

AGENCY FOR PREVENTION  
OF CORRUPTION

**STRATEGIC PLAN**  
**2019–2023**



# TABLE OF CONTENTS

MESSAGE FROM THE DIRECTOR.....	5
MISSION, VISION AND CORE VALUES.....	7
Mission.....	7
Vision.....	7
Core Values.....	7
STRATEGIC GOALS AND OPERATIONAL OBJECTIVES .....	9
STRATEGIC GOAL 1 STRENGTHEN THE INTEGRITY OF THE PUBLIC SECTOR .....	10
Operational objective 1.1 Provided support for the strengthening of the integrity of officials.....	11
Operational objective 1.2 Provided support for the increase of the transparency of political entities financing..	11
Operational objective 1.3 Provided support to public authorities for corruption prevention .....	12
Operational objective 1.4 Provided support for the strengthening of the personal integrity of public sector employees .....	12
Operational objective 1.5 Provided support for strengthening of the integrity of all participants in lobbying activities .....	13
STRATEGIC GOAL 2 INCREASE THE LEVEL OF SOCIETY'S INVOLVEMENT IN PREVENTING CORRUPTION .....	14
Operational objective 2.1 Improved communication with the media .....	15
Operational objective 2.2 Improved cooperation with civil society organizations .....	15
Operational objective 2.3 Strengthened anti-corruption awareness of citizens .....	16

STRATEGIC GOAL 3 IMPROVE THE IMPLEMENTATION OF ANTI-CORRUPTION REGULATIONS...	17
Operational objective 3.1	
Improved cooperation with misdemeanor courts .....	18
Operational objective 3.2	
Effective cooperation has been established with special units of the higher prosecutor’s offices, courts, and the Ministry of Internal Affairs.....	18
Operational objective 3.3	
Improved implementation of cooperation agreements at the national level.....	19
STRATEGIC GOAL 4 IMPROVE THE INTERNATIONAL COOPERATION AND IMPLEMENTATION OF INTERNATIONAL STANDARDS IN THE AREA OF PREVENTION OF CORRUPTION.....	20
Operational objective 4.1	
Increased contribution to the EU integration process .....	21
Operational objective 4.2	
Increased contribution to the work of regional and international initiatives.....	21
STRATEGIC GOAL 5 IMPROVE THE EXERCISE OF THE AGENCY’S COMPETENCIES.....	22
Operational objective 5.1	
Improved efficiency of processing the asset and income declarations and their verification .....	23
Operational objective 5.2	
Enhanced efficiency of controlling the financing of political activities .....	23
Operational objective 5.3	
Improved prevention and resolution of conflicts of interest.....	24
Operational objective 5.4	
Lobbying activity monitoring and control system has been established.....	24
Operational objective 5.5	
Improved system for complaint processing and efficiency of complaint handling.....	25
Operational objective 5.6	
Improved system of presenting the Agency’s work results.....	26
Operational objective 5.7	
Strengthened staff and technological capacities of the Agency .....	26

# MESSAGE FROM THE DIRECTOR

Gained experience, as well as challenges we have encountered in previous years determined our further strategic direction. In 2019, when ten years of work was marked, the Agency adopted a Strategic Plan and defined strategic goals for the next five years. In September 2020, the implementation of the new Law on Prevention of Corruption commenced, thus expanding the powers of the Agency and creating conditions for improving efficiency in the implementation of our preventive, control and oversight competencies. With the beginning of the implementation of the new Law, the Anti-Corruption Agency becomes the Agency for Prevention of Corruption. The most effective corruption prevention reduces the possibility of corruption, together with the strengthening of integrity and transparency through joint efforts of all stakeholders. In its strategic planning, the Agency seeks to prevent the occurrence of corruption, improve efficiency and effectiveness in the exercise of its competencies, analyze and monitor the situation, identify strategic goals and operational objectives and achieve them through the implementation of the annual plans.

With the resolve to use the lessons learned for further improvement of our work and believing in the importance of strategic planning and operation, we have defined the strategic goals of the Agency for the next five years. In this process, we were guided by the fact that the fight against corruption is not and cannot be successful without cooperation with all stakeholders at the national and international level, especially with the citizens whose trust in the institutions and the integrity of public sector employees should be continuously built, because it is the citizens who, in various ways, suffer the negative consequences of corrupt behavior and insufficiently developed personal and institutional integrity of both the public sector employees and the holders of public authority.

Prevention, as the pillar of the Agency's activity, entails identifying the phenomena and situations that provide opportunities for corrupt behavior. These opportunities do not necessarily lead to acts of corruption, but are ever-present in the form of temptation for those who work in such environments. In addition to identification, preventive activities include the design and establishment of mechanisms with the purpose to eliminate the opportunities for corruption before they lead to corrupt behavior. The Agency is also entrusted with the competencies aimed at establishing and implementing oversight and control over the proper and purposeful use of public authority bestowed to officials so they can take care of the protection of public interest in the areas in which they carry out their duties.

Prevention of corruption also implies strengthening of citizen awareness of its harmfulness, and rooting out corruption significantly contributes to the creation of a favorable economic environment for doing business, which is essential for further economic development of the country and attracting new foreign investments, as well as for the progress in the process of negotiations for full membership in the European Union.

Bearing this in mind, the key strategic goals of the Agency's activities pertain to strengthening of the public sector integrity; increasing the level of society's involvement in preventing corruption; improvement of the implementation of anti-corruption regulations; improvement of international cooperation and implementation of international standards in the area of prevention of corruption, as well as improvement of the exercise of the Agency's competencies.

I would like to take this opportunity to thank the Agency for Prevention of Corruption employees for their commitment in reflecting on and developing this strategic plan, as well as the representatives of the USAID Government Accountability Initiative for their exceptionally important and continuous support in this process.

DIRECTOR





# MISSION, VISION AND CORE VALUES

## Mission



Protecting the public interest by preventing corruption and ensuring the lawful and purposeful disposal of public resources in cooperation with citizens, civil society, and state authorities.

## Vision



Reduction of possibilities for conducting corrupt actions, strengthened capacities of the Agency and improved personal and institutional responsibility of the public authorities with the active participation of the public in the fight against corruption.

## Core Values



- **Integrity**

We ensure that managers and employees strictly adhere to ethical principles and legal norms for the purpose of protecting the public interest. When making decisions on behalf of the Agency, we take care that they are motivated exclusively by the protection of the public interest, and not the financial and / or material benefit of holders of public functions and / or employees working at the Agency, members of their families, or friends.

- **Independence**

It implies political, functional, operational and financial prerequisites in order for the Agency to exercise its competencies in accordance with legal authorizations and without undue influence. We work exclusively according to regulations and professional standards, striving to ensure consistent practice of the Agency, regardless of the characteristics and actors in individual cases we deal with.

- **Accountability**

It represents compliance with legal and ethical standards in decision-making and overall operation. Accountability also implies the ability to explain actions undertaken or decisions made and to list all the consequences arising out of them, as well as the ability to respond to all questions raised by the public or interested parties with the provision of all the information requested. We are committed to the implementation of standards by which the managers and employees at the Agency are accountable to the public for their decisions and actions and are subject to every scrutiny relevant to their function or position.

- **Transparency** \_\_\_\_\_

The implementation of delegated competencies in a visible, predictable, and comprehensible manner. We take care of the duty of the managers and employees of the Agency to be as open as possible when making decisions and in actions they take, as well as the obligation to explain their decisions.

- **Impartiality** \_\_\_\_\_

It means equal and fair treatment of all taxpayers and the cases under consideration in accordance with legal provisions. Operating within and on the basis of the current regulations is the foundation of our work, and we especially take care that we treat all obligors in an equal and fair manner, and that the meaning of decisions concerning the exercise of their rights or the determination of their obligations is in accordance with a legal and legitimate aim.

- **Objectivity** \_\_\_\_\_

It represents deciding on the basis of clearly defined criteria and facts, free from personal perceptions and affinities, or undue influence. Quality is the sole criterion that guides us in the performance of public affairs, including the acts of selecting executives, recruiting, assigning tasks, or recommending individuals for rewards and benefits.

- **Respecting human dignity** \_\_\_\_\_

For us, human dignity is a fundamental value that we take into account both in relationships within and outside the Agency.

- **Personal example** \_\_\_\_\_

We are guided by the idea that holders of public office at the Agency should encourage abiding by all the values that we share, by their own leadership and personal example.



# STRATEGIC GOALS AND OPERATIONAL OBJECTIVES

In order to achieve its mission and vision in the next 5 years, the Agency has set five strategic goals:

1. STRENGTHEN THE INTEGRITY OF THE PUBLIC SECTOR
2. INCREASE THE LEVEL OF SOCIETY'S INVOLVEMENT IN PREVENTING CORRUPTION
3. IMPROVE THE IMPLEMENTATION OF ANTI-CORRUPTION REGULATIONS
4. IMPROVE THE INTERNATIONAL COOPERATION AND IMPLEMENTATION OF INTERNATIONAL STANDARDS IN THE AREA OF PREVENTION OF CORRUPTION
5. IMPROVE THE EXERCISE OF THE AGENCY'S COMPETENCIES

In order to realize the strategic plan, the Agency will work on the realization of the following operational objectives within the framework of five strategic goals:

# STRATEGIC GOAL 1

## STRENGTHEN THE INTEGRITY OF THE PUBLIC SECTOR

Corruption threatens the democratic development of the country, weakens the economic position of citizens and economy, limits their social, economic and political rights, undermines the legitimacy and reputation of public institutions and principles of the rule of law.

In this way, corruption also undermines the trust of citizens in institutions.

Preventing corruption is aimed at detecting and eliminating the risk of corruption, which is followed by defining and implementing measures to manage those risks. Bearing this in mind, the purpose of preventing corruption is to mitigate the negative effects of corruption on all aspects of the functioning of the state and society.

Strengthening public sector integrity is an essential part of the prevention of corruption, and one of the key competencies of the Agency is precisely to provide the mechanisms for establishing and improving personal and institutional integrity, and thus the integrity of the entire public sector. In its work so far, opportunities have been identified for improving both the personal integrity of public officials and public sector employees, as well as the integrity of public sector institutions. Integrity is a step further from respecting the rules, in the sense that, in addition to the rules, it includes values so that they become an integral part of the functioning of an institution and of the day to day work of public officials and public sector employees. In addition to establishing a proper balance between rules and values, this strategic goal also implies strengthening the capacity to identify the risks of corruption and managing these risks, thereby strengthening the confidence of the citizens in institutions acting in accordance with the public interest.

With this in mind, the Agency recognizes the strengthening of public sector integrity as one of the strategic goals, since the strengthening of the integrity regime with a clear commitment to act in accordance with the public purpose is one of the most effective strategic and sustainable responses to corruption. This will contribute to raising public awareness of the existence, causes and menace of corruption, as well as the threat it poses.

In order to achieve this strategic goal and implement the mechanisms for preventing corruption so as to provide protection of the public interest, and identify proactive and practical responses to the related challenges, the Agency has also defined the following operational objectives:

## Operational objective 1.1



### Provided support for the strengthening of the integrity of officials

Integrity of officials, as well as public sector integrity is based on responsibility, expertise, ethics and elimination or management of the risks of corruption, which is why the strengthening of the integrity of officials at the same time establishes one of the most significant barriers to the occurrence of corruption.

The Agency will provide support to officials in the area of implementation of the mechanisms for the prevention of corruption related to conflict of interest and declaration and verification of assets and income. Through training cycles, the Agency will contribute to raising the awareness of officials about the obligations envisaged by the Law on Prevention of Corruption, and about the substance of these obligations in the context of preventing corruption.

In achieving this goal and creating a training program, the Agency will rely on previous years of practice i.e. the areas that have been identified during the implementation of the Law as areas in which the officials need to be better informed and more aware of the conflict of interest and the declaration and verification of assets and income. The Agency will also build on the lessons learned from the previously conducted cycles of such trainings.

## Operational objective 1.2



### Provided support for the increase of the transparency of political entities financing

Support to political entities in the implementation of the Law on Financing of Political Activities will significantly contribute to improving the transparency of disposing of public source funds as one of the main sources of financing of political entities. Support will be focused on training political entities to manage finance in a responsible and transparent way, and to present relevant reports (both annual financial and election campaign reports) in accordance with the law and principles of good governance.

In addition to training for representatives of political entities, the Agency will, depending on the electoral dynamics, conduct trainings for observers of election campaigns in order to obtain relevant and additional information sources for the purpose of conducting control of the election campaign expense reports.

## Operational objective 1.3



### **Provided support to public authorities for corruption prevention**

Through various forms of advisory activities, the Agency will provide support to public authorities in the preparation of analyses, models of internal rules, procedures, methodologies, strategic and operational documents for the prevention of corruption and strengthening of institutional integrity and integrity of executives and employees.

Special attention will be given to the development of opinions on the risks of corruption present in draft regulations and bills and to the development of initiatives for amending the current regulations or adopting new ones, in order to reduce the risks of corruption and to harmonize domestic regulations with the ratified international agreements in this field.

In achieving this operational objective, the Agency will also focus on the development of training programs for executives, with the emphasis on ethics and integrity issues, as well as on the strengthening of the organizational culture based on these values, with the executives leading by example and demonstrating their standards of excellence.

## Operational objective 1.4



### **Provided support for the strengthening of the personal integrity of public sector employees**

Personal integrity is a key prerequisite for improving the integrity of public sector institutions. With this in mind, the Agency will work to provide support to public sector employees in strengthening personal integrity by establishing a proper balance between respecting rules and acting in line with values and recognizing the risks of corruption, analyzing them and developing mechanisms, processes and procedures for managing these risks.

The Agency's training program will include training of trainers so the public sector employees are trained to transfer appropriate knowledge to the staff in their institutions on the topics of the implementation of codes of conduct, recognizing risk situations for corruption in the work environment, and solving ethical dilemmas.



### **Provided support for strengthening of the integrity of all participants in lobbying activities**

The achievement of this operational objective will be focused on the capacity strengthening of the participants in the lobbying activities so that the lobbying process is conducted as prescribed by the Law on Lobbying. This will include training on the concept of lobbying and good practice examples from the countries with significant experience in applying lobbying rules, developing codes of conduct, the role of participants in lobbying activities, as well as the conditions and way of lobbying, rules of lobbying, registry and records in the domain of lobbying.

## STRATEGIC GOAL 2 INCREASE THE LEVEL OF SOCIETY'S INVOLVEMENT IN PREVENTING CORRUPTION

One of the key competencies of the Agency is to ensure accountability to citizens, which is achieved through the legally, efficiently and effectively acting in the domain of its competencies, transparency in the work, informing the public about the results and effects of work, as well as providing information to interested parties in accordance with regulations governing this area. Bearing in mind that Article 13 of the UN Convention against Corruption provides for the inclusion of individuals and groups outside the public sector, including media and civil society organizations, in preventing corruption and raising awareness of the existence, causes and menace of corruption and the threat it poses, in pursuit of this goal, the Agency will carry out continuous activities to engage the society in the fight against corruption and develop platforms for joint action in this regard. This entails continuous improvement of transparency in the work of the Agency, strengthening of systemic cooperation with the media and civil society organizations, as well as awareness-raising activities, in order to contribute to reducing the degree of tolerance to corruption.

As foreseen by the UN Convention against Corruption, one of the key aspects of society involvement is that citizens should be involved in the implementation of anti-corruption measures, as it is the citizens who bear the negative consequences of corrupt behavior, insufficiently developed personal and institutional integrity, and inadequate management of public authority and public resources.

Active participation of the general public in the prevention and fight against corruption is one of the key preconditions for the effectiveness of anti-corruption measures and policies. Therefore, the Agency is determined to encourage public participation through cooperation in specific anti-corruption initiatives, as well as through continuous strengthening of public awareness of the importance of corruption prevention and joint efforts in this area.

This strategic goal is of horizontal character, since all the activities from the strategic plan will contribute to the improvement of transparency in the operation, and thus to the strengthening of public trust.

## Operational objective 2.1



### Improved communication with the media

The Agency recognizes the importance and role of the media in the fight against corruption, in particular in raising citizen awareness of the harmfulness of corruption, as well as strengthening cooperation with them as key partners in promoting the implementation of anti-corruption mechanisms.

An important segment of this objective relates to the continuous need to clarify the role of the Agency in system of the fight against corruption in order to better understand the scope of the Agency's competence in a manner that is understandable and accessible to general public.

The Agency will continuously work on improving communication and cooperation with the media, in particular through the organization of consultative meetings on select topics and the implementation of joint activities and projects, with the aim of providing support to the implementation of anti-corruption measures, raising public awareness of the harmfulness of corruption and the importance of monitoring the work of public sector institutions.

## Operational objective 2.2



### Improved cooperation with civil society organizations

The Agency recognizes the importance of the principle of inclusion of the entire society in the fight against corruption, with the civil society organizations being its integral part. The essence of this principle is reflected in the creation of a sustainable partnership with civil society organizations and the creation of specific initiatives in the area of corruption prevention. Not less important is the watchdog role of civil society organizations in the effective implementation of mechanisms for preventing corruption. This is also where the Agency sees the civil society organizations as important partners.

Bearing in mind the statements in the description of the strategic goal, achieving this goal will include consultative meetings with representatives of civil society organizations on selected topics, including the implementation of joint activities, as well as projects.



### **Strengthened anti-corruption awareness of citizens**

The Agency will work on raising citizens' awareness of the occurrence and ways of preventing corruption, the role of citizens in the fight against corruption, as well as on their better understanding of the role and work of the Agency. As the results in the prevention of corruption depend on the support and participation of the entire public, the Agency seeks to ensure a more significant participation of citizens in the creation, implementation and promotion of anti-corruption measures, and will achieve this objective through awareness-raising campaigns, publication of information on the work of the Agency, program of visits and trainings on the subject of the Agency's competence and implementation of mechanisms for preventing corruption.



## STRATEGIC GOAL 3

# IMPROVE THE IMPLEMENTATION OF ANTI-CORRUPTION REGULATIONS

As the efforts aimed at preventing corruption cannot be successful without the efficient and consistent implementation of anti-corruption regulations, the Agency will continue to develop cooperation with all relevant state institutions, respecting the principle of good governance and transparency in its work. The Agency will strive to achieve a more advanced data exchange with state institutions, which will significantly contribute to increasing its efficiency in implementing the anti-corruption regulations, including the technological linking with databases of other institutions.

Cooperation at the national level is realized with all relevant state institutions, in accordance with the provisions of the Law on Prevention of Corruption, as well as through cooperation agreements. It is especially focused on the exchange of information from the domain of the Agency's activities in the control of strategic documents in the field of fight against corruption, verification of assets and income of officials, control of financing of political activities, handling of complaints, resolving conflicts of interest, international cooperation activities, drafting and implementation of integrity plans, drafting opinions on the risks of corruption present in regulations, as well as conducting training. In this respect, the achievement of this strategic goal will also entail the identification of the existing shortcomings in communication with other institutions and recommendations for improvement, the execution of which will be monitored during the implementation of the strategic plan.

## Operational objective 3.1



### Improved cooperation with misdemeanor courts

In order to achieve this operational objective, the Agency will analyze the existing cooperation with the misdemeanor courts, as well as the possibilities for improvement, especially in the domain of filing a request for the initiation of a misdemeanor procedure, the exchange of information and the harmonization of databases.

This operational objective will be achieved, inter alia, through meetings with representatives of misdemeanor courts, primarily on the subject of actions in cases related to declaration and verification of assets and income, conflict of interest and control of financing of political activities, and through roundtable discussions. The key topics of the roundtable discussions would be related to the cooperation with misdemeanor courts, in a manner adapted to the format of the roundtable discussion and participants, including new enforcement mechanisms, such as the misdemeanor plea agreement.

## Operational objective 3.2



### Effective cooperation has been established with special units of the higher prosecutor's offices, courts, and the Ministry of Internal Affairs

The importance of efficient cooperation of all relevant state bodies in the fight against corruption has been recognized as extremely important for the timely and effective processing of perpetrators of criminal offenses in the field of corruption. The Law on Organization and Jurisdiction of State Authorities in Suppression of Organized Crime, Terrorism and Corruption prescribes the cooperation of state authorities as one of the modalities implies taking part in the Task Forces which can be formed at the request of special anti-corruption units of the higher public prosecutor's offices in order to work on the detection and prosecution of criminal offenses within the purview of the Task Force. In achieving this operational objective, the Agency will work to establish new and more efficient ways of cooperation with special units of the prosecutor's offices, courts, and the Ministry of Internal Affairs through the organization of various types of information exchange, data exchange, trainings, etc.



### **Improved implementation of cooperation agreements at the national level**

In order to achieve this operational objective, a continuous analysis of the current cooperation and its improvement on the basis of the lessons learned so far is necessary. This primarily relates to cooperation with misdemeanor courts, special units of higher prosecutor's offices and courts, as well as institutions with which the Agency has signed cooperation agreements. Based on this analysis, it is necessary to develop a plan for further cooperation with the mentioned institutions, as well as a plan for the operationalization of concluded agreements, with clearly defined steps to overcome the observed shortcomings and provide the basis for strengthening joint activities in the fight against corruption in different formats, such as regular meetings and roundtable discussions.

The achievement of this goal will include analyzing the selected sample of existing agreements and making recommendations for improving cooperation with national institutions through the implementation of the agreements, including the creation of a plan of activities that can be immediately implemented, as well as those requiring fulfillment of other preconditions (e.g. the conclusion of a special agreement) with defined deadlines.

# STRATEGIC GOAL 4

## IMPROVE THE INTERNATIONAL COOPERATION AND IMPLEMENTATION OF INTERNATIONAL STANDARDS IN THE AREA OF PREVENTION OF CORRUPTION

Considering the transnational character of the phenomenon of corruption, the Agency recognizes the importance of developing international cooperation in this area. The exchange of experiences and good practices is a pillar of building effective partnerships at the regional and international level.

Appropriate application of international standards, coordination, exchange of good practices and experiences is even more important, given the role of the Agency in the process of pre-accession negotiations of the Republic of Serbia for EU membership, in one of the most important negotiating chapters – Chapter 23 (Judiciary and Fundamental Rights).

The Agency will strengthen co-operation with international initiatives, especially the newly established Network of Corruption Prevention Authorities and identify opportunities for cooperation with complementary institutions with which it has not cooperated so far.

## Operational objective 4.1



### Increased contribution to the EU integration process

All the Agency activities toward the achievement of this operational objective will be done in accordance with the negotiation process for EU membership, especially in light of the fact that the most important ratified international conventions (including the UN Convention against Corruption, as well as the Council of Europe's conventions), and part of the EU acquis. The Agency will remain fully involved in pre-accession negotiations with the EU and will participate both in the implementation and in the review of relevant documents in the process so that the recommendations of the European Commission are fully met.

For this reason, the coordination with the state institutions involved in the negotiating process is of vital importance, in particular with the Ministry of Justice, the Ministry of European Integration, the Ministry of Public Administration and Local Self-Government, and the institutions with which the Agency coordinates reporting on transitional criteria for Chapter 23, such as the Republic Public Prosecutor's Office and misdemeanor courts.

Cooperation with international stakeholders in the field of European integration will continue so as to respond adequately to the requirements arising from the negotiation process.

## Operational objective 4.2



### Increased contribution to the work of regional and international initiatives

The Agency will continue the practice of active international cooperation on bilateral and multilateral levels. Further development of cooperation, exchange and harmonization of anti-corruption standards and practices is of utmost importance for efficient prevention and combating corruption. In particular, the Agency will intensify the cooperation and participation in the work of international initiatives and anti-corruption networks in order to consider the solutions which have yielded results in practice and to meet obligations arising from membership. This especially so in terms of the cooperation with the Group of States Against Corruption of the Council of Europe (GRECO), the Anti-Corruption Network of the Organization for Economic Co-operation and Development (ACN / OECD), the United Nations Office on Drugs and Crime (UNODC), the European Partners against Corruption / European contact-point network against corruption (EPAC / EACN), the Regional Anti-Corruption Initiative, the International Anti-Corruption Academy, the Regional School of Public Administration, with a special emphasis on the implementation of the activities of the newly established Network of Corruption Prevention Authorities.

The Agency will remain committed to further enhancing cooperation with international organizations and other actors active in the fight against corruption, such as the European Union, the Council of Europe, the United Nations, the Organization for Security and Co-operation in Europe and its Office for Democratic Institutions and Human Rights, the U.S. Agency for International Development, etc.

## STRATEGIC GOAL 5 IMPROVE THE EXERCISE OF THE AGENCY'S COMPETENCIES

Implementation of the mechanisms for preventing corruption, controlling the disposal of public resources, uncovering irregularities, providing mechanisms for establishing and improving integrity and education are ways in which the Agency directly benefits the citizens and wins their trust. Therefore, strengthening of the Agency capacities is the basis for even more successful execution of its competencies, i.e. the goals and activities foreseen in the strategic plan.

The importance of capacity building of the Agency is indicated by all relevant international recommendations, including the European Commission's annual Serbia 2018 Report on the Republic of Serbia reform progress, the resolution of the European Parliament, and the non-paper on the progress in Chapters 23 and 24 from 2018. In addition, one of the key recommendations of the European Commission from the Screening Report was elaborated through the activities of building the Agency's capacities in the Action Plan for Chapter 23. In that sense, in achieving this strategic goal the Agency will focus on capacity building through continuous professional development of employees, recruitment of appropriate specialized personnel, improvement in terms of utilizing technology advancement and appropriate office space, in cooperation with competent state institutions and the international community.

The basis of international recommendations is found in the Copenhagen criteria, which the state must fulfill in the process of joining the EU. These are political criteria, which foresee the existence of stable institutions that guarantee democracy, the rule of law, human rights, and respect and protection of minorities. In the context of this strategic goal, the criteria from Madrid are also significant as they foresee that the state must have sufficient administrative capacities.

In order to achieve this strategic goal, support to the Agency through international development assistance is very important. The prioritization and operationalization of this effort directly leads to the implementation of the above mentioned international recommendations aimed at the overall strengthening of the Agency's capacity.

## Operational objective 5.1



### Improved efficiency of processing the asset and income declarations and their verification

The essence of submitting the asset and income declarations of officials and their processing and publication on the Agency's website is reflected in the strengthening of transparency in the performance of public office and building trust of citizens in holders of public office. In that sense, verification of the asset and income declarations and identifying the inconsistencies between the actual and the reported constitutes an important mechanism for preventing corruption, i.e. eliminating the risks associated with the integrity of officials and performing a public function in accordance with the public purpose, as well as raising the public officials awareness of their accountability to the citizens while holding the public office. Therefore, this operational objective implies the strengthening of the Agency's capacities in order to identify more effectively the priorities in conducting the asset and income verification, and then carry out the necessary checks, both regular and extraordinary.

Fulfillment of this operational objective involves securing of the appropriate technological preconditions so that the Agency can process and check the asset and income declarations of officials more effectively. In accordance with the conducted analysis of the IT system of the Agency, the Agency's Information System Development Strategy together with the accompanying Action Plan will be developed, the integral part of which will be the improvement of the existing software applications for processing and verifying the officials' asset and income declarations, based on the analyzed and identified shortcomings in the work so far. An important element of this goal is ensuring compatibility and enhancing connectivity with other institutions, with which the Agency exchanges data in the asset verification process, as well as an analysis of procedures and techniques of verification, and improvement of prioritization in the preparation of a plan for the verification process of the officials' declarations.

## Operational objective 5.2



### Enhanced efficiency of controlling the financing of political activities

A key segment of the control of the financing of political activities is related to the strengthening of transparency, especially in relation to the disposal of funds from public sources, as well as the responsibilities of political entities towards citizens, both as beneficiaries of budgetary funds, as well as candidates in elections, as they are elected by the very citizens they are accountable to. In this respect, the Agency should be further trained to implement control more efficiently and to respond in a timely manner to any violation of regulations on the financing of political activities, as well as violation of the principles of transparency in political financing.

Achieving this operational objective involves securing of the appropriate technological preconditions so that the Agency can control the financing of political activities more effectively. In accordance with the conducted analysis of the IT system of the Agency, the Agency's Information System Development Strategy and the accompanying Action Plan will be developed, the integral part of which will be the improvement of existing software applications for the control of the political activity financing, based on analyzed and identified shortcomings in the work so far.

## Operational objective 5.3



### Improved prevention and resolution of conflicts of interest

The declaration of interest or of conflict of interest is closely related to the integrity of the functionaries, i.e. the transparent and responsible performance in the public office. In this sense, resolving the conflict of interest also constitutes a mechanism for preventing corrupt behavior, as well as the negative consequences to managing public authority, public asset management and citizens' trust which a public official with a conflict of interest can cause.

In addition to consistently resolving the conflict of interest, this Agency's competence also has an additional preventive component, given that the Agency identifies areas and situations especially susceptible to the emergence of a conflict of interest, and significantly affects the awareness of situations in which conflict of interest may arise.

Achieving this operational objective involves securing of the appropriate technological preconditions so that the Agency can resolve the conflict of interest more effectively. In accordance with the conducted analysis of the IT system of the Agency, the Agency's Information System Development Strategy and the accompanying Action Plan will be developed, the integral part of which will be the improvement of the existing software applications for resolving the conflict of interest, based on analyzed and identified shortcomings in the work so far.

## Operational objective 5.4



### Lobbying activity monitoring and control system has been established

The achievement of this operational objective is particularly significant, given that the Agency has yet to establish a solid basis for the proper implementation of the recently adopted Law on Lobbying, which also includes technical and substantive prerequisites related to strengthening the integrity of participants in lobbying activities.

Bearing in mind the provisions of the new Law on Lobbying which refer to the obligation of



the Agency to keep the Register of Lobbyists and the Register of Legal Persons Performing Lobbying, the realization of this operational objective will relate directly to the establishment of technological preconditions for monitoring and controlling lobbying activities.

Therefore, the needs and requirements of the Agency will first be defined in this respect, and after that the selection of the most adequate methodology will be carried out, and accordingly, the procurement of an application for the introduction and maintenance of the Register of Lobbyists and Register of Legal Entities Performing Lobbying will be carried out.

This operational objective will also include a comprehensive preparation for the implementation of the Law on Lobbying, including the development of the Code of Conduct for Participants in Lobbying.

## Operational objective 5.5



### Improved system for complaint processing and efficiency of complaint handling

The purpose of dealing with complaints is to identify corruption cases and be in appropriate coordination with other state bodies in their processing and sanctioning, identifying areas particularly vulnerable to corruption, as well as the risks and causes that lead to it, and to strengthening the trust of citizens in institutions they address wishing to indicate the suspicion of the existence of corruption. Having in mind the number and complexity of the complaints based on which the Agency takes actions, it is necessary, based on previous experience, to improve the way of prioritization, processing and taking action relative to complaints, and additionally strengthen analytical capacities in terms of identifying areas particularly vulnerable to corruption. The capacity of identifying risk areas will be additionally strengthened through cooperation of the Agency with other state bodies in accordance with the new Law on Organization and Jurisdiction of State Authorities in Suppression of Organized Crime, Terrorism and Corruption.

Achieving this operational objective involves meeting the appropriate technological preconditions so that the Agency can process and act on the complaints by natural persons and legal entities more effectively. In accordance with the conducted analysis of the IT system of the Agency, the Agency's Information System Development Strategy and the accompanying Action Plan will be developed, the integral part of which will be the improvement of existing software applications for the processing and acting on complaints, based on analyzed and identified shortcomings in the work so far.

## Operational objective 5.6



### Improved system of presenting the Agency's work results

The Agency will improve the system of presenting the work results to inform the interested parties in a clear and public manner about the execution of its competencies and achieved results. The Agency will continuously analyze the ways of presenting the work results and work on improving the content and transparency of the published information.

In particular, the Agency will pay attention to improving communication with the media and civil society organizations, in order to contribute to a better understanding of its role and achieved results in preventing corruption. Improving the presentation of the work results will focus on the content and transparency of the information in the reports, especially in the Annual Report submitted to the Parliament, as well as on the web site.

The Agency will pay special attention to the collection of data for reporting, their statistical processing and presentation of the results of the statistical analysis in order to improve the reporting on work results, primarily the Annual Report, but also all other reports, which it drafts in the framework of the implementation of the competencies bestowed by law.

## Operational objective 5.7



### Strengthened staff and technological capacities of the Agency

In order for the Agency to achieve results and to perform tasks in the area of its competences in an efficient and effective manner, it must have adequate personnel and technological resources. Therefore, the strategic priority of the Agency is to strengthen its own capacities.

Every institution's foundation is human resources and proper management of human resources. Having in mind the nature and scope of the Agency's competences of preventive, control and oversight nature, and that the Law on Organization and Jurisdiction of State Authorities in Suppression of Organized Crime, Terrorism and Corruption and the recently adopted Law on Lobbying have given it new powers expanded further by the Law on Prevention of Corruption, it is necessary to continuously work on increasing the number of employees and their professional development with a view to transformation into human capital. In this respect, it is also important to mention the international standards related to the specificity of the work tasks of the employees in the field of fight against corruption, as well as the necessity of adequate staffing of posts, their continuous specialization and professional development.

Capacity building will relate to appropriate specialized training programs for employees and new employees at the Agency in order to carry out the Agency's responsibilities in a more efficient and effective manner. The Agency will pay special attention to improving the functionality of all organizational units, increasing the efficiency of work process, improving

management and reporting, as well as internal coordination, while consistently respecting the principles of unity in execution, mutual cooperation, informing, coordination, and respecting the rights, duties and responsibilities. This will include the improvement of existing and introduction of new analytical tools to measure the work results and present them in an appropriate manner.

Capacity building will also refer to the proper career management and professional development of employees, as well as merit based promotion. It will also cover the improvement of the existing and procurement of new software applications that can meet the requirements and needs of the Agency with regard to the execution of competencies, as well as providing adequate office space for the work of the Agency with an increased number of employees. Recruitment of new, skilled staff will be conducted in accordance with the principles of transparency, good governance and appropriate behavioral and functional competencies. In the area of strengthening technological capacities, the activities will be focused on digitization of data, improvement of databases and search and analysis tools, improvement of access to relevant data of other state institutions, exchange of data with state institutions, and achieving appropriate compatibility of databases.

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