activities and low awareness on potential of social media. P=2; I=4	Emphasize awareness raising activities through "traditional" means, such as television, newspapers, radio, posters and presentations.	Project Manager	Programme Analyst		

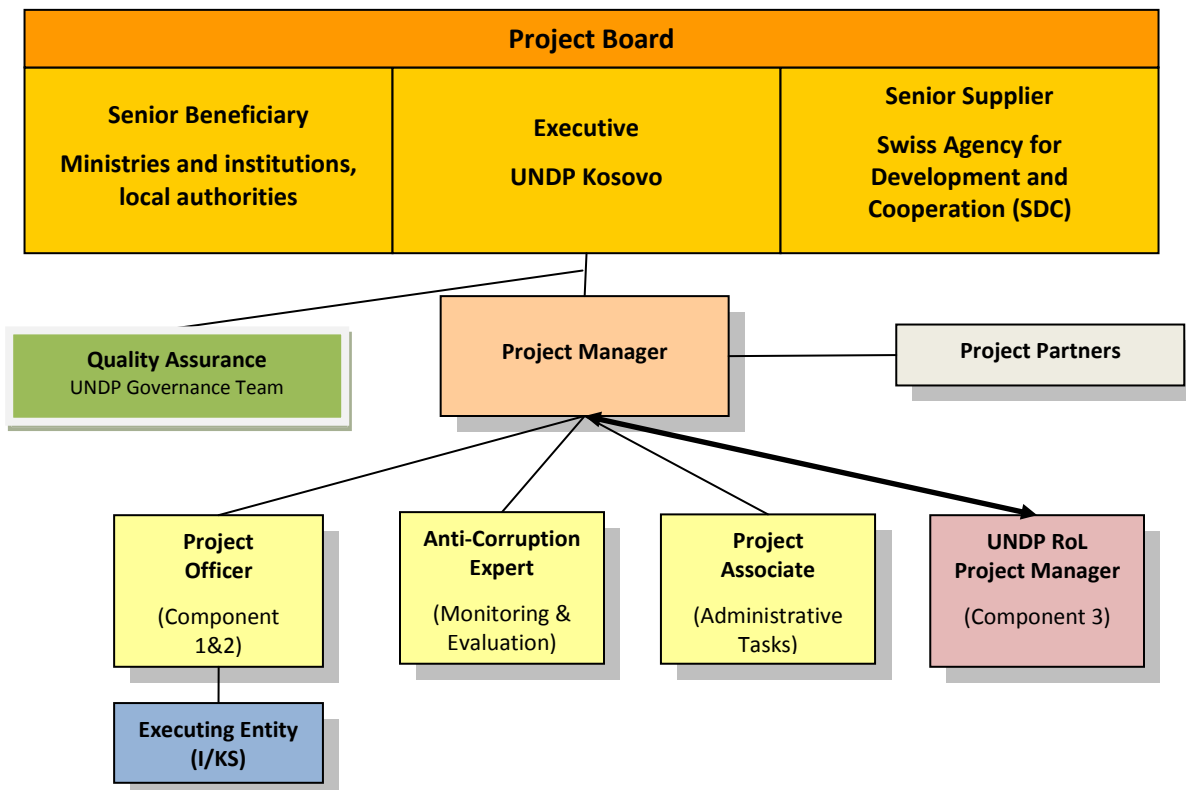
11) Management Arrangements

Given the context and the politically sensitive environment in Kosovo (neutrality of UN), this project will be implemented through a direct execution (DEX) modality. UNDP applies the DEX modality only in exceptional circumstances where the national Government does not have the capacity to manage and implement programmes. This implies that UNDP Kosovo takes the final accountability for the use of resources and is responsible for managing, reporting and achieving the expected outputs and objectives of the project. More concretely, it also involves financial management of funds, financial analysis of the project, procurement, recruitment, administration, logistics, administrative and capacity assessments of implementing partners, reporting to donors and monitoring and evaluation.

The *Swiss Agency for Development and Cooperation (SDC)* will be the Senior Supplier, operating according to the terms specified in the *Cost Sharing Agreement* between SDC and UNDP.

The project will establish a Project Board, which will be comprised of representatives of the senior supplier (SDC), senior beneficiaries (relevant government institutions and ministries, local authorities, etc.), the executive (UNDP Kosovo), and the Project Manager. The Project Board will be responsible for providing general oversight to ensure achievement of results on the primary project outcomes, and making consensus strategic management decisions when guidance is required by the Project Manager, including approval of project plans and revisions, as well as meeting the requirements of KPAP and CDP. UNDP Kosovo will be the chairman of the Project Board. Project Board meetings will be organized by the Project Board as needed, but not less than once every six months.

Project Quality Assurance will be provided by the UNDP Kosovo Governance Team, which will ensure that objective and independent project oversight is carried out for the purpose of meeting project management targets.



A **Project Manager** will be responsible for managing day-to-day project operations and decision-making. These will be executed on behalf of and according to the decisions of the Project Board. The Project Manager will supervise the staff of the project. He/she will also closely coordinate project activities with relevant government and other stakeholders.

A **Project Officer** will support implementing the approved work-plan related to Component 1 and 2 of the project, ensuring the expected results are achieved. Amongst many others, the Project Officer will also contribute in developing implementation strategies for the assigned components of the project and contribute to the preparation of the project work-plans in collaboration with the project partners.

UNDP will also engage an **Anti-Corruption Expert**, whose role will be to monitor and evaluate project activities and to work closely with counterparts in the implementation of specific activities, including assessing anti-corruption laws, regulations and systems and advising on improving the way anti-corruption systems and controls are implemented. The Anti-Corruption Expert will make recommendations on changes needed to laws, regulations and other directives and identify training needs.

A **Project Associate** will perform administrative aspects of the project, including payment processing and budget maintenance. The Project Associate will process requests for payments, make the budgetary controls and assist with the organization of events.

SAEK Component 3 will be implemented through the UNDP Kosovo RoL Project to make use of existing capacities, resources and experiences, share costs and avoid duplication of efforts. To do so, SAEK will partially cover the costs for the **RoL Project Manager** (50%), who will report to the SAEK Project Manager on all issues related to Component 3.

Similarly, SAEK Component 2 will be implemented in close synergy with UNDP Kosovo's SMILE Project, which is very much aligned with the objectives of this component. To make use of existing capacities, resources and experiences, share costs and avoid duplication of efforts, SAEK will cover parts of the costs of the SMILE Project Manager, who will contribute to the implementation of SAEK Component 2.

UNDP Kosovo shall offer expertise in capacity development and gender equality at the onset of the project by reviewing the implementation plan and offering recommendations that shall strengthen the outcomes on the project participants.

12) Monitoring Framework and Evaluation

In accordance with the programming policies and procedures outlined in the UNDP User Guide, the project will be monitored through the following:

1. Within the annual cycle:
 - After the 1st and 3rd quarter of each project year, an activity report will be prepared, based on the approved annual work plan and UNDP Kosovo reporting templates, indicating the progress toward completion of project activities and the resources spent.
 - On a mid-year basis, an analytical quality assessment report, based on UNDP Kosovo reporting templates, shall record progress towards the completion of key results and their corresponding impact on the ground.
 - Based on the initial risk analysis submitted, a risk log shall be activated and regularly updated by reviewing the external environment that may affect the project implementation.

- Based on the above information, a Quarterly Progress Reports (QPR) shall be submitted by the Project Manager to the Project Board through Project Assurance, using the standard report format.
 - A Project Lesson-learned log shall be activated and regularly updated to ensure on-going learning and adaptation within the organization, and to facilitate the preparation of the Lessons-learned Report at the end of the project.
 - A Monitoring Schedule Plan shall be activated and updated to track key management actions/events.
2. Annually:
- **Annual Review Report.** An Annual Review Report shall be prepared by the Project Manager and shared with the Project Board describing the results achieved against pre-defined annual targets at the output level and their corresponding impact on the ground. The Annual Review Report shall be based on the UNDP standard annual reporting template.
 - **Annual Project Review.** Based on the above report, an annual project review shall be conducted during the fourth quarter of the year or soon after, to assess the performance of the project and appraise the Annual Work Plan (AWP) for the following year. In the last year, this review will be a final assessment. This review is driven by the Project Board and may involve other stakeholders as required. It shall focus on the extent to which progress is being made towards outputs, and that these remain aligned to appropriate outcomes.
3. Mid-term and Final Evaluation:
- UNDP will conduct an external mid-term as well as final project evaluation which will lead to evaluation and lessons learned reports. The evaluations will be carried out by independent evaluators in collaboration with national and international organizations. The evaluation will consider achievement of development goals according to parameters of the relevance and responsiveness of the actions, their effectiveness and efficiency, and the impact and sustainability of results, focusing especially upon their contribution to capacity development. The evaluation will also provide recommendations for follow-up activities.

13) Gender and Anti-Corruption

Women are particularly affected by corruption due to, among other things, their role as the primary caretaker of the family, the fact that they earn lower incomes and have less control over personal resources than men, and ongoing anti-female biases in public spaces.

Though corruption affects women of all strata of society, poor women are the hardest hit, thus limiting their ability to access public goods and services. Women's perceived or real inability to pay bribes can exclude them from securing even a basic standard of living or result in requests for other forms of payments such as through sexual extortion or exploitation. Additionally, poor women are highly vulnerable to extortion and abuse because they are more likely to be illiterate and unaware of their rights and entitlements.

UNDP's focus in particular has been to address the gender dimensions of anti-corruption policies and programmes and to promote monitoring systems that use sex-disaggregated data. While the international community is making strides in developing gender-sensitive strategies for fighting corruption, less attention is paid to developing a deep understanding of the real impacts of corruption on poor women and the role they can and should play in fighting it in their communities.

The SAEK project will take a gender sensitive approach in all its interventions. More concretely, the project will aim to:

- Include women in consultative and advisory processes, and in the collection of data, to ensure definitions of corruption – including gender dimensions of corruption and subsequent policies and programmes – reflect the lived experiences of women.
- When developing gender-sensitive anti-corruption procedures and guidelines, recognize and seek to mitigate physical abuse, sexual extortion or exploitation, and other forms of abuse specific to grassroots women’s experiences.
- Involve women in national anti-corruption programme and policy development so institutional strategies reflect women’s experiences and encompass regional and rural-urban variants of corruption.
- Ensure that information related to laws, mechanisms, and channels to address corruption is made public, easily accessible, and can be practically utilized by grassroots women.
- Promote partnerships including women’s groups and research institutions to involve women capacities and views.
- Involve women in public dialogue with local government so women can discuss and report corruption, thus ensuring that elected leaders understand local contexts and develop constituencies among grassroots groups.
- Include grassroots women’s perspectives, experiences, and successful strategies for fighting corruption in anti-corruption policies, intergovernmental processes, and global debates on accountability, transparency, and the prevention of corruption.

14) Legal Context

The project document shall be the instrument envisaged in the [Supplemental Provisions](#) to the Project Document, attached hereto.

Consistent with the above Supplemental Provisions, the responsibility for the safety and security of the executing agency and its personnel and property, and of UNDP’s property in the executing agency’s custody, rests with the executing agency.

The executing agency shall:

- a) Put in place an appropriate security plan and maintain the security plan, taking into account the security situation in the country where the project is being carried;
- b) Assume all risks and liabilities related to the executing agency’s security, and the full implementation of the security plan.

UNDP reserves the right to verify whether such a plan is in place, and to suggest modifications to the plan when necessary. Failure to maintain and implement an appropriate security plan as required hereunder shall be deemed a breach of this agreement.

The executing agency agrees to undertake all reasonable efforts to ensure that none of the UNDP funds received pursuant to the Project Document are used to provide support to individuals or entities associated with terrorism and that the recipients of any amounts provided by UNDP hereunder do not appear on the list maintained by the Security Council Committee established pursuant to resolution 1267 (1999). The list

can be accessed via <http://www.un.org/Docs/sc/committees/1267/1267ListEng.htm>. This provision must be included in all sub-contracts or sub-agreements entered into under this Project Document.

15) Project Sustainability

A serious obstacle for successfully implementing activities with the Kosovo institutions is the high turnover of staff members, mainly due to the low salary, which does not attract highly skilled personnel. During 2010, four leading senior officials of the KAA have left the Agency – Head of Investigations department, Head of Division for Detection and Investigation, Head of Conflict of Interest Division and Head of Division for Legislation and Education.

UNDP aims to help solve this issue by providing a sustainable training mechanism, which will be prepared and delivered in consultation with different stakeholders. Capacity development activities under Component 1 and Component 3 will be conducted mainly by KIPA, who bears legal responsibility for training and professional development of Kosovo's civil servants. The project will be applying a multi-prong approach involving national CSOs, who have built significant anti-corruption knowledge in the past years, to augment the training.

Providing trainings or study visits by/through international academies and institutes has not proven to be very sustainable in the past and can be very costly. However, depending on the level of expertise of KIPA related to anti-corruption issues, international academies and institutes could be engaged to provide substantive training to KIPA to create a "training for trainers" scheme. Models and materials from relevant academies and institutes, such as the *International Anti-Corruption Academy* (IACA), will certainly be taken into account when designing the training modules. The established training mechanisms will remain, as a legacy of the programme, with KIPA and the participating CSOs to allow a sustainable delivery of trainings to newly appointed staff upon completion of the programme.

Furthermore, to guarantee sustainability, SAEK will provide full financial support to training activities in the initial stage and gradually decrease such support by requesting more financial contributions from its counterparts. By the end of the programme, counterparts will be fully capable to self-sustainably continue with the trainings activities.

Selecting the right implementing partners to implement Component 2 is essential to guarantee sustainability of the project. In this regard, UNDP Kosovo has selected *InternewsKosova* and its consortium to be the executing partners of this component, given their outstanding performance in the inception phase of the project, their strong reputation on investigative journalism and anti-corruption, the trust the organization enjoys from the citizens on actively following up the cases reported to them as well as their commitment to successfully carry out the duties and responsibilities entrusted to them. Today, the executing partners have taken full ownership of the developed platform. www.kallxo.com is already considered a "brand" of *InternewsKosova* and will therefore be sustained beyond the duration of this project.

16) Yearly Programme Budget Breakdown

	Component 1	Component 2	Component 3	Total Programmable Amount	Total Overhead	TOTAL per component
Year 1	210,400 €	176,200 €	120,400 €	679,750 €	54,855.83 €	734,605.83€
Year 2	180,100 €	160,400 €	134,800 €	625,600 €	50,485.92 €	676,085.92 €
Year 3	160,450 €	155,200 €	135,300 €	524,300 €	42,311.01 €	566,611.01 €
				1,829,650 €	147,652.76 €	1,977,302.76 €

17) Perspectives and possibilities for up-scaling

As highlighted above, SAEK component 1 and 2 will be piloted in selected municipalities. The project is innovative and demand driven and, as such, it should not remain as pocket of excellence, but be implemented on a bigger scale and given the requisite visibility for other organizations and donor agencies to be adopt its proven solutions/technologies/methods/processes.

Based on the lessons learned accumulated during the implementation of project and subject to availability of funds, a broader roll-out additional municipalities and communities could follow through a second phase.

SAEK will assess its interventions through applied monitoring and evaluation throughout the three year project duration. Lessons learned and good practices will be adequately recorded to tailor follow-up interventions and subsequent up-scaling, which could be done in terms of the following:

- Increase in the number of beneficiaries covered under the project
- Increase in the area brought under coverage of the project
- Introducing new and/or up-graded technology in the project area
- Adopting better processes in project implementation

As an important aspect, local demand from the communities/municipalities for scaling-up should exist and it should not be a top-down initiative. This should also reflect in the share of community contribution out of the total co-financing that is proposed for the second phase of the project.

18) Case study: Georgia

Although UNDP has not been extensively involved in anti-corruption efforts in Georgia, the approach taken by the Government of Georgia it is often referred to as a good model for other countries in the region. The intention of this case study is to review more critically the efforts performed by Georgia in fighting corruption.

Key policies anti corruption policies in Georgia:

Reforms in the security sector have revolved around several key policies, applied to varying degrees across the uniformed services:

- **Wholesale cadre change.** The most successful experiment was in the utterly corrupt traffic police, where all personnel were fired and new staff recruited. Merit-based competition, paired with large upgrades in salaries and equipment quality, dramatically improved the image of the service among the public and the staff themselves. However, the government has also had to deal with cases of excessive use of force and gaps in basic training. Similar cadre rotation among Defence Ministry personnel is thought to have contributed to failures during the 2008 Russo-Georgian war. In addition, the policy could not be implemented in the more 'professionalised' areas, such as the

criminal police and the Prosecutor's Office, since training new personnel takes significantly more time and resources.

- **Removing temptation.** The government has reduced to an absolute minimum the areas where Georgia's public services have to handle money. All payments are made through the private banking system. In an example of successful private-public partnership, the police agency responsible for issuing driving licences and licence plates has created bank-like service centres to process citizens' applications. The transactions are handled through a private bank, which won a bid to carry out on-site services. Thanks to a simplified registration process and absence of bribery, Georgia is now one of the top re-exporters of vehicles in the region. However, some crucial services -- such as vehicle technical checks -- have been cancelled until a formula for a corruption-free service is found.
- **Public punishment.** Cases of petty corruption are rigorously punished, and publicised on state-sponsored TV, sometimes at the expense of the accused's presumption of innocence. Investigators have regularly resorted to 'sting' operations, in which officers in various public services -- especially the police and the prosecution -- are offered bribes by undercover operatives. The compliance of such operations with human rights has been questioned, as has the potential for using them for political ends. In October 2010, two Israeli businessmen were detained on charges of bribing a Georgian minister, which led to a significant deterioration of relations between the two countries.
- **Concentration of political responsibility.** Implementation of anti-corruption initiatives has been centralised in the hands of the appropriate ministers, who exercise direct control and are responsible to the President. This has increased efficiency -- and has led to allegations of the use of selective, politically motivated punishments, particularly in the Defence Ministry, but also in the prosecution and some areas of the police service.

Georgia's approach is quite peculiar and to some extent controversial. There are several aspects that are (or might be) of concern:

- Georgia has focused mainly on the quick wins in the field of anti-corruption, while neglecting the more painstaking reforms needed to build up integrity in the public sector in a sustainable way. There is nothing wrong in going for the quick wins (like taking the most corrupt sectors and overhaul them completely, in very radical ways), but the long term approach to systemic change should not be neglected. A good example of the latter is the situation of civil service; it's actually symptomatic that Georgia is getting much less outstanding ratings on indicators that look at more systemic issues like integrity reforms (e.g. Global Integrity Index). This probably means that, after exhausting the quick-win measures, we are not likely to see continued progress at this pace, unless there is a change in the approach towards broader-based reforms (unlikely, including for reasons mentioned below).
- The President's anti-corruption drive is not politically neutral; it's actually a key part of his politics. This, combined with the emphasis on repression (common to former Soviet countries, most evident in Central Asia) creates serious concerns of political bias. Such bias can easily undermine the sustainability of anti-corruption efforts in the longer term and, beyond a certain point, is sure to limit their effectiveness. It also makes it difficult to build political consensus on the anti-corruption agenda.
- Another point of concern is the insufficient institutionalization of the reform drive, and the dependence on the personal factor. Basically, this approach does not seem so much geared towards building institutions, it is more about fixing punctual problems and relies heavily on the right people (or "good guys") being in control -- not exactly a sustainable approach. The more ominous aspect of this is lack of accountability -- for instance, as the Global Integrity report notes, "Power is tightly consolidated in the executive branch, where levels of accountability are low and the activities of the ruling party are mixed with those of the state."