



APC REPUBLIC OF SERBIA
THE AGENCY
FOR PREVENTION
OF CORRUPTION



REPORT ON THE IMPLEMENTATION OF THE REVISED ACTION PLAN FOR CHAPTER 23 – SUBCHAPTER 'FIGHT AGAINST CORRUPTION'

Year 2022



Republic of Serbia



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1.

INTRODUCTORY REMARKS

The Law on Prevention of Corruption,¹ whose implementation began on 1 September 2020, expanded the competence of the Agency for the Prevention of Corruption (hereinafter: the Agency)² to include oversight of the implementation of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’, as well as all future strategic documents in the field of fight against corruption, i.e. prevention of corruption.

In accordance with Article 6, paragraph 1 of the Law on Prevention of Corruption, the Agency oversees the implementation of strategic documents, submits to the National Assembly a report on their implementation with recommendations for further action, provides recommendations to responsible entities on how to eliminate shortcomings in the implementation of strategic documents, and initiates amendments and supplements to said documents.

Article 33, paragraph 3 of the Law on Prevention of Corruption further stipulates that in terms of “joint action in the implementation of strategic documents in the field of fight against corruption”, the Agency shall cooperate with public authorities and other legal entities, scientific institutions and associations.

Article 38 of the Law on Prevention of Corruption prescribes: 1) that entities responsible for the implementation of measures and activities contained in strategic documents are obliged to report to the Agency on their implementation; 2) that the manner of reporting is regulated in more detail by an act passed by the Director of the Agency, in accordance with strategic documents; 3) that the Agency shall submit to the National Assembly a report on the implementation of strategic documents, with recommendations for further action, no later than by March 31 of the current year for the previous year; and 4) that the Agency shall provide opinions with recommendations regarding the implementation of strategic documents.

According to the revised Action Plan for Chapter 23,³ adopted by the Government of the Republic of Serbia on 10 July 2020, the Agency will also oversee the implementation of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’, in accordance with the new Law on Prevention of Corruption.

1 “Official Gazette of the RS”, no. 35/19, 88/19, 11/21-authentic interpretation, 94/21 and 14/22

2 See the list of abbreviations on page 129

3 See: <https://www.mpravde.gov.rs/files/Revidirani%20AP23%202207.pdf>

The Agency is an independent and autonomous state body that is accountable to the National Assembly for its work.

The Agency submitted the First Report on the Implementation of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’⁴ to the National Assembly on 30 March 2021. The Second Report⁵ was submitted on 29 March 2022.

The Third Report on the Implementation of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’ contains the following:

- Introductory remarks;
- General assessment of fulfilment (for continuous activities, those due in 2022, those that were not implemented in 2020 and 2021, and those the Agency was unable to assess in the Second Implementation Report);
- Summary of the implementation of activities;
- Overview of the implementation of individual activities;
- Recommendations, and
- General remarks on implementation oversight.

4 See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20borba%20protiv%20korupcije_3.pdf

5 See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

2. GENERAL ASSESSMENT OF FULFILMENT

The revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’ defines 130 activities.

Out of the above number, in the reporting period the Agency assessed 87, that is, those that are continuous in nature, those that were due in 2022, those that were assessed as not implemented in the First and Second Implementation Reports, and those that the Agency was unable to assess in the Second Implementation Report. Namely:

1. 7 in the area of implementation of anti-corruption measures;
2. 52 in the field of prevention of corruption, and
3. 28 in the area of repression of corruption.

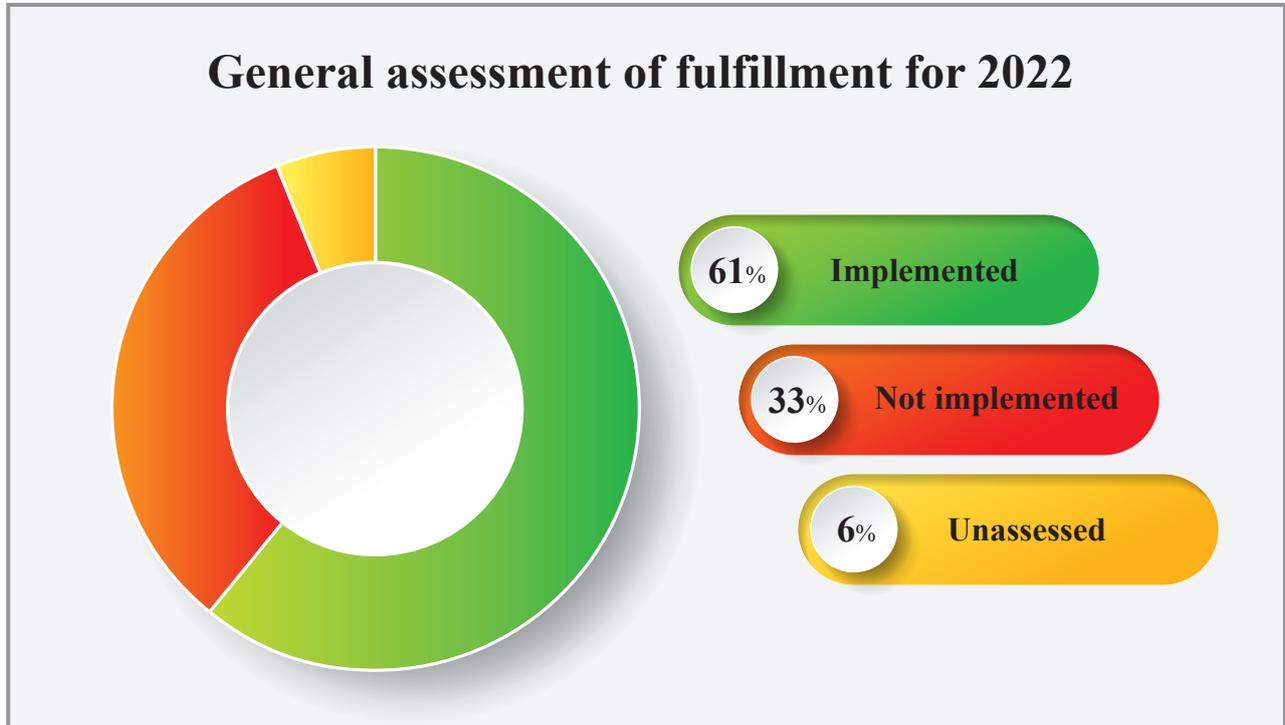
The assessment of fulfilment is presented using the so-called traffic light scale: the activities that were implemented are marked in green, the activities that were not implemented are marked in red, and those that the Agency was unable to assess are marked in yellow. The Agency evaluated certain activities as two, with relevant explanations provided for each such individual activity. Activities that are carried out simultaneously were counted as one, which was also explained in the presentation of individual activities. Activities with a one-off character, i.e. those whose deadlines were not marked as “continuous” and which in previous implementation reports were assessed as implemented, were not shown in the Third Implementation Report.

The statistical review that follows should certainly be taken conditionally, as the level of complexity, inter-institutional embedment or anticipated duration is not the same for all activities.

The Agency also indicates that, in order to gain complete insight, previous two Implementation Reports should also be taken into account when considering the assessment of activities, especially those that are continuous in nature.

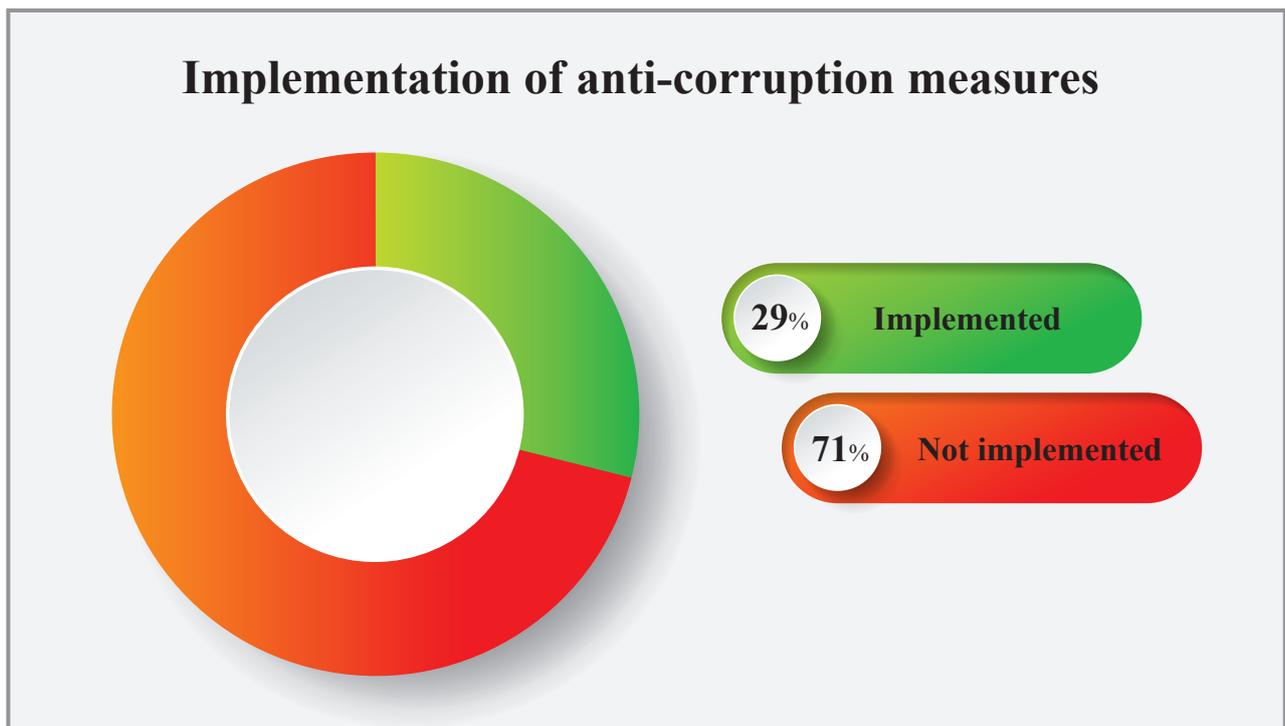
According to the Agency, out of **87** assessed activities:

- **53 (61%)** were implemented;
- **29 (33%)** were not implemented, and
- **5 (6%)** were impossible to assess.



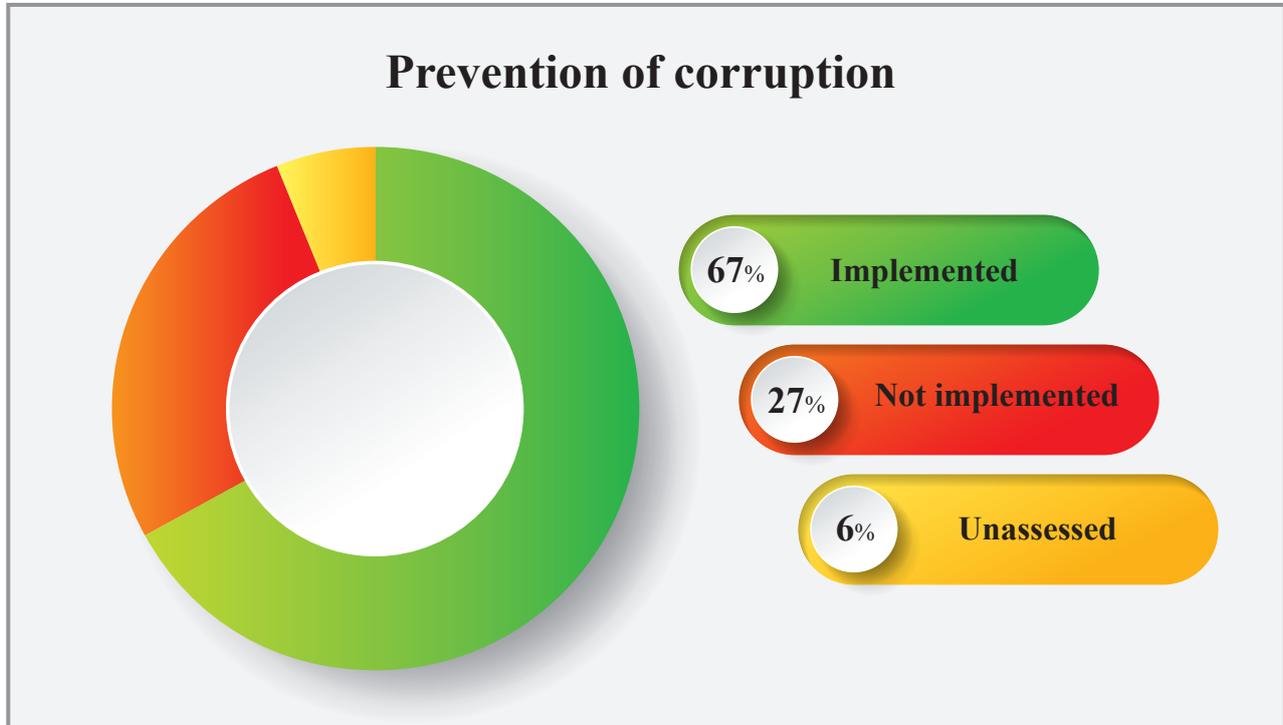
Out of **7** assessed activities **in the area of implementation of anti-corruption measures**:

- **2 (29%)** were implemented, while
- **5 (71%)** were not implemented.



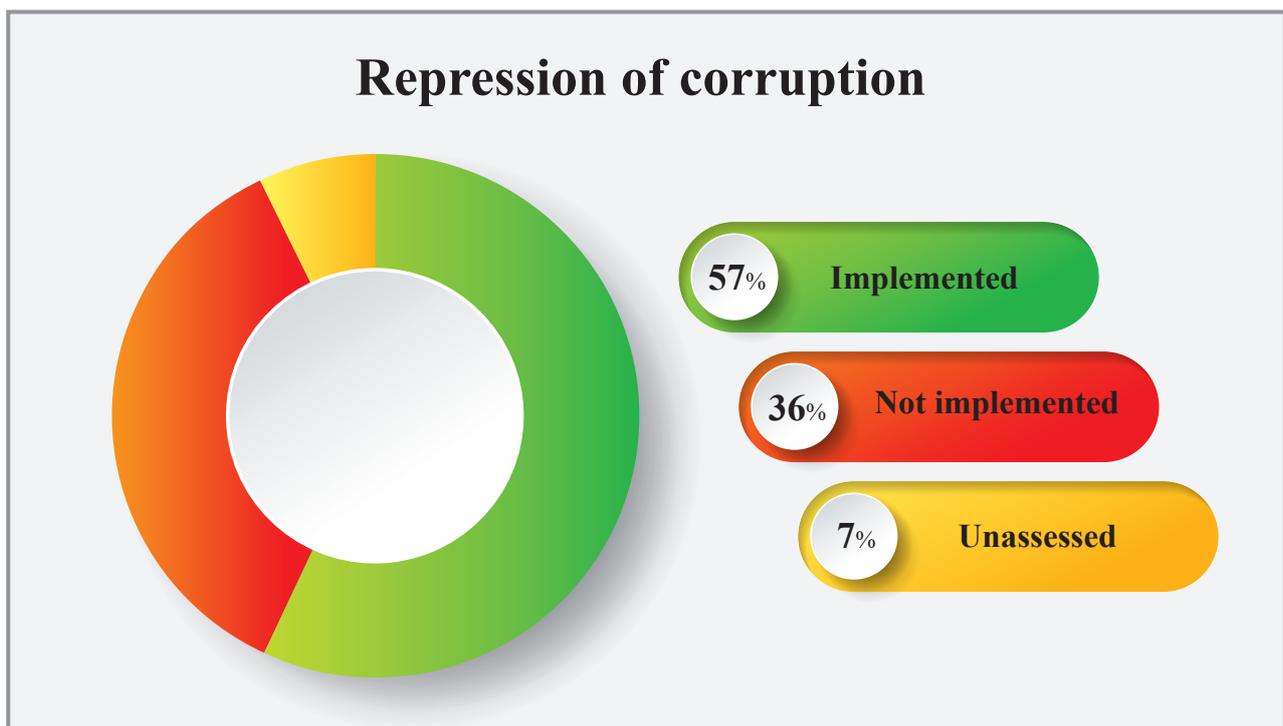
Out of 52 assessed activities **in the area of prevention of corruption**:

- 35 (67%) were implemented;
- 14 (27%) were not implemented, and
- (6%) were impossible to assess.



Out of 28 assessed activities **in the area of repression of corruption**:

- 16 (57%) were implemented;
- 10 (36%) were not implemented, and
- 2 (7%) were impossible to assess.



After the third cycle of monitoring the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’, the key conclusion is that it is necessary to carry out a new revision of the Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’, because the shortcomings that were identified in previous Reports continued to significantly affect implementation and reporting, as well as monitoring the implementation of this document. The revision is necessary also because, according to the current document, the activities should end in 2023.

The deficiencies of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’ were recognised by some of the reporting institutions as well, in the sense that it was not entirely clear to them what certain activities or parts of activities referred to; that they felt that certain activities were not even supposed to be listed in this document, because they were already implemented; that it was not always entirely clear which institution were in charge of which segments of the activity, and so on.

The activities that have been successfully implemented primarily relate to monitoring the application of current regulations and strengthening capacities in the form of professional development of employees and inter-institutional trainings.

Delays in conditional activities (e.g. adoption of regulations) had a negative impact on the overall performance. On the other hand, some activities, whose implementation was delayed earlier, were implemented in the meantime, making it possible to realise some other activities that were conditioned thereby.

Generally speaking, activities that include systemic steps such as planning, preparation and coordination, i.e. several stages and a number of actors (e.g. hiring, draft documents, consultations, submission of comments, testing and development of technical tools, public procurement, engaging experts, etc.) proceeded at a slower pace compared to those that had fewer phases from start to finish.

It is also worth noting that reporting entities have shown readiness to present the true status of the implementation of activities and that, in most cases, they themselves stated (in the reporting form) that certain activities have not been implemented. In most cases, they did not provide any information that was not relevant for the implementation of a specific activity. Although certain activities have been implemented in the previous reporting cycle, institutions continued to report on their further development (e.g. implementation of institutional anti-corruption plans); however, for reasons of methodological consistency, the Agency did not include these reports in this Report.

Progress in reporting quality has been noted in the third reporting cycle, but it cannot be said that the challenge of uneven quality has been entirely overcome. Continuous capacity building is still necessary, in terms of holding workshops and consultative meetings for contact persons, especially bearing in mind frequent staffing turnover and a specific type of experience necessary for reporting and coordination within each of the reporting institutions. In this domain, a good practice of organising workshops was noted in 2021 as well; namely, with the support of the IPA 2017 project “EU for Justice”, in the period from 10 to 12 March 2022 the Ministry of Justice organised a 3-day training on reporting on the implementation of the Revised Action Plan for Chapter 23. The training was organised with the aim of strengthening the capacity of contact persons for reporting on the implementation of the Revised Action Plan for Chapter 23, i.e. of improving the reporting process

as well as the quality of reports. The training also included the improvement of acting in accordance with the Early Warning System⁶, as well as reporting on impact indicators.

In 2022, the Agency collected reports at the quarterly level, except for the last one, which - as noted above - included a wider scope of activities and all reporting entities (as well as those which are not, depending on the activity). The reports were submitted on time, and institutions answered the Agency's additional questions whenever they were in possession of requested information. Timely reporting facilitated the work of the Agency, given that the deadline for submitting the annual implementation report is prescribed by the Law on Prevention of Corruption, and delay is therefore neither possible nor permitted.

Despite all the challenges referred to in the Third Implementation Report, the Agency was able to establish communication with all the reporting entities to discuss difficulties in the implementation process, not only through formal reporting channels, but also in meetings and conversations.

Certain reporting institutions stood out in terms of reporting, by referring to all necessary elements of both the activities and indicators of results, using necessary institutional memory to review the entire activity and what preceded it. However, the Agency reiterates its finding from the First and Second Implementation Reports that this was sometimes made difficult for institutions, not because of their insufficient reporting capacity, but because of the already mentioned deficiencies in certain parts of the strategic document. This has been noted by some of the institutions, while the Agency itself identified it at the end of the Third Implementation Report.

The fact that the Coordination Body for the Implementation of the Action Plan for Chapter 23 (established in 2021)⁷ continued to operate in 2022, and that, in addition to regular reports, it also collected exceptional reports on already existing or intended delays, has affected the improvement of consideration of the situation in the field, as the Agency pointed out in the first and second implementation reports. However, it is still necessary to pay attention to this issue, so that in the following reporting cycles it will be possible to respond, in the most successful and qualitatively better way, both to the priorities in the domain of reform processes and European integration and the supervision of the implementation of strategic documents.

In the Third Implementation Report, the Agency offered 25 recommendations,⁸ which, if implemented, could significantly influence the improvement of the implementation, reporting and supervision of the implementation of subchapter 'Fight against Corruption' of the Revised Action Plan for Chapter 23. Their purpose is also to provide help in the process of revision of the existing document once that process begins.

The deficiencies and challenges the Agency recognised during the development of the Third Implementation Report are explained in greater detail in Section 5 – Recommendations, and in Section 6.3 - Challenges in the Process of Supervision of Implementation.

⁶ For additional information, see Section 6 - General Remarks on Implementation Supervision

⁷ *Ibidem*

⁸ For additional information, see Section 5 - Recommendations

3. SUMMARY OF THE IMPLEMENTATION OF ACTIVITIES

3.1 Implementation of Anti-Corruption Measures

The Government did not consider the reports of the Anti-Corruption Council, nor was the Council actively involved in the legislative process. The Republic Public Prosecutor's Office did consider the reports of the Anti-Corruption Council; it also forwarded them to the competent prosecutor's offices, monitoring their actions and submitting data to the Anti-Corruption Council. The budget and staffing capacities of the Anti-Corruption Council have not been strengthened any further.

3.2 Prevention of Corruption

Implementation of the Law on Prevention of Corruption was monitored, and trainings for employees of the Agency were organised. Workshops were also held with the competent institutions with which the Agency cooperates.

Defficiencies of the application used for reporting on the implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption' have been eliminated and institutions continued to use it, although its functioning is still regularly monitored.

The application for monitoring the Operational Plan for Preventing Corruption in Areas of Special Risk has not been developed, but this did not affect the monitoring of the implementation of this document.

Workshops with representatives of the National Assembly of the Republic of Serbia, which were to be organised with the aim of monitoring the recommendations from the report of the Agency, were not held.

A new Law on the Financing of Political Activities⁹ was adopted, which made it possible to implemented activities that are directly connected to its adoption. However, not all were completed in 2022.

Public administration employees attended training in the field of prevention of conflicts of interest. The implementation of the Law on Prevention of Corruption in the field of conflict of interest of public officials was monitored, as well as the application of the Code of Conduct for Civil Servants.¹⁰

9 "Official Gazette of the RS", no. 14/22

10 "Official Gazette of the RS", no. 29/08, 30/15, 20/18, 42/18, 80/19 and 32/20

Data on the application of the Criminal Code¹¹ and the Law on Organisation and Competences in State Authorities in the Suppression of Organised Crime, Terrorism and Corruption¹² were submitted as well.

The application of the Law on Amendments and Supplements to the Law on Free Access to Information of Public Importance,¹³ adopted on 3 November 2021, has begun. Trainings for employees authorised to act upon requests for free access to information of public importance were organised.

The new legal framework based on competencies in the processes of employment, performance evaluation, advancement and career development of civil servants, is being applied.

Trainings on financial management and control were organised, increasing the number of certified auditors.

Trainings on the application of the Law on the Protection of Whistleblowers¹⁴ were conducted, but not for all identified target groups. Data on monitoring the application of the Law on the Protection of Whistleblowers were presented as well, but the impact assessment of this regulation has not been prepared.

Measures relating to supervision and control in public procurement are being monitored, but not by all identified institutions. Trainings for members of the police, prosecutors and judges, aimed at more efficient processing of corruption in public procurement, were conducted as well.

The impact assessment of measures taken to reduce corruption in vulnerable areas (public procurement, privatisation, health, taxes, education, police, customs, local self-government) has been made, and the assessment report has been prepared.

Work is being done to develop mechanisms to strengthen the integrity of police officers. The capacities of the Internal Control Sector of the Ministry of Internal Affairs are being strengthened.

The installation of video surveillance at customs points and border crossings, including access to video surveillance in real time, has not been completed.

Not all local self-government units have adopted local anti-corruption plans or formed bodies that will be charged with monitoring the application of this document.

Joint activities were conducted in the reporting period to encourage more efficient citizens' participation in the fight against corruption, and measures aimed at further improving the system of transparent financing of civil society organisations have been taken.

11 "Official Gazette of the RS", no. 85/05, 88/05 - corrigenda, 107/05 – corrigenda, 72/09, 111/09, 121/12, 104/13, 108/14, 94/16 and 35/19

12 "Official Gazette of the RS", no. 94/16 and 87/18 - other law

13 "Official Gazette of the RS", no. 105/21

14 "Official Gazette of the RS", no. 128/14

The 14th competition for the allocation of funds to civil society organisations for the realisation of projects in the field of corruption was completed.

3.3 Repression of Corruption

Data on the implementation of the amended and supplemented Criminal Code were submitted, in the part relating to corruptive and economic crimes, as well as data on the application of the altered criminal act of ‘abuse of position of responsible person’, which contains the “legal subsidiarity” mechanism.

The analysis of compliance of the normative framework of the Republic of Serbia with the recommendations of the Financial Action Task Force (FATF - international body tasked with developing and improving the fight against money laundering and terrorism financing) for conducting financial investigations in parallel with criminal investigations has been prepared, but the accompanying planning document has not.

Certain activities related to strengthening the capacity of the Financial Investigation Unit of the Ministry of Internal Affairs have been implemented, as well as those related to the training of members of the police, public prosecutors and judges on conducting financial investigations, monitoring money flows, proactive engagement and special investigative techniques.

The capacities of the Prosecutor’s Office for Organised Crime and special anti-corruption departments of higher public prosecutor’s offices are still being strengthened, as well as those of the Financial Forensics Services in the Prosecutor’s Office for Organised Crime and other bodies.

The Anti-Corruption Council held meetings with the Republic Public Prosecutor’s Office.

The by-law which was supposed to be adopted in accordance with the Law on Organisation and Competences of State Authorities in the Suppression of Organised Crime, Terrorism and Corruption to regulate the deadlines, the manner of acting and the communication between the police and the public prosecutor’s office in organised crime and corruption cases, has not been adopted.

The analysis of feasibility studies on the establishment of a single electronic register of corruption crimes has been conducted, and the recommendations from the analysis have been complied with.

The activities related to the improvement of the capacities of the Directorate for the Administration of Seized Assets were implemented, but no agreements were concluded with directorates from the countries of the region and the European Union.

The activity of monitoring the sanctioning of violations of regulations relating to disclosure of confidential information is also being implemented, but there is no data on whether an analysis of the application of regulations has been developed.

4 OVERVIEW OF THE IMPLEMENTATION OF INDIVIDUAL ACTIVITIES

4.1 Implementation of Anti-Corruption Measures

In this Report, within Section 2.1 of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption' which deals with the implementation of anti-corruption measures, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report and the relevant benchmark:

2.1.1 Expand political and institutional ownership, including top-level coordination, in the field of fight against corruption, and clearly identify high-level institutional leadership in the implementation of the anti-corruption strategy.

Benchmark: Serbia is implementing the Action Plan for the implementation of the National Anti-Corruption Strategy for the period 2013-2018. Implementation is strictly monitored, and corrective measures are being taken whenever necessary. Serbia is conducting an impact assessment of its results in 2018.

The activity in question is Activity 2.1.1.3, which is presented below.

Activity 2.1.1.3

Holding regular meetings of the Coordination Body in accordance with the new Decision (Activity 2.1.1.2).	
Meetings of the Coordination Body are open to the public and to the participation of civil society organisations.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Anti-Corruption Agency • All competent institutions
Deadline	Continuous, starting with the adoption of the Decision from Activity 2.1.1.2
Indicators of results	<p>Reports from the meetings of the Coordination Body are published on the website of the Ministry of Justice. Reports of the Anti-Corruption Agency on monitoring the implementation of the Operational Plan for the Fight against Corruption in Areas of Special Risk were considered.</p> <p>The Coordinating Body is considering specific proposals of civil society organisations submitted in connection with the reports of the Coordinating Body on the implementation of the Operational Plan.</p> <p>The Coordinating Body has solved the problems that have arisen in fulfilling the Action Plan.</p>
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.1.1.3

The Ministry of Justice has reported that there were no meetings of the Coordination Body in 2022, which is why in this reporting period the Agency assessed the activity as not implemented.

In this report, in the same Section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.1.2. The Government of the Republic of Serbia is engaged in a constructive relationship with the Anti-Corruption Council; it is seriously considering its recommendations and taking them into account as much as possible.

The activities in question are Activities no. 2.1.2.1, 2.1.2.2, 2.1.2.3, 2.1.2.4 and 2.1.2.5, which are shown individually below.

Activity 2.1.2.1

The Government is considering the reports of the Anti-Corruption Council at its sessions and taking them into account as much as possible.	
The Council is invited to Government sessions when the report is discussed, to present the report's main findings.	
In charge of activity	• Government of the Republic of Serbia
Deadline	Continuous
Indicators of results	The Government has considered the Council's Reports and has reached a Conclusion on further action regarding the Council's findings and recommendations.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.1.2.1

The Government of the Republic of Serbia has reported that the activity was not implemented, which is why in this reporting period the Agency assessed the activity as not implemented.¹⁵

Activity 2.1.2.2

Adopt a new Decision of the Government of RS regulating the work of the Anti-Corruption Council, in accordance with the conducted analysis titled "Anti-Corruption Council of the Government of the Republic of Serbia in the Light of Best Practices of the European Union", developed within the IPA 2013 project "Prevention and Fight against Corruption".	
In charge of activity	• Government of the Republic of Serbia • Ministry of Justice (State Secretary in charge of corruption issues) • Anti-Corruption Council
Deadline	Second quarter of 2021
Indicators of results	A new Decision of the Government of the RS, which regulates the work of the Anti-Corruption Council in accordance with the conducted analysis, has been adopted.
Agency's assessment	The activity was not implemented

¹⁵ Although it is not the holder of the activity (the activity just relates to it), the Anti-Corruption Council reported that it submitted four reports to the Government of the Republic of Serbia in 2022: 1) Report on the privatisation of the Institute for Water Management "Jaroslav Černi"; 2) Report on the news agency "Tanjug"; 3) Report on the construction of a cable car (gondola) between Kalemegdan and Ušće Park in Belgrade, and 4) Report on the non-transparency of ownership of agricultural land in the Republic of Serbia. The Council also reported that it received no feedback on whether the Government of the Republic of Serbia has considered the recommendations and conclusions from these reports, and that it submits all reports not only to the Government, but to the prosecutor's office as well.

On the implementation of Activity 2.1.2.2

The Government of the Republic of Serbia has reported that the activity was not implemented, which is why the Agency assessed the activity as not implemented.¹⁶

Activity 2.1.2.3

Ensure active participation of the Anti-Corruption Council in the legislative process, through membership in working groups for the adoption and amendment of laws that, according to the Council, carry a risk of a corruption, at the initiative of the Council, i.e. bodies authorised to propose laws.	
Members of the Council actively participate in the work of working groups.	
In charge of activity	• Anti-Corruption Council
Deadline	Continuous
Indicators of results	The Council receives information on legislative activities in a timely manner, acts proactively, and Council members actively participate in the legislative process.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.1.2.3

The Anti-Corruption Council has reported that it is included in three groups charged with the implementation of the Operational Plan for Preventing Corruption in Areas of Special Risk, namely: 1) the implementation group responsible for coordinating the implementation of the activities from the future National Anti-Corruption Strategy and its accompanying Action Plan; 2) the implementation group responsible for coordinating the implementation of measures and activities for the prevention of corruption in the areas of privatisation and public procurement, envisaged in measures 3.3 – Privatisation and 3.4 – Public Procurement, and 3) the implementation group responsible for coordinating the implementation of anti-corruption activities in the area of local self-government envisaged in measure 3.2 – Local Self-Government.

The Council further reported that it has met with the Agency for the Prevention of Corruption, with the aim of implementing measures 3.3.1 and 3.3.2 of the Operational Plan for Preventing Corruption in Areas of Special Risk. The topic of the meeting was the implementation of measures. In addition to the representatives of the Agency, the meeting was attended by representatives of the Ministry of Economy and the Agency for the Licensing of Bankruptcy Trustees.

On 15 June and 19 October 2022, the Anti-Corruption Council participated in the meeting of the Special Working Group in charge of formulating proposals for optimising and improving the content of planning documents for the prevention of corruption in local self-government units within the Operational Plan for Preventing Corruption in Areas of Special Risk.

¹⁶ The analysis entitled “The Anti-Corruption Council of the Government of the Republic of Serbia in light of best practices in the European Union” was prepared in 2018 as part of the IPA 2013 Project “Prevention and Fight against Corruption”.

The provided data do not correspond with the essence of this activity, that is, do not constitute participation in the legislative process, which is why, for this reporting period, the Agency assessed the activity as not implemented.

Activity 2.1.2.4

The Republic Public Prosecutor's Office considers the reports of the Council from the point of view of possible criminal responsibility and forwards them to the competent prosecutor's offices to act. It also follows-up and reports.	
In charge of activity	<ul style="list-style-type: none"> • Republic Public Prosecutor's Office • Government of the Republic of Serbia
Deadline	Continuous
Indicators of results	Annual reports on the activities related to the reports of the Anti-Corruption Council have been prepared and submitted to the Government.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.1.2.4

The Republic Public Prosecutor's Office has reported that it was considering the reports of the Anti-Corruption Council, forwarding them to the competent prosecutor's offices and monitoring their actions. It further reported that the Report on the actions of public prosecutor's offices for 2021, based on the reports of the Anti-Corruption Council, was prepared and submitted to the Council.

As the Agency was convinced that this was a regular annual practice of the Republic Public Prosecutor's Office, as supported by the report for 2021 and the fact that reports for the previous year are prepared in the following year, in this reporting period the Agency assessed the activity as implemented.

Activity 2.1.2.5

Further strengthen the budget and staffing capacities of the Anti-Corruption Council.	
In charge of activity	<ul style="list-style-type: none"> • Government of the Republic of Serbia • Anti-Corruption Council
Deadline	Second quarter of 2021
Indicators of results	The Government decision appointing members of the Anti-Corruption Council has been adopted. Higher level of administrative support from the General Secretariat of the Government.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.1.2.5

The Government of the Republic of Serbia has reported that the activity was not implemented, which is why the Agency assessed it as such.

In this report, in the same Section of the Revised Action Plan for Chapter 23 - subchapter ‘Fight against Corruption’, the Agency assessed the implementation of activities related to the following benchmark:

2.1.3. Serbia is conducting a comprehensive assessment of its legislation compared to the EU acquis and the UN Convention against Corruption, and is amending it where necessary. Serbia is following all GRECO recommendations.

The activity in question is Activity 2.1.3.1, which is shown below.

Activity 2.1.3.1

Amend the legal framework for the fight against corruption, taking into account the recommendations contained in the “Analysis of Compliance of Anti-Corruption Legislation with EU acquis and International Standards”, conducted under the IPA 2013 project “Prevention and fight against corruption”.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Other ministries, in accordance with their competencies • Government of the Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	Fourth quarter of 2021
Indicators of results	Amendments and supplements to laws have been adopted.
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.1.3.1

The Ministry of Justice has reported that, on 23 September 2021, the National Assembly adopted the Law on Amendments and Supplements to the Law on Prevention of Corruption, with the aim of further compliance with the recommendations of the Council of Europe’s Group of States against Corruption (GRECO).

Further compliance with the GRECO recommendations is one of the recommendations contained in the “Analysis of the Compliance of the Anti-Corruption Legislation with EU acquis and International Standards”,¹⁷ which is why the Agency assessed the activity as implemented. However, since this is not the only recommendation contained in the above Analysis, the Agency continued to monitor the implementation of this activity in this reporting cycle as well. The Analysis recommends further compliance with the GRECO recommendations from the Fourth Evaluation Round,

¹⁷ See: <https://www.mpravde.gov.rs/files/ANALIZA%20KOMPATIBILNOSTI%20ANTI-KORUPCIJSKOG%20ZAKONODAVSTVA%20SA%20PRAVNIM%20TEKOV....docx>

especially referring to recommendations no. 2, 3, 6, 9, 12 and 13. In the second interim report on the compliance of the Republic of Serbia in the Fourth Round of the GRECO evaluation, which was adopted at the GRECO plenary session in March 2022, it was stated that recommendations no. 2, 3, 6, 12 and 13 were implemented, while recommendation no. 9 was implemented only in part.¹⁸

For this reason, the Agency assessed this activity as implemented.

4.2 Prevention of Corruption

In this report, within the Section 2.2 of the Revised Action Plan for Chapter 23 - subchapter ‘Fight against Corruption’, which refers to the prevention of corruption, the Agency assessed the implementation of activities related to the following benchmarks:

2.2.1 Benchmark: Serbia has adopted a new Law on the Anti-Corruption Agency, providing said Agency with clear and strong competencies. Serbia has ensured that the Anti-Corruption Agency can continue to enjoy the necessary independence, the receipt of adequate financial and human resources, training, as well as very good embedment with other relevant bodies (including access to their databases). Serbia has ensured that all bodies that fail to submit their reports and refuse to cooperate with the Anti-Corruption Agency are held accountable for such behaviour.

Benchmark: Serbia has provided initial records of effective implementation of the asset declaration and verification system, including dissuasive sanctions in cases of non-compliance, as well as appropriate monitoring of measures (including criminal investigations where necessary) in cases where reported assets do not correspond to reality.

The activities in question are Activities no. 2.2.1.1, 2.2.1.3, 2.2.1.4, 2.2.1.5, 2.2.1.6, 2.2.1.8 and 2.2.1.9, which are individually shown below.

¹⁸ See: <https://rm.coe.int/fourth-evaluation-round-corruption-prevention-in-respect-of-members-of/1680a5ff19>

Activity 2.2.1.1

Monitor the implementation of the new Law on Prevention of Corruption and the actions of all state authorities under the new Law on Prevention of Corruption.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with relevant institutions
Deadline	Continuous, once per year
Indicators of results	<p>The annual report on the work of the Anti-Corruption Agency contains the following elements:</p> <ol style="list-style-type: none"> 1) Number of obligations fulfilled by public officials in accordance with the Law on Prevention of Corruption; 2) Number of measures issued by the Agency respected by public officials; 3) Percentage of institutions that have fulfilled the obligation to adopt an integrity plan and a local anti-corruption plan; 4) Percentage of measures in the integrity plan and local anti-corruption plan implemented by relevant institutions; 5) Number of institutions that adhere to the obligation to conduct training in ethics and integrity based on the curriculum of the Agency; 6) Qualitative analyses, comparisons with previous years, comparison of results with the number of reported cases and controlled subjects. <p>The National Assembly has adopted conclusions on the implementation of the new Law on Prevention of Corruption.</p> <p>The Government and other state authorities are acting in accordance with the conclusions of the National Assembly.</p> <p>The European Commission's Report on the progress of the Republic of Serbia.</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.1.1

The Agency has submitted final data on monitoring the implementation of the Law on Prevention of Corruption for 2022. However, as it submits the Annual Work Report for 2022 to the National Assembly at the same time as it does the Third Implementation Report, and these will be publicly available at the same time, only data that speak in favour of meeting the result indicators are presented here.

Since the implementation of the Law on Prevention of Corruption began on 1 September 2020, in the Sacond Implementation Report the Agency was unable to compare the results with the previous ones (result indicator no. 6), given the methodological unsustainability of such a comparison and the fact that it would mean that 12 months of implementation in 2021 would be compared to four months of implementation in 2020. However, it is now possible to compare the year 2022 with the year 2021, and the comparison will be presented below.

Following other result indicators, the Agency reported that the number of reports submitted on assets and revenues of public officials in 2022 was 5,218 (compared to 4,669 in 2021); that the number of public authorities that notified the Agency of the commencement/termination of public office was 2,057 (compared to 2,151 in 2021), and that 8 legal entities (compared to 8 in 2021) notified the Agency of their participation in public procurement, privatisation or other procedures that involve concluding a contract with a public authority as their outcome. In the area of assets reporting, 246 reprimand measures were issued for failure to submit a report within the legally prescribed time period after the commencement or termination of public office, as well as 10 measures involving the announcement of a decision on the violation of the Law¹⁹ (compared to 152 in 2021).

In the area of asset verification, 111 procedures were initiated to decide whether there were violations of the Law on Prevention of Corruption (compared to 82 in 2021), 119 warning measures were issued (compared to 67 in 2021), one decision on the violation of the Law on Prevention of Corruption was published, and 22 requests for misdemeanour proceedings were submitted (compared to 18 in 2021). Five criminal reports were submitted to the competent prosecutor's offices, while 22 requests for misdemeanour proceedings were submitted (compared to 6 in 2021) due to suspicion that a criminal offence under Article 101 of the Law on Prevention of Corruption was committed, i.e. another criminal offence that is prosecuted ex officio. Also, five reports (compared to 8 in 2021) were submitted to other authorities due to a suspicion of violation of regulations that fall within the competence of said authorities.

Data on conflicts of interest are presented in Activity 2.2.3.4.

The agency further reported that, in 2022, 2,936 out of 2,969 institutions that were obliged to prepare an integrity plan did fulfil this statutory obligation (99%). The deadline for implementing the measures from the integrity plans is 30 September 2024, while the deadline for submitting the report on the implementation of the integrity plans is 31 October 2024.

Data on local anti-corruption plans are presented in Activity 2.2.10.31.

The number of public authorities whose employees and managers attended ethics and integrity trainings in 2022 was 2,105 (compared to 686 in 2021).

Since the Agency has submitted all the data on the application of the Law on Prevention of Corruption, which, according to result indicators, were objectively possible to submit, and since, from the submitted report, it is evident that the application of the new Law on the Prevention of Corruption is being monitored, in this reporting period the Agency assessed the activity as implemented.

¹⁹ There were none in this area in 2021, which is why no comparison is presented.

Activity 2.2.1.3

Continuous specialised training of employees in the Anti-Corruption Agency on the implementation of the new Law on Prevention of Corruption and the Law on Lobbying.	
In charge of activity	• Anti-Corruption Agency
Deadline	Continuous, starting with the adoption of the new Law on Prevention of Corruption and the Law on Lobbying
Indicators of results	Trainings have been conducted. Out of the total number of employees in the Agency, at least two thirds attended trainings on the implementation of the new Law on Prevention of Corruption, i.e. the Law on Lobbying, in the first year of implementation.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.1.3

The Agency has reported that 12 employees have successfully completed the online training on ethics and integrity in 2022, including the Director and Deputy Director (along with 82 who have completed it in 2021).

With the support of the OSCE Mission in Serbia, 15 employees of the Agency attended a 2-day training on digital assets, while 22 attended a 2-day training on offshore jurisdictions.

The analysis of the system of verifying the assets and income of public officials was prepared with the support of the OSCE Mission in Serbia and an international expert, with an emphasis on the random selection of officials whose reports will be included in the annual verification plan. The findings and recommendations of the international expert were presented at several informational sessions held with representatives of the Asset Verification Sector and the Sector for Registers and Records.

With the support of the International Foundation for Electoral Systems, training on cyber hygiene was held for 25 employees of the Agency.

Six employees of the Agency attended the second regional workshop within the project of the UN Office on Drugs and Crime entitled “Fostering Sustainable Development by Supporting the Implementation of UNCAC in Countries along the Silk Road Economic Belt”. The workshop was organised by the UN Office on Drugs and Crime, with the support of the Serbian Ministry of Justice.

One employee of the Agency attended training on successful awareness raising campaigns in the field of fight against corruption within the project entitled “Improving Whistleblower Policies and Culture in the Western Balkans and Moldova”, implemented by the Secretariat of the Regional Anti-Corruption Initiative and financed by the European Union.

Four employees of the Agency attended a cycle of preparatory trainings for obtaining certificates of authorised fraud investigators and anti-money laundering specialists, organised by the US Bureau of International Narcotics and Law Enforcement, the US Department of Justice and the Judicial Academy. In 2022, two employees obtained certificates as authorised fraud investigators.

Within the project implemented by Transparency Serbia and Transparency Czech Republic, one employee of the Agency participated in a study visit to the Czech Republic in connection with the control of the financing of political activities.

Two employees of the Agency participated at the regional meeting of bodies charged with the implementation of the Law on Conflict of Interest, organised by Transparency Bosnia and Herzegovina as part of the USAID support to citizens in the fight against corruption. Representatives of competent institutions from Bosnia and Herzegovina, Croatia and Montenegro also participated at the regional meeting.

One employee of the Agency attended a workshop on the UN Convention against Corruption and the accompanying compliance review mechanism, which was held in Montenegro, organised by the UN Office on Drugs and Crime in cooperation with the Regional Anti-Corruption Initiative.

One employee of the Agency attended the training entitled “Public policy - Implementation Monitoring and Evaluation”, organised by the National Academy for Public Administration, while one employee attended the training entitled “Development and Improvement of Capacities for Drafting Public Policy Documents - Strategies, Programmes and Action Plans”, which was also organised by the National Academy for Public Administration.

Within the framework of the IPA 2019 Flexible Mechanism “Support for Strengthening the Rule of Law in the Republic of Serbia”, two training cycles were held for employees of the Agency in cooperation with the Special Investigation Service of Lithuania. Twelve employees of the Agency participated in the first cycle, which covered the mechanisms of preventing corruption, the assessment of the risk of corruption and the assessment of the risk of corruption in regulations. Nine employees of the Agency participated in the second cycle of training, which was also conducted by representatives of the Special Investigation Service of Lithuania and was related to awareness-raising, training and communication activities.

Four representatives of the Agency went on a two-day study visit to the State Audit Service of Georgia, together with representatives of the International Foundation for Electoral Systems (IFES) which supported the study visit. The visit was aimed at controlling the financing of political activities.

As at 31 December 2022, the Agency was employing 93 people permanently and two for a fixed period of time, which means that two thirds of the employees attended trainings related to the application of the Law on Prevention of Corruption. However, it needs to be said that certain trainings were attended by the same employees, depending on the topic and the organisational unit of the Agency to which the topic referred.

Due to one of the results indicators, in the First Implementation Report the Agency reported on the number of employees who attended trainings on the topic of the Law on Lobbying in the first year of implementation.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.1.4

Adapt the software for reporting on the National Anti-Corruption Strategy and the Action Plan for its implementation so that it meets the needs of monitoring the relevant measures of the Revised Action Plan for Chapter 23, and maintain said software on a regular basis.	
In charge of activity	• Anti-Corruption Agency
Deadline	Software customisation - Fourth quarter of 2020 Software maintenance - continuous
Indicators of results	Software has been customised to meet the needs of monitoring relevant measures from the Revised Action Plan for Chapter 23. The software is regularly maintained.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.1.4

The Agency has reported that the reporting software, i.e. the application was adjusted and put into operation in the third quarter of 2021, but that the Agency intensively worked on eliminating the application's shortcomings that were identified in 2022. The Agency simultaneously continued to collect data by e-mail and correspondence (on paper), in order to ensure unhindered supervision of the implementation of subsection 'Fight against Corruption' of the Revised Action Plan for Chapter 23 in the initial stages of testing. In the third quarter of 2022, the Agency eliminated identified deficiencies in the reporting application, which enabled reporting institutions to submit reports using the application. As it also provided funds for the maintenance of the application, and as the application was maintained in the year 2022, in this reporting period the activity was assessed as implemented.

Activity 2.2.1.5

Adjust the software for reporting on the Revised Action Plan for Chapter 23 to meet the needs for monitoring the Operational Plan for the Prevention of Corruption in Areas of Risk.	
In charge of activity	• Anti-Corruption Agency
Deadline	Third quarter of 2021
Indicators of results	Software was customised to meet the needs of monitoring the Operational Plan for the Prevention of Corruption in Areas of Risk.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.1.5

The Agency has reported that it has not adjusted the software because the Operational Plan for Preventing Corruption in Areas of Special Risk was to be in effect only until the end of 2022, and because spending funds would not be expedient taking into account the duration of the development and testing of the application. The Agency further reported that monitoring the implementation of the Operational Plan for Preventing Corruption in Areas of Special Risk was carried out smoothly, and that implementation reports were prepared on time regardless of the absence of the application.²⁰

Since the application was not developed, the activity was assessed as not implemented.

Activity 2.2.1.6

Technically improve the existing software application related to integrity plans. Maintain the software application regularly.	
In charge of activity	• Anti-Corruption Agency
Deadline	For software updating – fourth quarter of 2021 For software maintenance – continuous
Indicators of results	Software has been updated. Software is regularly maintained.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.1.6

The Agency has reported that the maintenance of the software application for integrity plans, which was upgraded in 2021, has continued in 2022, which is why the activity was assessed as implemented.

²⁰ In 2022, the Agency prepared two reports on monitoring the implementation of the Operational Plan for the Prevention of Corruption in Areas of Special Risk, which are available on the Agency's website at the following link: https://www.acas.rs/cyr/page_with_sidebar/nadzor_pracenje#

Activity 2.2.1.8

Multidisciplinary trainings and workshops with institutions that intensively cooperate with the Anti-Corruption Agency, including trainings for journalists.	
In charge of activity	• Anti-Corruption Agency
Deadline	Continuous
Indicators of results	<p>Trainings and workshops that contribute to the improvement of the level of knowledge necessary for the implementation of the new Law on Prevention of Corruption have been conducted.</p> <p>At least two trainings per year are organised with institutions with which the Agency cooperates intensively.</p> <p>At least one training per year is organised for journalists.</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.1.8

The Agency has reported that, in 2022, it organised a round table on the topic of “Cooperation between Misdemeanour Courts and the Agency for the Prevention of Corruption”, which was attended by representatives of the Misdemeanour Court in Belgrade, the Appellate Misdemeanour Court, and the Misdemeanour Courts in Kragujevac, Niš and Šabac. The discussion was focused on requests for initiation of misdemeanour proceedings, reporting on the status of the cases, and misdemeanour plea agreements.

It has further reported that - after the second (final) workshop on comparative practice in access to information from the financial and non-financial sectors and inter-institutional cooperation in efficient asset verification, at which Council of Europe experts from Slovenia and Romania presented recommendations in 2021 - in 2022, the experts prepared a final document with recommendations for improving the exchange of information in the area of asset verification. The activity was realised as part of the project entitled “Prevention of Money Laundering and Financing of Terrorism in Serbia”, supported by the Swedish Agency for International Development and Cooperation and implemented by the Council of Europe.

The activity of cooperation with banks began in 2022, within the same project. The expert analysis entitled “Exchange of Information between the Authorities Charged with the Prevention of Corruption and the Banks for the Purpose of Property Verification and Detection of Corruption” was prepared, and a round table was held on the exchange of data between the authorities in charge of the prevention of corruption and the banks, at which, in addition to five representatives of the Agency, representatives of the National Bank of Serbia, the Association of Banks of Serbia and the Commissioner for Information of Public Importance and Personal Data Protection participated as well.

After the adoption of the new Law on the Financing of Political Activities, the Agency organised training for political subjects, media and civil society organisations on the novelties brought about by the Law and the role of the Agency. It also organised an online training for journalists and representatives of civil society organisations on the control of the implementation of strategic

documents in the field of fight against corruption, with an emphasis on the Second Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption' for 2021. The third training for the media and civil society organisations referred to the gender dimension in the implementation of anti-corruption policies.

The Agency conducted six trainings for 146 managers under the title "Director as the Driver of Institutional Integrity Building". The training was attended by managers (directors/deputy directors, presidents /deputy presidents of courts, heads of organisational units, etc.) of institutions obliged to prepare an integrity plan from the areas of justice, local self-government, health care, social policy, education and finance, and the public enterprises from the territory of Belgrade and from Novi Now, Šabac, Čačak, Indjija and Smederevo. The objective of the training was to improve their understanding of the role they play in the development and implementation of integrity plans, and in the creation of an organisational culture in the institutions they lead.

In 2022, the Agency also held 22 online trainings on integrity plans for members of working groups and coordinators of institutions charged with the development of integrity plans from all 14 systems (political system, defence system, police, judiciary, health care, education, state administration and local self-government, economy, environment, social policy, culture and sport, public finance, public enterprises, data protection, human rights and public interest). The training was attended by 1,630 participants from 822 institutions.

The Agency also organised training for trainers in the field of ethics and integrity in Belgrade, for 14 participants employed in public enterprises and public utility companies from the territory of the City of Belgrade and the Republic of Serbia.

Two employees of the Agency attended a workshop organised as part of the Swedish and Serbian Police Cooperation Programme "Swedish Police Assistance Programme III (SPAP III) 2019-2022", which referred to the provision of support in preparation for the establishment of the National Criminal Intelligence System (NCIS) in the Republic Serbia. In addition to representatives of the Agency, representatives of the Ministry of Internal Affairs, the Republic Public Prosecutor's Office, the Prosecutor's Office for Organised Crime, the Tax Administration, the Customs Administration, the Administration for the Prevention of Money Laundering, the Office of the Council for National Security and the Protection of Confidential Data, the Ministry of Justice and the Criminal Police University also attended the workshop.

Together with representatives of the Republic Election Commission, representatives of the Agency participated at the round table on the elections in Serbia, which was organised by the Council of Europe and the Venice Commission. They also participated in the discussion entitled "Election Disputes in Serbia: What now?", dedicated to the resolution of election disputes in Serbia and the adoption and implementation of a set of new election laws, organised by the Centre for Free Elections and Democracy.

The representative of the Agency also participated in the workshop entitled "Analysis of the Results of the Research on Problems in Detecting and Proving Criminal Acts of Corruption and the Preparation of the Handbook on Detecting and Proving Criminal Acts of Corruption", organised by the

Criminal Police University, the Criminal Police Directorate of the Ministry of Internal Affairs and the International Criminal Investigative Training Assistance Programme of the Ministry of Justice (ICITAP). Representatives of the Criminal Police University, the Ministry of Internal Affairs, the Directorate for the Prevention of Money Laundering, the State Audit Institution and the Public Procurement Office also took part in the workshop.

Within the project “Effective Public Procurement in the Service of Economic Growth”, organised by the National Alliance for Local Economic Development (NALED) with the support of the Swedish Agency for International Cooperation and Development, a representative of the Agency participated in a study visit to France and Luxembourg. Within the same project, three employees of the Agency participated at the round table “Protection of Competition in Public Procurement”.

As part of the Project “Roadmap for the Fight against Corruption and Illegal Money Flows” implemented by UNODC, two representatives of the Agency participated in regional meetings that were held in Dubrovnik (online), Vienna and Ljubljana, as well as at the regional conference in Skopje.

In 2022, the Agency held four online trainings for public officials at the local and provincial levels on the topic of conflicts of interest, asset reporting and verification and lobbying, which included the segment on protecting the financial interests of the European Union, in accordance with the Strategic Plan for fight against fraud and management of irregularities in the handling of financial resources of the European Union in the Republic of Serbia for the period 2021-2023.²¹ At the trainings, the Guide for officials²² and the Handbook for recognising and managing conflict of interest situations and incompatibility of functions,²³ both prepared by the Agency, were presented to public officials.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.1.9²⁴

Hold workshops with the relevant parliamentary committee in order to meet the Agency’s recommendations, including training on ethics and integrity for MPs.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • Relevant Assembly committees
Deadline	Continuous
Indicators of results	Workshops were held to contribute to improving the level of knowledge necessary for the implementation of the new Law on Prevention of Corruption. At least two workshops per year are organised with MPs, i.e. members of relevant committees of the National Assembly.
Agency’s assessment	The activity was not implemented

21 “Official Gazette of the RS”, no/ 99/21

22 See: [https://www.acas.rs/storage/page_files/Vodi%C4%8D%20za%20javne%20funkcionere%20\(2021\).pdf](https://www.acas.rs/storage/page_files/Vodi%C4%8D%20za%20javne%20funkcionere%20(2021).pdf)

23 See: [https://www.acas.rs/storage/page_files/Priru%C4%8Dnik%20o%20sukobu%20interesa%20oktobar%20\(2021\).pdf](https://www.acas.rs/storage/page_files/Priru%C4%8Dnik%20o%20sukobu%20interesa%20oktobar%20(2021).pdf)

24 Although in the Second Implementation Report the Agency assessed Activity 2.2.1.9 as two activities because they were thematically different, this time it assessed it as one, because both segments of of the activity were evaluated as not implemented in 2022.

On the implementation of Activity 2.2.1.9

The Agency has reported that, at the session held on 16 December 2022, the National Assembly's Committee for Finances, the Republic Budget and Control of Spending of Public Funds adopted the Draft Conclusion on the Report on the Agency's Work for 2021. At the session held on 26 December 2022, the National Assembly's Committee for Justice, State Administration and Local Self-Government adopted the Draft Conclusion on the Report on the Work of the Agency for 2021 and the Report on the Implementation of Activities from the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'. Since the Report on the Work of the Agency for 2021 was not discussed at the plenum in 2022, and was discussed at the competent committees of the National Assembly in December 2022, no workshops were held with the aim of following up on the Agency's recommendations.

As regards training on ethics and integrity, Article 26 of the Code of Conduct for Members of the National Assembly²⁵ stipulates that the Ethics Commission and the Agency are charged with its implementation. The Agency did not organise any trainings with the Ethics Commission in 2022.

The Agency further reported that, upon the constitution of the National Assembly, it dispatched 300 printed copies of the Guide for public officials and the Handbook for recognising and managing conflicts of interest situations and incompatibility of functions, as well as an extract from the provisions of the Law on Prevention of Corruption referring to MPs, with the aim of strengthening their awareness of the obligations that stem from this Law.

Since neither the workshops with competent parliamentary committees nor the trainings on ethics and integrity for MPs were held in 2022, in this reporting period the activity was assessed as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.2.2. Serbia has amended the Law on Financing Political Activities and is working on strengthening the independence and administrative capacity of relevant oversight bodies, in particular the State Audit Institution and the Republic Election Commission. Serbia is providing initial records of adequate application of the Law, including deterrence measures where necessary.

The activities in question are Activities 2.2.2.1, 2.2.2.2, 2.2.2.3, 2.2.2.4, 2.2.2.5, 2.2.2.6, 2.2.2.7 and 2.2.2.8, which are individually presented below.

²⁵ "Official Gazette of the RS" no. 156/20 and 93/21

Activity 2.2.2.1

<p>Amend the Law on Financing Political Activities so as to clearly define and delineate the obligations of the Agency, SAI and other bodies in the process of control of political activities and entities, and precisely define obligations and mechanisms for transparency of financing of political entities in accordance with a qualitative analysis of the implementation of the Law on Financing Political Activities.</p> <p>Ensure that amendments to the Law include strengthening the capacity of the Anti-Corruption Agency by providing it with all necessary information on financial flows.</p>	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Finance • Anti-Corruption Agency • Government of the Republic of Serbia • National Assembly of the Republic of Serbia • With the participation of civil society organisations
Deadline	Fourth quarter of 2020
Indicators of results	The Law on Amendments and Supplements to the Law on Financing Political Activities has been adopted.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.2.1

The Ministry of Finance has reported that, as the entity responsible for the fulfilment of the aforementioned measures, it implemented all the activities that led to the adoption of the Law on the Financing of Political Activities by the National Assembly of the Republic of Serbia on 4 February 2022. The Law was published in the “Official Gazette of the Republic of Serbia” on 7 February 2022 and entered into force on 8 February of the same year. The Ministry further reported that the adoption of this Law is an indicator of the results of implemented activities.

Other available sources were also taken into account while evaluating this activity, such as the previous annual reports on the work of the Agency in the domain of analysis and shortcomings identified in the then current Law on the Financing of Political Activities.

As the above stated requirements are reflected in the new Law on the Financing of Political Activities, the Agency assessed this activity as implemented.

Activity 2.2.2.2

Prescribe that the audit programme must include the audit of parliamentary political parties at the national level and introduce the obligation of the Director of the Tax Administration to include providers of funds and other services to political entities in the annual or extraordinary plan of tax control in accordance with the Agency's report on financing political activities and entities.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Finance (State Secretary) • Government of the Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	Fourth quarter of 2020
Indicators of results	The Law on Amendments and Supplements to the Law on Financing Political Activities has been adopted.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.2.2

The Ministry of Finance has reported that, as the entity responsible for the fulfilment of the aforementioned measures, it implemented all the activities that led to the adoption of the Law on the Financing of Political Activities in the National Assembly of the Republic of Serbia on 4 February 2022. The Law was published in the "Official Gazette of the Republic of Serbia" on 7 February 2022 and entered into force on 8 February 2022. The Ministry further reported that the adoption of this Law is an indicator of the results of implemented activities.

As the above stated requirements are reflected in the new Law on the Financing of Political Activities, the Agency assessed this activity as implemented.

Activity 2.2.2.3

Monitor the implementation of the Law on Financing Political Activities, including the application of dissuasive measures.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • Misdemeanour courts • Republic Public Prosecutor's Office
Deadline	Continuous
Indicators of results	<p>Reports of the Anti-Corruption Agency on the financing of political activities and the election campaign.</p> <ol style="list-style-type: none"> 1) At least 50% of political entities have submitted annual financial reports; 2) At least 70% of political entities have submitted the costs of the election campaign; 3) The number of initiated misdemeanour proceedings, the number and degree of sanctions imposed by the misdemeanor courts. <p>Annual reports of the Republic Public Prosecutor's Office on criminal proceedings arising from the application of Article 38 of the Law on Financing Political Activities, including the number and degree of sanctions applied..</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.2.3

The Agency has reported that parliamentary elections, elections for the President of the Republic of Serbia and elections for councilors in the assemblies of the cities of Belgrade and Bor, the assemblies of the municipalities of Arandjelovac, Smederevska Palanka, Lucani, Medveđa, Knjaževac, Bajina Bašta, Doljevac, Kula, Kladovo, Majdanpek and Sečanj, and the Assembly of the City Municipality of Sevojno, were held in 2022.

During the election campaign, the Agency organised and conducted monitoring of the election activities of political entities that participated in said elections. The procedure of selecting and training the observers of the election campaign was carried out in several cities, for the purposes of data collection in the field in order to monitor the control of the financing of election campaign expenses. In the end, 124 field observers were engaged. Ten central coordinators from the Agency were engaged to monitor and control the work of observers in the field.

103 preliminary reports on election campaign expenses were submitted.

111 final reports on election campaign expenses were submitted.

218 annual reports on the financing of political entities were submitted.

Substantial control of 22 submitted annual reports on the financing of political subjects and 100 final reports on election campaign expenses was carried out.

Due to the violation of the Law on the Financing of Political Activities, the Agency conducted proceedings against political subjects both ex officio and based on submitted reports.

168 requests for the initiation of misdemeanour proceedings were submitted.

31 decisions were made establishing a violation of the Law on the Financing of Political Activities, with 28 issued warning measures (of which 11 were related to the election campaign).

Four decisions were made to suspend proceedings that were initiated ex officio.

Nine decisions establishing violations of the Law were made during the election campaign regarding submitted reports.

41 decisions involved the loss of the right to receive funds from public sources.

A report was submitted to the competent prosecutor's office due to the suspicion of the existence of a criminal offence.

According to the results indicators, 62% of political entities submitted annual financial reports, and 88% submitted reports on election campaign expenses.

A total of 113 second-instance judgments were handed down, of which 46 were at the legal minimum, 45 below the legal minimum, one above the legal minimum, 19 warnings and two acquittals.²⁶

The Republic Public Prosecutor's Office reported that it is monitoring the actions of public prosecutor's offices in cases that were opened based on criminal reports related to violations of the provisions of the Law on the Financing of Political Activities and informing the Agency for the Prevention of Corruption thereof. Six-monthly reports on the actions of public prosecutors' offices in cases from this area are drawn up in January and July. The Republic Public Prosecutor's Office further reported that on 18 July 2022 the Agency for the Prevention of Corruption received a report on the actions of public prosecutors' offices based on criminal reports / Agency reports regarding violations of the provisions of the Law on Financing Political Activities.

Considering all the above, in this reporting period the activity was assessed as implemented.

²⁶ Second-instance judgments were issued based on requests for the initiation of misdemeanour proceedings submitted in previous years.

Activity 2.2.2.4

Draft bylaws that would regulate the criteria and deadlines for the control of reports of political entities by introducing a plan of priority control of reports that will enable prioritisation of reports control.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2021
Indicators of results	Bylaws have been adopted.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.2.4

The Agency reported that on 4 February 2022, upon the adoption of the new Law on the Financing of Political Activities, it drafted and adopted the following acts:

1. Rulebook on the records and reports of political subjects,²⁷
2. Plan to control reports on election campaign expenses related to elections for MPs and local elections,²⁸
3. Plan to control the report on the expenses of the election campaign for the elections for the President of the Republic of Serbia,²⁹ and
4. Plan to control the annual reports on the financing of political subjects for 2021.³⁰

Therefore, the Agency assessed the activity as implemented.

Activity 2.2.2.5

Build the capacity of all entities responsible for the implementation of the Law on Financing Political Activities, the Republic Election Commission, train judges of misdemeanour courts.	
In charge of activity	• Anti-Corruption Agency • Judicial Academy • Republic Election Commission (REC)
Deadline	Continuous, starting from the first quarter of 2021
Indicators of results	Capacities of all entities responsible for the implementation of the Law on Financing Political Activities and REC have been built, misdemeanour court judges have been trained. Number of held trainings, compared to the number of planned trainings on the Law on Financing Political Activities.
Agency's assessment	The activity was implemented

27 "Official Gazette of the RS" no. 23/22

28 See: https://www.acas.rs/storage/page_files/Plan%20kontrolne%20izveštaja%20o%20troškovima%20izborne%20kampanje_1.pdf

29 See: https://www.acas.rs/storage/page_files/Plan%20kontrolne%20izve%C5%A1taja%20o%20tro%C5%A1kovima%20izborne%20kampanje%20za%20izborne%20za%20predsednika%20Republike_1.pdf

30 See: https://www.acas.rs/storage/page_files/Plan%20kontrolne%20GIF%20za%202021%20godinu.pdf

On the implementation of Activity 2.2.2.5

The Agency has reported that in 2022, after the adoption of the new Law on the Financing of Political Activities, it held three trainings for political entities on the application of this Law (one attended in person and two online). In addition to political subjects, the first training included the media and civil society organisations.

Therefore, in this reporting period, the Agency assessed the activity as implemented.

Activity 2.2.2.6

Build the technical capacity of the Anti-Corruption Agency to monitor the financing of political activities, software for online reporting, better accessibility of published data.	
In charge of activity	• Anti-Corruption Agency
Deadline	Continuous, starting from the fourth quarter of 2020
Indicators of results	The technical capacities that enable efficient control of monitoring the financing of political activities have been built.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.2.6

The Agency has reported that, following the adoption of the Law on Referendum and People's Initiative³¹ and the Law on the Financing of Political Activities, it adjusted the existing software applications to new requirements and created new forms for political entities, including the forms for their preliminary reports. In addition, following the support of the OSCE Mission and the Council of Europe regarding the i2 IBM analytical tool and accompanying trainings in 2021, the Agency - using funds from the 2022 budget - secured a new annual license for this tool, which was used to fund the control of political activities throughout 2022.

As the technical capacities for controlling the financing of political activities were improved, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.2.7

Introduce online training modules related to the implementation of the Law on Financing Political Activities.	
In charge of activity	• Anti-Corruption Agency
Deadline	Continuous, starting from the second quarter of 2021
Indicators of results	Online training modules have been introduced.
Agency's assessment	The activity was not implemented

31 "Official Gazette of the RS" no. 111/21 and 119/21

On the implementation of Activity 2.2.2.7

The Agency has reported that, immediately after the completion of the Handbook for the application of the Law on the Financing of Political Activities,³² it started to develop the online training which was to be based on the content of the Handbook, with the support of the International Foundation for Electoral Systems (IFES). However, since the development of the online training was not completed in 2022, the activity was assessed as not implemented.

Activity 2.2.2.8

Develop a handbook for the implementation of the Law on Financing Political Activities.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2021
Indicators of results	The handbook has been developed.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.2.8

The Agency has reported that the Handbook was prepared with the support of the International Foundation for Electoral Systems (IFES), and that it was published on the Agency's website.³³

Having in mind the above, the activity was evaluated as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.2.3. Serbia provides initial records showing an increase in the number of observed and resolved cases of conflict of interest, including deterrence sanctions. Serbia is conducting trainings and raising awareness so as to ensure a better understanding of the concept at all levels.

The activities in question are Activities no. 2.2.3.3; 2.2.3.4 and 2.2.3.5, which are individually presented below.

³² See Activity 2.2.2.8

³³ See: [https://www.acas.rs/storage/page_files/Prirodni%20zakona%20o%20finansiranju%20politiki%20aktivnosti%20\(2022\).pdf](https://www.acas.rs/storage/page_files/Prirodni%20zakona%20o%20finansiranju%20politiki%20aktivnosti%20(2022).pdf)

Activity 2.2.3.3

Conduct professional training of public administration employees on issues of conflict of interest prevention.	
In charge of activity	• National Academy of Public Administration
Deadline	Continuous
Indicators of results	Professional training of public administration employees on issues of conflict of interest prevention has been conducted. Number of trainings held on the topic of prevention of conflicts of interest, in relation to the number of planned trainings.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.3.3

The National Academy of Public Administration has reported that it is preparing and implementing the General Training Programme for Civil Servants, the General Training Programme for Employees in Local Self-Government Units, the Training Programme for Heads of State Authorities and the Training Programme for Heads of Local Self-Government Units, which are all to be adopted by the Government of the Republic of Serbia.

The introductory training programmes for 2022, for employees in both state administration and local self-government, and both for those with secondary and higher education, envisages trainings on ‘Constitutional Order’ and ‘Constitutional Order and Foundations of the State Administration System’, the aim of which is to prepare employees for the state professional examination, in accordance with the Decree on the Programme and Manner of Taking the State Professional Examination.³⁴ Topics related to the prevention of conflicts of interest are part of this training.

The training programme “Prevention of conflicts of interest, verification of property and income of public officials, and registers and lobbying in the Republic of Serbia” was developed as part of the General Training Programme for Civil Servants for 2022 - thematic area “Prevention of Corruption”. In addition, the online training “Inspection Control” was developed within the thematic area “Inspection Control”, which includes the thematic unit “The Integrity of Inspectors: Conflict of Interest”.

The training entitled “Resolving Ethical Dilemmas”, which deals with the topic of conflicts of interest as well, was developed within the Training Programme for Managers in State Bodies for 2022, as part of the Training Programme for Appointed Civil Servants.

The training “Ethics and integrity of public officials in local self-government units”, as well as the training “Improvement of ethical behaviour and management of conflict of interest” for managers in internal organisational units of the city (municipal) administration, were developed as part of the Training Programme for Managers in Local Self-Government Units for 2022, within the thematic

³⁴ “Official Gazette of the RS” no. 16/09, 84/14, 81/16, 76/17 and 60/18

unit “Key Aspects of Management in Local Self-Government for Public Officials and Appointed Civil Servants in LGUs”.

Since the beginning of 2022, 37 participants have completed the online training on “Inspection Control”, 55 participants have completed the training on “Constitutional Order”, and 72 have completed the training on the “State Administration System” (data is processed on an annual basis). Since they were placed on the platform, a total of 142 participants completed the “Inspection Control” training, while 179 completed the one entitled “Constitutional Order”.

The training on the topic of “Prevention of conflicts of interest, verification of assets and income of officials, registers and lobbying in the Republic of Serbia” was held twice, in the form of a webinar attended by a total of 35 participants.

There was one training on the topic of “Resolving Ethical Dilemmas”, and it was attended by 10 participants.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.3.4

Regularly monitor cases of conflict of interest, including the number and degree of sanctions applied.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • Republic Public Prosecutor’s Office • Misdemeanour courts
Deadline	Continuous
Indicators of results	Conflict of interest cases are regularly monitored in the reports of the Anti-Corruption Agency.
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.2.3.4

The Agency has reported that a total of 803 requests were resolved through the application of the Law on Prevention of Corruption.

37 decisions were made rejecting the request of a public official to discharge another public office, i.e. to perform another job or activity (incompatibility of simultaneous discharge of a public office and performing another job was found in four of these procedures).

Based on the finality of the decisions (31), in 28 proceedings the public official stopped discharging public office, i.e. engaging in another job or activity, while in three proceedings the deadline for the submission of proof that the decision was complied with was not yet passed. Six decisions are not final, in four cases the delivery of the decision is in progress, the deadline for appeal has not passed, while in two cases the appeal process is ongoing.

Applying the Law on Prevention of Corruption, public officials were issued a total of 309 decisions establishing a violation of the Law on Prevention of Corruption. They were issued 279 measures and 30 decisions establishing the termination of another public office by force of law (Article 56, paragraph 8 of the Law on Prevention corruption).

Among the total of 279 measures, the following were imposed:

- 222 reprimands,
- 45 measures of public announcement of the decision on violation of the law; and
- 12 measures of public announcement of the recommendation for dismissal from public office.

Of the imposed reprimands, 22 included an order issued to a public official, in 16 cases the public officials complied with the measure, one procedure is still pending, while in one the delivery of the decision to the public official is still in progress.

In four procedures, the public official did not comply with the given order, which is why he was imposed the measure of public announcement of the decision on violation of the Law.

The six decisions that imposed the measure of public announcement of the recommendation for dismissal from public office are not yet final because in two of the proceedings the delivery of the decision is still in progress, while in four the appeal procedure is under way. In one procedure, the deadline set for acting on the initiative of the Agency has not yet passed.

Based on the finality of seven decisions that imposed the measure of public announcement of the recommendation for dismissal from public office (four such decisions were issued in 2021 and three in 2022), initiatives, i.e. requests for action in line with the decision were submitted to the competent authority. Of these, public officials were dismissed in three procedures, in one procedure the public office ceased before the initiative was submitted, while in three procedures the public officials were not dismissed. In two procedures, the initiative was not submitted because public officials ceased to hold public office.

When it comes to decisions ordering the termination of another public office, there have been 28 such final decisions. Out of these, 26 were complied with, while in two cases a letter was sent to inform the recipient that he should act in line with the decision, and the timeframe allowed for acting is still in progress.

In two procedures, the delivery of the decision is in progress, so the decision is not yet final.

The Agency further reported that, in 2022, it also held four online trainings³⁵ for public officials at the local and provincial level on the topics of conflicts of interest, declaration and verification of assets and lobbying, which included the segment of protecting the financial interests of the European Union in accordance with the Strategic plan for combating fraud and managing irregularities in

³⁵ Trainings conducted on 14 October, 7 November, and 2 and 28 December 2022

the handling of European Union funds in the Republic of Serbia for the period 2021-2023.³⁶ The Guide for Public Officials³⁷ and the Handbook for Recognising and Managing Conflicts of Interest and Incompatibility of Functions,³⁸ prepared by the Agency, were presented to public officials at the trainings.

As cases of conflict of interest are being monitored and the Agency has submitted final data thereon, in this reporting period this activity was assessed as implemented

Activity 2.2.3.5

Monitor cases of conflict of interest through the application of the Code of Conduct for Civil Servants, in terms of the number of identified and resolved cases of conflict of interest, including disciplinary measures.	
In charge of activity	• High Civil Service Council
Deadline	Continuous, once per year
Indicators of results	The annual report of the High Civil Service Council contains data on the number of identified and resolved cases of conflict of interest, including disciplinary measures.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.3.5

The High Civil Service Council has reported that, at the 112th session held on 10 March 2022, it had formed a Working Group with the aim of preparing - based on the report of the state administration bodies, with data and information necessary for monitoring the Code of Conduct for Civil Servants – a draft report on compliance with the Code of Conduct for Civil Servants in 2021, with proposed measures to improve compliance with said Code.

At its 113th session held on 30 March 2022, the High Civil Service Council adopted the Report on Compliance with the Code of Conduct for Civil Servants for 2021, with measures proposed to improve compliance with the Code.

The report on compliance with the Code of Conduct for Civil Servants for 2021 was submitted to the Ministry of State Administration and Local Self-Government and published on the website of the Human Resources Management Service.³⁹

The Human Resources Management Service reported that, at its 5th session held on 16 December 2022, the High Civil Service Council adopted the final document - the Analysis of the content of the Code of Conduct for Civil Servants and procedures for data collection and reporting - which was

³⁶ "Official Gazette of the RS" no. 99/21

³⁷ See: [https://www.acas.rs/storage/page_files/Vodi%C4%8D%20za%20javne%20funkcionere%20\(2021\).pdf](https://www.acas.rs/storage/page_files/Vodi%C4%8D%20za%20javne%20funkcionere%20(2021).pdf)

³⁸ See: [https://www.acas.rs/storage/page_files/Priru%C4%8Dnik%20o%20sukobu%20interesa%20oktobar%20\(2021\).pdf](https://www.acas.rs/storage/page_files/Priru%C4%8Dnik%20o%20sukobu%20interesa%20oktobar%20(2021).pdf)

³⁹ See: <https://www.suk.gov.rs/tekst/609/izvestaj-o-postovanju-kodeksa-ponasanja-drzavnih-sluzbenika-za-2021-godinu.php>

then submitted to the Ministry of State Administration and local governments. The above activity was carried out in accordance with the Action Plan 2021-2025 for the implementation of the Public Administration Reform Strategy in the Republic of Serbia 2021-2030 - Special objective 6: Improved level of accountability and transparency at all levels of government, Measure 6.3: Strengthening integrity and ethical standards in public administration, Activity 3: Development of content analysis of the Code of Conduct for Civil Servants and procedures for data collection and reporting, aimed at improving ethical standards and mechanisms for monitoring the implementation of the rules of ethical conduct of civil servants.

The Service further reported that, in 2022, in connection with the monitoring of conflicts of interest through the implementation of the Code of Conduct for Civil Servants, four complaints against civil servants and employees in public institutions were submitted to the High Civil Service Council and subsequently forwarded to the competent authorities.

This activity is directly related to Activity 2.2.6.3, that is, it is the same report that appears as the result indicator in Activities 2.2.3.5 and 2.2.6.3, considering that the High Civil Service Council does not resolve cases of conflict of interest, but rather monitors the implementation of the Code of Conduct for Civil Servants, collecting data from the state administration authorities that are directly taking care of the implementation of this act, including cases of conflict interest.

The Agency is convinced that this is the regular annual practice of the High Civil Service Council, as supported by the report that was prepared for the year 2021 and the fact that the reports for the previous year are prepared in the current one; for this reason, in this reporting period the activity was assessed as implemented .

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities that are related to the following recommendation from the Screening Report:

2.2.4. Consider what would be an adequate statutory and institutional solution for effectively addressing the issue of illicit enrichment.

The activity in question is Activity no. 2.2.4.1, which is presented below.

Activity 2.2.4.1

Monitor the implementation of the Criminal Code and the Law on Organisation and Competences of State Authorities in Combating Organised Crime and Corruption; the Ministry of Justice - along with the obligation of courts and prosecutor's offices of general and special jurisdiction to submit reports on the number of initiated and completed procedures - also compiles a single report, composed of the reports of all the above-mentioned authorities and publishes it on its website (link to Activity 2.3.1.3).	
In charge of activity	• Ministry of Justice (State Secretary for corruption issues)
Deadline	Continuous, once per year
Indicators of results	A report was prepared and published on the website of the Ministry of Justice. Annual report of the Anti-Corruption Agency.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.4.1

The Ministry of Justice has submitted information that the report for 2021 was prepared in June 2022 and published on the website of the Ministry of Justice.⁴⁰

Although the result indicator also mentions the Agency, the Agency did not submit any information as it is not competent to monitor the application of the above regulations.

The Agency is convinced that this is a regular annual practice of the Ministry of Justice, as supported by the report that was prepared for 2021 and the fact that reports for the previous year are made in the following year. For this reason, in this reporting period the Agency assessed the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.2.5. Serbia has amended its Law on Free Access to Information of Public Importance, strengthening the administrative capacity of the Commissioner for Information of Public Importance and Personal Data Protection, providing training on handling requests for access to information and initial records of improved access to information, including tasks related to privatisation, activities of state-owned enterprises, public procurement procedures, public spending and donations to political parties from abroad.

The activities in question are Activities no. 2.2.5.3, 2.2.5.4 and 2.2.5.5, which are presented individually below.

⁴⁰ See: <https://www.mpravde.gov.rs/tekst/33769/statistika-koruptivnih-krivicnih-dela-.php>

Activity 2.2.5.3⁴¹

<p>Strengthen the staffing capacities of the Commissioner based on a previously conducted analysis of existing staffing capacities, especially in terms of:</p> <ul style="list-style-type: none"> - Organisational Structure; - Number of employees; - Level of training; <p>in accordance with the amended Rulebook on Internal Organisation and Classification of Job Positions.</p>	
In charge of activity	<ul style="list-style-type: none"> • Commissioner for information of public importance and personal data protection • National Assembly – Committee for Administrative Affairs
Deadline	Continuous, starting six months from the adoption of amendments to the law
Indicators of results	Amended Rulebook on Internal Organisation and Classification of Job Positions. Vacancies were filled in accordance with the amended Rulebook.
Agency's assessment	The activity was implemented in the part referring to the. Amendment of the Rulebook on Internal Organisation and Classification of Job Positions.
	The activity was not implemented in the part referring to the filling of vacancies.

On the implementation of Activity 2.2.5.3

The Commissioner for Information of Public Importance and Personal Data Protection has reported that the Rulebook on Internal Organisation and Classification of Job Positions was amended as a result of the amendments and supplements to the Law on Free Access to Information of Public Importance.⁴²

The Rulebook on Internal Organisation and Classification of Job Positions in the Office of the Commissioner for Information of Public Importance and Personal Data Protection from February 2022 envisages 156 executors and three advisers to the Commissioner. In March 2022, the Ministry of Finance approved the Commissioner's proposed staffing plan according to which the Commissioner would have a total of 134 employees in 2022.

In 2022, there were no competitions because everyone was waiting for the constitution of the National Assembly after the election and the appointment of the competent Committee for Administrative-Budgetary and Mandate-Immunity Issues, to which the Commissioner submitted a letter requesting the employment of new persons in the Commissioner's Office in accordance with the provisions of Article 27k, paragraph 9, in connection with paragraph 1 of the Budget System Law, in order to announce a public competition for hiring new people. The competitions were not announced in 2022 due to the above explained circumstances. In 2022, three persons were consensually transferred from other state bodies. Also, five people left the Commissioner's Office (one retired). At the end of 2022, the Commissioner's Office had 105 employees, not counting the Commissioner and Deputy Commissioner as appointed officials.

⁴¹ The Agency assessed and counted Activity 2.2.5.3 as two activities because it included two sub-activities.

⁴² The Law on Amendments and Supplements to the Law on Free Access to Information was adopted on 3 November 2021, published in the Official Gazette of the Republic of Serbia on 8 November 2021, entered into force on 16 November 2021, and is being applied since 17 February 2022.

Having in mind the above, the Agency assessed the activity as implemented in the part relating to amending the Rulebook on Internal Organisation and Classification of Job Positions. Since the positions envisaged in the new Rulebook on the Internal Organisation and Classification of Job Positions are yet to be filled, in this reporting period it assessed the part of the activity related to filling the envisaged positions as not implemented.

Activity 2.2.5.4

Monitoring the application of the Law on Free Access to Information of Public Importance	
In charge of activity	• Commissioner for Information of Public Importance and Personal Data Protection
Deadline	Continuous, starting from the moment of the coming into effect of the Law
Indicators of results	Description of the situation in the annual report on the work of the Commissioner for Information of Public Importance and Personal Data Protection
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.5.4

The Commissioner for Information of Public Importance and Personal Data Protection has submitted detailed information from the monthly reports for 2022 on the application of the Law on Free Access to Information of Public Importance.⁴³ The report on the work for the year 2021 was prepared in March 2022⁴⁴ (work reports for the previous year are prepared in the current year).

As the monthly reports of the Commissioner for Information of Public Importance and Personal Data Protection are publicly available, the Agency did not show them here, assessing the activity in this reporting period as implemented.

Activity 2.2.5.5

Conduct trainings for officials authorised to deal with requests for free access to information, in accordance with case law and international standards.	
In charge of activity	• National Academy of Public Administration • Commissioner for Information of Public Importance and Personal Data Protection
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained officers authorised to deal with requests for free access to information, in relation to the percentage of officials in need of training.
Agency's assessment	The activity was implemented

43 See: <https://tinyurl.com/yyczhry>

44 See: <https://www.poverenik.rs/images/stories/dokumentacija-nova/izvestajiPoverenika/2021/Izvešta2021CIRfinal.pdf>

On the implementation of Activity 2.2.5.5

The National Academy of Public Administration has reported that it has prepared and is implementing the General Training Programme for Civil Servants, the General Training Programme for Employees in Local Self-Government Units, the Training Programme for Managers in State Authorities and the Training Programme for Managers in Local Self-Government Units, all adopted by the Government of Serbia.

The training programme “Right to Access Information of Public Importance” was developed within the General Training Programme for Civil Servants for 2022 - thematic area “Prevention of Corruption”. Within the sectoral programme of continuous professional development of employees in local self-government units, which is part of the General Training Programme for employees in local self-government units for 2022, a training programme “Exercising the Right to Access Information of Public Importance” is envisaged within the thematic area “Good Governance”.

Two trainings on the topic “Right to Access Information of Public Importance” were organised in the form of a webinars, which were attended by 107 participants.

The National Academy for Public Administration further reported that, according to the submitted information, 7 trainings on the topic “Exercising the right to access information of public importance”, attended by 122 participants, were held in 2022 (implemented by the Permanent Conference of Cities and Municipalities).

The Commissioner for Information of Public Importance and Personal Data Protection reported that it had organised the following trainings in 2022:

- On 3 February 2022: Training for employees on novelties brought about by the Law on Free Access to Information of Public Importance;
- On 10 February 2022: Training for employees on novelties brought about by the Law on Free Access to Information of Public Importance;
- On 22 February 2022: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 49 interested persons, organised by the National Academy for Public Administration;
- On 5 May 2022, in Kragujevac: Training on novelties brought about by the Law on Free Access to Information of Public Importance, for 28 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;
- On 16 May 2022, in Novi Sad: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 21 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;
- On 30 May 2022, in Novo Gradište: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 11 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;
- On 2 June 2022: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 30 employees of the Directorate of Civil Aviation;
- On 13 June 2022, in Šabac: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 13 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;

- On 20 June 2022, in Vrnjačka Banja: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 15 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;
- On 27 June 2022, in Niš: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 18 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;
- On 8 July 2022, in Belgrade: Training on novelties brought about by the Law on Free Access to Information of Public Importance for 16 employees in local self-government units, in cooperation with the Permanent Conference of Cities and Municipalities;
- On 30 September 2022: Training for directors of preschool institutions (40 persons);
- On 26 October 2022, in Bujanovac: Professional training at the round table “Right to Access Information of Public Importance and the Personal Data Protection”, on the topic of rights and obligations stemming from the Law on Free Access to Information of Public Importance, for 25 representatives of local self-government units and the media, in cooperation with the Permanent Conference of Cities and Municipalities and the OSCE Mission in Serbia;
- On 2 November 2022, in Novi Pazar: Professional training at the round table “Right to Access Information of Public Importance and the Personal Data Protection”, on the topic of rights and obligations stemming from the Law on Free Access to Information of Public Importance, for 25 representatives of local self-government units and the media, in cooperation with the Permanent Conference of Cities and Municipalities and the OSCE Mission in Serbia;
- On 4 November 2022: Training for employees of the Public Communal Enterprise “Belgrade Water Supply and Sewerage”, in the field of free access to information of public importance, for 50 persons;
- On 8 November 2022, in Novi Sad: Training on the topic of rights and obligations stemming from the Law on Free Access to Information of Public Importance, at the request of interested persons authorised for processing requests, for 30 persons;
- On 8 November 2022: Online training on the application of the Law on Free Access to Information of Public Importance, for interested persons in the Provincial Administration, for 25 persons;
- On 9 November 2022, in Niš: A round table entitled “Right to Access Information of Public Importance and the Personal Data Protection”, on the topic of the Law on access to information of public importance, for 20 representatives of local self-government units and the media, in cooperation with the Permanent Conference of Cities and Municipalities and the OSCE Mission in Serbia;
- On 7 December 2022, in Valjevo: Two trainings – “Amendments and supplements to the Law on Free Access to Information of Public Importance” and “Publication of the Bulletin on the work of government bodies and submission of annual reports on actions under the Law on Free Access to Information from the Public significance”.

Having in mind the above, in this reporting period the Agency evaluated the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter ‘Fight against Corruption’, the Agency assessed the implementation of activities related to the following benchmark:

2.2.6. Serbia is employing and managing the careers of civil servants based on clear and transparent criteria, with an emphasis on performance evaluation and demonstrated skills. Serbia has developed and is implementing a mechanism for the efficient implementation of the Code of Conduct for Civil Servants. Serbia is providing initial records of sanctions applied in cases of violation of said Code. Serbia is ensuring the prevention of corruption through the introduction of an effective internal system of control and by increasing the accountability of managers in the public sector.

The activities in question are Activities no. 2.2.6.1, 2.2.6.2, 2.2.6.3, 2.2.6.4, 2.2.6.5, 2.2.6.6, 2.2.6.7 and 2.2.6.8, which are presented individually below.

Activity 2.2.6.1

Ensure the implementation of the new legal framework based on competencies in the processes of employment, performance evaluation, promotion and career development of civil servants.	
In charge of activity	<ul style="list-style-type: none"> • Human Resources Management Service • High Civil Service Council • Ministry in charge of state administration and local self-government
Deadline	Continuous
Indicators of results	Competitions, performance evaluation, promotion and career development of civil servants are based on the full application of the system of competencies (recorded in the relevant reports of the Human Resources Management Service).
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.6.1

The Human Resources Management Service has reported that, in the processes of selection in employment, performance evaluation, and support of civil servants' career development and promotion, it applies the updated legal framework based on competencies, which dates from the end of 2018 but was further formulated in 2019. They are actively applying regulations, providing advisory support in the application of regulations and the improvement of the process, and are monitoring their implementation in practice in state administration authorities and Government services.

In the period from 1 January to 31 December 2022, the Human Resources Management Service announced 1,107 competitions to fill a total of 1,466 vacant executors' positions. Out of 1,107 announced competitions, 73 were internal and 1.034 were public.

For the purpose of verifying behavioural competences in election procedures in state administration and other state bodies, psychologists have assessed 1,447 candidates.

Employees of the Department for the implementation of the staffing selection procedure have created a questionnaire for additional assessment of the motivation and value of candidates participating in the selection process. The questionnaire will be implemented in the first quarter of 2023.

At the end of the second quarter of 2022, they also prepared the annual Report on the quality of job filling in 2021, which was submitted to the Government of the Republic of Serbia for review.

Employees in the Staff Selection Department are still providing expert assistance and support in the assessment of competences to other state bodies that do not have psychologists as mandatory commission members (Tax Administration, Agency for the Prevention of Corruption, Customs Administration, courts). Due to the specific epidemiological situation, which continued in 2022, adapting to the circumstances and the needs of the authorities the employees of the Staff Selection Department intensified consultations (online, by telephone) and briefings. In addition, psychologists who participate in the selection procedure as members of the competition commissions encouraged holding initial meetings to acquaint the members of the competition commissions with the new procedures in the process of filling vacancies. As members of the competition commissions, psychologists are providing expert and technical support, both to the human resources units of the authorities and to the members of the commission.

In addition to educating members of competition commissions and employees in human resources units, the Human Resources Management Service is dedicated also to more intensive informing and attracting potential candidates. The Viber Group is used as a channel of communication, giving candidates the opportunity to get acquainted with the competencies, phases and techniques of selection, as well as with certain career development opportunities, and to ask individual questions and receive concrete answers. At the same time, the website of the Service is undergoing improvement. A 'Candidates' Corner' has been created to better inform the candidates, and they now have the opportunity to ask questions through the website, Facebook and LinkedIn pages, and via Viber group.

In the field of performance evaluation, the Human Resources Management Service has collected data on performance evaluation marks in state administration authorities and has prepared a summary Annual Report on the results of the performance evaluation for 2021, which was submitted to the Government of the Republic of Serbia for review. The Human Resources Management Service drafted two decrees: the Decree on the determination of competencies for the work of civil servants and the Decree on the determination of competencies for the work of officials in AP and LGU bodies, which entered into force at the end of January 2022. Also, together with representatives of the Ministry of State Administration and Local Self-Government, employees of the Service worked on drafting amendments and supplements to the Decree on the performance evaluation of civil servants, which entered into force at the beginning of 2022. For the purpose of supporting a more objective performance evaluation in state administration bodies, the Personnel Management Service has developed Guidelines for evaluating the performance of civil servants. The document is available on the website of the Internal Control Sector and on the HR network.

As regards the career development of civil servants and their promotion, as well as further modernisation in the field, the Career Management Centre of the Personnel Management Service applies the following: the analysis of individual potentials, the 360-degree assessment of development needs, career counseling, preparation of individual development plans, as well as coaching and development support through individual work or work in small groups. Civil servants apply for these services in person, or are referred to them by their superiors.

The following activities were implemented in 2022: 183 civil servants passed the assessment of individual potentials for development, for promotion purposes; 8 employees underwent the process of assessing general functional and behavioural competencies, so that they could be taken over through the internal labour market; 12 people applied for an online assessment of competencies for development purposes; 226 civil servants underwent career counseling; 13 coaching sessions were held; and 81 appointed persons passed the 360-degree feedback assessment for development purposes.

The Human Resources Management Service is continuing its efforts to improve the human resource management system in terms of employment, performance evaluation and career development of employees, both through proposals for improving the regulatory framework and by directly improving the practice.

The Ministry of State Administration and Local Self-Government reported that, on 14 February 2022, at the proposal of the Ministry of State Administration and Local Self-Government, the Government of the Republic of Serbia adopted the Decree on Amendments and Supplements to the Decree on Evaluating the Performance of Civil Servants,⁴⁵ which represents a further step in building a modern, efficient and professional public administration. With the aim of strengthening the professionalisation of persons in appointed positions/managers, the Decree, among other things, established indicators of performance in the fulfilment of annual goals for appointed persons in the process of performance evaluation. The work results are now evaluated based on clearly defined indicators of the fulfilment of each goal, which include the initial and target value as well as a source of verification for monitoring and fulfilling each annual goal. In addition, due to the need to strengthen the capacity of the staffing units, they are now obliged to attend training programmes in the field of performance evaluation, with the aim of providing support to managers as well as employees in accepting an organisational culture with a clearly indicated role of competencies as well as expectations that stem from their performance evaluation.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

45 "Official Gazette of the RS" no. 20/22

Activity 2.2.6.2

Complete all initiated competition procedures to fill the positions, and initiate competition procedures for all vacancies (including positions currently discharged by acting officials).	
In charge of activity	<ul style="list-style-type: none"> • Human Resources Management Service • High Civil Service Council • Authorised proposers • Government of Republic of Serbia
Deadline	Continuous
Indicators of results	<p>Competition procedures are being conducted.</p> <p>All competitions started by the competition commissions to fill the positions have been completed.</p>
Agency's assessment	Activity cannot be assessed

On the implementation of Activity 2.2.6.2

The Human Resources Management Service has reported that there were 31 competitions in 2022, of which 14 were internal and 17 public. In the reporting period, 72 competitions that were announced in 2022 and earlier, but were implemented in the reporting period, were completed - 16 were internal and 56 were public.

The total number of job positions, i.e. appointed positions in the state administration is 412.

The number of persons who are currently in appointed positions, having been appointed by the Government after the conducted competition, is 160.

The Government of the Republic of Serbia reported that the Ministry of State Administration and Local Self-Government formed a special Working Group to monitor the situation regarding the filling of positions in the state administration bodies that started operating in April 2021. The Working Group consists of representatives of the Ministry of State Administration and Local Self-Government, the Prime Minister's cabinet, the General Secretariat of the Government, the Republic Secretariat for Legislation, the National Academy for Public Administration and the Human Resources Management Service.

Although the Human Resources Management Service did submit information and appropriate supporting statistics, looking at the activity itself and the indicators of results the Agency was not able to assess the implementation of this activity.

The Agency had provided an explanation of why Activity 2.2.6.2 cannot be evaluated in the Second Implementation Report.⁴⁶

⁴⁶ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Activity 2.2.6.3

Monitor violations of the Code of Conduct for Civil Servants by applying sanctions in case of violation of the Code.	
In charge of activity	• High Council of Civil Servants
Deadline	Continuous, once per year
Indicators of results	Sanctions have been applied in cases of violation of the Code of Conduct. Annual Report of the High Civil Service Council.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.6.3

The Human Resources Management Service has reported that monitoring the implementation of the Code of Conduct for Civil Servants is a regular activity of the High Civil Service Council, which stems from the Law on Civil Servants (Article 164a) and the tasks defined in the Action Plan for Chapter 23.

At its 112th session held on 10 March 2022, the High Civil Service Council formed a Working Group tasked with preparing - based on reports from state administration bodies, and with data and information necessary for monitoring the Code of Conduct for Civil Servants - a Draft Report on compliance with the Code of Conduct for Civil Servants in 2021, with appropriate measures to improve compliance with said Code.

At the 113th session held on 30 March 2022, the High Civil Service Council adopted the Report on Compliance with the Code of Conduct for Civil Servants for 2021, with proposed measures to improve compliance with the Code.

The Report on Compliance with the Code of Conduct for Civil Servants for 2021 was submitted to the Ministry of State Administration and Local Self-Government and published on the website of the Human Resources Management Service.⁴⁷

In accordance with Article 18a of the Code of Conduct of Civil Servants, in December 2022 the High Civil Service Council sent a letter to all heads of state administration bodies, Government services and expert services of administrative districts, reminding them of their obligation to submit a report on the number of civil servants employed for an indefinite and fixed term as at the end of 2022, the total number of complaints filed by citizens about the behaviour of civil servants related to violations of the Code of Conduct for Civil Servants, the number of procedures initiated ex officio for non-compliance with the provisions of the Code, the conduct of civil servants, types of violations of the Code of Conduct for Civil Servants (classified by articles) indicated in complaints and the authorities' own initiatives, data on initiated disciplinary proceedings and imposed disciplinary measures against civil servants due to violation of the provisions of the Code of Conduct for Civil Servants, and an assessment of the level of compliance with the provisions of the Code of Conduct of Civil Servants.

⁴⁷ See: <https://www.suk.gov.rs/tekst/609/izvestaj-o-postovanju-kodeksa-ponasanja-drzavnih-sluzbenika-za-2021-godinu.php>

They were also told that it is necessary that they inform the High Civil Service Council about the manner in which citizens are notified of the behaviour they have the right to expect from civil servants in that body, and about the manner of receiving complaints about the conduct of civil servants. At the same time, it was specifically indicated that all data and information processed by the authorities during the preparation of reports on the implementation of the Code of Conduct for Civil Servants are to be submitted to the High Civil Service Council, without indicating the personal data of the civil servants mentioned in the report.

The High Civil Service Council recommends to all state administration bodies, Government services and professional services of administrative districts to continue improving the quality of the work of their employees, as well as the way they receive complaints from citizens and the way they measure citizens' satisfaction with the services they provide (by providing information, making it possible to file complaints through the website, by surveying service users, etc.). It is especially recommended for public officials and appointed persons to cultivate appropriate behaviour when communicating with colleagues by providing them with timely, accurate and complete data in a polite and dignified manner.

The High Civil Service Council also proposes to look at the justification and consider the possibility of including material from the Code of Ethics in the content of the programme related to the state professional examination.

This activity is directly linked to Activity 2.2.3.5, that is, it is the same report as in the result indicators for Activities 2.2.3.5 and 2.2.6.3.

The Agency is convinced that this is the regular annual practice of the High Civil Service Council, as supported by the report that was prepared for the year 2021 and the fact that the reports for the previous year are prepared in the current year. For this reason, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.6.4

Improve the process of implementation of programme budgeting (operational and methodological improvement of the process of planning and preparation of multi-annual budget at all levels of government).	
In charge of activity	• Ministry of Finance
Deadline	Continuous
Indicators of results	The process of implementing programme budgeting is being continuously improved at all levels.

On the implementation of Activity 2.2.6.4

Activity 2.2.6.4 was previously assessed as implemented because in 2021 the Ministry of Finance reported on the steps that were taken in the course of a three-year period (2022-2024).⁴⁸ Since the

⁴⁸ See the Second Implementation Report, at: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Agency has already assessed the activity as implemented, and its essence is such that it does not necessarily require changes at the annual level (i.e., the deadline has not been determined in an appropriate way), the Agency did not include this activity in the statistical presentation in this report.

Activity 2.2.6.5

Conduct periodic analyses of the programme budgeting process and identify recommendations for its improvement.	
In charge of activity	• Ministry of Finance
Deadline	Continuous, once per year
Indicators of results	Percentage of budget users who have switched to the programme budget. Recommendations for improvement have been identified.

On the implementation of Activity 2.2.6.5

Activity 2.2.6.5 was previously assessed as implemented because the Ministry of Finance conducted analyses periodically, i.e. when they were expedient, as it had reported in the previous report.⁴⁹ Since the Agency has already assessed the activity as implemented, and its essence is such that it does not necessarily require changes at the annual level (i.e., the deadline has not been determined in an appropriate way), the Agency did not include this activity in the statistical presentation in this report.

Activity 2.2.6.6

Improve the methodology of the programme budget and prepare a new Instruction in accordance with the recommendations from the analyses under Activity 2.2.6.5.	
In charge of activity	• Ministry of Finance • Republic Secretariat for Public Policies
Deadline	Continuous, once per year
Indicators of results	Percentage of compliance of programme structures of budget users with the Instruction for Drafting the Programme Budget.

On the implementation of Activity 2.2.6.6

Activity 2.2.6.6 was previously assessed as implemented, because the essence of the activity is such that it does not require the improvement of the methodology, nor the preparation of a new instruction on an annual level, which the Ministry of Finance did in 2021, reporting on it in the previous report.⁵⁰ Since the Agency has already assessed the activity as implemented, and its essence is such that it does not necessarily require changes at the annual level (i.e., the deadline has not been determined in an appropriate way), the Agency did not include this activity in the statistical presentation in this report.

⁴⁹ Ibidem

⁵⁰ Ibidem

Activity 2.2.6.7

Strengthen the staffing capacities of the Central Harmonisation Unit (which provides central guidance and coordinates public internal financial control activities) in accordance with the amended Rulebook on Internal Organization and Classification of Job Positions.	
In charge of activity	• Ministry of Finance
Deadline	Fourth quarter of 2022
Indicators of results	Vacancies have been filled in accordance with the Rulebook on Internal Organization and Classification of Job Positions
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.6.7

The Ministry of Finance has reported that in the first quarter of 2022 one person was hired, based on a contract for temporary and occasional work, to help collect annual reports on the state of internal controls and internal audit activities in beneficiaries of public funds. In June 2021, two executive positions in the Central Harmonisation Unit were filled through an internal competition (the position of coordinator for financial management, control and internal auditing, and the position of coordinator for internal audit work methodology). Before that, the position of head of the Group for assessing the quality of the financial management and control system was filled by transferring a civil servant. The Ministry of Finance also reported that there is a plan to fill other vacant positions in 2023.

The staffing capacities of the Central Harmonisation Unit have been strengthened, but since not all positions were filled in 2022, in line with the set deadline, the Agency assessed the activity as not implemented.

Activity 2.2.6.8

Increase the number of managers and employees in the public sector who are trained on the essence and importance of the financial management and control system, and increase the number of trained internal auditors.	
In charge of activity	• Ministry of Finance
Deadline	Continuous
Indicators of results	Consolidated annual report on the state of internal financial control in the public sector. Number of newly trained managers and employees in public administration and certified internal auditors, compared to 2013.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.6.8

The Ministry of Finance has reported that a theoretical training for internal auditors was held in the first quarter of 2022 for 47 participants, as was a one-day training for top managers at the Institute

of Nuclear Sciences - Vinča, which was attended by 26 participants. In the second quarter of 2022, workshops on financial management and control were held in Čačak, Novi Pazar and Prokuplje, attended by 102 participants (23+54+25). In the third quarter of 2022, basic training on financial management and control was held for 94 employees and managers of the beneficiaries of public funds. Workshops on financial management and control were also held in Loznica and Vrnjačka Banja, and were attended by 62 participants (42+20).

The Ministry of Finance reported that in the April 2022 examination period, 26 candidates passed the exam for the title of Authorised Internal Auditor in the public sector. In December 2022, 18 candidates passed the examination for the title of Authorised Internal Auditor in the public sector (550 authorised internal auditors, 532+18, in total).

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.2.7. Serbia is efficiently implementing the new Law on the Protection of Whistleblowers and is monitoring its implementation.

The activities in question are Activities no. 2.2.7.1, 2.2.7.2, 2.2.7.3 and 2.2.7.4, which are individually presented below.

Activity 2.2.7.1⁵¹

Conduct trainings on the application of the Law on the Protection of Whistleblowers for the police, public prosecutors and judges, as well as for special departments in public prosecutor's offices and courts dealing with the suppression of corruption.	
In charge of activity	• Judicial Academy
Deadline	Continuous
Indicators of results	Trainings for police, public prosecutors and judges, as well as for special departments in public prosecutor's offices and courts, have been conducted. Percentage of police officers, public prosecutors and judges trained to apply the Law on the Protection of Whistleblowers, compared to those in need of training.
Agency's assessment	The activity cannot be assessed in the part referring to training the police.
	The activity was implemented in the part referring to training for public prosecutors, judges and special departments for the suppression of corruption in public prosecutor's offices and the courts.

⁵¹ The Agency assessed Activity 2.2.7.1 as two activities, because the institution listed as its carrier is not competent for all its segments.

On the implementation of Activity 2.2.7.1

The Judicial Academy has reported that, in 2022, it conducted three one-day trainings on the topic “Law on the Protection of Whistleblowers”, for a total of 54 participants.

In cooperation with the association “Pištaljka” [Whistle], four one-day trainings were organised on the topic “Professional Ethics in the Prevention and Fight against Corruption”, for a total of 111 participants (judges).

One 2-day and nine 1-day trainings were held in Belgrade, Niš, Novi Sad and Kragujevac on the topic “Recognition of and Protection from Undue Influence on Judges – Advanced Training for Lecturers”, for a total of 190 participants. Three 3-day trainings were held in Arandjelovac, Kragujevac and Belgrade on the topic “Preventing the Risk of Undue Influence and the Protection of Prosecutors - Training of Lecturers”, for a total of 59 participants (prosecutors, deputy public prosecutors and prosecutor’s assistants).

In the Second Implementation Report,⁵² the Agency provided the explanation as to why Activity 2.2.7.1 could not be assessed in the part referring to the training of police officers.

In the part for which the Judicial Academy is competent and has submitted data on implementation, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.7.2

Monitor the implementation of the Law on Protection of Whistleblowers by preparing the annual report of the Ministry in charge of justice compiled based on periodic reports of competent institutions on actions related to whistleblowers.	
In charge of activity	• Ministry of Justice (State Secretary)
Deadline	Continuous, once per year
Indicators of results	The Ministry of Justice’s report, with detailed statistical data, has been prepared and published.
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.2.7.2

The Ministry of Justice has reported that the Annual Report on the Implementation of the Law on the Protection of Whistleblowers for the period from 1 January to 31 December 2021 was prepared and published in 2022.⁵³

As the report for the previous year is prepared in the current year, in this reporting period the Agency has assessed the activity as implemented.

52 See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

53 See: <https://www.mpravde.gov.rs/obavestenje/36949/izvestaj-o-primeni-zakona-o-zastiti-uzbunjivaca-za-2021godinu.php>

Activity 2.2.7.3

Monitor the effects of the Law on the Protection of Whistleblowers with regard to the actions of state authorities in response to whistleblowers' reports.	
In charge of activity	• Ministry of Justice (State Secretary)
Deadline	Continuous, once per year
Indicators of results	The report of the Ministry of Justice on the actions of state authorities in response to whistleblowers' reports has been prepared and published.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.7.3

The Ministry of Justice has submitted information related to the report on the application of the Law on the Protection of Whistleblowers, which was assessed in activity 2.2.7.2. Since no impact assessment of the Law on the Protection of Whistleblower has been made, in this reporting period the Agency assessed the activity as not implemented.⁵⁴

Activity 2.2.7.4

Raise citizens' awareness of the Law on the Protection of Whistleblowers as well as the level of their readiness to act as whistleblowers.	
In charge of activity	• Ministry of Justice (State Secretary)
Deadline	Fourth quarter of 2021
Indicators of results	The awareness raising campaign has been conducted.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.7.4

The Ministry of Justice has reported that the Ministry of European Integration has engaged an expert to prepare an analysis of the Law on the Protection of Whistleblowers. The need for possible amendments to the law will be considered based on the above analysis, and a brochure will be created to raise the level of awareness among citizens about the Law on the Protection of Whistleblowers and their willingness to act as whistleblowers.

Since the deadline has expired and the activity has not been completed, in this reporting period the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

⁵⁴ In its recommendations, the Agency pointed out that the impact assessment should be done in accordance with the Law on the Planning System of the Republic of Serbia, and that the deadline for implementation cannot be 'once per year'.

2.2.8. Serbia is implementing and assessing the impact of measures taken to reduce corruption in areas of risk (health, taxes, customs, education, local self-government, privatisation, public procurement and police), taking corrective action where necessary and organising initial records of measurable reduction of corruption in above areas.

The activities in question are Activities no. 2.2.8.3, 2.2.8.4, 2.2.8.6 and 2.2.8.7, which are individually presented below.

Activity 2.2.8.3⁵⁵

Monitoring of measures related to the application of supervision and control in public procurement.	
In charge of activity	<ul style="list-style-type: none"> • Public Procurement Office • Republic Commission for Protection of Rights in Public Procurement Procedures • Ministry of Finance
Deadline	Continuous, once per year
Indicators of results	<p>Report of the Public Procurement Office on supervision of the implementation of the Law on Public Procurement.</p> <p>Report on the work of the Republic Commission for the Protection of Rights in Public Procurement Procedures.</p> <p>Report of the Ministry of Finance on the supervision of the execution of public procurement contracts.</p>
Agency's assessment	The activity was implemented in the part referring to the competencies of the Public Procurement Office.
	The activity was implemented in the part referring to the competencies of the Republic Commission for the Protection of Rights in Public Procurement Procedures
	The activity was not implemented in the part referring to the competencies of the Ministry of Finance,

On the implementation of Activity 2.2.8.3

The Public Procurement Office has reported that monitoring data for 2022 will be presented in the Annual Report on Implemented Monitoring for the year 2022. In accordance with Article 180, paragraph 6 of the Law on Public Procurement,⁵⁶ the Public Procurement Office prepares an annual report on the implemented monitoring, which it submits to the Government and the National Assembly no later than on 31 March of the current year, for the previous year. The annual report for 2021 was prepared in March 2022.

⁵⁵ The Agency counted Activity 2.2.8.3 as three activities, because result indicators indicate that the activity is to be implemented by three institutions, each within its own purview.

⁵⁶ "Official Gazette of the RS" no. 91/19

The Republic Commission for the Protection of Rights in Public Procurement Procedures has submitted statistical data for 2022, with a note that, bearing in mind that this body submits its Annual Work Report to the National Assembly by 31 March of the current year for the previous year in accordance with Article 203 of the Law on Public Procurement, the submitted data can be considered working data, which means that the final data will be presented in the annual report of the Republic Commission for 2022. The Work Report for 2021 was drafted in March 2022.⁵⁷

The Ministry of Finance has reported that it is not preparing a Report on the Supervision of the Execution of Public Procurement Contracts.

As the Agency is convinced that this is the regular annual practice of the Public Procurement Office and the Republic Commission for the Protection of Rights in Public Procurement Procedures, as shown by the reports that have been prepared for 2021 and the fact that the reports for the previous year are prepared in the current year, the Agency assessed the activities from the purview of these two institutions as two activities and, in this reporting period, assessed them as implemented. At the same time, in the part that falls under the purview of the Ministry of Finance, in this reporting period the activity was assessed as not implemented.

Activity 2.2.8.4

Conduct trainings for police officers, prosecutors and judges in order to process cases of corruption in public procurement more efficiently (compatible with the Financial Investigation Strategy).	
In charge of activity	<ul style="list-style-type: none"> • Public Procurement Office • Republic Commission for Protection of Rights in Public Procurement Procedures • Judicial Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained police officers, public prosecutors, judges and employees and the Public Procurement Directorate, in relation to those in need of training.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.8.4

The Public Procurement Office has reported that in the second quarter of 2022, with the support of the project entitled “Effective Public Procurement in the Service of Economic Growth” and the National Alliance for Local Economic Development (NALED), it held two trainings for judges and judicial assistants of the higher courts’ special anti-corruption departments, i.e. for higher deputy public prosecutors and assistant prosecutors of the higher prosecutor’s offices’ special departments for combating corruption in the field of public procurement.

⁵⁷ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-555_22.pdf

In the fourth quarter of 2022, with the help of the USAID project for the improvement of public procurement, the Public Procurement Office conducted a training/webinar on 22 December for members of the Ministry of Internal Affairs with the aim of helping members of the police in cases that involved irregularities in the implementation of public procurement procedures. The Guide for monitoring the application of regulations in the field of public procurement was presented to the attendees of the above training. The Guide is a document that - in addition to describing the general characteristics of monitoring and clarifying solutions contained in laws and by-laws - also includes an overview of irregularities that are most commonly observed while monitoring public procurement, which can be of great importance for members of the police when working on cases involving such irregularities.

The Judicial Academy has reported that, in 2022, it conducted 23 two-day seminars from the international certification programme in the field of fraud investigation and money laundering prevention (CFE and CAMS programmes) in cooperation with the USAID Project. The seminars were attended by 319 participants from the ranks of basic and higher public prosecutors and their deputies, judicial and prosecutors' assistants and associates, and police officers.

With the support of NALED, one 1-day and one 2-day seminar on the topic of "Public Procurement - Accountability of the Contracting Authority" were held in 2022, for a total of 27 participants from special anti-corruption departments.

Eight one-day seminars on the topic of "Financial Forensics, Module 1: Corruption, Fraud and Public Procurement" were held for a total of 62 participants.

In October 2022, as part of the project "Effective Public Procurement in the Service of Economic Growth" and with the support of the Swedish Agency for International Cooperation and Development (SIDA), NALED organised a study visit to France and the Grand Duchy of Luxembourg on the topic of "Protection of Rights in the Field of Public Procurement" for representatives of the Judicial Academy and others.

In December 2022, in cooperation with NALED, the Judicial Academy organised a one-day round table on the topic of "Application of the Law on Public Procurement", for a total of five participants (judges and judicial assistants).

For the above reasons, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.8.6⁵⁸

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in the field of public procurement and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All the data relevant for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.8.6

The Agency has reported that the establishment of the Working Groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁵⁹

The collection of data possessed by institutions ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.8.7⁶⁰

Prepare and present the Impact Assessment of the measures taken to reduce corruption in the field of public procurement.	
In charge of activity	• Anti-Corruption Agency
Deadline	First quarter of 2022
Indicators of results	An impact assessment of measures taken to reduce corruption in the field of public procurement was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part related to the preparation of the Impact Assessment.
	The activity cannot assess in the part related to the presentation of the Impact Assessment.

58 The Agency counted Activities 2.2.8.6, 2.2.9.3, 2.2.10.2, 2.2.10.7, 2.2.10.12, 2.2.10.20, 2.2.10.28 and 2.2.10.33 as one activity because it simultaneously formed working groups for eight risk areas in 2021, and then ended the collection of data for all risk areas in 2022. Although each of these activities implies two different sub-activities, i.e. education of working groups and data collection, in this report the Agency reviewed the activity as one because both sub-activities were evaluated as implemented.

59 See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

60 The Agency presented Activities 2.2.8.7, 2.2.9.4, 2.2.10.3, 2.2.10.8, 2.2.10.13, 2.2.10.21, 2.2.10.29 and 2.2.10.34 through two sub-activities, because one refers to the implementation of the Impact Assessment, and the other to its presentation. In this sense, it counted the first sub-activity as one, because it covered all eight risk areas in one impact assessment report. It applied the same approach to the second sub-activity, counting it as one.

On the implementation of Activity 2.2.8.7

The Agency has reported that it prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁶¹

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency assessed the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.2.9. Serbia is implementing and assessing the impact of measures taken to reduce corruption in areas of risk (health, taxes, customs, education, local self-government, privatisation, public procurement and police), taking corrective measures when necessary, and organising initial records of measurable reductions of corruption in said areas.

The activities in question are Activities nos. 2.2.9.1, 2.2.9.3 and 2.2.9.4, which are individually presented below.⁶

Activity 2.2.9.1

Establish internal control in all public enterprises.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Finance (Central Harmonisation Unit) • All public enterprises
Deadline	Fourth quarter of 2022
Indicators of results	As evident from the Annual Report of the Central Harmonisation Unit, internal control has been established in all public enterprises.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.9.1

The Ministry of Finance has reported that beneficiaries of public funds are independently establishing internal control in their organisations based on the principle of a decentralised system of internal

⁶¹ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

control, while the Sector - Central Harmonisation Unit of the Ministry of Finance is providing a legal and methodological framework and continuously conducting training and promotional activities to raise awareness of the importance and obligation of establishing a system of internal control.

It also reported that, in order to raise awareness and train managers and employees about internal control, the Central Harmonisation Unit organised a basic training on financial management and control in the second and fourth quarters of 2021 for 120+145 participants, as well as for internal auditors - for 60 participants at the beginning of the third quarter of 2021, and for 47 participants at the end of the first quarter of 2022.

In the course of 2022, ending with the third quarter, the Central Harmonisation Unit held two-day trainings on Financial Management and Control (FMC) for a total of 164 employees and managers of beneficiaries of public funds, mostly at the local level, attended by employees of Public Utility Companies, as well as basic training on FMC in October 2022 for 94 employees and managers.

The Ministry of Finance pointed out that, in accordance with the Law on the Budget System,⁶² beneficiaries of public funds are obliged to establish a system of financial management and control. Pursuant to this Law, it is the manager of a beneficiary of public funds who is responsible for establishing a system of financial management and control.

Bearing in mind the above, the Ministry of Finance further pointed out that this activity (2.2.9.1) is not defined in line with Article 81, paragraph 4 of the Law on the Budget System, because in addition to public enterprises, the Ministry of Finance / Sector - Central Harmonisation Unit was also listed as the carrier of activities related to the establishment of internal control in public enterprises (beneficiaries of public funds).

According to the above Law, beneficiaries of public funds should report to the Minister of Finance about the implementation of internal control in their organisations, whose status is monitored by the Sector - Central Harmonisation Unit, preparing - based on individual reports of beneficiaries of public funds - an annual report on the state of internal financial control in the Republic of Serbia, which the Minister then uses to report to the Government.

Based on data from the Consolidated Annual Report on the State of Internal Financial Control in the Public Sector in the Republic of Serbia for 2020, which was adopted by the Government of the Republic of Serbia by Conclusion 05 number: 400-7619/2021-2 of 26 August 2021, of the total number of public enterprises and capital companies from the central republic level monitored by the Central Harmonization Unit, 36 have submitted a report on the state of the financial management and control system, which constitutes 87.80% of that group of beneficiaries of public funds.

36 out of 39 public enterprises (92.31%) have submitted the report on the state of FMC for 2021.

⁶² "Official Gazette of the RS" no. 54/09, 73/10, 101/10, 101/11, 93/12, 62/13, 63/13 - corrigenda, 108/13, 142/14, 68/15 – other law, 103/15, 99/16, 113/17, 95/18, 31/19, 72/19, 149/20, 118/21, 118/21 – other law, and 138/22

The Ministry of Finance further pointed out that the list of public enterprises is changing as a result of reorganisations and restructurings, as well as separations and mergers. It also stated that it should be borne in mind that, in 2017, all public enterprises submitted a report on the FMC and performed self-assessment of the organisation from the point of view of the establishment of FMC (and that, therefore, it cannot be assumed that certain public enterprises that were changed due to reorganisation, which did not submit a report on internal controls for 2019, did not establish FMC, that is, a system of internal controls).

According to the data available to the Central Harmonisation Unit, out of a total of 41 public enterprises and capital companies at the central level of the Republic of Serbia that perform activities of general interest and are bound by the Law on Public Enterprises, 22 have a functional internal audit, i.e. 54% of that category of beneficiaries of public funds. A total of 7 public enterprises out of 14 that are bound by regulations have a fully staffed internal audit unit with at least three auditors.

Based on the report for 2021, 21 public enterprises (54%) have a functional internal audit, while 8 of the 14 (57%) that are bound by the Law have a fully staffed internal audit unit.

The Ministry of Finance also stated that, starting from the fact that from the point of view of financial management and control, the issue of corruption as a narrower term is covered by the term ‘irregularity’ (as defined in Article 2 of the Law on the Budget System), and bearing in mind that this activity is part of of the Action Plan related to the issue of prevention of corruption, the Central Harmonisation Unit had already implemented appropriate activities related to the establishment of a system for management of irregularities within the jurisdiction defined by law and its scope of work. Namely:

- The definition of irregularity was introduced in the Budget System Law;
- The Rulebook on common criteria and standards for the establishment, operation and reporting on the financial management and control system in the public sector⁶³ obliges managers of users of public funds to establish a system for detecting, recording and acting on notifications of suspected irregularities, as well as a reporting system, and to take measures necessary to reduce the risk of irregularities;
- As an aid in understanding and implementing the system for irregularities in practice, the Central Harmonisation Unit has developed Guidelines for managing irregularities for the beneficiaries of public funds;
- The trainings that the Central Harmonisation Unit regularly holds for employees and managers on financial management and control contain a section devoted to irregularities;
- The Central Harmonisation Unit continuously conducts promotional activities through electronic and print media, organises meetings and trainings to raise awareness of the importance and obligation of establishing internal control systems; has published on the Ministry’s website an extensive set of practical guidelines to help with the implementation, better understanding and self-study on financial management and control and internal audit, which are available for download; and informs the most important beneficiaries of public funds (from the point of view of the number of employees and their budgets) about the obligation to establish a system and appropriate reporting.

63 “Official Gazette of the RS” no. 89/19

In Activity 2.2.9.1, the carrier of the activity is not properly defined because - as the Ministry of Finance itself stated in the report - this institution, based on individual reports of users of public funds, does prepare an annual report on the state of internal financial control in the Republic of Serbia. However, since the data submitted by the Ministry of Finance clearly show that internal control has not been established in all public enterprises, the Agency assessed the activity as not implemented.⁶⁴

Activity 2.2.9.3⁶⁵

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in the privatisation process and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All data relevant for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.9.3

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁶⁶

The collection of data in the possession of institutions ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.9.4⁶⁷

Prepare and present the Impact Assessment of measures taken to reduce corruption in the privatisation process.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in the privatisation process was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

⁶⁴ The consolidated Annual Report for 2021 on the state of internal financial control in the public sector of the Republic of Serbia was prepared in July 2022 and is available at the following link: https://www.mfin.gov.rs/upload/media/6jh9Z7_6336a07d4be6f.pdf, which is why the Agency will be able to present the data for 2022 in the next Implementation Report.

⁶⁵ See footnote 59.

⁶⁶ See: https://www.acas.rs/storage/page_files/Izve%C5%Altaj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

⁶⁷ See footnote 61

On the implementation of Activity 2.2.9.4

The Agency has reported that it has prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁶⁸

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.2.10. Serbia is implementing and assessing the impact of measures taken to reduce corruption in areas of risk (health, taxes, customs, education, local self-government, privatisation, public procurement and police), taking corrective action where necessary, and organising initial records of measurable reductions of corruption in said areas.

The activities in question are Activities no. 2.2.10.2, 2.2.10.3, 2.2.10.7, 2.2.10.8, 2.2.10.12, 2.2.10.13, 2.2.10.16, 2.2.10.18, 2.2.10.20, 2.2.10.21, 2.2.10.23, 2.2.10.24, 2.2.10.25, 2.2.10.26, 2.2.10.28, 2.2.10.29, 2.2.10.31, 2.2.10.33 and 2.2.10.34, which are presented individually below.

Activity 2.2.10.2⁶⁹

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in health care and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All data relevant for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented.

⁶⁸ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

⁶⁹ See footnote 59

On the implementation of Activity 2.2.10.2

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁷⁰

The collection of data at the institutions' disposal ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.10.3⁷¹

Prepare and present the Impact Assessment of measures taken to reduce corruption in health care.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in health care was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

On the implementation of Activity 2.2.10.3

The Agency has reported that it has prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁷²

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

70 See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

71 See footnote 61

72 See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

Activity 2.2.10.7⁷³

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in the field of taxation and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All data relevant for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.10.7

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁷⁴

The collection of data at the institutions' disposal ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.10.8⁷⁵

Prepare and present the Impact Assessment of measures taken to reduce corruption in the area of taxes.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in the area of taxes was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

On the implementation of Activity 2.2.10.8

The Agency has reported that it has prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁷⁶

⁷³ See footnote 59

⁷⁴ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

⁷⁵ See footnote 61.

⁷⁶ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

Activity 2.2.10.12⁷⁷

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in education and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All data relevant for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.10.12

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁷⁸

The collection of data at the institutions' disposal ended in 2022, which is why the Agency assessed the activity as implemented.

⁷⁷ See footnote 59

⁷⁸ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Activity 2.2.10.13⁷⁹

Prepare and present the Impact Assessment of measures taken to reduce corruption in education.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in education was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

On the implementation of Activity 2.2.10.13

The Agency has reported that it has prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁸⁰

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

⁷⁹ See footnote 61

⁸⁰ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf.

Activity 2.2.10.16⁸¹

Develop mechanisms to strengthen the integrity of police officers: a) Carry out a corruption risk analysis for job positions in the police; b) Create preconditions for normative regulation; strengthen integrity (change procedures and work methodology).	
In charge of activity	• Ministry of Interior
Deadline	Point a) - fourth quarter of 2021 Point b) - third quarter of 2020
Indicators of results	Analysis of the risk of corruption in the Ministry of Interior has been created. A register of risks has been created. Procedures of the methodologies of work and actions in the Sector have been created.
Agency's assessment	The activity was not implemented in point a).

On the implementation of Activity 2.2.10.16

In connection with item a), the Ministry of Internal Affairs has reported that the work of the working groups charged with the implementation of the analysis of the risk of corruption in the organisational units of the Ministry of Internal Affairs has continued in 2022. The Internal Control Sector has formed working groups for the implementation of the risk analysis in all organisational units in the Police Administration, and the activities of most of the working groups are nearing completion. As the Ministry of Internal Affairs further stated, the results of the prepared corruption risk analysis will serve as the basis for the preparation of the Integrity Plan of the Ministry of Internal Affairs. The Traffic Police Administration and the Police Administration in Požarevac have completed the analysis of the risk of corruption and were provided with reports aimed at implementing the proposed preventive measures.

The Ministry of Internal Affairs also reported that, in cooperation with the OSCE Mission to Serbia and the Geneva Centre for Security Sector Governance (DCAF), online training was held in the period from 12 to 14 April 2022 for police officers of the Internal Control Sector and members of working groups charged with the analysis of corruption risks in the Ministry of Internal Affairs of the Republic of Serbia, i.e. in 27 regional police administrations. The goal of the training was the continuous monitoring of activities within the working groups, as well as gaining additional experience in the field of corruption risk analysis. The lecturers were a representative of the Agency for the Prevention of Corruption and a representative of the Anti-Corruption Administration of the Ministry of Internal Affairs of Romania, with whom the Control Sector and the OSCE Mission to Serbia have had a successful long-term cooperation.

⁸¹ In the Second Implementation, the Agency assessed Activity 2.2.10.16 as two activities because of the different deadlines for the implementation of the two segments of this activity. In this, Third Implementation Report, the Agency assessed and counted only one activity, which has remained unimplemented.

The activity in point b) was assessed as implemented in the Second Implementation Report,⁸² so the Agency did not deal with it any further in this one.

Having in mind the above, as well as the deadline for implementation, the Agency assessed point a) as not implemented due to the fact that the analysis of the risk of corruption has not been fully completed.

Activity 2.2.10.18

Continuous education of employees in the Internal Control Service and all employees in the Ministry of Interior on the topic of integrity.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Interior • Criminal Police Academy
Deadline	Continuous
Indicators of results	<p>Trainings have been conducted.</p> <p>Percentage of employees in the Ministry of Interior trained on the topic of integrity, in relation to those in need of training.</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.10.18

The Ministry of Internal Affairs has reported that police officers from the Internal Control Sector have participated in the integrity testing workshop the Geneva Centre for Security Sector Governance (DCAF) organised on 16 March 2022. In the period from 19 to 21 April 2022, in the organisation of the OSCE Mission in Serbia and DCAF, training for police officers of the Internal Control Sector was held in Vrdnik on the topic of security vetting.

In the period from 7 to September 2022, on the premises of the Criminal Police University in Belgrade, police officers of the Internal Control Sector participated in the second part of the training in the field of fight against corruption, organised by the National Crime Agency of Great Britain and the City of London Police.

Four trainings on the application of the Methodology for conducting investigations in cases of ill-treatment by the police were organised in cooperation with the Republic Public Prosecutor's Office, the Internal Control Sector, the OSCE Mission in Serbia and the Judicial Academy. They were attended also by police officers from the Internal Control Sector. The above four trainings were held on 20 and 27 May, 17 June and 1 July 2022 in Kragujevac, Niš, Belgrade and Novi Sad, and each was attended by 25-30 participants from the public prosecutor's offices and the Ministry of Internal Affairs.

⁸² See: https://www.acas.rs/storage/page_files/Izveštaj%20o%20sprovedenju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

The Ministry of Internal Affairs also reported that the Regional Conference of Internal Control Services was held in Belgrade on 10 and 11 October 2022, with the support of the OSCE Mission in Serbia. In addition to police officers from the Internal Control Sector, the conference was attended by police officers from four related services from the region: the General Directorate for Combating Corruption of the Ministry of Internal Affairs of Romania, the Directorate for Internal Security of the Ministry of Internal Affairs of Bulgaria, the Department for Internal Control of the Police of Montenegro, and the Department for Internal Control, Criminal Investigations and Professional Standards of the Ministry of Internal Affairs of the Republic of North Macedonia. The goal of the Regional Conference was to establish and improve the existing international/cross-border cooperation between internal control services from the above countries, present case studies, discuss challenges, and present experiences in the field of applying mechanisms aimed at preventing corruption.

In cooperation with the Republic Public Prosecutor's Office, the Internal Control Sector, the OSCE Mission in Serbia and the Judicial Academy, four trainings were organised on the implementation of the Methodology for conducting investigations in cases of ill-treatment by the police, which were attended by police officers from the Internal Control Sector as well. The four trainings were held on 4 and 25 November, and 2 and 16 December 2022 in Kragujevac, Niš, Belgrade and Novi Sad, and each was attended by 25-30 participants from the public prosecutor's offices and the Ministry of Internal Affairs.

Organised by the OSCE Mission in Serbia, a training on the implementation of a complex financial investigation, attended by 20 representatives of the Internal Control Sector, was organised at Srebrno jezero [Silver Lake] in the period from 12 to 14 November 2022.

Having in mind the above trainings, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.10.20⁸³

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce police corruption and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions and relevant civil society organisations
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All relevant data for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented

83 See footnote 59

On the implementation of Activity 2.2.10.20

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁸⁴

The collection of data in possession of the institutions ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.10.21⁸⁵

Prepare and present the Impact Assessment of measures taken to reduce corruption in the police.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in the police was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

On the implementation of Activity 2.2.10.21

The Agency has reported that it prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁸⁶

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

84 See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

85 See footnote 61

86 See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

Activity 2.2.10.23

Establish a Working Group in the Ministry of Justice to consider the initiative of the Customs Administration (based on the Corruption Risk Analysis of the legal framework of the customs system) to amend the Criminal Procedure Code, and act in accordance with the conclusions (link: Activity 2.3.7.2).	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice • Customs Administration, Ministry of Finance • Government of Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	Creation of the working group: first quarter of 2021 Amendments and supplements to regulations: up to the fourth quarter of 2022
Indicators of results	The working group has been created. Amendments and supplements to the law have been adopted, in accordance with the conclusions of the working group.
Agency's assessment	The activity was not implemented in the part related to amending regulations.

On the implementation of Activity 2.2.10.23

The Ministry of Justice has reported that, by Decision of the Minister of Justice number 119-01-126/2021-05 of 12 May 2021, a Working Group was established to analyse the Criminal Procedure Code with the aim of identifying and eliminating its weaknesses and shortcomings and preparing the working version of the text of the Law on Amendments to the Criminal Procedure Code based on the results of the analysis.

In the Second Implementation Report,⁸⁷ the Agency had assessed the activity related to the establishment of the Working Group as implemented and did not deal with it any further in this Report, while the activity was assessed as not implemented in the part relating to amending regulations due to the fact that the Criminal Procedure Code was not amended.

Activity 2.2.10.24

Train customs officers in accordance with the new regulations.	
In charge of activity	• Customs Administration, Ministry of Finance
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained customs officers, in relation to those in need of training.
Agency's assessment	The activity was not implemented

⁸⁷ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

On the implementation of Activity 2.2.10.24

The Customs Administration has reported that activity 2.2.10.24 is conditioned by amendments to the Criminal Procedure Code (activity 2.2.10.23), and that - since the Code has not yet been amended - it was not possible to implement activity 2.2.10.24.

For this reason, in this reporting period the Agency assessed the activity as not implemented.

Activity 2.2.10.25

Strengthen the capacity of the Internal Control Department by procuring adequate supporting equipment, IT equipment and uniforms, and by employing 15 people.	
In charge of activity	• Customs Administration, Ministry of Finance
Deadline	Continuous
Indicators of results	Capacities have been strengthened (appropriate supporting equipment, IT equipment, uniforms, etc.). The number of systemised job positions has been increased by 13 in 2021.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.10.25

The Customs Administration has reported that customs officials received new uniforms and IT equipment in 2022. It further reported that, due to limited budget resources, no new people were employed by the Department for Internal Control in 2022.

As measures to strengthen the capacity of the Department for Internal Control - in the form of uniforms and IT equipment - were taken in 2022, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.10.26

Install video surveillance in customs offices and at border crossings, with a centralised signal recorder in the Customs Administration and a possibility of the Customs Administration to access video surveillance in each facility in real time.	
In charge of activity	• Customs Administration, Ministry of Finance
Deadline	Fourth quarter of 2021
Indicators of results	Video surveillance has been installed.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.10.26

The Customs Administration has reported that the activity was not carried out, and that, in the earlier period, it used to be carried out by the Ministry of Internal Affairs through the Project

“Integrated border management”. As of April 2019, the introduction of video surveillance was transferred to the jurisdiction of the Directorate for Property of the Republic of Serbia. In the section ‘Interagency Cooperation’ of the new Strategy of Integrated Border Management 2022-2024, the Customs Administration proposed the procurement of video surveillance for all border crossings.

Having in mind the above, the Agency assessed the activity as not implemented.

Activity 2.2.10.28⁸⁸

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in the field of customs and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions
Deadline	Second quarter of 2021
Indicators of results	The working group has been established and is operational. All relevant data for the preparation of the Impact Assessment have been collected.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.10.28

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁸⁹

The collection of data in possession of the institutions ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.10.29⁹⁰

Prepare and present the Impact Assessment of measures taken to reduce corruption in customs.	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in customs was prepared and presented to the National Assembly.
Agency’s assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

⁸⁸ See footnote 59

⁸⁹ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

⁹⁰ See footnote 61

On the implementation of Activity 2.2.10.29

The Agency has reported that it prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁹¹

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

Activity 2.2.10.31⁹²

The assemblies of the autonomous provinces and local self-governments are adopting local action plans and establish permanent working bodies to monitor the implementation of local action plans.	
In charge of activity	For adoption: • Assemblies of the autonomous provinces and local self-governments
	For reporting: • Anti-Corruption Agency
Deadline	For the adoption: fourth quarter of 2020 For the reporting: continuous, until the local self-governments and autonomous provinces fulfil their obligations
Indicators of results	Local action plans have been adopted. Working bodies to monitor their implementation have been established. The assemblies of local self-government units and the territorial autonomy have adopted their anti-corruption plans and formed bodies to monitor their implementation in line with the model of the Anti-Corruption Agency.
Agency's assessment	The activity was not implemented in the part that refers to the adoption of local anti-corruption plans and the establishment of bodies to monitor their implementation.
	The activity was implemented in the part that refers to reporting on the adoption of local anti-corruption plans and the establishment of bodies to monitor their implementation.

⁹¹ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

⁹² The Agency assessed Activity of 2.2.10.31 as two activities because its segments are separate, both thematically and in relation to the activity holder.

On the implementation of Activity 2.2.10.31

The Agency has reported that, from the beginning of April 2017, when it published the Model LAP, until 15 December 2022, a total of 111 LGUs⁹³ adopted LAPs, or 76.55% of the 145 LGUs that are bound by this obligation (not counting the territory of Kosovo and Metohija). Thirty LGUs informed the Agency that they did not prepare LAPs, while four did not submit data on the preparation of the LAP and the formation of a body charged with its monitoring.

Out of a total of 111 plans the LGUs submitted to the Agency, 95 were prepared in accordance with the Model, 11 partially in accordance with the Model, four did not correspond to the Model in either form or content, while one LGU did not submit sufficient data to assess whether the LAP was done in accordance with the Model. The reasons for such partial compliance of individual LAPs are reflected in the fact that, during the preparation of some of the plans, there were no representatives of civil society in the working groups that were charged with their preparation; in some reports on the adoption of LAPs local self-government units did not properly explain why certain measures were not taken over from the Model; activities were not defined well enough, and so on.

A total of 38 LGUs formed bodies that will be in charge of monitoring the implementation of the LAPs; of these, 26 were formed mainly in line with the Model, two were formed partially in line with the Model, six had significant deviations, while for four bodies there is no sufficient data to assess compliance. During the process of forming the bodies to monitor the implementation of the LAPs, i.e. during the election of members of said bodies, there were no representatives of civil society in some of the commissions, some LGUs had to re-announce a public competition for the election of body members because not enough candidates submitted an application for the competition, while certain municipalities formed temporary bodies in accordance with the supplement to the Model after two conducted public competitions in which there were no applicants.

After the data on the preparation of the LAPs and the establishment of monitoring bodies are summarised at the end of the last reporting period in 2022, it can be concluded that in 2022 a total of five LGUs submitted information to the Agency on the adoption of the LAP, and that most of them had expert assistance which was obtained through projects. When it comes to the formation of bodies to monitor the implementation of LAPs, three LGUs completed this task in 2022, in line with the LAP Model and with expert assistance.

Taking into account the above, it can also be concluded that, in the past six years, 26 LGUs have adopted the LAP and formed a body to monitor its implementation, mostly in line with the Agency's Model.

Since the deadline for adopting the LAP was the fourth quarter of 2020, and since not all LGUs have fulfilled this obligation, the Agency assessed the first activity as not implemented, while the second activity was assessed as implemented for this reporting period because the Agency continuously monitors and reports on the adoption of LAPs and the formation of bodies to monitor their implementation.

⁹³ The Agency's complete reports are available at: https://www.acas.rs/cyr/page_with_sidebar/lap#.

Activity 2.2.10.33⁹⁴

Establish a Working Group to prepare an Impact Assessment of measures taken to reduce corruption in local self-government and collect all relevant data.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Agency • In cooperation with competent institutions and relevant civil society organisations
Deadline	Second quarter of 2021
Indicators of results	A working group has been established and is operational. All relevant data for the preparation of the Impact Assessment have been collected.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.10.33

The Agency has reported that the establishment of the working groups was completed in 2021, as discussed in detail in the Second Implementation Report.⁹⁵

The collection of data in possession of the institutions ended in 2022, which is why the Agency assessed the activity as implemented.

Activity 2.2.10.34⁹⁶

Prepare and present the Impact Assessment of measures taken to reduce corruption in local self-management	
In charge of activity	• Anti-Corruption Agency
Deadline	Second quarter of 2022
Indicators of results	Impact assessment of measures taken to reduce corruption in local self-management was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part relating to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part relating to the presentation of the Impact Assessment.

On the implementation of Activity 2.2.10.34

The Agency has reported that it prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.⁹⁷

⁹⁴ See footnote 59

⁹⁵ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

⁹⁶ See footnote 61

⁹⁷ See: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/2022/02-554_22.pdf

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities, both in the part of implementation and in the part of presentation of the Impact Assessment.

For this reason, the Agency evaluated the activity as implemented in the part relating to the preparation of the Impact Assessment, while due to the inappropriate presenter it was unable to evaluate the activity in the part related to the presentation of this document.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.2.11. Ensure the involvement of civil society in the anti-corruption programme.

The activities in question are Activities no. 2.2.11.1, 2.2.11.2 and 2.2.11.3, which are individually presented below.

Activity 2.2.11.1

Implement joint activities to encourage citizens and make their participation in the fight against corruption more efficient.	
In charge of activity	• Office for Cooperation with Civil Society
Deadline	Continuous
Indicators of results	Joint activities aimed at encouraging citizens and making their participation in the fight against corruption more efficient are continuously implemented.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.11.1

The Ministry of Human and Minority Rights and Social Dialogue has reported that in the first quarter of 2022, in cooperation with the Ministry of Justice, it announced a public call for civil society organisations to submit candidacies for membership in the Working Group charged with the preparation of the National Strategy for the Fight against Corruption 2023-2028 and the Action Plan for the implementation of the National Strategy for the Fight against Corruption 2023-2028. Two organisations were selected following the public call. However, since the organisations whose applications were rejected had many years of work experience and have participated in numerous reforms and processes of drafting regulations and public policy documents, and since the Action Plan for Chapter 23 promotes the inclusion of civil society organisations in all stages of the preparation of planning documents, the Commission proposed considering the possibility of including all the organisations that applied in the Working Group for the preparation of the National Strategy for

the Fight against Corruption 2023-2028 and the Action Plan for the implementation of the National Strategy for the Fight against Corruption 2023-2028.

Since the Ministry for Human and Minority Rights and Social Dialogue did take steps towards greater involvement of citizens in the fight against corruption, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.11.2

Further improve the system of transparent financing of civil society organisations, by:	
<ul style="list-style-type: none"> - Monitoring the implementation of the Decree on funds for stimulating programmes or the missing part of funds for financing programmes of public interest that are implemented by associations - Strengthening the capacity of public administration employees. 	
In charge of activity	• Office for Cooperation with Civil Society
Deadline	Continuous
Indicators of results	<p>The summary report of the Office for Cooperation with Civil Society contains relevant data on the implementation of the Decree.</p> <p>The number of trainings held for public administration employees, in relation to the number of planned trainings on the system of transparent financing of civil society organisations.</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.11.2

The Ministry for Human and Minority Rights and Social Dialogue has reported that, in cooperation with the Office for Information Technologies and Electronic Administration, it started the process of improving the e-application “Competition Calendar”. The application was created with the aim of implementing the provisions of the Decree on funds to encourage programmes or the missing part of funds for financing programmes of public interest implemented by associations,⁹⁸ which stipulates the obligation of authorities at all three levels of government to submit the Annual Plan for announcing public tenders.

Activities related to the additional improvement of the “Competition Calendar” application were carried out in the second quarter and should ensure easy availability of data not only about the planned competitions, areas, potential applicants and the period of their implementation, but also data about all implemented tenders, projects that were approved within said tenders, and the amounts of allocated funds. Additional improvement of the application was completed in 2022.

⁹⁸ “Official Gazette of the RS” no. 16/18

In the third quarter, two trainings were held on the topic “Financing Programmes of Public Interest Implemented by Associations”, organised by the National Academy for Public Administration and carried out by implementers employed by the Ministry for Human and Minority Rights and Social Dialogue. The training was attended by a total of 53 public administration employees. The aim of the training was to acquaint the participants with the obligations of public authorities arising from the legal framework and strategic documents related to the financing of programmes of public interest implemented by associations; to acquire knowledge required to raise the level of transparency, efficiency and responsibility in the work of state authorities that allocate budget funds to associations; to strengthen the system of fiscal responsibility; and to raise awareness of the fact that encouraging and developing integrity and accountability of state bodies strengthens citizens’ trust in their work and the work of associations whose programmes are supported by funds from the budget.

Furthermore, the Ministry of Human and Minority Rights reported that at the session held on 16 September 2022 the Government of the Republic of Serbia adopted the Action Plan for the implementation of the Strategy for the Creation of an Environment Encouraging for the Development of Civil Society 2022-2030,⁹⁹ for the period 2022-2023.¹⁰⁰ The Action Plan contains an overview of general and specific goals and measures, as well as activities planned to achieve the defined goals and measures of the Strategy for the Creation of an Environment Encouraging for the Development of Civil Society in the Republic of Serbia for the period 2022-2030.

Special objective 2 – “Improved transparent financing and sustainability of the civil sector”, envisages two measures: Measure 2.1 - Improving the stimulating normative framework and administrative practices for funding transparency and financial sustainability of the civil sector, and Measure 2.2 - Improving the staffing and professional capacities of the public administration for plan-based and transparent allocation, monitoring and evaluation of the allocation of budget funds intended for CSO programmes and projects and the achievement of set goals, directly aimed at increasing the capacity of the public administration for transparent financing of civil society organisations from budget funds. The deadline for the realisation of these activities is the fourth quarter of 2023, and the implementation of the above activities is expected in the upcoming period.

Since the Ministry of Human and Minority Rights and Social Dialogue did provide information on the implementation of the Decree on funds to encourage programmes or the missing part of funds to finance programmes of public interest implemented by associations, and since it organised capacity-building activities related to transparent financing of civil society organisations, in this reporting period the Agency assessed the activity as implemented.

⁹⁹ “Official Gazette of the RS” no. 23/22

¹⁰⁰ “Official Gazette of the RS” no. 109/22

Activity 2.2.11.3

Conduct public competitions for the allocation of funds to civil society organisations for projects in the field of anti-corruption, for initiatives at the national and local level, as well as for media initiatives in the field of anti-corruption.	
In charge of activity	• Anti-Corruption Agency
Deadline	Continuous
Indicators of results	The civil sector is involved in the fight against corruption, based on conducted competitions for donations to civil society organisations for projects in this area.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.2.11.3

The Agency has reported that it conducted another public competition for the allocation of funds to civil society organisations in 2022. Contracts on the implementation of four projects were signed with the following civil society organisations: Transparency Serbia, Niš Integrity Centre, Užice Centre for Human Rights and Democracy, and Bečej Youth Association. The implementation of projects started on 1 June 2022, but one project will remain unrealised due to the inability of the project activities holder to implement them. The Agency will return unused funds to the budget of the Republic of Serbia.

Having in mind the above, in this reporting period the activity was assessed as implemented.

4.3 Repression of Corruption

In this report, in the Section 2.2 of the Revised Action Plan for Chapter 23 - subchapter ‘Fight against Corruption’, which refers to the repression of corruption, the Agency assessed the implementation of activities related to the following benchmark:

2.3.1. Serbia is revising its Criminal Code and providing an effective solution for dealing with crimes against the economy, especially the criminal act ‘abuse of office by responsible official’.

The activities in question are Activities no. 2.3.1.1, 2.3.1.2 and 2.3.1.3, which are individually presented below.

Activity 2.3.1.1

Monitor the implementation of the amended and supplemented Criminal Code, the part referring to corruption-related and economic crimes, with the obligation of the police, public prosecutor’s office and courts to submit to the Ministry of Justice annual statistical reports on initiated and completed proceedings.	
The Ministry of Justice compiles a single annual report and publishes it on its website.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Interior • Republic Public Prosecutor’s Office • Supreme Court of Cassation • Ministry of Justice (State Secretary in charge of corruption issues)
Deadline	Continuous
Indicators of results	Annual report has been published.
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.3.1.1

The Ministry of Justice has reported that the Report for 2021 was prepared and published on the website of the Ministry of Justice.¹⁰¹

The Ministry of Internal Affairs reported that, in the first quarter, 28 criminal reports from the jurisdiction of the Internal Control Sector were filed due to the existence of grounds for suspicion that a criminal act of corruption had been committed (Article 359 of the Criminal Code - Abuse of official position; Article 367 of the Criminal Code - Accepting a bribe; Article 368 of the Criminal Code - Giving a bribe, and Article 366 of the Criminal Code - Trading in influence). In the period from 1 January to 25 March 2022, the number of recorded criminal acts, criminal reports and the number of perpetrators from Article 359 of the Criminal Code - Abuse of official position from the jurisdiction of the Police Directorate, Criminal Police Administration, Anti-Corruption Department was as follows: a total of 28 criminal reports were filed, the number of criminal offences was 116, and the number of perpetrators was 80.

¹⁰¹ See: <https://www.mpravde.gov.rs/tekst/33769/statistika-koruptivnih-krivicnih-dela-phi>

In the period from 1 January to 31 March 2022, the Sector for Analytics, Telecommunications and Information Technologies registered in the territory of the Republic of Serbia registered 154 criminal acts, 60 criminal reports and 83 perpetrators from Article 359 of the RS Criminal Code - Abuse of official position. As for Article 366 - Trading in influence, it registered 19 acts, 8 criminal reports and 17 perpetrators; from Article 367 - Accepting a bribe - 65 acts, 7 criminal reports and 11 perpetrators; while no offences from Article 368 – Giving a bribe, have been recorded.

In the second quarter, 26 criminal reports were filed from the jurisdiction of the Internal Control Sector due to the existence of grounds for suspicion that a criminal act of corruption had been committed (Article 359 of the Criminal Code - Abuse of official position; Article 367 of the Criminal Code - Accepting a bribe; Article 368 of the Criminal Code – Giving a bribe, and Article 366 of the Criminal Code - Trading in influence). The following were recorded from the jurisdiction of the Police Directorate, Criminal Police Administration of the Anti-Corruption Department: from Article 359 of the Criminal Code - Abuse of official position: 39 criminal acts, 19 criminal reports and 53 perpetrators; from Article 366 - Trading in influence: 6 offences, 2 criminal reports and 10 perpetrators; from Article 367– Accepting a bribe: 4 offences, 3 criminal reports and 12 perpetrators; and from Article 368 – Giving a bribe: 12 offences, 7 criminal reports and 16 perpetrators. In the period April-June 2022, the Sector for Analytics, Telecommunications and Information Technologies of the Ministry of Internal Affairs registered the following number of criminal offences in the territory of the Republic of Serbia under specific articles of the law: from Article 359 of the Criminal Code: 57 criminal offences, 30 criminal reports and 60 perpetrators; from Article 234 of the Criminal Code: 4 criminal acts, 4 criminal reports and 4 perpetrators; from Article 227 of the Criminal Code as amended and supplemented in 2018: 34 acts, 27 criminal reports and 40 perpetrators; and from Article 228 of the Criminal Code as amended in 2018: 6 criminal acts, 3 criminal reports and 6 perpetrators.

In the third quarter, 25 criminal reports were filed from the jurisdiction of the Internal Control Sector due to the existence of grounds for suspicion that a criminal act of corruption had been committed (Article 359 of the Criminal Code - Abuse of official position; Article 367 of the Criminal Code - Accepting a bribe; Article 368 of the Criminal Code: Giving a bribe, and Article 366 of the Criminal Code - Trading in influence). From the jurisdiction of the Police Directorate, Criminal Police Administration of the Anti-Corruption Department, the following were recorded: from Article 359 of the Criminal Code - Abuse of official position: 28 criminal acts, 20 criminal reports and 60 perpetrators; from Article 366 - Trading in influence: 1 crime, 1 criminal report and 2 perpetrators; from Article 367 – Accepting a bribe: 2 crimes, 1 criminal report and 9 perpetrators; and from Article 368 – Giving a bribe: 10 crimes, 4 criminal reports and 12 perpetrators.

In the fourth quarter, 17 criminal reports from the jurisdiction of the Internal Control Sector due were filed due to the existence of grounds for suspicion that a criminal act of corruption had been committed (Article 359 of the Criminal Code - Abuse of official position; Article 367 of the Criminal Code - Accepting a bribe; Article 368 of the Criminal Code: Giving a bribe, and Article 366 of the Criminal Code - Trading in influence). From the jurisdiction of the Police Directorate, Criminal Police Administration of the Anti-Corruption Department, the following were recorded: from Article 359 of the Criminal Code - Abuse of official position: 34 criminal acts, 31 criminal reports and 65 perpetrators; from Article 366 - Trading in influence: 3 crimes, 2 criminal reports and 21

perpetrators; from Article 367 - Accepting a bribe: 2 crimes, 2 criminal reports and 4 perpetrators, while from Article 368 – Giving a bribe, there were no criminal reports.

The Republic Public Prosecutor’s Office reported that the Prosecutor’s Office for Organised Crime and the special anti-corruption departments in higher public prosecutor’s offices submitted to the Republic Public Prosecutor’s Office reports on initiated and completed proceedings related to cases of economic crime and corruption. Based on the aforementioned reports, the Republic Public Prosecutor’s Office prepared the Annual Report on Suppression of Crime and Protection of Constitutionality and Legality for the year 2021.¹⁰²

The report contains an analysis of the state and trends of economic crime, an elaboration of the work of the Anti-Corruption Department of the Republic Public Prosecutor’s Office, as well as a statistical report - tabular overview of the work of the Prosecutor’s Office for Organised Crime and the special anti-corruption departments, presenting criminal offences against the economy, criminal offences against official duty, and criminal offences with an element of corruption.

The Agency is convinced that this is the regular annual practice of the Ministry of Justice, as supported by the reports that were prepared for 2020 and 2021 and the fact that the reports for the previous year are prepared in the current year, which is why in this reporting period it assessed the activity as implemented.

Activity 2.3.1.2

Training of judges and prosecutors for the application of the Criminal Code.	
In charge of activity	• Judicial Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Number of conducted trainings, in relation to the number of planned trainings.
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.3.1.2

The Judicial Academy has reported that a one-day round table was held in 2022 in Belgrade, with the support of the US Department of Justice (OPDAT) and the OSCE, on the topic of “Procedural Skills: Writing Indictments”, for a total of 48 participants. In 2022, three two-day workshops were held in Subotica, Niš and Novi Sad, on the topic of “Procedural Skills: Writing Indictments”, for a total of 65 participants.

With the support of the OSCE Mission in Serbia, the Judicial Academy also organised four one-day interactive workshops in Novi Sad, Niš, Belgrade and Kragujevac, on the topic of “New approaches to the exclusion of micro-traces in the forensic processing of a crime scene; Recognition of foreign

¹⁰² See: <http://www.rjt.gov.rs/docs/rad-javnih-tuzilastava-na-suzbijanju-kriminaliteta-i-zastiti-ustavnosti-2022.pdf>

court decisions and evidence collected abroad”, for a total of 120 participants. A one-day seminar on the topic of “Digital Forensics” was held in Belgrade, for a total of 22 participants.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.3.1.3

Monitor the application of the amended criminal offence ‘abuse of office by responsible official’, which includes the mechanism of ‘legal subsidiarity’, in effect since 1 March 2018, and monitor those criminal events from 1 March 2018.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor’s Office
Deadline	Continuous
Indicators of results	The annual report has been published.
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.3.1.3

The Ministry of Justice has submitted information that the Report for 2021 was prepared and published on the website of the Ministry of Justice.¹⁰³

The Republic Public Prosecutor’s Office reported that, in accordance with the Mandatory Instruction of the Republic Public Prosecutor no. A 146/2018 of 1 March 2018, the Prosecutor’s Office for Organised Crime and special anti-corruption departments in higher public prosecutor’s offices are submitting to the Republic Public Prosecutor’s Office quarterly reports on initiated and completed proceedings related to economic crime and corruption cases. Based on the aforementioned reports, the Republic Public Prosecutor’s Office monitors the actions of the prosecution in this area.

The Agency is convinced that this is the regular annual practice of the Ministry of Justice, as supported by the reports that were prepared for 2020 and 2021 and the fact that the reports for the previous year are prepared in the current one, which is why in this reporting period the Agency assessed the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter ‘Fight against Corruption’, the Agency assessed the implementation of activities related to the following benchmark

2.3.2: Prior to amending the Law on the Organisation and Competences of State Authorities in Combating Organised Crime, Corruption and Other Particularly Serious Crimes, Serbia has conducted an analysis of the organisational structure and state authorities. Serbia pays special attention to building the capacity of public prosecutor’s offices and the police, and provides the necessary financial and staff support and training. Inter-agency cooperation and the exchange of intelligence in a safe and secure manner are being significantly improved.

¹⁰³ See: <https://www.mpravde.gov.rs/tekst/33769/statistika-koruptivnih-krivicnih-dela-phi>

The activities in question are Activities nos. 2.3.2.1, 2.3.2.2, 2.3.2.3, 2.3.2.4, 2.3.2.5, 2.3.2.6, 2.3.2.7, 2.3.2.10; 2.3.2.11, 2.3.2.12 and 2.3.2.14, which are presented individually below.

Activity 2.3.2.1¹⁰⁴

Conduct an analysis of compliance of the RS normative framework with the FATF recommendations for conducting financial investigations in parallel with criminal investigations, on the basis of which a planning document in the field of combating financial crime will be prepared. (Link to AP 24, Activity 6.2.5.4)	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor's Office • Prosecutor's Office for Organised Crime • Ministry of Interior • Anti-Money Laundering Authority
Deadline	For the analysis: fourth quarter of 2020 For the planning document: fourth quarter of 2021
Indicators of results	An analysis of the compliance of the normative framework with the relevant FATF recommendations has been made. A planning document in the field of fight against financial crime has been prepared.
Agency's assessment	The activity was implemented in the part relating to the preparation of the analysis.
	The activity was not implemented in the part relating to the preparation of the planning document.

On the implementation of Activity 2.3.2.1

The Ministry of Justice has reported that, as part of the “Prevention of Money Laundering and Terrorism Financing” project, a meeting was held on 6 September 2021 between the representatives of the Ministry of Justice and the Council of Europe implementing this project, which is financed by the Kingdom of Sweden. At the meeting, it was agreed that the expert engaged to draft the analysis of compliance of the Republic of Serbia with the recommendations of the FATF in connection with financial investigations will prepare recommendations for the development of the Strategy for the Investigation of Financial Crimes. The analysis of the compliance of the normative framework with the relevant FATF recommendations has been completed and submitted to the Ministry of Justice.

Therefore, the Agency assessed the activity as implemented in the part referring to the analysis, and as not implemented in the part that referred to drafting the planning document.

¹⁰⁴ The Agency assessed Activity 2.3.2.1 as two activities because it contains a sub-activity related to the analysis and a sub-activity related to the preparation of the planning document. As one sub-activity was assessed as implemented, and the other as not implemented, the Agency counted them as two activities.

Activity 2.3.2.2

Strengthen the capacity of the Financial Investigation Unit of the Ministry of the Interior, based on the results of the analysis. (Related activity from AP 24: Activity 6.2.5.3.)	
In charge of activity	• Ministry of Interior
Deadline	From the second quarter of 2016 on.
Indicators of results	The number of employees in the Financial Investigation Unit has been increased from 57 to 63 police officers. Trainings have been conducted. Percentage of trained personnel in the Financial Investigation Unit of the Ministry of the Interior, in relation to those in need of training.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.3.2.2

The Ministry of Internal Affairs has reported that 64 job positions were envisaged in the Financial Investigations Unit in the fourth quarter of 2022, and that the number of employees was 62.

In the reporting period, police officers of the Financial Investigation Unit participated in the following seminars: 1) webinar on the topic of “Seizure of Digital Assets”, in February 2022; 2) seminar on the topic of “Value Added Tax Evasion”, in March 2022, organised by the OSCE; 3) seminar on “Financial investigations and asset recovery in human trafficking, including compensation for victims in Southeast Europe”, in March 2022, organised by the UN Office on Drugs and Crime (UNODC); 4) three seminars on “Cryptocurrencies”, organised by the OSCE Mission in Serbia; 5) regional meeting on the topic “Strengthening the fight against transnational organised crime in South-East Europe through the improvement of regional cooperation in seizure and confiscation of property, management and reuse of confiscated property”, organised by UNODC; 6) regional workshop on “Cooperation via operational networks CARIN and Globe”, organised by UNODC; and 7) training on “OSINT - Collecting Data from the Internet”, organised by the OSCE.¹⁰⁵

As further measures aimed at strengthening the capacity of the Financial Investigations Unit have been taken, in this reporting period the Agency assessed the activity as implemented.

¹⁰⁵ To clarify on which analysis this activity is based, the Ministry of Internal Affairs previously submitted information that the activity at hand was linked with the activity from the previous Action Plan for Chapter 24 (the number of the previous activity was 6.2.5.6), which related to the strengthening of the capacities of the Financial Investigation Unit based on the analysis of the work of said Unit. That analysis was conducted by OSCE expert Albert Perduca, Italian prosecutor who was on an expert mission in May 2015.

Activity 2.3.2.3

Conduct professional training of employees with information exchange mechanisms at the international level in accordance with Framework Decision 2006/960/PUP in order to more efficiently seize, confiscate and manage property.	
In charge of activity	<ul style="list-style-type: none"> • Judicial Academy • Ministry of Interior
Deadline	Continuous, starting from the fourth quarter of 2021
Indicators of results	<p>Training has been conducted.</p> <p>Percentage of employees trained on information exchange mechanisms at the international level, in relation to those in need of training.</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.3.2.3

The Judicial Academy has reported that a one-day presentation of the Handbook on confiscation of property obtained by crime¹⁰⁶ for 20 participants was held in February 2022, with the support of the US Embassy and the OSCE Mission in Serbia.

In 2022, an online seminar was held for 56 participants, on the topic “Standards and practice of confiscation of property obtained by crime”, in cooperation with the AIRE Centre and the RAI Secretariat, and with the support of the Government of the United Kingdom. Two online seminars were also held on the topic “Seizure of property obtained by crime”, in cooperation with the AIRE Centre and the RAI Secretariat, for 64 participants.

An online one-day seminar on the topic “Virtual Assets and Cryptocurrencies” was held in cooperation with the AIRE Center and the RAI Secretariat, for 103 participants.

Therefore, in this reporting period the Agency assessed the activity as implemented.

¹⁰⁶ The handbook also contains a segment dedicated to international cooperation and information exchange.

Activity 2.3.2.4

Continuous training of police, public prosecutors and judges to conduct financial investigations, monitor cash flows, act proactively and use special investigative techniques. (Activity related to AP 24: Activity 6.2.5.2)	
In charge of activity	• Judicial Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of police officers, public prosecutors and judges trained to conduct financial investigations, monitor cash flows, act proactively and use special investigative techniques, in relation to those in need of training.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.3.2.4

The Judicial Academy has reported that, with the support of the Council of Europe and the Swedish Agency for International Development and Cooperation, it held a one 2-day and five 1-day seminars in 2022 on the topic “Prevention of money laundering and terrorism financing in Serbia” in Belgrade, Niš, Novi Sad, Vrnjačka Banja, Arandjelovac and Palić, for a total of 131 participants.

In 2022, with the support of the OSCE Mission in Serbia, the Judicial Academy organised four one-day interactive workshops on the topic “New approaches to the exclusion of micro-traces in forensic processing of crime scenes; Recognition of foreign court decisions and evidence collected abroad” in Novi Sad, Niš, Belgrade and Kragujevac, for a total of 120 participants. In October, a one-day seminar on the topic of “Digital Forensics” was held in Belgrade, for a total of 22 participants.

In addition, as part of a joint project of the Council of Europe and the European Union, the Judicial Academy conducted a three-day training in Belgrade, in December, on the topic “High-Tech Crime”, for a total of 22 participants

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.3.2.5

Enable mutual connection of criminal investigations databases, i.e. a secure system for electronic exchange of information between public prosecutor's offices, the police, the Customs Administration, the Tax Administration, the Agency for the Anti-Corruption Agency and other relevant authorities that have databases of importance for combating corruption.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Ministry of the Interior • State Prosecutorial Council • Republic Public Prosecutor's Office • Agency for the Prevention of Corruption
Deadline	First quarter of 2022
Indicators of results	Databases were connected.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.3.2.5

The Republic Public Prosecutor's Office has reported that the implementation of the activities is under way. The web services the prosecutor's office presents on the platform of the National Criminal Intelligence System (NCIS platform) have been defined and submitted to the Ministry of Internal Affairs within the set deadline. The graphic layout of the future application was also defined, in accordance with the needs of the users. In the period from 11 to 13 May 2022, a workshop was held in Šabac, where members of the group dealing with IT/technical issues and the group dealing with legal issues jointly worked on the Draft Law on NCIS.

With the aim of implementing the activities from the Revised Action Plan for Chapter 24, the project "Instrument to support Serbia in achieving goals within Chapter 24 - Justice, Freedom and Security (Facility IPA 2019)" is under way, implemented for the needs of the police and the judiciary. As part of the support for the Ministry of Internal Affairs of the Republic of Serbia, this project serves to plan, among other things, activities for the further development of the Police-Intelligence Model (PIM) in establishing the NCIS. By establishing the NCIS and digitising the process, the Republic of Serbia will establish a unique, standardised, high-quality and modern system of collection, processing, search, analysis, exchange and management of data and information in the field of organised crime, corruption, terrorism and other security-threatening phenomena. In this regard, on 22 September and 1 December 2022, representatives of the Republic Public Prosecutor's Office who participate in the work of the working group for the establishment of the NCIS, and representatives of the working group for the establishment of the case management programme in the Public Prosecutor's Office (SAPO), held meetings with IT experts engaged on this project with the aim of conducting an analysis of the business processes of the public prosecutor's office and connecting the prosecutorial software with relevant police software in connection with the submission of criminal reports, exchange of electronic documents, delivery of feedback on the status of cases, and so on.

Since the measures have been taken (some after the deadline, though), and the activity has not yet been completed, the Agency assessed it as not implemented.

Activity 2.3.2.6

Adopt the by-law from Article 16, paragraph 4 of the Law on Organisation and Competences of State Authorities in the Suppression of Organised Crime, Terrorism and Corruption, which will regulate deadlines, manner and ways of official communication between the police and the public prosecutor's office in cases of organised crime and corruption. (Activity related to the AP 24: Activity 6.2.2.1)	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Ministry of Interior, Service for the Fight against Organised Crime • Republic Public Prosecutor's Office • Prosecutor's Office for Organised Crime
Deadline	Fourth quarter of 2021
Indicators of results	The by-law has been adopted.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.3.2.6

The Ministry of Justice has reported that representatives of the Ministry of Justice and the Republic Public Prosecutor's Office are working on finalising the by-law.

Since the activity has not been completed, having in mind the implementation deadline the Agency assessed the activity as not implemented.

Activity 2.3.2.7

Strengthen the capacity of the Prosecutor's Office for Organised Crime and special departments of high public prosecutor's offices for combating corruption, by conducting trainings on the application of new mechanisms prescribed by the Law on Organisation and Competences of State Authorities for Combating Organised Crime, Terrorism and Corruption (liaison officers, task forces, financial forensics service). (Activity related to the AP 24: Activity 6.2.2.3.)	
In charge of activity	<ul style="list-style-type: none"> • Judicial Academy • Prosecutor's Office for Organised Crime • Special departments high public prosecutor's offices for combatting corruption
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained employees, in relation to those in need of training.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.3.2.7

The Judicial Academy has reported that two three-day workshops were held in 2022 on the topic of “Proactive investigations of corruption cases of financial fraud and economic crime: Fraud involving value added tax (module 3)”, with the support of the US Justice Department (OPDAT) and the OSCE, for a total of 45 participants.

In 2022, with the support of the Council of Europe and the Swedish Agency for International Development and Cooperation, the Judicial Academy held one 2-day and five 1-day seminars on the topic of “Prevention of money laundering and terrorism financing in Serbia” in Belgrade, Niš, Novi Sad, Vrnjačka Banja, Arandjelovac and Palić, for a total of 131 participants.

In 2022, in cooperation with the German Organisation for International Cooperation (GIZ), the Judicial Academy organised four one-day round tables on the topic “Misuse of European Union funds”, for a total of 98 participants (judges, prosecutors, police officers and employees of the Ministry of Finance).

In December, as part of a joint project of the Council of Europe and the European Union, the Judicial Academy conducted one 3-day training in Belgrade, on the topic “High-Tech Crime”, for a total of 22 participants.

The Prosecutor’s Office for Organised Crime reported that its representatives participated in a series of educational activities,¹⁰⁷ namely: 1) CEPOL webinar “Raising awareness in EMPACT”; 2) seminar on ballistic evidence; 3) webinar “Presentation of reports on illegal financial flows in the region”; 4) online seminar on investigations into the misuse of virtual assets for the purpose of money laundering; 5) online case study of the prosecution of terrorism in the USA; 6) regional workshop on the exchange of best practices and experiences in the prevention, detection and prosecution of criminality, migrant smuggling and human trafficking in the Western Balkans; 7) training on reporting on action plans 23; 8) workshop for developing software for human resources; 9) training on the topic of proactive investigation of fraud related to value added tax, as a lecturer (VAT); 10) training for judges and judicial assistants of the special anti-corruption departments of the higher courts in the field of public procurement “Effective public procurement in the service of economic growth”, as a lecturer; 11) preparatory training for certified fraud investigations (CFE); 12) round table on the topic “Misuse of European Union funds”; 13) training for the use of antivirus protection; 14) webinar: “Mapping and analysis of offshore investments”; 15) symposium on organised crime, drug trafficking and money laundering; 16) training for trainers on the preparation of training on the topic of preventing money laundering; 17) online workshop on the fight against human smuggling and human trafficking; 18) forum of law enforcement authorities in the fight against terrorism; 19) workshops on the topic of “Implementation of the National Criminal Intelligence System (NCIS)”; 20) training for deputy public prosecutors and prosecutors’ assistants on the topic of “Writing indictments”, as a lecturer; 21) panel on “Seizure of property gains obtained by crime - Examples of good practice and the importance of regional cooperation”, as a presenter; 22) conference in the field of criminal law; 23) seminar/conference “Evidence from social media - How to collect, analyse and present them in court”; 24) webinar “Analysis of the drug market in the EU: Cocaine”; 25) panel

¹⁰⁷ The trainings completed by the financial forensic officer of the Prosecutor’s Office for Organised Crime are presented under Activity 2.3.2.10.

on “Seizure of property gains obtained by crime - Examples of good practice and the importance of regional cooperation”, as presenters; 26) joint training of task groups - simulation exercises, as participants; 27) project “Building forensic accounting capacities in Serbia”, as participants at the round table; 28) trainings on the topic “Assessment of the risk of money laundering and terrorism financing and the financing of proliferation of weapons of mass destruction, risk assessment in the digital property sector - Harmonisation of internal acts, state risk assessment and behavior of obligees”, as lecturers; 29) project “Building forensic-accounting capacities in Serbia”; 30) workshop on risk assessment of money laundering and terrorism financing in the real estate sector; 31) on the topic of case study on money laundering, as lecturers; 32) webinar “Cyber investigations in social media”; 33) workshop of the Expert Team on recommendations for reporting suspicious activities; 34) workshop of the Expert Team on developing typologies of money laundering and terrorism financing; 35) training “Communication and press”; 36) online presentation on the use of the E-Complaints application; 37) webinar “High-risk criminal networks”; 38) training: “Implementation of the Law on Prevention of Money Laundering and Terrorism Financing”, as a lecturer; 39) regional workshop on international cooperation in confiscation of assets through CARIN (Camden Asset Recovery Inter-Agency Network) and the GlobE network (Global Operation Network of Anti-Corruption Law Enforcement Authorities); 40) regional training “Investigative teams in the fight against terrorism”; webinar “Judicial cooperation”; 42) training “Chainalysis Cryptocurrency Fundamentals Certification”; 43) joint training of Task Groups; 44) webinar “Cryptocurrencies and drugs: Analysis of the use of cryptocurrencies on darknet markets in the EU and neighbouring countries”; 45) regional seminar “Money from drug trafficking cases: Better cooperation for better confiscation of property in drug trafficking cases”; 46) conference: “Effective return of property in accordance with European standards”; 47) workshop on parallel investigations (American and Dutch experiences in criminal and financial investigations, money laundering and asset confiscation); 48) topic “Court proceedings as an outcome of detected fraud: Scope, limitations and alternatives”, as a panelist; 49) regional workshop “Complex money laundering and confiscation of property”, as lecturers; 50) regional seminar “Strengthening the regional response in the fight against organised criminal groups engaged in migrant smuggling”; 51) webinar “Investment fraud”; 52) webinar “Islamist groups in the Syrian armed opposition”; 53) workshop with Dutch prosecutors on the methodology for detecting, investigating and proving money laundering cases; 54) training for deputy public prosecutors and prosecutors’ assistants on the topic of “Writing indictments”, as a lecturer; and 55) electronic lessons on illegal drug production laboratories.

Since the capacities of the Prosecutor’s Office for Organised Crime and special anti-corruption departments of higher public prosecutor’s offices have been strengthened by the above trainings, in this reporting period the Agency assessed the activity as implemented.

Activity 2.3.2.10

Strengthen the capacity of the Financial Forensics Service in the Prosecutor’s Office for Organised Crime and other authorities. (Activity related to AP 24: Activity 6.2.2.6)	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor’s Office • Prosecutor’s Office for Organised Crime
Deadline	Continuous, starting from the fourth quarter of 2020
Indicators of results	<p>A team of economic forensic experts has been formed in the Prosecutor’s Office for Organised Crime.</p> <p>Trainings of economic experts have been conducted.</p> <p>Number of conducted trainings, in relation to the number of planned trainings.</p>
Agency’s assessment	The activity was implemented

On the implementation of Activity 2.3.2.10

The Prosecutor’s Office for Organised Crime has reported that from 1 May 2022, when the second vacant job position was filled as well, the financial forensics service has had two financial forensics officers.

In the reporting period, financial forensic experts participated in the following educational activities, either as lecturers or participants: 1) webinar on the presentation of the “Report on Illegal Financial Flows in the Region”, held on 26 January 2022; 2) a webinar on the topic of investigating the abuse of virtual assets for the purpose of money laundering, as lecturers; 3) workshop on VAT fraud; 4) training on the topic “Effective public procurement in the service of economic growth”; 5) webinar “Presentation of reports on illegal financial flows in the region”; 6) online seminar on investigations into the misuse of virtual assets for the purpose of money laundering; 7) as a lecturer, at a training on conducting a proactive fraud investigation related to value added tax (VAT); 8) as a lecturer, at the training for judges and judicial assistants of the special anti-corruption departments of the higher courts in the field of public procurement “Effective public procurement in the service of economic growth”; 9) as a lecturer, on the topic “Assessment of the risks of money laundering and terrorism financing: Assessment of the state’s risk and the actions of the obligees - Harmonisation of internal acts”; 10) training of trainers for the preparation of training on the topic of money laundering; 11) workshop for drafting the National Risk Assessment: New tools for specific risks; 12) as lecturers, money laundering case study; 13) workshop on risk assessment of money laundering and terrorism financing in the real estate sector; 14) workshop of the Expert Team on recommendations for reporting suspicious activities; 15) workshop of the Expert Team on developing typologies of money laundering and terrorism financing; 16) training “Chainalysis Cryptocurrency Fundamentals Certification”; 17) workshops on the National Risk Assessment of Money Laundering and Terrorism Financing; 18) Maltese workshops: “Legal challenges in the investigation and prosecution of criminal offences involving taxes, related to the criminal offence of money laundering”; “Best practices related to the management of frozen assets”; 19) course on blockchain analysis; 20) seminar “Exchange of best practices in processing cases of money

laundering as an independent criminal offence”; 21) regional training on international cooperation and mutual legal assistance in asset recovery; 22) as lecturers, at the regional workshop “Complex Money Laundering and Confiscation of Assets” 23) as lecturers, at the training course “Application of the Law on Prevention of Money Laundering and Terrorism Financing - Documentation of obligees; and 24) regional online training on crypto/virtual assets.

The Ministry of Justice also submitted information on the implementation of this activity, which has already been listed in the section relating to the Prosecutor’s Office for Organised Crime.

The Republic Public Prosecutor’s Office reported that, in accordance with the Rulebook on Internal Organisation and Classification of Job Positions, two financial forensic experts were permanently employed in the Prosecutor’s Office for Organised Crime. Thus, both classified job positions were filled.

In the Special Anti-Corruption Departments in the Higher Public Prosecutor’s Offices in Belgrade, Niš, Kraljevo and Novi Sad, the job positions of financial forensics officer are still vacant.

In the Special Anti-Corruption Department of the Higher Public Prosecutor’s Office in Belgrade, two financial forensic experts were hired based on ad hoc contracts, while in 2022 five financial forensic experts were hired based on ad hoc contracts in the Special Anti-Corruption Department of the Higher Public Prosecutor’s Office in Niš.

With the aim of overcoming this problem, together with the Faculty of Economics of the University of Belgrade, the US Justice Department and the Ministry of Foreign Affairs - INL, the Republic Public Prosecutor’s Office is participating in the project “Building forensic-accounting capacities in Serbia”, which aims to launch a one-year academic study programme at the Faculty of Economics in Belgrade to train financial forensic experts to work in competent public prosecutor’s offices. Representatives of the prosecutor’s office participated in interviews that were conducted by the Faculty of Economics to map the need for financial forensics in prosecutor’s offices.

A round table within the project “Strengthening the forensic-accounting capacities in Serbia” was held on 1 July 2022 at the Faculty of Economics of the University of Belgrade. The round table was attended by representatives of several state bodies, namely: the Supreme Court of Cassation, the Republic Public Prosecutor’s Office, the Prosecutor’s Office for Organised Crime, the Ministry of Internal Affairs, the Administration for the Prevention of Money Laundering, and others. The topic of the round table was the curriculum of the academic study programme in financial accounting. The working version of the curriculum was presented by prof. Dr. Dejan Malinić. A panel “Court proceedings as an outcome of detected fraud: Scope, limitations and alternatives” was held on 17 November 2022 at the Faculty of Economics. The objective of the panel was to point out the importance of and the need to strengthen the forensic capacities in the Republic of Serbia.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.3.2.11

<p>Adopt a new Rulebook on the Systemisation of Job Positions in the Prosecutor's Office for Organised Crime and special anti-corruption departments in accordance with the conducted analysis of human capacity needs in Prosecutor's Office for Organised Crime and special anti-corruption departments of high public prosecutor's offices.</p> <p>(Activity related to The AP 24: Activity 6.2.2.7)</p>	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Prosecutor's Office for Organised Crime • Republic Public Prosecutor's Office • High Public Prosecutor's Offices in Belgrade, Novi Sad, Niš and Kraljevo • State Prosecutors Council
Deadline	Fourth quarter of 2020
Indicators of results	Needs analysis for staff capacity expansion has been conducted. Amendments to the Rulebook on the Systemisation of Job Positions have been adopted.
Agency's assessment	The activity was implemented in the part referring to special departments for anti-corruption of high public prosecutor's offices.

On the implementation of Activity 2.3.2.11

The Ministry of Justice has reported that changes to the Rulebook on the Classification of Job Positions in the Prosecutor's Office for Organised Crime and the Higher Public Prosecutor's Office in Belgrade were made in 2021.

The staffing plan for 2022 of the Higher Public Prosecutor's Office in Kraljevo approved five new job positions (three of which are new job positions in the Special Anti-Corruption Department), on the basis of which the Rulebook on Internal Organisation and Classification of Job Positions was amended on 5 July 2022. The Ministry of Justice approved it on 13 July 2022 and it entered into force on 1 August 2022.

The Ministry of Justice further reported that the Higher Public Prosecutor's Office in Niš adopted the Rulebook on Amendments and Supplements to the Rulebook on the Internal Organisation and Classification of Job Positions on 1 July 2022. The Rulebook was approved by the Ministry of Justice on 1 September 2022 and entered into force on 30 September 2022. The aforementioned Rulebook includes changes in the part that refers to the Special Anti-Corruption Department; namely, the number of prosecutors' assistants was increased by one executor so there are now 6 of them. The number of record takers was increased by 2 executors and there are now 7. One state employee position has been added – that of driver / delivery person. Consequently, instead of 4 job positions with 14 executors, the Special Anti-Corruption Department now has 5 classified job positions with a total of 18 executors.

The Higher Public Prosecutor's Office in Novi Sad received from the Ministry of Justice a staffing plan for 2022, according to which the number of executors employed for an indefinite period re-

mained the same as in the current Rulebook on the Internal Organisation and Classification of Job Positions. Therefore, there was no need to change the Rulebook.

The Republic Public Prosecutor's Office has reported on the above Rulebooks as well.

The Prosecutor's Office for Organised Crime reported that it has prepared an Analysis of the organisational structure, powers and the existing and necessary capacities of that Office as at 2020. The analysis showed that, in order to achieve faster, better and more economical flow of criminal proceedings and prosecutorial investigations led by the Prosecutor's Office for Organised Crime, intensive international cooperation, fulfilment of obligations undertaken in connection with the implementation of a series of strategic documents, and participation in the process of European integration in the area of negotiation Chapters 23 and 24, it is necessary to increase the number of employees in the Prosecutor's Office for Organised Crime as soon as possible, as follows:

Employ the envisaged number of deputy prosecutors for organised crime so that there are 25 of them (currently, there are 5 vacancies), a financial forensics officer (1 vacancy), and a typist (1 vacancy);

Increase the number of job positions of prosecutors' assistants from 19 to 25, typists/record takers by 2 job positions, registrars by 2 job positions, and IT support technicians by 1 job position;

Introduce new job positions for European integration and strategic planning (1 job position), translation to and from English (1 job position), study-analytical tasks (2 job positions), administrative-technical support, general affairs and human resources (1 job position), and for entering data into the application for monitoring money laundering and terrorism financing cases (1 job position).

This analysis was submitted to the Ministry of Justice with the aim of adopting a new Rulebook on the Classification of Job Positions in the Prosecutor's Office for Organised Crime and the Staffing Plan. On 7 May 2021, the Prosecutor's Office for Organised Crime was informed that the Staffing Plan was adopted on 27 April 2021, envisaging an increase in the number of employees in this prosecutor's office in accordance with the needs identified in the aforementioned analysis; On 14 May 2021, the Ministry of Justice approved the new Rulebook on Internal Organisation and Classification of Job Positions in the Prosecutor's Office for Organised Crime.

In the Second Implementation Report,¹⁰⁸ the activity was assessed as implemented in the part related to the Prosecutor's Office for Organised Crime, so the Agency did not deal with it any further in this report, except for presenting the information that was submitted by the Prosecutor's Office for Organised Crime once again.

Having in mind the above, the Agency assessed the activity as implemented in the part that refers to special anti-corruption departments of the higher public prosecutor's offices.

¹⁰⁸ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Activity 2.3.2.12

Fill the vacancies in line with the Rulebook on the Systemisation of Job Positions in Prosecutor's Office for Organised Crime and special anti-corruption departments of high public prosecutor's offices. (Activity related to the AP 24: Activity 6.2.2.8)	
In charge of activity	<ul style="list-style-type: none"> • Prosecutor's Office for Organised Crime • State Prosecutors Council • Republic Public Prosecutor's Office • Ministry of Justice (State Secretary in charge of corruption issues)
Deadline	Fourth quarter of 2021
Indicators of results	Administrative capacities of Prosecutor's Office for Organised Crime and special anti-corruption departments have been filled in accordance with the new Rulebook on the Systemisation of Job Positions.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.3.2.12

The Prosecutor's Office for Organised Crime has reported that there was an increase in the staffing capacity in said Prosecutor's Office in 2022 because another deputy prosecutor and one financial forensic scientist started working, while preparatory activities are under way to fill the remaining vacant job positions. It also reported that the current accommodation capacities of the Prosecutor's Office for Organised Crime are not sufficient to accommodate all the planned job positions. This will be fully possible only after the new building that will house the Prosecutor's Office for Organised Crime is constructed, in accordance with activity 6.2.2.14 of the Action Plan for Chapter 24.

The Republic Public Prosecutor's Office reported that activities to fill job positions in the special anti-corruption departments have continued.

In 2022, one prosecutor's assistant was assigned to the Special Anti-Corruption Department of the Higher Public Prosecutor's Office in Belgrade.

Due to the increased volume of work, in the Special Anti-Corruption Department of the Higher Public Prosecutor's Office in Niš two prosecutor's assistants were engaged for a specific period of time, one record taker and one registry office clerk were hired, while one record taker was hired on a permanent basis in accordance with the amendments to the Rulebook on the Classification of Job Positions.

In the Special Anti-Corruption Department in Novi Sad, all the positions have been filled in accordance with the current Rulebook on Internal Organisation and Classification of Job Positions, except for the position of financial forensic officer.

In the Special Anti-Corruption Department of the Higher Public Prosecutor's Office in Kraljevo two positions envisaged in the Rulebook on Internal Organisation and Classification of Job Positions have been filled, namely the position of prosecutor's assistant - 1 executor, and the position of

registrar - one executor, while the position of financial forensic officer is still vacant. In the course of 2022, the number of employed record takers was increased by one, based on a special approval.

To further strengthen the capacity of the special anti-corruption departments, in 2022, 10 deputy public prosecutors were referred to the Special Anti-Corruption Department in Belgrade, five deputy public prosecutors were referred to the Special Anti-Corruption Department in Novi Sad, and three deputy public prosecutors were referred to the Special Anti-Corruption Department in Kraljevo.

Activity 2.3.2.12 is not adequately termed, bearing in mind that, in essence, it requires a process longer than a one-off deadline. Rulebooks from activity 2.3.2.11 made it possible to strengthen the staffing capacities, which was done in 2022, both in the Prosecutor's Office for Organised Crime and in the special anti-corruption departments of the higher public prosecutor's offices. However, since the need to fill job positions in the above institutions still exists, the Agency assessed the activity as not implemented.

Activity 2.3.2.14

Procure technical equipment for the Prosecutor's Office for Organised Crime and special anti-corruption departments of high public prosecutor's offices in accordance with the results of the analysis. (Activity related to the AP 24: Activity 6.2.2.10)	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Prosecutor's Office for Organised Crime
Deadline	Fourth quarter of 2021
Indicators of results	Technical equipment for the Prosecutor's Office for Organised Crime and special anti-corruption departments has been procured.
Agency's assessment	The activity was not implemented in the part referring to the equipment for the Prosecutor's Office for Organised Crime.

On the implementation of Activity 2.3.2.14

The Ministry of Justice has reported that on 21 September 2021, following the public procurement procedure, it has concluded a contract with the best selected bidder on the purchase/sale of technical equipment for special departments of public prosecutor's offices in the amount of RSD 69,090,038.82, including VAT. The contract was fully implemented, i.e. the equipment was delivered to the authorities in February 2022.

The Prosecutor's Office for Organised Crime reported that, in accordance with the Analysis of Technical Capacities and Needs for Technical Equipment of the Prosecutor's Office for Organised Crime, the Ministry of Justice of the Republic of Serbia has procured some of the necessary equipment.

In the Second Implementation Report,¹⁰⁹ the activity was assessed as implemented in the part related to equipment for special departments of the higher public prosecutor's offices, and the Agency did not deal with it any further in this report.

Having in mind the deadline for the implementation of this activity, and the fact that the procurement of equipment for the Prosecutor's Office for Organised Crime was partially realised, the Agency assessed the activity as not implemented in that part.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.3.3. Conduct effective investigations into all allegations of corruption in privatisation cases, and ensure full transparency and accountability to avoid similar cases in the future.

The activities in question are Activities nosno. 2.3.3.1. and 2.3.3.2, which are individually presented below.

Activity 2.3.3.1

Create and implement the Programme of mutual professional development of authorities participating in the privatisation process and authorities in charge of prevention and criminal prosecution of corruption cases.	
In charge of activity	<ul style="list-style-type: none"> • Judicial Academy (Director) • Ministry in charge of economic affairs • Anti-Corruption Agency
Deadline	Fourth quarter of 2021
Indicators of results	<p>Trainings have been conducted.</p> <p>Number of conducted trainings, in relation to the planned trainings on mutual professional development of authorities participating in the privatisation process and authorities in charge of prevention and criminal prosecution of corruption cases.</p>
Agency's assessment	The activity was not implemented in the part referring to the realisation of the trainings.

On the implementation of Activity 2.3.3.1

The Judicial Academy has reported that no trainings were conducted after the curriculum and the case study with working materials were created. There is a plan to organise them in the upcoming period.

¹⁰⁹ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

In the Second Implementation Report,¹¹⁰ the activity was assessed as implemented in the part relating to the creation of the Professional Training Programme, and the Agency did not deal with it in this report. The activity was assessed as not implemented in the part relating to conducting trainings.

Activity 2.3.3.2

Hold regular meetings of the Anti-Corruption Council with the Republic Public Prosecutor's Office and the Prosecutor's Office for Organised Crime in order to better implement the recommendations provided in the Council's reports.	
In charge of activity	<ul style="list-style-type: none"> • Anti-Corruption Council • Republic Public Prosecutor's Office • Prosecutor's Office for Organised Crime
Deadline	Continuous
Indicators of results	Meetings are being held on a regular basis.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.3.2

The Anti-Corruption Council has reported that a meeting was held with the Republic Public Prosecutor's Office with the aim of exchanging information and acting upon reports of the Anti-Corruption Council that were submitted to the Republic Public Prosecutor's Office. The Council agreed with the Republic Public Prosecutor's Office to hold regular quarterly meetings in the upcoming period.

The Republic Public Prosecutor's Office also reported that a meeting with representatives of the Anti-Corruption Council was held on 23 March 2022; the Council's reports were discussed at said meeting and further cooperation in the fight against corruption was agreed upon.

Therefore, in this reporting period, the Agency assessed the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.3.4. Improve the collection of uniform statistics on corruption, drawing clear distinctions between different criminal offences and providing the possibility of a detailed assessment of the length of cases, outcomes, and so on.

The activities in question are Activities no. 2.3.4.1, 2.3.4.2 and 2.3.4.3, which are presented below.

¹¹⁰ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Activity 2.3.4.1

Conduct an analysis of feasibility studies on the establishment of a single electronic register of corruption-related crimes, conducted under IPA 2013 “Prevention and Fight against Corruption” and USAID GAI projects.	
Act in line with the findings of the analysis in terms of the most feasible solution.	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues)
Deadline	Fourth quarter of 2021
Indicators of results	Feasibility study analysis has been conducted.
Agency’s assessment	The activity was not implemented in the part referring to acting in line with the findings from the analysis.

On the implementation of Activity 2.3.4.1

The Ministry of Justice has reported that the analysis of the feasibility study has been carried out, and that based thereon, software was developed and is now successfully used.

In the Second Implementation Report,¹¹¹ the activity was assessed as implemented in the part of the analysis of the feasibility study, so the Agency did not deal with it any further in this report.

Since action in accordance with the findings of the analysis was taken in 2022, in terms of the most feasible solution, the Agency assessed that part of the activity as implemented.

Activity 2.3.4.2

Amend positive regulations so as to establish a unique methodology for data collection, recording and statistical reporting on criminal acts of corruption.	
In charge of activity	• Ministry of Justice (state secretary in charge of corruption issues) • Government of the Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	Second quarter of 2022
Indicators of results	Amendments to regulations were adopted.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.3.4.2

The Ministry of Justice has reported that a uniform methodology for data collection, recording and statistical reporting on corruption crimes was established based on the functional analysis developed within the IPA 2013 project “Prevention and Fight against Corruption” and USAID GAI projects. It further reported that there was no need to change any positive regulations in this area.

¹¹¹ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%202023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Although Activity 2.3.4.2 included amendments to the regulations, the essence of the activity refers to the establishment of a uniform methodology for data collection, recording and statistical reporting on corruption crimes. Since said methodology was established, the Agency assessed the activity as implemented.

Activity 2.3.4.3

Establish a unique record (electronic register) of criminal acts with a corrupt element, in accordance with the law governing personal data protection, which will be used in the future to create criminal policy.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (state secretary in charge of corruption issues) • Republic Public Prosecutor's Office • Partner institutions • Ministry of Internal Affairs • Ministry of Finance • Authorities in charge of repression of corruption • All relevant institutions
Deadline	Second quarter of 2022
Indicators of results	The record was established.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.3.4.3

The Ministry of Justice has reported that an electronic registry of criminal offences containing a corrupt element (Electronic Register of Corruption Cases - ERCC) has been established, and that data is collected in accordance with the Law on Personal Data Protection. It also reported that the total number of cases in ERCC, as on the day of reporting, was 8,946.

The Republic Public Prosecutor's Office reported that a project was implemented in cooperation with the Ministry of Justice of the Republic of Serbia, the Republic Public Prosecutor's Office and the Supreme Court of Cassation, within the USAID Government Accountability project, to develop the Electronic Register of Corruption Cases (ERCC). ERCC is a reporting software tool that will provide regular and ad hoc reports with timely information on the status of corruption cases, reveal "bottlenecks" in the investigation of this type of cases, and enable the identification of strategies to increase the efficiency of the four special anti-corruption departments in higher courts and higher public prosecutor's offices. The register will communicate with existing case management systems in courts and public prosecutor's offices (AVP, SAPO) by generating reports based on data stored in these systems. Using the application will not require the introduction of new or changes to existing work processes in registry offices.

For the purpose of developing the application, the Republic Public Prosecutor's Office created models of necessary reports, the correctness of most reports was tested and confirmed, while a few reports could not be tested due to work on improving the SAPO programme for managing cases in public prosecutor's offices.

The development of the new SAPO application is in the final phase. The work on additional functionalities of the programme - necessary for the operation of the Electronic Register of Corruption Cases - was completed in the second half of 2022, enabling the testing of additional reports, e.g. the report on the duration of the proceedings and the report on the costs of criminal proceedings. Since the duration of the SAPO software development project has been extended due to the necessary refinement of the existing functionalities and the development of previously requested functionalities necessary for the work of public prosecutors' offices, the start of the application of this reporting tool intended for special anti-corruption departments was postponed until 1 July 2023.

As it still remains to add new functionalities in order for the ERCC to become fully operational in all competent institutions, and bearing in mind the deadline for implementation, the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.3.5. Ensure that the legislative and institutional frameworks allow for the effective temporary and permanent confiscation and management of criminal assets stemming from crime, which would lead to more asset confiscation cases, as well as the following benchmark:

Serbia is establishing an initial record of efficient and effective investigations (including financial investigations), prosecutions, convictions and confiscations of assets in corruption cases, including cases of high-level corruption. (Serbia is applying a zero-tolerance policy for information leakage in connection with planned or ongoing corruption investigations and imposes sanctions in the event of such situations - discussed in 2.3.7)

The activities in question are Activities nos. 2.3.5.1, 2.3.5.2 and 2.3.5.3, which are presented below.

Activity 2.3.5.1

Improve the capacity of the Directorate for the Management of Confiscated Property by holding trainings, especially in the part related to the management of property confiscated from legal persons.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Directorate for the Management of Confiscated Property
Deadline	Continuous
Indicators of results	<p>Trainings have been conducted.</p> <p>Percentage of trained employees in the Directorate for the Management of Confiscated Property, in relation to those in need of training.</p>
Agency's assessment	The activity was implemented

On the implementation of Activity 2.3.5.1

The Ministry of Justice has reported that representatives of the Directorate, as part of the continuous training of judges and prosecutors, are attending trainings in commercial and criminal law organised by the Judicial Academy. A Memorandum of Cooperation was signed between the Directorate and the Judicial Academy on continuous training of the Directorate's employees. It also reported on trainings that were held on the following topics: 1) Virtual assets and cryptocurrencies; 2) Standards and practice of confiscation of property obtained through crime; 3) Jurisprudence of the European Court of Human Rights in matters of confiscation of property obtained through crime, and 4) Case study: Practice and implementation of the Law on Confiscation of Property Obtained through Crime.

Having in mind the above, in this reporting period the Agency assessed the activity as implemented.

Activity 2.3.5.2

Improve international cooperation by concluding agreements with directorates from countries in the region and the EU. (Activity related to the AP 24: Activity 6.2.6.6)	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Directorate for the Management of Confiscated Property
Deadline	Continuous
Indicators of results	Number of contracts concluded with directorates from the countries of the region and the EU.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.3.5.2

The Ministry of Justice has reported that a Draft Agreement on the division of property with foreign countries has been prepared and will be submitted as a proposal for the basis for negotiations with interested parties. Since positive answers were received from the counterparties, the Government of the Republic of Serbia adopted the Draft Agreement and the basis for conducting negotiations for the purpose of concluding a contract on the division of property with the Kingdom of Spain, Montenegro, Bosnia and Herzegovina and the Republic of Srpska.

A draft regional agreement on the division of assets, to be signed by the above countries, was prepared in cooperation with the "Asset Recovery Project Western Balkans Rule of Law Programme", AIRE Centre. The provisions of the submitted Draft Agreement were discussed at two online meetings. A conference has been scheduled in Belgrade for 7 February 2023, where the final negotiations on the submitted text of the agreement should take place, after which the signing procedures should begin.

The Kingdom of Spain has submitted a response to the Draft Agreement, and harmonisation of the proposed texts of both parties is under way.

Although steps were taken to implement the activity, in this reporting period the Agency assessed the activity as not implemented from the standpoint of the result indicator which foresees a number of agreements concluded with directorates from the countries of the region and the EU.

Activity 2.3.5.3

Strengthen the capacity of the Directorate for the Management of Confiscated Property by hiring new people in accordance with the Rulebook on the Systemisation of Job Positions.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Directorate for the Management of Confiscated Property
Deadline	Fourth quarter of 2021
Indicators of results	Vacancies have been filled in accordance with the Rulebook on the Systemisation of Job Positions.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.3.5.3

The Ministry of Justice has reported that the procedure to amend the Rulebook on the Classification of Job Positions, which should provide a basis for the implementation of this activity, is under way. Therefore, the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Agency assessed the implementation of activities related to the following benchmark:

2.3.7. Serbia is establishing initial records of efficient and effective investigations (including financial investigations), prosecutions, convictions and confiscation of assets in corruption cases, including cases of high-level corruption - discussed in 2.3.5). Serbia is applying a zero-tolerance policy on information leaks related to planned or ongoing corruption investigations and imposing sanctions in such situations.

The activities in question are Activities nos 2.3.7.1, 2.3.7.2, 2.3.7.3 and 2.3.7.4, which are presented individually below.

Activity 2.3.7.1

Adopt new regulations and procedures in order to introduce control and control mechanisms in accordance with the analysis of the current state of affairs (normative, organisational and functional), and identify weaknesses and risks (level of data availability, with accurate determination of availability in terms of time and content).	
In charge of activity	• Ministry of Interior
Deadline	First quarter of 2021
Indicators of results	Amended or adopted new regulations and procedures have been amended, or new ones adopted, in accordance with the analysis.
Agency's assessment	Activity cannot be assessed.

On the implementation of Activity 2.3.7.1

The Agency did not receive any new information on the basis of which it could assess the implementation of this activity. The Agency explained the reasons why Activity 2.3.7.1 cannot be assessed in the Second Implementation Report.¹¹²

Activity 2.3.7.2

Establish a Working Group in the Ministry of Justice to consider initiatives of the Republic Public Prosecutor's Office concerning the amendments and supplements to the Criminal Procedure Code (based on the Analysis of the normative, organisational and functional frameworks - measures to prevent information leaks and repressive measures to suppress unauthorised communication of criminal procedure data), the Criminal Code and the Law on Public Prosecutor's Office (based on the Analysis of the legislative framework related to criminal, disciplinary and other types of liability in connection with unauthorised disclosure of information).	
Act in accordance with the conclusions of the working group.	
(Related to Activity 2.2.10.23)	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor's Office • Government of the Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	For the creation of the Working Group: first quarter of 2021 For amendments and supplements: until the fourth quarter of 2022
Indicators of results	The Working Group has been established. The law has been amended and supplemented in accordance with the conclusions of the Working Group.
Agency's assessment	The activity was not implemented in the part relating to the adoption of regulations.

¹¹² See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

On the implementation of Activity 2.3.7.2

The Ministry of Justice has reported that, by the Decision of the Minister of Justice no. 119-01-126/2021-05 of 12 May 2021, a Working Group was established to analyse the Criminal Procedure Code with the aim of identifying and eliminating its weaknesses and shortcomings, and preparing a working version of the text of the Law on Amendments and Supplements to the Criminal Procedure Code based on the results of the analysis.

By the decision of the Minister of Justice no. 119-01-125/2021-05 of 12 May 2021, a Working Group has been formed to analyse the effectiveness of the criminal justice system. The analysis is to be based on completed cases, and its aim is to identify and eliminate weaknesses and shortcomings of the system and prepare the working text of the Law on Amendments and Supplements to the Criminal Code based on the results of the analysis. The MoJ further reported that the Working Group held a large number of meetings, and that the preparation of the text of the amendments and supplements to the Criminal Code is under way.

In the Second Implementation Report,¹¹³ the activity was assessed as implemented in the part referring to the establishment of the working groups, and the Agency did not deal with it any further in this report. Since the amendments and supplements to the regulations were not adopted in 2022, the Agency assessed that part of the activity as not implemented.

Activity 2.3.7.3

Increase the level of IT protection by creating the so-called early warning system and the alarm system.	
In charge of activity	• Ministry of Interior
Deadline	Continuous
Indicators of results	The level of IT protection has been increased. The so-called early warning system and alarm system has been established.
Agency's assessment	The activity was implemented

On the implementation of Activity 2.3.7.3

The Ministry of Internal Affairs has submitted information that, during the reporting period, within the Information System Attack Response Center (CERT) of the Ministry of the Interior, activities took place in accordance with the competences and the normative framework in the field of information security, namely: Monitoring the ICT systems of the Ministry of Internal Affairs.

Protection against information leakage is included in the protection of the IT system of the Ministry of Internal Affairs, which is why in this reporting period the Agency assessed the activity as implemented.

¹¹³ See: https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprov%C4%91enju%20Revidiranog%20akcionog%20plana%20za%20Poglavlje%2023-Potpoglavlje%20Borba%20protiv%20korupcije.pdf

Activity 2.3.7.4¹¹⁴

Monitor the sanctioning of violations of regulations to prevent the disclosure of confidential information and prepare the analysis of the application of regulations and recommendations.	
In charge of activity	<ul style="list-style-type: none"> • Ministry of Interior • Republic Public Prosecutor's Office
Deadline	Continuous
Indicators of results	<p>Number of violations of regulations that serve to prevent disclosure of information.</p> <p>Analysis of the application of regulations, with recommendations, has been prepared.</p>
Agency's assessment	The activity was implemented in the part relating to monitoring the sanctioning of the violation of regulations.
	The activity cannot be assessed in the part referring to the analysis of the application of regulations and recommendations.

On the implementation of Activity 2.3.7.4

The Ministry of Internal Affairs has reported that, in the first quarter, the Police Directorate, the Criminal Police Administration, the Anti-Terrorism Service and the Directorate for Administrative Affairs had one disciplinary procedure each, pending for the violation of official duties under Article 207, paragraph 1, item 10 of the Law on Police.¹¹⁵ One disciplinary procedure each was also pending on the above basis in the Police Administration for the city of Belgrade and the Police Administrations in Zaječar, Kraljevo, Novi Sad, Vranje and Niš. In this quarter, one disciplinary procedure conducted on the aforementioned basis was completed in the Police Administration in Leskovac, and a fine of 20% salary reduction for a period of two months was imposed.

In the second quarter, there were no recorded data referring to Article 207, paragraph 19 of the Law on Police.

In the third quarter, two disciplinary proceedings were pending in the Police Directorate, Criminal Police Administration, while one disciplinary proceeding is pending in the Sector for Analytics, Telecommunications and Information Technologies due to the violation of official duty from Article 207, paragraph 1, item 10 of the Law on Police.

It is also stated that, in the third quarter, the Ministry of Internal Affairs was informed that the disciplinary procedure that was pending in the Directorate for Administrative Affairs (first quarter of 2022) has ended by the defendant being released from responsibility. One disciplinary procedure each is pending on the above basis in the Police Administrations of Vranje, Novi Sad, Niš and Leskovac. In this quarter, one such disciplinary procedure was concluded in the Police Administration of the city of Belgrade, due to the statute of limitations.

¹¹⁴ The Agency assessed Activity 2.3.7.4 as two activities because it includes the monitoring of sanctioning of regulation violations as well as the analysis of the application of regulations.

¹¹⁵ "Official Gazette of the RS" no. 6/16, 24/18 and 87/18

In the fourth quarter, in the Police Directorate, Criminal Police Administration, a disciplinary procedure was pending for violation of official duty from Article 207, paragraph 1, item 10 of the Law on Police. Two disciplinary proceedings that were conducted on the above-mentioned basis were completed in the fourth quarter, namely: one in the Criminal Police Administration, which ended with the police officer being declared guilty and imposed a measure of assignment to a workplace requiring a lower level of education for a period of 20 months, and one in the Sector for Analytics, Telecommunications and Information Technologies, which ended with the police officer being found guilty and imposed a measure in the form of a fine of 20% salary reduction for a period of two months. One disciplinary procedure each is pending on the above basis in the Police Administrations in Vranje, Novi Sad, Niš, Leskovac and Prijepolje.

According to the report of the Republic Public Prosecutor's Office, in the course of the reporting period this institution was not notified of the existence of grounds for suspicion that a violation of the regulations on the prevention of disclosure of confidential information¹¹⁶ has been committed.

Based on the result indicators, in this reporting period the Agency assessed the part of the activity related to monitoring the sanctioning of violations of regulations preventing disclosure of confidential information, as implemented. In the part referring to the analysis of the application of regulations and recommendations, the Agency could not assess the status of implementation because it did not have information on the basis of which it could do so.

¹¹⁶ The Republic Public Prosecutor's Office previously reported that the analysis was prepared in 2018, when an ideal model and instructions were created and forwarded to all prosecutor's offices.

5. RECOMMENDATIONS

5.1 Implementation

1. It is necessary to revise the Action Plan for Chapter 23 - subchapter 'Fight against Corruption';
2. It is necessary to revise the deadlines for activities that involve several different activities; not all these should have the same deadline, especially in cases where one sub-activity results from another (e.g. conducting an analysis and acting in accordance with said analysis in the same period of time);
3. It is necessary to take into account the duration of certain procedures, based on the positive regulations of the Republic of Serbia, and to harmonise the deadlines for the implementation of activities (e.g. the procedure for filling job positions);
4. It is necessary to harmonise the deadlines referring to the implementation of the impact analysis on regulations and the evaluation of the impact of those regulations with the Law on the Planning System of the Republic of Serbia¹¹⁷ (Articles 1, 2, 40 and 41 of the Law on the Planning System of the Republic of Serbia);
5. It is necessary to revise the deadlines so that the activities which, in essence, precede and condition the implementation of others, have appropriate deadlines;
6. Activities which, by their very nature, are of a one-off character, should be marked as such (deadline-wise);
7. It is necessary to mark the activities which, in essence, are not of a one-off character (e.g. procurement of technical equipment based on analyses that precede it) as such (deadline-wise), so that their implementation can be monitored in the subsequent reporting cycles as well;
8. It is necessary to review the expediency of conducting analyses and/or adopting supporting acts at the annual level if the nature of the activity does not require this (e.g. drafting new Instructions for the preparation of the programme budget);
9. If it is envisaged that a certain activity is to be carried out with the participation of civil society organisations, it is necessary to submit information on whether civil society organisations were indeed involved in the implementation of the activity;
10. It is necessary to exclude activities related to documents whose validity period has expired (e.g. application for reporting on the Operational Plan for the Prevention of Corruption in Areas Susceptible to Risk)

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11. It is necessary to define the activity holders in accordance with the Law on the Budget System so that the institution in charge of collecting reports is not the main activity holder. The main activity holder should be the institution in charge of the reporting (Article 81, Paragraph 4 of the Law on the Budget System).

5.2 Improving the Quality of Reporting

12. When submitting information, those obliged to report should be guided by the essence of the activity itself, as well as the result indicator, and should submit complete information to make it possible to assess implementation;
13. In the case of capacity building and training activities, which are continuous by nature, it is necessary that the reporting entities submit information on the percentage of those trained in relation to those in need of training. This can be done by creating an annual plan containing base and target values based on the analysis of training needs, and by submitting reports to the Agency with information on the fulfilment of said plan, to enable monitoring how the strengthening of capacities contributes to the implementation of the competences of the institutions, that is, the achievement of the goal to be reached through that activity;
14. In the case of activities that involve conducting proceedings, it is necessary to also include information on the outcome of the proceedings that have been completed.

5.3 Closer Definition of Certain Activities, Those in Charge and the Result Indicators

15. It is necessary to avoid repeating the same activities;
16. It is necessary to change the names of institutions that have changed in the meantime (e.g. by adopting new regulations, such as the Law on Prevention of Corruption, the Law on Public Procurement and the Law on Amendments and Supplements to the Law on Ministries);¹¹⁸
17. It is necessary to consider also the recommendations of the reporting entities which are listed in the individual activities themselves, and to amend the document in accordance with the recommendations. In the event that some of them are not acceptable, such a conclusion must be thoroughly explained and appropriately presented to the specific reporting entity;
18. In the case of result indicators listing only the report of a certain institution, it is necessary to change the result indicator so as to define the elements it should contain, which arise

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from the activity itself, bearing in mind that the report itself is a source of data verification, but not an indicator of results in the narrower sense of the word;

19. It is necessary to exclude result indicators that include institutions that are not competent for the implementation of activities;
20. It is necessary to exclude result indicators that are not directly related to the implementation of activities, that is, are not the responsibility of the institution listed as the activity holder;
21. It is necessary to fully harmonise the result indicators with the activity in connection with which they were defined;
22. It is necessary to redefine the parts of the activity for which the listed activity holder is not responsible, that is, to define another, appropriate activity holder;
23. In the case of activities that envisage holding meetings, it is necessary to more closely define the result indicators so as to determine the outcome of the meetings, in addition to the fact that they are being held on a regular basis;
24. In the case of activities in which the institution has stated that the analysis had already been carried out, it is necessary to clarify whether the issue is the already conducted or the new analysis. If it is the already conducted analysis, it is necessary to exclude that result indicator and adjust the activity, and if not, it is necessary to redefine the result indicator with a clear indication of which institution should conduct the analysis;
25. It is necessary to ensure consistency in defining all the elements of the Action Plan.

6. GENERAL REMARKS ON THE SUPERVISION OF IMPLEMENTATION

6.1 Revision of the Action Plan for Chapter 23

At the third Intergovernmental Conference, held in Brussels on 18 July 2016, the Republic of Serbia opened negotiating Chapters 23 (Judiciary and Fundamental Rights) and 24 (Justice, Freedom and Security). Following the recommendations of the European Commission from the Screening Report for Chapter 23, made on the basis of conclusions from explanatory and bilateral meetings on the analytical review of legislative compliance, and after consultations with relevant actors and the civil society, the Government of Serbia adopted the Action Plan for Chapter 23 on 27 April 2016. One of the recommendations of the European Commission to the Republic of Serbia was to “adopt one or more detailed action plans with a harmonised schedule and clear objectives and deadlines, as well as the necessary institutional framework and adequate estimates of costs and financial allocations in the following areas: justice, the fight against corruption and fundamental rights.” Following the adoption of the Action Plan for Chapter 23, negotiations on this chapter were opened in July 2016. The Common Position of the European Union for Chapter 23, including 50 transitional criteria defined in order to assess further progress of the Republic of Serbia, was presented at the above mentioned Intergovernmental Conference.

The revised Action Plan for Chapter 23 was adopted by the Government of the Republic of Serbia on 10 July 2020.¹¹⁹

As stated in the Revised Action Plan for Chapter 23, the revision of the Action Plan for Chapter 23 was necessary to review the activities that clearly indicate future direction (setting new, realistic deadlines), make interventions in the formulation of activities so that they properly reflect the recommendations from the Screening Report and the benchmarks, and eliminate the observed difficulties in the implementation and monitoring of the implementation of activities. During the process of revision, the aim was for the interventions to properly reflect the recommendations of the Screening Report and the benchmarks, taking into account the assessments of the fulfilment of activities provided by the Council for the Implementation of the Action Plan for Chapter 23, contributions of responsible institutions - holders of activities from the Action Plan for Chapter 23, and difficulties observed in the implementation and monitoring of the implementation of activities.

¹¹⁹ See: <https://www.mpravde.gov.rs/files/Revidirani%20AP23%202207.pdf>

As also provided for in the Revised Action Plan for Chapter 23, the oversight of the implementation of activities listed in this document has been entrusted to the Coordination Body.

The Secretariat of the Coordination Body provides the Body with professional and administrative-technical support in performing the entrusted tasks. The Coordination Body conducts oversight by analysing and reviewing draft implementation reports, making recommendations for improving the implementation of the Revised Action Plan for Chapter 23, and initiating an early warning mechanism in case of delays or other implementation problems. This Body adopts the implementation reports and forwards them to the European Commission, the Government of the Republic of Serbia and the National Assembly. Members of the Coordination Body are appointed by the Government. Members of the Body are top-level officials who come from the institutions that are in charge of carrying out the main part of the activities from the Revised Action Plan for Chapter 23.

In 2020, the Government of the Republic of Serbia made a decision to establish the Coordination Body for the Implementation of the Action Plan for Chapter 23: Judiciary and Fundamental Rights, which was amended in 2021.¹²⁰

Four meetings of the Coordination Body were held in 2022: on 28 February, 19 May, 26 July and 28 October. In 2021, the Coordination Body established a new way of reporting that monitors the indicators of results, as well as the so-called Early Warning Mechanism, with the aim of special monitoring of activities whose implementation is delayed or expected to be delayed. This mechanism was also applied in 2022.

6.2 Supervision of Implementation

In the process of monitoring the implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption' in 2022, the Agency submitted quarterly communications to the institutions responsible for implementing the subchapter 'Fight against corruption',¹²¹ setting deadlines for the submission of quarterly implementation reports, in line with the Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan

¹²⁰ "Official Gazette of the RS" no. 98/20 and 6/21

¹²¹ Written communication was dispatched to the following institutions: Government of the Republic of Serbia; Ministry of Justice; Anti-Corruption Council; Republic Public Prosecutor's Office; Prosecutor's Office for Organised Crime; Ministry of Finance; Tax Administration; Customs Administration; Ministry of Health; Ministry of Education, Science and Technological Development; Ministry of Interior; Ministry of State Administration and Local Self-Government; Ministry of Human and Minority Rights and Social Dialogue; National Academy of Public Administration; Human Resources Management Service; High Civil Service Council; Judicial Academy; Public Procurement Office, and the Commissioner for Information of Public Importance and Personal Data Protection. After the new Government of the Republic of Serbia formation on 26 October 2022, written communication was dispatched to the following institutions: Government of the Republic of Serbia; Ministry of Justice; Anti-Corruption Council; Republic Public Prosecutor's Office; Prosecutor's Office for Organised Crime; Ministry of Finance; Tax Administration; Customs Administration; Ministry of Health; Ministry of Education, Ministry of Interior; Ministry of State Administration and Local Self-Government; Ministry of Human and Minority Rights and Social Dialogue; National Academy of Public Administration; Human Resources Management Service; High Civil Service Council; Judicial Academy; Public Procurement Office, and the Commissioner for Information of Public Importance and Personal Data Protection.

for Chapter 23 - Subchapter 'Fight against Corruption'.¹²² The Agency thus collected data on the first quarter until 15 April, on the second quarter - until 15 July, and on the third quarter - until 15 October 2022,¹²³ following which it prepared three quarterly implementation reports. The Agency collected data for the entire year 2022 until 16 January 2023,¹²⁴ having informed the institutions that they needed to submit a report on activities that were not implemented in 2020 and 2021 along with the report on the status of implementation of continuous and activities that were due in 2022.

Reports were collected through e-mail, regular mail and the reporting application. The institutions were regularly provided with assistance in using the application, and were informed in a timely manner if identified deficiencies in the application were being taken care of.

Institutions in charge of carrying out individual activities which in 2020 appointed persons authorised to coordinate, monitor the implementation and report on the implementation of activities from the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', and which have experienced staff changes in 2022, informed the Agency thereof in a timely manner, enabling the Agency to regularly update its internal records of activity holders, i.e. reporting entities.

Three quarterly reports and reports on the implementation of activities that became due in the period from 1 January to 31 December 2022, which are of a continuous nature, as well as those that were previously assessed as not implemented, were submitted to the Agency by all institutions responsible for the activities, including those which are not primary activity holders but do possess information relevant for the implementation and implementation monitoring.

Although certain institutions have taken a proactive approach and have reported on activities that have not yet become due, the Agency, for the purposes of this report, did not pay special attention to these activities since their implementation is still under way, and will address them individually when they become due or once they have been completed. An exception was made only in cases where these were related to activities that did become due in this reporting period. In this cycle of implementation monitoring, the Agency also did not show activities that were of a continuous nature but with an indicated ending, if said ending was envisaged in 2021 and they were already assessed as implemented.

During the preparation of the report, the Agency requested additional information from some of the institutions. If they possessed the requested information, they replied within the set deadlines. Additional information was requested to complete the rationale for the assessment of the activities provided by the Agency in the report.

¹²² See: https://www.acas.rs/storage/page_files/Smernice%20za%20izveštavanje%20o%20spirovodenju%20i%20vršenju%20nadzora%20nad%20spirovodenjem%20Revidiranog%20akcionog%20plana%20za%20poglavlje%202023%20-%20Potpoglavlje%20borba%20protiv%20korupcije.pdf

¹²³ The Agency extended the deadline for submitting the report because 15 October 2022 fell on a Saturday.

¹²⁴ The Agency extended the deadline for submitting the report because 15 January 2023 fell on a Saturday.

6.3 Challenges in the Process of Supervision of Implementation

As the Revised Action Plan for Chapter 23, adopted on 10 July 2020, is still in force, one of the key challenges in the process of monitoring the implementation relates to certain shortcomings of the Revised Action Plan itself, which the Agency pointed out in recommendations contained in this, Third Implementation Report, as well as in the First and the Second. In certain cases, these shortcomings significantly affected both the way activities were carried out and the way of reporting on their implementation.

Although certain activities from the domain of normative changes were implemented at the beginning of 2022, certain others were delayed due to the fact that the new Government of the Republic of Serbia was formed only on 26 October 2022.

The uneven complexity of the activities themselves is also a challenge which must be taken into account during the next revision of the Action Plan. For this reason, the statistical presentation should be taken conditionally, because activities that e.g. include the holding of meetings and activities that e.g. define amendments to umbrella laws or the introduction of complex IT mechanisms cannot be treated equally, especially considering the sequence of steps involved in the first or second type of activity.

Activities related to the filling of job positions are also a challenge, as they sound almost the same in different activities, but have different implementation deadlines. Even when this happens, the complete filling of job positions should be taken conditionally, because various forms of employee turnover can cause the situation in a certain institution to change each year. Particular attention should be paid to this during the revision of the existing Action Plan, in order to ensure consistency in the drafting of the document, as well as in the implementation and monitoring of implementation.

Some institutions did not fully address the result indicators; however, when it was obvious and clear from their reports that steps have been taken towards their implementation, the Agency assessed such activities as implemented, indicating in the recommendations how this challenge could be overcome. This especially refers to continuous activities, because the Agency will continue to monitor their implementation in other reporting cycles.

The manner in which certain activities were timed was particularly challenging in this implementation monitoring cycle, although this challenge has been addressed in previous reports as well. We are talking about different deadlines for activities of the same type; about activities that are marked as continuous although it is obvious from the activity itself that it is of a one-off nature, and vice versa; about activities that define the obligation of state bodies to carry out a certain activity every year, even though the nature and essence of the activity is such that this is not possible and not always expedient, etc.

Many activities are related to capacity building in the form of conducting trainings, and these are - for the most part - being worked on. However the wording that describes trainings in certain areas does not define clearly enough how many of them there should be, or how many participants they should have. As stated in the recommendations, the implementation of training should be preceded by a needs analysis, followed by the creation of a training plan and programme. The activity structured in this way would enable much easier implementation, as well as supervision of the implementation by monitoring the implementation of the training plan.

There are activities regarding whose implementation certain institutions have declared themselves incompetent, which is also mentioned in the recommendations as an area that needs to be adjusted so that the responsibility for implementation is assigned to institutions that are truly competent for a certain area.

In the Third Implementation Report, the Agency (as stated also in the First and Second Reports) tried to avoid not providing any assessment for a specific activity, except when it did not have enough relevant information to assess implementation. Such occurrences were explained in the individual activities.

The challenge of uneven quality of reporting is still present, but there is a noticeable improvement compared to the first two implementation reports, in the sense that institutions are recognising shortcomings on their own, both in the structure of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', and in implementing and reporting on what they did and did not achieve in the reporting period. Consequently, they are finding ways to overcome these shortcomings wherever possible. This could be explained by the fact that the institutions are now more familiar with the document, that the continuity of reporting has been established and they are aware of their obligations, as well as by the fact that the Coordination Body was established and that deficiencies in the implementation and reporting processes were discussed at its meetings.

Special attention should be paid to activities that have been assessed as not implemented since the beginning of the supervision of the implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', and whose status has not changed in this Report either.

However, it is important to note that there are also examples of good practice; there are institutions that have submitted complete reports, processing both the essence of the activities and the results indicators in their entirety.

Other challenges are listed in the recommendations.

6.4 Methodological Framework

The methodological framework is based on the Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'.

Supervision of the implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption' means that the Agency collects information on the implementation of activities from the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'; assesses the level of implementation of activities, and submits a report to the National Assembly.

In addition to monitoring the implementation of strategic documents and submitting a report to the National Assembly on their implementation, with recommendations for action, the Agency provides recommendations to the responsible entities on how to eliminate shortcomings in the implementation of strategic documents, and initiates amendments and supplements thereto.

In this regard, the Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan for Chapter 23 - subchapter "Fight against Corruption" include four key processes:

The manner in which the Agency collects information and data on the implementation of activities from the activity holders, i.e. the manner in which the activity holders report to the Agency;

The manner in which the Agency handles the received information and data and submits a report to the National Assembly;

The manner in which the Agency gives opinions with recommendations to the holders of activities for overcoming difficulties, i.e. improving the quality of reporting; and

The manner in which the Agency initiates amendments and supplements to the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'.

The reports of the reporting entities were the main source of information on which the Agency based its assessments of the status of the activities. For that reason, in the reporting form, the reporting entities were also asked to provide evidence that the activities were in fact implemented.

In addition to the reporting entities' reports, other sources of information were also available to the Agency to analyse the context in which certain activities are carried out and to better understand the situation in the reporting area, such as: research in a specific monitored area; reports of other independent state authorities on the state of affairs in certain areas; reports on the work of public authorities charged with implementing the activities, etc.

The assessment of the status of the activities was supposed to provide an answer to the question of whether and to what extent the activities were carried out. Based on the reports submitted to the Agency by the reporting entities, and by comparing the responses from the reports with the essence of specific activities and result indicators, in this report the Agency gave one of the following status assessments regarding each of the activities:

- The activity has been implemented,
- he activity has not been implemented, or
- The activity could not be assessed.

based on the parameters presented in the table below, using the so-called traffic light scale.

Preparing the report, the Agency used only data related to the reporting period, not to the activities that were implemented in the first quarter of 2023. Certain institutions subsequently submitted data on the implementation of these activities, i.e. on additional steps that were taken to complete the implementation of activities that became due in the reporting period. For the sake of consistency in reporting, the Agency will present these in the upcoming quarterly reports, as well as in the Fourth Implementation Report which will be submitted to the National Assembly by 31 March 2024.

To ensure the methodological coherence of the report, the Agency always tried to assess the essence of the activity itself, as well as the result indicators. In situations where the result indicator was not appropriately defined, as explained in the recommendations, the Agency relied on the meaning of the activity itself, as well as the goal that should have been achieved, or should be achieved, by its implementation.

In the process of drafting this report, while entering individual activities, recommendations from the screening report and the benchmarks, the Agency used the already available translation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption' into Serbian, published on the website of the Ministry of Justice, despite the fact that it contains certain inaccuracies.

6.5 Tabular Presentation of the Assessment of the Status of Individual Activities in the Third Implementation Report

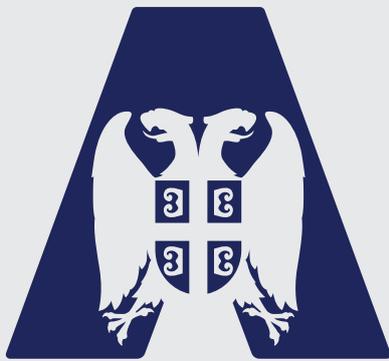
Status of activity	Assessment criteria/Explanation
<p>1. Activity was implemented</p>	<p>The activity is viewed as implemented because:</p> <ol style="list-style-type: none"> 1. It was completed within the set deadline and in accordance with the steps planned for its implementation and defined result indicators; 2. The purpose of the activity indicates that steps have been taken towards its implementation (especially in the case of continuous activities), even if it is not fully in line with the result indicator.
<p>2. Activity was not implemented</p>	<p>The activity is viewed as not implemented because:</p> <ol style="list-style-type: none"> 1. It was not completed within the set deadline and in accordance with the steps planned for its implementation and defined result indicators; 2. The purpose of the activity indicates that no steps have been taken, or completed, towards its proper implementation; 3. It is conditioned by the implementation of some other activity, which is either not yet implemented or is currently in the process of being implemented.
<p>3. Activity cannot be assessed</p>	<p>The activity could not be assessed because:</p> <ol style="list-style-type: none"> 1. No data have been submitted from which it could be determined how the activity is being implemented; 2. The holder of the activity is not defined in an appropriate manner in all the aspects of the implementation of the activity; 3. The activity is not clearly defined and/or it cannot be established whether it has been implemented or not.

7. LIST OF ABBREVIATIONS AND ACRONYMS

Agency	Agency for Prevention of Corruption
First Implementation Report	First Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter Fight against Corruption
Second Implementation Report	Second Report on the Implementation of the Revised Action Plan for Chapter 23 - subshapter 'Fight against Corruption'
Third Implementation Report	Third Report on the Implementation of the Revised Action Plan for Chapter 23 - subshapter 'Fight against Corruption'
Fourth Implementation Report	Fourth Report on the Implementation of the Revised Action Plan for Chapter 23 - subshapter 'Fight against Corruption'
Guidelines	Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan for Chapter 23 - subchapter Fight against Corruption
Council	Anti-Corruption Council
MoI	Ministey of the Interior
PPOOC	Prosecutor's Office for Organised Crime
SAI	State Audit Institution
HRMS	Human Resources Managment Service
Commissioner	Commissioner for Information of Public Importance and Personal Data Protection
CC	Criminal Code
NALED	National Alliance for Local Economic Development
IPA	Instrument for Pre-Accession Assistance of the European Union
USAID	United States Agency for International Development

OSCE	Organisation for Security and Cooperation in Europe
ODIHR	Office for Democratic Institutions and Human Rights
EU	European Union
SIGMA	Joint initiative of the European Union and the Organization for Economic Cooperation and Development to support for improvement in governance and management
GIZ	German Agency for International Cooperation
DCAF	Geneva Centre for Security Sector Governance
PCIB	Regional Police Cooperation and Integrity Building Programme in the Western Balkans
AP	Autonomous province
LSGU	Local Self-Government Unit
LAP	Local anti-corruption plan
Model	Model Local Anti-Corruption Plan
OPDAT	Office of Overseas Prosecutorial Development, Assistance and Training
CAMS	International certification programme in the field of prevention of money laundering
ACAMS	Association of Certified Anti-Money Laundering Specialists
CFE	International Certification Program for Certified Fraud Examiners
ACFE	Association of Certified Fraud Examiners
BIRODI	Bureau of Social Research
BC	Border crossing
FATF	Financial Action Task Force - an international body whose task is to develop and improve the fight against money laundering and terrorism financing
UNODC	United Nations Office on Drugs and Crime
PA	Police administration
UNDP	United Nations Development Programme
SPC	State Prosecutors Council
CERT	Information System Attack Response Centre
BIA	Security Intelligence Agency

VBA	Military Security Agency
VOA	Military Intelligence Agency
MU	Military units
MFA	Ministry of Foreign Affairs
SCTE	Service for Combating Terrorism and Extremism
OITEA	Office of Information Technology and Electronic Administration
EMPACT	European Multidisciplinary Platform Against Criminal Threats
VAT	Value added tax



APC