

**АСК**

РЕПУБЛИКА СРБИЈА  
АГЕНЦИЈА ЗА  
СПРЕЧАВАЊЕ  
КОРУПЦИЈЕ

**REPORT ON  
IMPLEMENTATION OF THE  
REVISED ACTION PLAN FOR  
CHAPTER 23 –  
SUB-CHAPTER: FIGHT  
AGAINST CORRUPTION**





Republic of Serbia



РЕПУБЛИКА СРБИЈА  
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# **REPORT ON IMPLEMENTATION OF THE REVISED ACTION PLAN FOR CHAPTER 23 - SUB-CHAPTER: FIGHT AGAINST CORRUPTION**

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**1.**

**RECITALS**

The Law on Prevention of Corruption<sup>1</sup>, whose implementation began on September 1, 2020, extended the competence of the Agency for Prevention of Corruption (Agency<sup>2</sup>) related to the supervision of the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, as well as all future strategic documents in the area of anti-corruption and prevention of corruption.

In accordance with Article 6, paragraph 1 of the Law on Prevention of Corruption, the Agency shall supervise the implementation of the strategic documents, submit the Report on the Implementation of the Strategic Documents with Recommendations about Further Actions to the National Assembly, provide recommendations for the responsible entities on how to eliminate oversights during the implementation of the strategic documents and initiate amendments thereto.

In accordance with Article 33, paragraph 3, the Law on Prevention of Corruption further stipulates that the Agency shall cooperate with public authorities and other legal entities, scientific institutions and associations to "act jointly in the implementation of the strategic documents in the area of fight against corruption".

Article 38 of the Law on Prevention of Corruption stipulates: 1) that the entities responsible for the implementation of the measures and activities contained in the strategic documents shall inform the Agency about their implementation; 2) that the manner of reporting is more closely defined by an act of the Agency Director, in accordance with the strategic documents; 3) that the Agency shall submit the Report on the Implementation of the Strategic Documents with Recommendations about Further Actions to the National Assembly no later than 31 March of the current year for the previous year; and 4) that the Agency shall provide opinions with regard to the implementation of the strategic documents.

The Revised Action Plan for Chapter 23<sup>3</sup>, adopted by the Government of the Republic of Serbia on July 10, 2020 also states that the Agency shall supervise the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, in accordance with the new Law on Prevention of Corruption.

The Agency is an autonomous and independent state authority which reports to the National Assembly for the performance of activities under its purview.

The first Report on the Supervision of the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, shall be structured so as to contain as follows:

- *Recitals;*
- *Eligibility assessment the III and IV quarters of 2020 and continuous activities;*
- *Summary of activity implementation;*
- *Overview of the implementation of individual activities;*
- *Recommendations and*
- *General notes on implementation supervision.*

1 Official Gazette of the RS, no. 35/19, 88/19 and 11/21 -authentic interpretation

2 See the list of abbreviations on page 93

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

# 2.

## **ELIGIBILITY ASSESSMENT FOR THE III AND IV QUARTERS OF 2020 AND CONTINUOUS ACTIVITIES**



## 2. ELIGIBILITY ASSESSMENT FOR THE III AND IV QUARTERS OF 2020 AND CONTINUOUS ACTIVITIES

The Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption defines **130** activities. For the reporting period, the Agency assessed **68** of these activities due in the III and IV quarters of 2020, that is, after July 10, 2020 (adoption of the Revised Action Plan for Chapter 23), as well as those of a continuous nature, as follows:

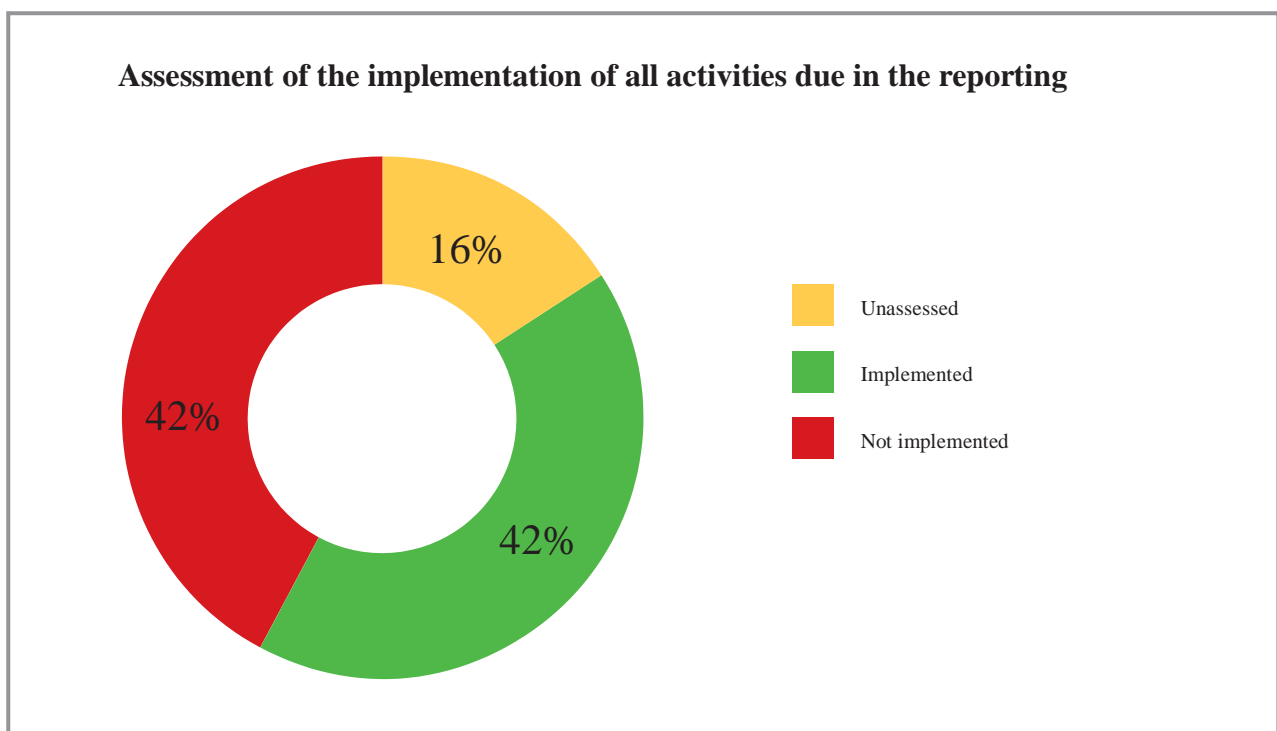
1. **3** in the area of implementation of anti-corruption measures;
2. **50** in the area of prevention of corruption and
3. **15** in the area of repression of corruption.

However, the Agency presented **62** instead of **68** activities in the following statistical overview for the following reasons:

1. Even though the Revised Action Plan for Chapter 23 – Sub-chapter: Fight against Corruption, defined the Methodology for assessing the impact of measures taken with the aim of reducing corruption in vulnerable areas (public procurement – 2.2.8.5; privatization – 2.2.9.2; health care – 2.2.10.1; taxes – 2.2.10.6; education – 2.2.10.11; police – 2.2.10.19; customs – 2.2.10.27; local self-government – 2.2.10.32) as eight separate activities, it was assessed as one activity, due to the fact that the Agency is bound to implement every one of them and that one Methodology will be developed with indicators, which will be classified within the eight listed areas;
2. Activity 2.2.10.31 was assessed as two activities because it comprises two completely separate units (adoption of local anti-corruption plans and reporting), as well as two different activity implementers.

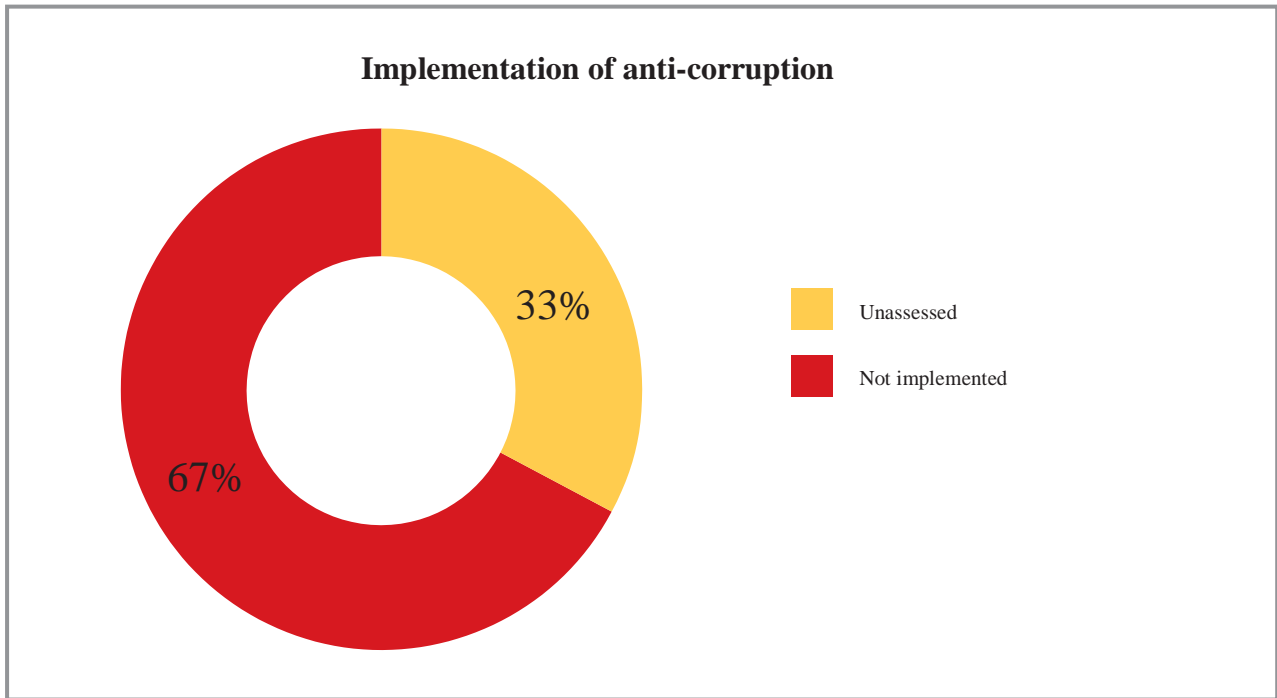
According to the Agency's assessment, out of the 62 assessed activities:

1. **26 (42%)** were implemented;
2. **26 (42%)** were not implemented and
3. **10 (16%)** could not be assessed.



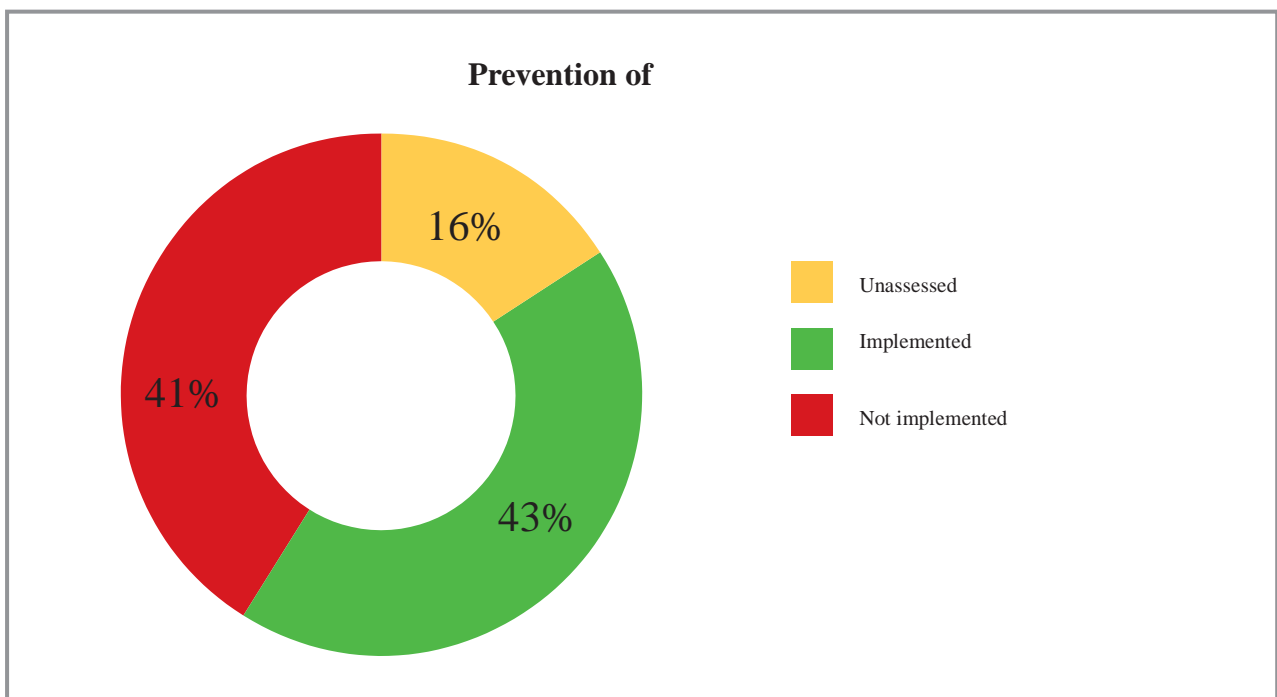
Out of **3** activities assessed in the area of implementation of anti-corruption measures:

1. 2 (67%) were not implemented and
2. 1 (33%) could not be assessed.



Out of **44<sup>4</sup>** activities assessed in the area of prevention of corruption:

1. 19 (43%) were implemented;
2. 18 (41%) were not implemented and
3. 7 (16%) could not be assessed.

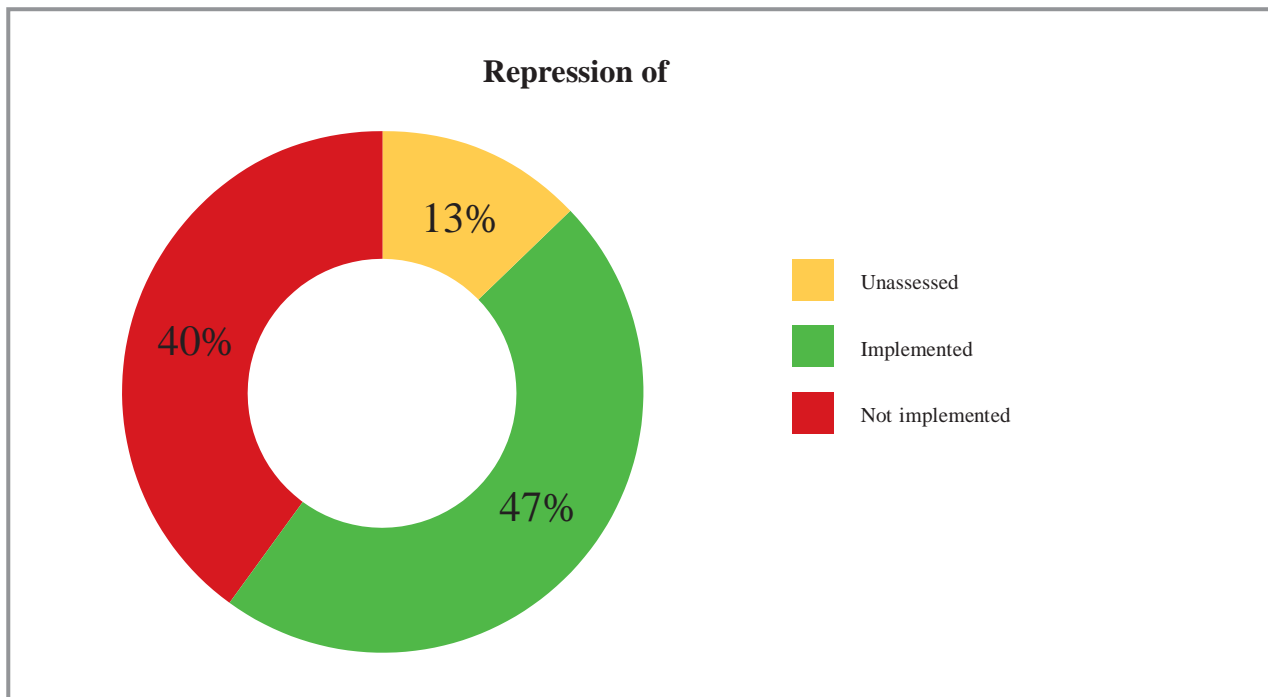


<sup>4</sup> As mentioned above, the Methodology for assessing the impact of measures taken with the aim of reducing corruption in vulnerable areas was assessed as one activity in the area of prevention of corruption, and activity 2.2.10.31 was assessed as two activities.

## 2. ELIGIBILITY ASSESSMENT FOR THE III AND IV QUARTERS OF 2020 AND CONTINUOUS ACTIVITIES

Out of **15** activities assessed in the area of repression of corruption:

1. 7 (47%) were implemented;
2. 6 (40%) were not implemented and
3. 2 (13%) could not be assessed.



Even though this is the Agency's first Report on the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, it can be concluded that the reporting institutions have shown willingness to present the actual status of activity implementation and that, in the majority of cases, they themselves stated in the report template that certain activities had not been carried out. Also, most of them did not provide information that could not be considered relevant from the point of view of specific activity implementation. The quality of reporting cannot be assessed as fully uniform, which was, inter alia, caused by the fact that some reports were submitted by contact persons, who either have not specifically addressed the matters of the European integration before or generally lack sufficient experience in the area of reporting with regard to the implementation of the strategic documents. Efforts should be made in this regard in the upcoming period through the organization of workshops, consultative meetings for the contact persons and improvement of the reporting process, especially taking into account frequent personnel changes and the specific type of experience necessary for the reporting and coordination within each of the reporting institutions.

However, at this point, it is also necessary to indicate that all reporting institutions (as well as those that are not obliged to report, depending on the activity) submitted their reports in a timely manner and responded to additional queries from the Agency whenever requested, which greatly facilitated the Agency's work, bearing in mind that the deadline for the submission of this Report is prescribed by the Law on Prevention of Corruption, so delay is neither possible nor allowed.

Some of them stood out in terms of reporting, as they covered all necessary elements, both activities and performance indicators, using the necessary institutional memory to comprehend the whole activity and preceding events. Nevertheless, the Agency hereby notes that this was sometimes difficult for these institutions, not because of their insufficient reporting capacity, but because of deficiencies in some parts of the strategic document, which was recognized by certain institutions and identified by the Agency at the end of this Report.

On the other hand, when it comes to implementation, it can be concluded that the most common causes of slowdowns or delays are reflected in an inadequate degree of coordination, both on an institutional and inter-institutional level, especially when it comes to the activities which involve multiple institutions. When an activity represents the responsibility of only one institution, it can already be observed that the implementation is easier, which is why the improvement of inter-institutional cooperation and coordination is crucial, so that the upcoming reporting cycles, when more and more activities will be carried out (because those yet unimplemented, continuous and those to be implemented will be assessed as well), can produce a more successful and qualitatively better response in terms of priorities in the field of reform processes, the European integration and supervision of the implementation of the strategic documents. However, there were cases where only one institution was the implementer, but it was not responsible for all segments of a specific activity. Delays with respect to conditional activities (e.g. enactment of regulations or production of analyses) had a particularly adverse effect on the overall performance in terms of the implementation of this document, bearing in mind the number and essence of the unimplemented activities, since the conditional activities preceding them were not implemented either.

Generally speaking, activities, which involve systemic steps – planning, preparation and coordination, that is, multiple stages and multiple actors (e.g. document drafts, consultations, submission of commentaries, testing and development of technical tools, public procurements, hiring experts, etc.), took place at a slower pace than those involving fewer stages from the beginning to the end.

The Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption itself contains certain shortcomings identified in the recommendations, which evidently made it difficult to complete and supervise the implementation of this document as early as in the first reporting cycle. For this reason, the Agency has defined 15 recommendations<sup>5</sup>, which, if fulfilled, could have a significant influence on the improvement of the implementation, reporting and supervision of the implementation of this document. The Agency's remaining findings, including challenges, are presented in Part 6. General notes on implementation supervision.

In the first reporting period, the Agency was not able to assess the activities where, according to the methodological framework, it was not possible to assess the implementation (e.g. activity implementer was not properly determined in all its segments), and also due to the fact that the reporting institutions could not provide the necessary information both because the preparation of their individual reports is due in 2021 and the fact that these are new activities, defined by the Revised Action Plan for Chapter 23, which is why they will finish the preparation of this specific report in 2021. In the following reporting periods, the Agency will attempt to provide such assessments as less as possible, that is, only when it is not possible to provide an assessment of the implementation according to methodological rules.

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5 For more information, see Section 5



# 3.

## SUMMARY OF ACTIVITY IMPLEMENTATION

### 3. SUMMARY OF ACTIVITY IMPLEMENTATION

#### 3.1. Implementation of anti-corruption measures

The Government neither reviewed the reports of the Anti-Corruption Council nor was this institution actively involved in the legislative process. The National Public Prosecutor's Office did review the reports of the Anti-Corruption Council, referred them to the competent Prosecutors' Offices and monitored further action, but this information will be known in the next reporting cycle.

#### 3.2. Prevention of corruption

In the area of prevention of corruption, implementation of the Law on Prevention of Corruption began on September 1, 2020 and the Agency's employees were trained to implement it more efficiently. Workshops were also held with competent institutions cooperating with the Agency.

The application for reporting on the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption is not complete. No workshops were held with the representatives of the National Assembly of the Republic of Serbia for the purpose of monitoring the recommendations from the Agency's report, and neither were ethics and integrity training courses for the MPs.

Also, the amended Law on Financing of Political Activities was not adopted, and neither were the activities directly related to its adoption.

The Guidelines for the Identification and Management of Conflicts of Interest and Incompatibility of Functions were developed, as well as a video material relating to potential conflicts of interest of public officials. Public administration employees attended a training in the area of prevention of conflicts of interest. Implementation of the Law on Prevention of Corruption in the area of conflicts of interest of public officials was monitored, whereas the information about the individual cases of conflicts of interest will be known in the next reporting cycle after the implementation of the Code of Conduct for Civil Servants<sup>6</sup>.

Information about the application of the Criminal Code<sup>7</sup> and the Law on Organization and Competence of State Authorities in Suppression of Organized Crime, Terrorism and Corruption<sup>8</sup> will also be known in the next reporting cycle.

The analysis of the application of the Law on Free Access to Information of Public Importance<sup>9</sup> was not made, and the amendments to this Law were not adopted.

The new legal framework applies and is based on competencies in the process of recruitment, valuation, promotion and development of civil servant careers, however, not all the initiated tender procedures were brought to an end.

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

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

8 Official Gazette of the RS, no. 94/16 and 87/18-as amended

9 Official Gazette of the RS, no. 120/04, 54/07, 104/09 and 36/10

The process of implementation of program budgeting was improved, analyses of the program budgeting process conducted, the program budget methodology improved and training courses on financial management and control held, therefore, which led to a larger number of certified authorized auditors.

Training courses on the application of the Law on Protection of Whistleblowers<sup>10</sup> were conducted, but not for all identified target groups. Information about its implementation will be available in the next reporting cycle. A report on monitoring of the effects of the Law on Protection of Whistleblowers is also under preparation.

The capacities of the Public Procurement Office are currently strengthened and a new Public Procurement Portal has been established as well. Measures related to the supervision and control of public procurements are monitored, but final relevant information is not available in this report. Police officers, prosecutors and judges were also trained for the purpose of more efficient prosecution of public procurement corruption.

Methodology for assessing the impact of measures taken with the aim of reducing corruption in vulnerable areas (public procurement; privatization; health care; taxes; education; police; customs; local self-government) is being developed, but the document was not completed in the reporting period.

The Operational Plan for Combating Corruption in the Field of Taxes was not adopted either.

Mechanisms are currently developed to strengthen the integrity of police officers, but proper operative procedures are yet to be established. The capacities of the Internal Control Sector of the Ministry of the Interior are strengthened to prevent and combat police corruption and the employees are also taking integrity training courses.

The capacities of the Department of Internal Control at the Customs Administration were not properly built.

Total 106 local self-government units (LSGUs) adopted local anti-corruption plans (LACPs), i.e. 73% of 145, which were subject to this obligation, whereas 34 of them formed a body in charge of monitoring the application of this document – hence this activity was not fully implemented either. However, the Agency shall continuously report on these activities.

In the given reporting period, no joint activities aimed at the encouragement and more effective participation of citizens in the fight against corruption were carried out.

Measures have been taken to further improve the system of transparent financing of civil society organizations, but this information will be known in the following reporting cycles.

The 11th competition for the allocation of funds to civil society organizations for the implementation of anti-corruption projects, organized by the Agency, was completed.

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<sup>10</sup> Official Gazette of the RS, no. 128/14



### 3.3. Repression of corruption

Information about the application of the amended Criminal Code with connection to corrupt and commercial criminal offenses, as well as the application of the amended criminal offense of abuse of a responsible person's office, which contains the mechanism of legal subsidiarity, will be known in the next reporting period.

Due to current epidemiological situation, judges and prosecutors were not trained for the application of the Criminal Code during the reporting period.

Analysis of the compliance of the normative framework of the Republic of Serbia with the recommendations of the Financial Action Task Force – an international body whose task is to develop and improve combat against money laundering and terrorist financing (*FATF*), with respect to conducting financial investigations in parallel with criminal investigations was initiated, but not finalized in the reporting period.

Certain activities were carried out to strengthen the capacities of the Financial Investigation Unit of the Ministry of the Interior and to train police officers, public prosecutors and judges in conducting financial investigations, monitoring money flows, proactive approaches and special investigative techniques.

The capacities of the Prosecutor's Office for Organized Crime and special departments for the repression of corruption of Higher Public Prosecutors' Offices and Financial Forensics Department at the Prosecutor's Office for Organized Crime are also being strengthened, as well as other relevant bodies.

The new Rulebook on Job Classification at the Prosecutor's Office for Organized Crime and special anti-corruption departments was not adopted, based on the conducted analysis of human resource capacity needs in these bodies, so the activity was not conducted either, given the fact that the activity is directly conditioned by the implementation of this analysis; the analysis of technical equipment needs at the Prosecutor's Office for Organized Crime and special anti-corruption departments of the Higher Public Prosecutors' Offices was not completed either.

Due to pandemic-related reasons, meetings of the Anti-Corruption Council, National Public Prosecutor's Office and Prosecutor's Office for Organized Crime did not take place.

Steps were taken to improve the capacity of the Directorate for Confiscated Property Management in terms of trainings attended by the employees during the reporting period. The Ministry of Justice carried out important activities aimed at improving international cooperation with directorates from the countries of the region and the European Union, however, no contracts were concluded in this reporting cycle.

The level of *IT* protection of the Ministry of the Interior was improved.

Sanctioning of the breaches of regulations related to the disclosure of confidential information is monitored.

# 4.

## OVERVIEW OF THE IMPLEMENTATION OF INDIVIDUAL ACTIVITIES

#### 4. OVERVIEW OF THE IMPLEMENTATION OF INDIVIDUAL

### 4.1. Implementation of anti-corruption measures

Within Section 2.1. Of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Cooperation related to the implementation of anti-corruption measures in this Report, the Agency assessed the implementation of activities related to the following interim benchmark:

2.1.2: The Government of the Republic of Serbia has a constructive relationship with the Anti-Corruption Council and seriously takes its recommendations into consideration to the highest possible extent.

These are activities 2.1.2.1, 2.1.2.3 and 2.1.2.4, which are separately shown below.

#### *Activity 2.1.2.1.*

<b>The Government shall review the reports of the Anti-Corruption Council at its sessions and take them into account to the highest possible extent. In order to present the main findings of this Report, the Council was invited to the Government sessions when the Report is under discussion.</b>	
<b>Activity implementer</b>	Government of the Republic of Serbia
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	The government reviewed the Council's Reports and reached the Conclusion on the Council's Follow-Up Actions regarding its Findings and Recommendations.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

#### *Implementation of activity 2.1.2.1.*

*The Government of the Republic of Serbia informed the Agency that it did not review the reports of the Anti-Corruption Council during the reporting period. As both the activity and the performance indicator refer to the review of the Anti-Corruption Council's report and the adoption of the Conclusion on the Follow-Up Actions regarding the Findings and Recommendations of the Anti-Corruption Council, the Agency assessed this activity as unimplemented for the given reporting period.*

#### *Activity 2.1.2.3.*

<b>At the initiative of the Council and bodies authorized to propose laws, active participation of the Anti-Corruption Council in the legislative process should be ensured through membership in the task forces in charge of the adoption and amendments to the law with a risk of corruption, as deemed by the Council. The members of the Council shall actively participate in the work of the task forces.</b>	
<b>Activity implementer</b>	Anti-Corruption Council
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	The Council receives timely information about legislative activities, acts proactively in the course of its operations and the members of the Council take an active part in the legislative process.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.1.2.3.**

The Anti-Corruption Council informed the Agency that it did not participate or receive an invitation to be an active member in the task forces established in the III and IV quarters of 2020 during the reporting period. As the purpose of the activity is an active involvement of the Anti-Corruption Council in the legislative process, which is supported by the performance indicator, the Agency assessed the activity as unimplemented for this reporting period.

The Anti-Corruption Council also recommended that the Ministry of Justice should also be the leader of this activity, "which should submit to the Council draft laws, laws and by-laws in the area of anti-corruption and include the Council as an active participant in the relevant task forces".

**Activity 2.1.2.4.**

<b>The National Public Prosecutor's Office reviews the reports of the Council from the viewpoint of potential criminal liability and refers them to the competent Prosecutors' Offices to take proper actions; it is also in charge of monitoring and reporting.</b>	
<b>Activity implementer</b>	National Public Prosecutor's Office Government of the Republic of Serbia
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Annual reports on the activities related to the reports of the Anti-Corruption Council were prepared and submitted to the Government.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.1.2.4.**

The National Public Prosecutor's Office informed the Agency that it reviewed the reports of the Anti-Corruption Council, referred them to the competent Prosecutors' Offices and monitored further actions. As the National Public Prosecutor's Office systemizes the data in the first quarter of the current year for the previous year, it will submit them in the next reporting cycle, which is why the Agency was not able to assess the implementation of the activity for this reporting period.

**4.2. Prevention of corruption**

Within Section 2.2. of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption related to the prevention of corruption in this Report, the Agency assessed the implementation of activities related to the following interim benchmarks:

2.2.1. Interim benchmark: Serbia adopts the new Law on the Agency for Prevention of Corruption, providing it with a clear and strong mandate. Serbia shall ensure the maintenance of the necessary independence for the Agency for Prevention of Corruption, receipt of proper financial and human resources, as well as training and proper connectedness to the other relevant authorities (including access to their databases). Serbia shall ensure that any body that fails to submit its reports or deny its cooperation with the Agency for Prevention of Corruption shall be held accountable;

#### 4. OVERVIEW OF THE IMPLEMENTATION OF INDIVIDUAL

Interim benchmark: Serbia shall provide initial records on the effective application of the assets declaration and verification systems, including dissuasive sanctions in cases of non-compliance, as well as appropriate monitoring of measures (including criminal investigations where necessary) in cases where declared assets do not correspond to the real state of affairs.

These are activities no. 2.2.1.1; 2.2.1.3; 2.2.1.4; 2.2.1.8; 2.2.1.9, which are separately shown below.

##### **Activity 2.2.1.1.**

<b>Monitoring of the application of the new Law on Prevention of Corruption and the actions of all state authorities as per the new Law on Prevention of Corruption.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption In cooperation with competent institutions
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	<p>The annual report on the work of the Agency for Prevention of Corruption shall contain the following elements:</p> <ol style="list-style-type: none"> <li>1) number of obligations fulfilled by public officials in accordance with the Law on Prevention of Corruption;</li> <li>2) number of measures issued by the Agency which are to be observed by public officials;</li> <li>3) percentage of institutions that have fulfilled the obligation to adopt the integrity plan and local anti-corruption plan;</li> <li>4) percentage of measures in the integrity and local anti-corruption plans implemented by the relevant institutions;</li> <li>5) number of institutions complying with the obligation to conduct ethics and integrity trainings according to the Agency's plan and program;</li> <li>6) qualitative analyses, comparisons with previous years, comparison of the results with the number of reported cases and inspected entities.</li> </ol> <p>The National Assembly adopted the conclusions about the application of the new Law on Prevention of Corruption. The Government and other state authorities shall act in accordance with the conclusions of the National Assembly. The European Commission's Progress Report for the Republic of Serbia.</p>
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

##### **Implementation of activity 2.2.1.1.**

*The Agency reported that it undertook all preparatory activities required for the appropriate start of the application of the Law on Prevention of Corruption as of September 1, 2020.*

*Within the deadline prescribed by Article 110 of the Law on Prevention of Corruption, all by-laws that had to be adopted by the Agency were adopted. The Rulebook on the Agency's Internal Job Organization and Classification was submitted to the competent committee of the National Assembly of the Republic of Serbia and almost all Agency's normative acts were harmonized with the new regulation during the reporting period.*

*As part of the technical preparations, the Agency completed an upgrade of the unique information system, that is, all application modules of the system. New online form templates were introduced (report on the assets and income of public officials, notice of commencement/termination of public office, gift records, notice of participation in a public procurement, privatization or any other procedure ending in the conclusion of a contract with a public authority) to facilitate the fulfilment of the obligations of public officials and public authorities in accordance with the Law on Prevention of Corruption, while allowing the Agency to work more efficiently. The application module related to the procedures conducted by the Agency for the violations of the Law on Prevention of Corruption was also upgraded, thereby enabling more efficient monitoring of the work results and the course of cases managed by the Agency.*

*As this Report on the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption covers four months of implementation of the Law on Prevention of Corruption (from September 1 to December 31, 2020), the statistical data submitted by the Agency refer solely to this period. To that end, the Agency could not compare the results with previous years, given the methodological unsustainability of such comparison. In accordance with the Law on Prevention of Corruption, the Agency will provide the National Assembly with the Annual Report by 31, March 2021, which will cover eight months of application of the previous Law on the Agency for Prevention of Corruption<sup>11</sup> and four months of application of the new Law on Prevention of Corruption. As this activity related only to the Law on Prevention of Corruption, the Agency assessed the application of this Law.*

*Following the performance indicators, the Agency reported that the number of reports on the assets and income of public officials submitted amounted to 3,062 for the reporting period; the number of public authorities that notified the Agency about the commencement/termination of public office is 1,197, and four legal entities informed the Agency about their participation in public procurement, privatization or other procedure ending in the conclusion of a contract with a public authority. In the domain of assets declaration, 36 warning measures were imposed for non-submission of the reports within the legally prescribed deadline after the commencement or termination of public office.*

*In the domain of conflicts of interest, a total of 538 applications of public officials were resolved. Furthermore, 50 decisions were issued to deny applications of public officials for the approval of another public office or performance of another job or activity. Out of the 50, in 38 cases a public official stopped simultaneously performing incompatible public functions, jobs or activities, while in 11 procedures the decisions were not final (the appeal procedure is ongoing) and in one case the deadline for appeal has not expired. In the same area, a total of 39 measures were imposed on public officials, 19 of which were warning measures and 20 were measures of public announcement of the decisions on law violation.*

*In the field of assets verification, 35 warning measures were imposed, mostly due to untimely submission of reports after the commencement of public office or untimely submission of reports on significant changes in assets and income during the public office.*

*The Agency reported that integrity plans are adopted and implemented in cycles, with cycles lasting three years on the average. The third cycle of preparation and implementation of integrity plans is underway. The cycle itself involves a preliminary preparation of the integrity plan model and adaptation of the application for the development and implementation of these documents, which are implemented by the Agency. After the preparatory part, all institutions bound to make integrity plans shall have usernames and passwords to*

<sup>11</sup> Official Gazette of the RS, no. 97/08, 53/10, 66/11-decision of the Constitutional Court, 67/13-decision of the Constitutional Court, 112/13-authentic interpretation, 8/15-decision of the Constitutional Court and 88/19



#### 4. OVERVIEW OF THE IMPLEMENTATION OF INDIVIDUAL

access the application and start composing the plans. According to the Instructions for the Development and Implementation of Integrity Plans<sup>12</sup>, the deadline for the development of the plan in the third cycle is March 31, 2022. After that, the percentage of institutions that have adopted integrity plans will be known. Furthermore, the deadline for the implementation of integrity plans in the third cycle and reporting on the implementation, as defined by the said Instructions, is April 30, 2024, after which the percentage of the integrity plan measures implemented by the institutions will be known.

After the onset of the implementation of the Law on Prevention of Corruption, preparation of 42 models of integrity plans was completed. These models were developed for all types of public sector institutions, which are bound to develop integrity plans by the Law on Prevention of Corruption. The aforementioned Instructions for the Development and Implementation of Integrity Plans are already developed, and there is an ongoing preparation of the technical specification for the application, which will be used by all taxpayers when developing, implementing, monitoring or reporting about the implementation of integrity plans.

According to the Agency's information collected before December 15, 2020, 73% of LSGUs adopted LACPs<sup>13</sup>. On the other hand, LACP monitoring is the responsibility of local bodies in charge of monitoring the implementation of these documents, which means that the LSGUs are bound to submit reports on the implementation of measures under the LACPs to these bodies. Since only 23% of all LSGUs formed bodies for implementation monitoring, and a small number of these bodies are operational and have started implementing the activities under their purview (primarily collecting information and preparing reports on the implementation of measures and activities from the LACPs), information on the percentage of implemented measures from the LACPs is not available yet. This information will be available after the remaining LSGUs have formed LACP implementation monitoring bodies and become operational, or after a different and more effective mechanism for monitoring the implementation of these documents has been identified through the prospective LACP model.

In order to fulfill the obligations prescribed by the Law on Prevention of Corruption, the Agency developed the Instructions for Training in the Area of Prevention of Corruption and Integrity Strengthening<sup>14</sup>, the Training Program in the Area of Prevention of Corruption and Integrity Strengthening<sup>15</sup>, Appendix on Education of Trainers<sup>16</sup>, as well as the Instructions on Amendments to the Instructions for Training in the Area of Prevention of Corruption and Integrity Strengthening<sup>17</sup>. The Instructions and accompanying documents contain information about the training program, methods of implementation, proper record keeping, as well as instructions on the criteria and manner of appointing public authority employees to be trained for such training implementation. In addition to these documents, the Agency also developed the Guidelines for the Implementation of the Program and Instructions for Training in the Area of Prevention of Corruption and Integrity Strengthening, which are available on the Agency's website at the following link:<http://www.acas.rs/wp-content/uploads/2021/01/Vodic-za-primenu-Program-a-i-Uputstva-za-sprovodjenje-obuke-u-oblasti-sprecavanja-korupcije-i-jacanja-integriteta-1.pdf>. The Agency intended to use the Guidelines to provide the ethics and integrity training implementers with thorough explanations about

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12 Official Gazette of the RS, no. 145/20

13 For more information, see the section on activity implementation 2.2.10.31.

14 Official Gazette of the RS, no. 114/20

15 *ibidem*

16 *ibidem*

17 Official Gazette of the RS, no. 145/20

*all elements which may cause doubts or additional questions during the implementation, as well as to provide instructions and advice for the program execution which could not be included in the above documents, because the given format (general legal acts) did not allow for such inclusion.*

*Remote training courses on ethics and integrity have been conducted by the Agency since 2016. This type of training represents only one of the modalities that public sector employees and managers can use to meet the legal obligation of regularly organizing and attending the ethics and integrity training courses under the Agency's Program. Since the beginning of the application of the Law on Prevention of Corruption, 36 participants have attended remote training courses on ethics and integrity, and in the period between the start of 2020 and preparation of this report there were 127 participants.*

*Regarding the fact that the Agency submitted information about the implementation of the Law on Prevention of Corruption for four months of its implementation, whose submission, according to the performance indicators, was possible, and that it was evident from the submitted report that the application of the new Law on Prevention of Corruption was monitored, the Agency assessed the activity as implemented for this reporting period.*

**Activity 2.2.1.3.**

<b>Continuous specialized training of the Agency for Prevention of Corruption employees in the application of the new Law on Prevention of Corruption and Law on Lobbying.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	Continuously, starting from the adoption of the new Law on Prevention of Corruption and Law on Lobbying
<b>Performance indicators</b>	Conducted training courses. Out of the total number of Agency employees, at least 2/3 attended training courses for the application of the new Law on Prevention of Corruption or Law on Lobbying in the first year of application.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.1.3.**

*The Agency reported that 16 employees attended three training courses within the IPA 2013 Project "Prevention and Fight against Corruption" on the topic of data analysis and processing, with special emphasis on anti-corruption data.*

*Within the USAID Government Accountability Initiative, 53 Agency employees attended one group and four individual training courses on research and analysis methodology, as well as one course on analytic decision-making charts for reports on the assets and income of public officials.*

*As a sign of support in the preparation of a methodological framework for conducting corruption risk assessment in regulations provided to the Agency, the OSCE Mission in Serbia organized one basic and one advanced specialized training course on the subject for the employees. Each of the training courses were attended by four employees, whereby two representatives of civil society also attended the basic training course.*

*Training on the application of the new Law on Prevention of Corruption was attended by 17 new Agency employees.*



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*In the first year of application of the Law on Lobbying<sup>18</sup> (from August 14, 2019 to August 14, 2020), 15 Agency employees attended lobbying training, training for trainers of 11 employees, whereas six employees had a study visit to become familiar with the legal framework and practice in the area of lobbying in Slovenia.*

*The total number of Agency employees who completed the training courses related to the application of the Law on Prevention of Corruption in the reporting period was 94, whereby some employees attended different training courses, depending on the topic and organizational unit of the Agency to which the topic refers.*

*The total number of Agency employees who completed training courses related to the application of the Law on Lobbying was 32, whereby some employees attended different training courses, primarily those from the Conflict of Interest and Lobbying Sector, whose primary area of competence includes lobbying, along with the employees from the Sector for Civil Registers and Records and Legal Sector.*

*As of December 31, 2020, the Agency had 94 employees employed for an indefinite time period and two employees employed for a definite time period, which means that 2/3 of the employees attended training courses related to the application of the Law on Prevention of Corruption and Law on Lobbying. The Agency would like to note that the nature of the training courses related to the Law on Lobbying is strictly professional compared to the training courses for the Law on Prevention of Corruption, hence it assessed the accomplishment of the performance indicators in relation to the number of employees in the organizational units directly or indirectly in charge of lobbying. Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.*

##### **Activity 2.2.1.4.**

<b>Adaptation of the software for reporting on the National Strategy for Fight against Corruption and Action Plan for its implementation so as to meet the needs related to the monitoring of the relevant measures from the Revised Action Plan for Chapter 23, as well as regular maintenance of the software.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	For software adaptation - IV quarter of 2020 For maintenance – continuous
<b>Performance indicators</b>	The software adapted so as to meet the needs related to the monitoring of the relevant measures from the Revised Action Plan for Chapter 23. The software is regularly maintained.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

##### **Implementation of activity 2.2.1.4.**

*According to the information provided by the Agency, even though appropriate steps were taken to adapt the software and great efforts are made for the implementation of this activity, the Agency assessed the activity as not implemented with regard to the deadline.*

<sup>18</sup> Official Gazette of the RS, no. 87/18 and 86/19-as amended

**Activity 2.2.1.8.**

<b>Multidisciplinary training courses and workshops with institutions that developed intensive cooperation with the Agency for Prevention of Corruption, including training courses for journalists.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Held training courses and workshops that contribute to the improvement of knowledge necessary for the application of the new Law on Prevention of Corruption. At least two training sessions per year organized with institutions that have an intensive cooperation with the Agency. At least one annual training session organized for journalists.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.1.8.**

The Agency reported that, with the support of the USAID Government Accountability Initiative, the first out of three workshops was held in the reporting period with the representatives of the Prosecutors' Offices about the cooperation between the Agency and National Public Prosecutor's Office, where, inter alia, discussions were made about the actions of the Agency and the competent Prosecutors' Offices in criminal proceedings initiated by the Agency, due to a reasonable doubt that a public official committed a criminal offense of not declaring assets, providing false information about assets or some other criminal offense for which they were prosecuted *ex officio*.

With the support of the USAID Government Accountability Initiative, during the reporting period a round table was held and attended by the representatives of the Agency and misdemeanor courts, as well as representatives of the Court of Appeal, for the purpose of presentation of draft Instructions on the Plea Bargain Procedure. The Instructions are completed and available on the Agency's website at the following link: <http://www.acas.rs/wp-content/uploads/2021/01/Uputstvo-o-postupku-zaključenja-sporazuma-o-priznanju-prekršaja.pdf>. The round table was preceded by two workshops with representatives of the misdemeanor courts from Belgrade, Niš, Kraljevo, Kragujevac and Novi Sad, aiming at strengthening their cooperation with the Agency and drafting the Instructions on the Plea Bargain Procedure before the reporting period, but during 2020, also with the support of the USAID Government Accountability Initiative.

In the reporting period, the Agency also held a workshop for the representatives of the media and civil society organizations in order to present the most important novelties of the Law on Prevention of Corruption. The training course particularly focused on the areas of conflicts of interest, cumulation of functions, declaration of assets and income of public officials, as well as on improving the cooperation between the Agency and the media. The course was attended by the representatives of the Center for Free Elections and Democracy, Research Center for Defense and Security, Bureau for Social Research, Bečej Youth Association, Politika and Danas daily newspapers, Defense and Security journal and Tanjug, Beta and FoNet news agencies.

With the support of the IPA 2013 Project "Prevention and Fight against Corruption", three webinars were held for public officials at the local self-government level, where the participants got familiar with the novelties of the Law on Prevention of Corruption.

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*The Agency employees and representatives of other state institutions attended two webinars on the topic of protection of personal data, lifecycle of whistleblowing procedure and information (cyber) security in whistleblowing procedure, as well as two workshops on the topic of trial simulation organized under the IPA 2013 Project "Prevention and Fight against Corruption" and National Public Prosecutor's Office.*

*Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.*

##### **Activity 2.2.1.9.**

<b>Organization of workshops with the competent National Assembly Committee for the monitoring of the Agency's recommendations, including ethics and integrity training courses for the MPs.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption Competent National Assembly Committees
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Held workshops that contribute to the improvement of knowledge necessary for the application of the new Law on Prevention of Corruption. At least two workshops a year organized with the MPs or members of the competent Committees of the National Assembly
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

##### **Implementation of activity 2.2.1.9.**

*The Agency reported that the National Assembly of the Republic of Serbia adopted the Conclusion about the Review of the 2019 Report on the Performance of the Agency for Prevention of Corruption<sup>19</sup> accepting the 2019 Report on the Performance of the Agency for Prevention of Corruption at the Fifth Sitting of the Second Regular Session in 2020 held on December 2, 2020. As this activity relates to the workshops aimed at following the Agency's recommendations, they were not held in the reporting period.*

*When it comes to training courses on ethics and integrity, in early September 2020, the Agency adopted the Training Program in the area of prevention of corruption and integrity strengthening. Training Program titled "Ethics and integrity" is designed so as to include the presentation of the rules of conduct and resolution of ethically problematic situations (ethical dilemmas) in the work environment. A prerequisite for conducting the ethics and integrity training course was the adoption of the Code of Conduct for MPs, which will allow the aforementioned target group to familiarize itself with the rules of conduct and application of these rules in specific situations. As the Code of Conduct of MPs<sup>20</sup> was adopted on December 24, 2020, the training course on ethics and integrity was not held in the reporting period, so the Agency assessed the activity as not implemented for this reporting period.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report the Agency assessed the implementation of the activities related to the following interim benchmark:

<sup>19</sup> See: [http://www.parlament.gov.rs/upload/archive/files/cir/pdf/ostala\\_akta/2020/RS40-20.pdf](http://www.parlament.gov.rs/upload/archive/files/cir/pdf/ostala_akta/2020/RS40-20.pdf)

<sup>20</sup> Official Gazette of the RS, no. 156/20

2.2.2. Serbia is currently amending its Law on Financing of Political Activities and is endeavoring to strengthen the independence and administrative capacity of the relevant supervisory authorities, in particular, the State Audit Institution and the National Electoral Commission. Serbia shall provide initial records on proper application of the Law, including dissuasive measures where necessary.

These are activities no. 2.2.2.1; 2.2.2.2; 2.2.2.3; 2.2.2.6, which are separately shown below.

**Activity 2.2.2.1.**

<b>Amendments to the Law on Financing of Political Activities with the purpose of clearly defining and differentiate the obligations of the Agency, SAI and other bodies in the process of control of political activities and entities, and precisely establishing the obligations and mechanisms for a transparent financing of political entities in accordance with a qualitative analysis of the application of the provisions of the Law on Financing of Political Activities. The amendments to the Law should include strengthening of the capacities of the Agency for Prevention of Corruption so that it can receive all necessary information on financial flows.</b>	
<b>Activity implementer</b>	Ministry in charge of the financial affairs of the Agency for Prevention of Corruption Government of the Republic of Serbia National Assembly of the Republic of Serbia With the participation of civil society organizations
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Adopted Law on Amendments to the Law on Financing of Political Activities.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.2.1.**

*The Ministry of Finance informed the Agency that the obligation to amend the Law on Financing of Political Activities aims at eliminating the shortcomings in the legal framework and control of the financing of political activities and entities, and reminded it that this activity was also envisaged by the previously valid Action Plan for the Implementation of the National Strategy for Combating Corruption in the Republic of Serbia for the period between 2013 and 2018.*

*The text of the Draft Law on Amendments to the Law on Financing of Political Activities was composed by the Task Force consisting of the representatives of the Ministry of Justice, State Audit Institution, Agency for Prevention of Corruption and Ministry of Finance. Public debate on the Draft Law was conducted from August 4 to August 25, 2014, after which the Draft Law text was submitted to the Venice Commission for opinion; the Commission and the OSCE Office for Democratic Institutions and Human Rights (ODIHR) adopted a Joint Opinion on the Draft Law at the plenary session held on October 10 and 11, 2014 and submitted it to the Ministry of Finance.*

*As further reported by the Ministry of Finance, the opinions of all competent authorities were obtained, including the Ministry of Justice, Public Policy Secretariat, Secretariat for Legislation and European Integration Office, after which the Committee on Judiciary*

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and State Authorities and Committee on Economy and Finance held sessions in January 2015, reviewed the text of the Draft Law and submitted it to the Government of the Republic of Serbia.

As the amended law has not been adopted yet, the Agency assessed this activity as not implemented.

##### Activity 2.2.2.2.

<b>The audit program should include mandatory audit of the political parties in the Parliament at the national level and bound the Tax Administration director to include the grantors of financial funds and other services to political parties in the annual or extraordinary tax control plan, in accordance with the Agency's report on financing of political activities and entities.</b>	
<b>Activity implementer</b>	National Assembly of the Republic of Serbia
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Adopted Law on Amendments to the Law on Financing of Political Activities.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

##### Implementation of activity 2.2.2.2.

Bearing in mind that this activity is directly conditioned by the implementation of the previous one, i.e. the adoption of amendments to the Law on the Financing of Political Activities, which is supported by the performance indicator, the Agency assessed this activity as not implemented.

##### Activity 2.2.2.3.

<b>Monitoring of the implementation of the Law on Financing of Political Activities, including the application of dissuasive measures.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption Misdemeanor Courts National Public Prosecutor's Office
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Reports on the financing of political activities and election campaigns of the Agency for Prevention of Corruption. 1) at least 50% of political entities submit annual financial statements; 2) at least 70% of political entities submitted election campaign expenditure information; 3) number of misdemeanor proceedings initiated, as well as number and degree of sanctions imposed by misdemeanor courts.  Annual reports of the National Public Prosecutor's Office on criminal proceedings arising from the application of Article 38 of the Law on Financing of Political Activities, including the number and degree of sanctions applied.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.2.3.**

Even though both the Agency and the National Public Prosecutor's Office submitted information about the implementation of the applicable Law on Financing of Political Activities<sup>21</sup>, it is clear from the following activities that this one also refers to the amended Law on Financing of Political Activities, which is why the Agency assessed it as not implemented for this reporting period.

**Activity 2.2.2.6.**

Building technical capacities of the Agency for Prevention of Corruption for the monitoring of political activities financing, online reporting software, better accessibility of published data.	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	Continuous, starting from the IV quarter of 2020
<b>Performance indicators</b>	Built technical capacities enabling effective control of monitoring of political activities financing.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.2.6.**

The Agency reported that the technical capacities are continuously built and that it planned the funds for this activity during 2020 budgeting. However, since the activity refers to the amended Law on Financing of Political Activities (which can also be seen from the activities preceding this one and the very deadline for implementation), which has not yet been adopted, the Agency reported that it cannot start building technical capacities in accordance with the provisions of the regulation. In this regard, the Agency assessed the activity as not implemented for this reporting period.

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.3. Serbia shall provide initial records showing an increase in observed and resolved cases of conflict of interest, including dissuasive sanctions. Serbia shall conduct training courses and raise awareness in order to ensure better understanding of the concept at all levels.

These are activities no. 2.2.3.1; 2.2.3.2; 2.2.3.3; 2.2.3.4 and 2.2.3.5, which are separately shown below.



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##### Activity 2.2.3.1.

<b>Development of the Guidelines on Prevention of Conflicts of Interest after the adoption of the new Law on Prevention of Corruption. Presentation of the Guidelines on Prevention of Conflicts of Interest.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	III quarter of 2020
<b>Performance indicators</b>	The Guidelines were developed and published to ensure better understanding of the concept of conflicts of interest and to properly inform all risk categories that may experience a conflict of interest. Presentation of the Guidelines held at the round table.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

##### **Implementation of activity 2.2.3.1.**

*The Agency reported that, with the support of the USAID Government Accountability Initiative, it developed the Manual for the Recognition and Management of Conflicts of Interest and Incompatibility of Functions, which is harmonized with the provisions of the new Law on Prevention of Corruption and available on the Agency's website at the following link: <http://www.acas.rs/wp-content/uploads/2020/11/Conflict-of-Interest-MANUAL-for-Website-30Oct20FINAL.pdf>.*

*Even though the Agency prepared the Manual before the beginning of the application of the Law on Prevention of Corruption on September 1, 2020, it had to adopt the Book of Visual Identity with the new name and adapt the Manual according to the new visual elements, which the Agency did shortly after the beginning of the application of the Law on Prevention of Corruption. Due to this delay, epidemiological situation and dynamics of the activities carried out with the representatives of the USAID Government Accountability Initiative, it was agreed that special events dedicated to the presentation of the Manual would be held in early 2021.*

*In addition to making the electronic version of the Manual available to all interested parties, the Agency representatives held the meetings and workshops concerning other topics and informed the attendees about the availability of materials in the Publication section of its website, where the Manual is also located. These were as follows: webinars for public officials at the local self-government level held as part of the IPA 2013 Project "Prevention and Fight against Corruption"; meeting held on November 19, 2020 with the representatives of the High Judicial Council and State Prosecutorial Council regarding activity 1.2.2.2. from the Sub-Chapter: Judiciary of the Revised Action Plan for Chapter 23 (raising awareness of the strict observance of conflict-of-interest provisions through improved cooperation of the High Judicial Council and the State Prosecutorial Council with the Agency for Prevention of Corruption, regular meetings and consideration of ongoing problems in order to consistently and timely fulfill the obligation to submit reports on assets and income (asset certificates) of the holders of judicial functions, and the first of three workshops with the representatives of Prosecutors' Offices on the topic of cooperation between the Agency and the National Public Prosecutor's Office, which, with the support of the USAID Government Accountability Initiative, was held in the reporting period.*

*By assessing the essence of the activity reflected in the development and publication of the Manual, as well as the fact that the deadline for its preparation and presentation is identical and that the Agency presented the Manual at other related events after the beginning of the application of the Law on Prevention of Corruption by the end of 2020, the Agency assessed this activity as implemented, even though the events specifically dedicated to the Manual will be held in 2021.*

**Activity 2.2.3.2.**

<b>Creation of video materials – potential conflict-of-interest situations, including dissemination and awareness raising component.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Video materials produced, operational and widely used as part of the training course for public officials conducted by the Agency.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.3.2.**

The Agency reported that it developed a video material showing potential conflicts of interest, which is available on its website, i.e. the official YouTube channel of MyIntegrity at the following link: <https://www.youtube.com/watch?v=KCoV0KRJb1g&t=12s>. The video material was also made available through the Agency's official social media accounts.

Since the deadline for the development of the video material and its dissemination is the same or is not clearly separated, the Agency could not use the video material for the training courses for public officials in 2020, however, it will use it in accordance with the training plan for 2021. By assessing the essence of the activity and for the same reasons stated for the previous activity (2.2.3.1), the Agency assessed this activity as implemented.

**Activity 2.2.3.3.**

<b>Professional training courses for public administration employees on the prevention of conflicts of interest.</b>	
<b>Activity implementer</b>	National Academy of Public Administration
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Completed professional training courses for public administration employees on the prevention of conflicts of interest. Number of training courses held in relation to the planned training on the prevention of conflicts of interest.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.3.3.**

The National Academy of Public Administration reported that it implemented the General Training Program for Civil Servants, General Training Program for Employees in Local Self-Government Units, Training Program for Managers in State Authorities and Training Program for Managers in Local Self-Government Units, which are to be adopted by the Government of the Republic of Serbia. Introductory training programs for both state administration and local self-government employees, both secondary and higher education officials deal with the Constitutional Order and aim at proper preparation for the state license exam, in accordance with the Regulation on the Program and Method of Taking State License Exams<sup>22</sup>. A part of this course comprises

<sup>22</sup> Official Gazette of the RS, no. 16/09, 84/14, 81/16, 76/17 and 60/18



topics related to the prevention of conflicts of interest. Within the 2020 General Training Program for Civil Servants – thematic area "Prevention of Corruption and Fight against Corruption", a training program titled "Prevention of Conflicts of Interest, Control of Assets of Officials and Registers" was developed. In addition, thematic area titled "Inspection" generated an online training course titled "Inspection", which includes thematic unit titled "Integrity of inspectors: Conflict of interest". The Training Program for Managers in State Authorities for 2020 developed the course titled "Solving ethical dilemmas", which also addresses the topic of conflicts of interest. The Training Program for Managers in Local Self-Government Units for 2020 developed the course titled "Improving Ethical Behavior and Conflict-of-Interest Management".

In the period between July 10 and December 31, 2020, 40 participants completed the online training titled "Inspection", and 32 participants completed the online training titled "Constitutional order". As further reported, the course titled "Prevention of conflicts of interest, control of assets of officials and registers" was not held in the reporting period, due to the epidemic.

Given the fact that certain completed training courses covered conflicts of interest, the Agency assessed the activity as implemented for this reporting period.

#### Activity 2.2.3.4.

<b>Regular monitoring of conflict-of-interest cases, including the number and degree of sanctions applied</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption National Public Prosecutor's Office Misdemeanor Courts
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conflict-of-interest cases are regularly monitored through the reports of the Agency for Prevention of Corruption.
<b>Agency's assessment</b>	<b>Activity was implemented.</b>

#### Implementation of activity 2.2.3.4.

As this Report on the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption covers four months of implementation of the Law on Prevention of Corruption (from September 1 to December 31, 2020), and it is clear that it also refers to the applicable Law on Prevention of Corruption, the statistical data submitted by the Agency refer solely to this period.

With this in mind, the Agency reported that in the first four months of the application of the Law on Prevention of Corruption total 538 applications of public officials were resolved. Furthermore, 50 decisions were issued to deny applications of public officials for the approval of another public office or performance of another job or activity. Out of the 50, in 38 cases a public official stopped simultaneously performing incompatible public functions, jobs or activities, while in 11 procedures the decisions were not final (the appeal procedure is ongoing) and in one case the deadline for appeal has not expired.

A total of 39 measures were imposed on public officials through the implementation of the Law on Prevention of Corruption, 19 of which were warning measures and 20 were measures of public announcement of the decisions on law violation. In the reporting period, no measures of public announcement of a recommendation for dismissal were imposed, and neither were decisions determining the termination of another public office by force of law.

Bearing in mind that conflict-of-interest cases are monitored and that the Agency submitted final information on this, even though only for the four months of the application of the Law on Prevention of Corruption, this activity was assessed as implemented for the reporting period.

**Activity 2.2.3.5.**

<b>Monitoring conflict-of-interest cases through the implementation of the Code of Conduct for Civil Servants regarding the number of observed and resolved conflict-of-interest cases, including disciplinary measures.</b>	
<b>Activity implementer</b>	High Civil Service Council
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	The annual report of the High Civil Service Council contains data on the number of observed and resolved conflict-of-interest cases, including disciplinary measures.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.2.3.5.**

The High Civil Service Council reported that, at its 80th session dated July 16, 2020, it formed a Task Force with the purpose of drafting a proper report based on the reports of the state administration bodies containing the data and information necessary for the monitoring of the situation in the area of civil servant conflict-of-interest management. At the 81st session dated August 7, 2020, the High Civil Service Council adopted the information necessary for the preparation of the Draft Guidelines for Conflict-of-Interest Management.

In the second half of the year, two complaints were sent to the High Civil Service Council regarding certain employees of public institutions and police officers, which were escalated to the competent authorities, namely, the City Center for Social Work in Belgrade and Ministry of the Interior – Valjevo Police Administration.

The deadline for the preparation of the report covered by the performance indicators is March 31, however, the implementer stated that it was not a report on the performance of the High Civil Service Council, but rather a report related to the application of the Code of Conduct for Civil Servants, which is submitted to the Ministry of Public Administration and Local Self-Government and published on the Human Resources website.

Regarding the fact that the High Civil Service Council does not resolve conflict-of-interest cases, but rather monitors the application of the Code of Conduct for Civil Servants by collecting data from state administration bodies that directly take care about the application of this act, and the fact that the report on monitoring the application of the Code of Conduct for Civil Servants, including conflict-of-interest cases, has not been completed yet, the Agency was not able to assess the implementation of the activity for this reporting period.

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following recommendation under the Screening Report:

2.2.4. Consideration of a proper legal and institutional solution for an effective resolution of illicit enrichment.

This is activity no. 2.2.4.1, which is shown below.

**Activity 2.2.4.1.**

<b>Monitoring of the application of the Criminal Code and Law on Organization and Competence of State Authorities in Suppression of Organized Crime and Corruption, with the obligation imposed on courts and Prosecutors' Offices with general and special jurisdiction to submit reports on the number of initiated and completed proceedings. The ministry in charge of judicial affairs shall draw up a single report comprising the reports of all the aforementioned authorities and publish it on the website. (link 2.3.1.3.)</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues)
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	The report composed and published on the website of the ministry in charge of judicial affairs. Annual report of the Agency for Prevention of Corruption.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.2.4.1.**

*The Ministry of Justice submitted information that the report would be completed in early 2021, which is why the Agency was not able to assess the implementation of the activity for this reporting period.*

*Although the performance indicator also lists the Agency, it did not provide the information as it is not competent to monitor the application of the aforementioned regulations.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.5. Serbia is currently amending its Law on Free Access to Information of Public Importance, strengthening the administrative capacity of the Commissioner for Information of Public Importance and Protection of Personal Data, providing training on handling requests for access to the information and initial records on advanced access to the information, including privatization activities, activities of state enterprises, public procurement procedures, public spending and donations to political parties sent from abroad.

These are activities no. 2.2.5.1; 2.2.5.2; 2.2.5.4 and 2.2.5.5, which are separately shown below.

**Activity 2.2.5.1.**

<b>Completed analysis of the previous application of the Law on Free Access to Information of Public Importance, with particular emphasis on the following areas:</b> - privatization, - public procurements, - public expenditures and - donations to political entities from abroad.	
<b>Activity implementer</b>	Commissioner for Information of Public Importance and Protection of Personal Data with the participation of civil society organizations
<b>Deadline</b>	III quarter of 2020
<b>Performance indicators</b>	The analysis of the previous application of the Law on Free Access to Information of Public Importance was carried out with particular emphasis on the areas of privatization, public procurements, public expenditures and donations to political entities from abroad.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.5.1.**

The Commissioner for Information of Public Importance and Protection of Personal Data reported that he regularly published annual reports on the application of the Law on Free Access to Information of Public Importance, which contained relevant analyses divided by thematic areas, and that all analyses related to the application of this law were available in his annual reports. At the same time, the Commissioner pointed out that political parties were not obliged by the Law on Free Access to Information of Public Importance, so he could not make a report on this issue. With respect to the special analysis, the Commissioner stated that he did not have the funds in the 2020 budget for the completion of the special analysis, nor was he, as the activity implementer, provided with the funds of the current budget reserve, as proposed in the opinion on the Draft Revised Action Plan for Chapter 23 (Letter to the Ministry of Justice no. 073-12-1567/2020-02 dated June 9, 2020), while recommending that it was necessary to allocate funds from the 2021 budget for this analysis.

Bearing in mind that this activity requires the special analysis, the Agency assessed the activity as not implemented.

**Activity 2.2.5.2.**

<b>Amendments to the Law on Free Access to Information of Public Importance based on the analysis of the previous application of the Law on Free Access to Information of Public Importance.</b>	
<b>Activity implementer</b>	Ministry in charge of state administration and local self-government affairs Partner institution: Commissioner for Information of Public Importance and Protection of Personal Data Government of the Republic of Serbia National Assembly of the Republic of Serbia
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Adopted Law on Amendments to the Law on Free Access to Information of Public Importance.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.5.2.**

*The Ministry of Public Administration and Local Self-Government reported that it established a special Task Force for drafting the Law on Amendments to the Law on Free Access to Information of Public Importance in 2015 and that its composition changed on more than one occasion. Online public consultations were made in the period between February 5 and February 15, 2018, that is, the Draft was published on the website of the Ministry of Public Administration and Local Self-Government with an invitation for an electronic submission of comments, proposals or suggestions.*

*Several special meetings were held at the Ministry of Public Administration and Local Self-Government with competent authorities, representatives of civil society, Commissioner for Free Access to Information of Public Importance and Protection of Personal Data and representatives of his Office (at the initiative of this Ministry).*

*The Ministry of Public Administration and Local Self-Government further reported that a public debate was held with an extended duration from March 22 to April 19, 2018, and that the text of the Draft Law was published on the official website of the Ministry of Public Administration and Local Self-Government, Office for Cooperation with Civil Society and eGovernment Portal, and that all interested parties were able to submit comments and opinions electronically or by mail to the address of the Ministry of Public Administration and Local Self-Government in Belgrade.*

*During the public debate a round table was also organized on March 27, 2018 in Belgrade, where the participants, in addition to the representatives of the EU Delegation, international organizations, representatives of the Commissioner for Information of Public Importance and Protection of Personal Data and state authorities, also included representatives of more than 30 civil society organizations, MPs, representatives of local self-government units and representatives of judicial authorities, with more than 120 participants in total.*

*After the public debate, due to a large number of comments received, the Ministry of Public Administration and Local Self-Government decided to organize a new round of meetings with the activity implementers in order to jointly come up with the best solutions and send the Draft Law to a wide range of state authorities,*

*independent bodies and institutions (26 in total) to provide their opinions, and at the same time to the European Commission via the Ministry of European Integration.*

*The Ministry of Public Administration and Local Self-Government received all opinions of competent authorities and institutions, including the opinion of the European Commission drafted by SIGMA in early 2019.*

*The Ministry of Public Administration and Local Self-Government completed the text of the Draft Law, and, as the previous Commissioner's mandate expired, the Ministry found it reasonable to leave room for the new Commissioner to comment on the Draft Law. As it was necessary to subject the proposals for additional amendments to the Law submitted by the Commissioner to the Ministry of Public Administration and Local Self-Government in September 2019 to further consideration before the final text of the Draft Law would be sent to the Government for consideration and decision, and given the fact that since the public debate (April-May 2018), when the Draft Law was last published, a long period of time elapsed, the Ministry of Public Administration and Local Self-Government published the Draft Law on the official website in November 2019 and thus, as they stated, continued the trend of transparent and inclusive actions in the process of law drafting.*

*After the formation of the new Government in December 2020, a working meeting of the Minister of Public Administration and Local Self-Government was held with the Commissioner for Information of Public Importance and Protection of Personal Data, when they agreed to cooperate on the drafting of amendments to the Law on Free Access to Information of Public Importance.*

*In January 2021, the composition of the Task Force working on the law amendments since August 2017 was changed. The first meeting was scheduled for the second half of January 2021. According to the Government Work Plan, the deadline for the adoption of the Law on Amendments to the Law on Free Access to Information of Public Importance is the first quarter of 2021.*

*Considering the fact that, due to the declared COVID-19 pandemic in the Republic of Serbia, a state of emergency was introduced on March 15, 2020, thereby rescheduling the MP election date from April 26 to June 21, 2020, and that the new Government was formed at the end of October 2020, the Ministry of Public Administration and Local Self-Government reported that they did not have enough time to work on the finalization of the Draft Law text and submit the Draft Law to the Government for adoption by the planned deadline, December 2020, in accordance with the Rules of Procedure.*

*The Commissioner for Information of Public Importance and Protection of Personal Data also sent a notice of the meeting with the Minister of Public Administration and Local Self-Government in December 2020, the agreement to form a Task Force to draft amendments to the Law and the fact that the Commissioner for Information of Public Importance and Protection of Personal Data would participate in the activities of such Task Force.*

*Bearing in mind that the Law on Amendments to the Law on Free Access to Information of Public Importance was not adopted in the reporting period, the Agency assessed this activity as not implemented.*



**Activity 2.2.5.4.**

<b>Monitoring the application of the Law on Free Access to Information of Public Importance.</b>	
<b>Activity implementer</b>	Commissioner for Information of Public Importance and Protection of Personal Data
<b>Deadline</b>	Continuous, starting from the effective date of the Law
<b>Performance indicators</b>	Status description in the annual report on the performance of the Commissioner for Information of Public Importance and Protection of Personal Data.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.5.4.**

The Commissioner for Information of Public Importance and Protection of Personal Data submitted detailed information and statistical data on the application of the applicable Law on Free Access to Information of Public Importance. However, due to nature of the sequence of activities and implementation deadline, the monitoring refers to the Law on Amendments to the Law on Free Access to Information of Public Importance which has not been adopted yet, the Agency assessed the activity as not implemented for this reporting period.

**Activity 2.2.5.5.**

<b>Training for officers authorized to deal with requests for free access to information, in accordance with case law and international standards.</b>	
<b>Activity implementer</b>	National Academy of Public Administration Commissioner for Information of Public Importance and Protection of Personal Data
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Percentage of trained officers authorized to deal with the requests for free access to information compared to the percentage of officers in need of such training.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.5.5.**

The National Academy of Public Administration reported that it implemented the General Training Program for Civil Servants, General Training Program for Employees in Local Self-Government Units, Training Program for Managers in State Authorities and Training Program for Managers in Local Self-Government Units, which are to be adopted by the Government of the Republic of Serbia.

Within the 2020 General Training Program for Civil Servants – thematic area "Prevention of Corruption and Fight against Corruption", a training program titled "Right to Access to Information of Public Importance" was developed. As part of the Sectoral Continuous Development Training Program for Employees in Local Self-Government Units, which is part of the 2020 General Training Program for Employees in Local Self-Government Units, the thematic area "Good Administration" includes a training program titled "Exercising the right to availability of information of public importance".

*The National Academy of Public Administration further reported that, given the inability to hold classroom training courses due to the pandemic, it switched to remote learning in the form of a webinar, but that none of the implementers selected for this topic in the internal competition process were able to hold it as a webinar.*

*The Commissioner for Information of Public Importance and Protection of Personal Data reported that the employees of the Commissioner's Office did not attend the training course in the field of free access to information of public importance organized by the National Academy of Public Administration and other bodies in the second half of 2020, nor did the Commissioner organize such training courses, and he also stated that the National Academy of Public Administration did not contact him regarding the organization of such training courses in the field of free access to information of public importance during the reporting period.*

*Bearing in mind the aforementioned, the Agency assessed the activity as not implemented for this reporting period.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.6. Serbia shall employ and manages the careers of civil servants on the basis of clear and transparent criteria with emphasis on valuation and demonstrated skills. Serbia shall develop and implement a mechanism for the effective implementation of the Code of Conduct for Civil Servants. Serbia shall provide initial records of applied sanctions in cases of violation of the said Code. Serbia shall ensure the prevention of corruption through the introduction of an effective internal system of control and empowerment of public sector managers' responsibilities.

These are the following activities: 2.2.6.1; 2.2.6.2; 2.2.6.3; 2.2.6.4; 2.2.6.5; 2.2.6.6 and 2.2.6.8, which are separately shown below.

**Activity 2.2.6.1.**

<b>Application of the new legal framework based on competencies in the process of recruitment, valuation, promotion and development of the careers of civil servants.</b>	
<b>Activity implementer</b>	Human Resources High Civil Service Council Ministry in charge of state administration and local self-government affairs
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Competitions, performance valuation, promotion and career development of civil servants are based on full application of the competency system (recorded in the relevant HR reports).
<b>Agency's assessment</b>	<b>Activity was implemented.</b>

**Implementation of activity 2.2.6.1.**

*The Human Resources reported that they have applied a competency-based innovative legal framework to the processes of selection in the recruitment, valuation, promotion and support of career development of civil servants since the end of 2018, and this framework was further elaborated during 2019. They actively*



*apply regulations, provide advisory support in the application of the regulations and improvement of the process and monitor their application in practice within the state administration bodies and Government departments.*

*In the period between July 10 and December 31, 2020, the Human Resources announced and completed 210 competitions for executive job positions by employing a total of 229 employees. Out of the 210 announced competitions, 56 were internal and 154 were public. By the end of the reporting period, 146 procedures were completed as follows: 131 competitions ended in employment, 14 procedures failed and one was suspended.*

*The employees of the Recruitment Division also provide professional assistance and support in the assessment of competencies for other state bodies where psychologists are not mandatory members of commissions (Tax Administration, Agency for Prevention of Corruption, courts). Due to the specific epidemiological situation throughout 2020 which required adapting to the circumstances and needs of the authorities, the Recruitment Division employees increased (online and phone) consultations and instructions. In addition, psychologists who participate in the election procedure as members of the competition commissions instigated the first meetings in order to familiarize the members of the competition commissions with the new procedures in the employment process. Psychologists, as members of the competition commissions, represent professional and technical support, both to the HR department of the authority and the members of the commission. Apart from educating the members of the competition commissions and employees in HR departments, the Human Resources was also committed to informing and attracting potential candidates. A new channel of communication, that is, a Viber Group was formed, where candidates could familiarize themselves with the competencies, selection stages and techniques. At the same time, the Human Resources website is improved on a daily basis and for information purposes a "candidate corner" has been opened so that the candidates themselves can ask questions through the Viber Group, website or Facebook account.*

*In the field of valuation and in line with the new procedures in the bodies, after proper performance valuation, the Human Resources collected, processed, analyzed the data and prepared the Annual Report on the Results of the Performance Evaluation for 2019 with recommendations and submitted it to the Government for review and consideration.*

*Regarding the career development and promotion of civil servants, as well as further modernization, the Human Resources, i.e. Career Management Center, apply the following in line with the new competency-based legal framework: analysis of individual potentials, career advice, composition of individual development plans and support in the development through individual work or work in small groups, upon personal application of the civil servants or referral by their managers.*

*In the reporting period between July 10 and December 31, 2020, the following activities were carried out: 75 civil servants performed an assessment of individual development potentials for promotion purposes; 22 civil servants passed an evaluation of general functional and behavioral competencies for takeover via the internal labor market; 10 civil servants passed an online evaluation of competencies for development purposes; 22 civil servants underwent career advice consultations; 20 coaching sessions with 5 civil servants were held, and 12 civil servants passed the evaluation via 360 Degree Feedback.*

Following the monitoring of the situation in the field of personnel outflows, in accordance with the Instructions on the Methodology for Monitoring and Analyzing the Situation concerning Personnel Outflows and their impact on the work of state administration bodies<sup>23</sup>, the Annual Report on personnel outflows in the reporting period, was prepared for the period between April 2019 and April 2020 along with recommendations and submitted to the Government for review and consideration.

As further reported, the Human Resources maintain their efforts to improve the human resources management system with regard to the recruitment, valuation and career development of employees, both by making proposals for the improvement of the regulatory framework and by directly improving their practices. In the first quarter of 2021, the employees of the Recruitment Division will create a questionnaire for the assessment of the information level and degree of satisfaction of candidates in terms of the selection process in state bodies, which will be followed by the improvement of the existing and creation of new tools for the competition data entry for the purpose of generating reports on the employment quality.

The Ministry of Public Administration and Local Self-Government reported that the provisions of the Law on Amendments to the Law on Civil Servants<sup>24</sup> applied as of January 1, 2019, introduced a system of competencies in human resources management for all human resources management functions (selection, recruitment, transfer, takeover, evaluation of work performance, etc.). In order to implement these provisions, the following by-laws were adopted: Decree on the Valuation of Civil Servant Performance<sup>25</sup>, Decree on the Determination of Competencies for Civil Servant Positions<sup>26</sup>, Decree on Internal and Public Competitions for Employment by State Authorities<sup>27</sup>, Decree on the Internal Labor Market of State Authorities<sup>28</sup> and Decree on the Classification of Jobs and Criteria for the Description of Civil Servant Jobs<sup>29</sup>.

Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.

#### Activity 2.2.6.2.

<b>Completion of all initiated competition procedures for employment and commencement of competition procedures for all vacancies (including positions currently held by the acting officers)</b>	
<b>Activity implementer</b>	Human Resources High Civil Service Council Authorized petitioners Government of the Republic of Serbia
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted competition procedures. All initiated competition procedures for employment were completed by the competition commissions.
<b>Agency's assessment</b>	<b>Activity was not implemented.</b>

23 Official Gazette of the RS, no. 28/19

24 Official Gazette of the RS, no. 95/18

25 Official Gazette of the RS, no. 2/19 and 69/19

26 Official Gazette of the RS, no. 4/19

27 Official Gazette of the RS, no. 2/19

28 Official Gazette of the RS, no. 88/19

29 Official Gazette of the RS, no. 117/05, 108/08, 109/09, 95/10, 117/12, 84/14, 132/14, 28/15, 102/15, 113/15, 16/18, 2/19,4/19, 26/19 and 42/19

### **Implementation of activity 2.2.6.2.**

*The Human Resources and the High Civil Service Council reported that in the period between July and December 2020 total 12 employment competitions were announced, five of which were internal and seven public, and that out of the total number of announced competitions four were completed - three internal and one public competition.*

*They further stated that, during the reporting period, 26 competition procedures that had been announced earlier and conducted during the reporting period were completed, namely, four internal and 22 public competitions.*

*According to the submitted reports, the total number of positions in the public administration is 391, and the number of people currently holding positions established by the Government after the competition is 138. In the reporting period, five internal competitions were announced and seven internal competitions ended, and, as for the public ones, seven were announced and 23 were completed.*

*Even though the Human Resources started and completed certain competition procedures, the Agency assessed the activity as not implemented for this reporting period, bearing in mind the performance indicator, which would be achieved if the competition procedures had been conducted and all initiated employment competition procedures completed.*

### **Activity 2.2.6.3.**

<b>Monitoring violations of the Code of Conduct for Civil Servants through sanctions applied in the event of the Code violations.</b>	
<b>Activity implementer</b>	High Civil Service Council
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	Sanctions applied in cases of Code of Conduct violations. The annual report of the High Civil Service Council.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

### **Implementation of activity 2.2.6.3.**

*The High Civil Service Council reported that the monitoring of the implementation of the Code of Conduct of Civil Servants was its regular activity under the Law on Civil Servants<sup>30</sup> (Article 164a), as well as from the activities defined by the Revised Action Plan for Chapter 23.*

*Pursuant to Article 18a of the Code of Conduct for Civil Servants, the High Civil Service Council sent a letter to all heads of state administration bodies, Government departments and professional services of administrative districts in December 2020, reminding them of the obligation to submit information about the number of civil servants employed for an indefinite and definite period for 2020 at the end of 2020, namely, by January 31, 2021, as well as about the total number of citizens' complaints about civil servant conduct, violations of the Code of Conduct for Civil Servants, the number of ex officio proceedings initiated for non-compliance with the provisions of the Code of Conduct for Civil Servants, civil servant conduct,*

<sup>30</sup> Official Gazette of the RS, no. 79/05, 81/05-correction, 83/05-correction, 64/07, 67/07-correction, 116/08, 104/09, 99/14, 94/17, 95/18 and 157/20

type of violations of the Code of Conduct for Civil Servants (classified Article-wise), referred to in the complaints and own initiatives of the authorities, information about disciplinary actions initiated and disciplinary measures imposed against civil servants for violations 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 for Civil Servants. It reminded them that they were required to inform the High Civil Service Council about the manner in which the citizens obtained information about the conduct they should expect from civil servants in the subject body and about the manner of receipt of the complaints about civil servant conduct. It was specifically emphasized that all data and information processed by the bodies during the preparation of the report on the application of the Code of Conduct for Civil Servants are to be submitted to the High Civil Service Council without specifying the personal data of the civil servants covered by the report.

The deadline for the preparation of the report covered by the performance indicators is March 31, however, the implementer stated that it was not a report on the performance of the High Civil Service Council, but rather a report related to the application of the Code of Conduct for Civil Servants, which is submitted to the Ministry of Public Administration and Local Self-Government and published on the Human Resources website.

This activity is directly related to activity 2.2.3.5, i.e. it is the same report under the performance indicators for activities 2.2.3.5 and 2.2.6.3. Bearing in mind that the High Civil Service Council was not able to submit information about the applied sanctions, because it should prepare the report in the first quarter of 2021 based on the information collected from other institutions, the Agency was not able to assess the implementation of the activity for this reporting period.

#### **Activity 2.2.6.4.**

<b>Improvement of the process of implementation of program budgeting (operational and methodological improvement of the process of planning and preparation of the multiannual budget at all authority levels).</b>	
<b>Activity implementer</b>	Ministry in charge of financial affairs
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	The process of implementation of program budgeting is continuously improved at all levels.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

#### **Implementation of activity 2.2.6.4.**

The Ministry of Finance reported that, during the preparation of the Law on the Budget of the Republic of Serbia for 2021<sup>31</sup>, in cooperation with budget beneficiaries, new programs, program activities and projects were opened in accordance with the methodology of the program budget, and that the program structure was defined for new budget beneficiaries with competences stipulated under the Law on Ministries<sup>32</sup>.

Since it can be concluded from the submitted information that the process of implementation of program budgeting is facing improvement, the Agency assessed the activity as implemented for this reporting period.

<sup>31</sup> Official Gazette of the RS, no. 149/20

<sup>32</sup> Official Gazette of the RS, no. 128/20

**Activity 2.2.6.5.**

<b>Periodic analyses of the program budgeting process and identification of recommendations for improvement.</b>	
<b>Activity implementer</b>	Ministry in charge of financial affairs
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	Percentage of budget beneficiaries who have switched to the program budget. Improvement recommendations identified.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.6.5.**

The Ministry of Finance reported that it conducted an internal analysis of the needs of local self-government units for the initiation of new program activities within the uniform program structure of local self-government units. The analysis was carried out on the basis of the requests from local self-government units related to the initiation of new program activities and contained recommendations for improvement. In addition, and in accordance with the performance indicator, the Ministry of Finance reported that all budget beneficiaries switched to the program budget.

Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.

**Activity 2.2.6.6.**

<b>Improvement of the methodology of the program budget and preparation of new instructions in accordance with the recommendations of the analyses under activity 2.2.6.5.</b>	
<b>Activity implementer</b>	Ministry in charge of financial affairs National Public Policy Secretariat
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	Percentage of compliance of program structures of budget beneficiaries with the Instructions for the preparation of the program budget.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.6.6.**

The Ministry of Finance reported that, based on the conducted analysis of the program structure of local self-government units, Annex 5 was amended. Instructions for the preparation of the program budget by adding new program activities to the uniform program structure of the budget of local self-government units. Bearing in mind the performance indicator, the Ministry of Finance also provided information about the fact that the percentage of compliance of the program structures of budget beneficiaries with the Instructions for the preparation of the program budget was 92%. The Agency therefore assessed the activity as implemented for this reporting period.

**Activity 2.2.6.8.**

<b>There was an increase in the number of public sector managers and employees trained to understand the essence and significance of the financial management and control system and the number of trained internal auditors.</b>	
<b>Activity implementer</b>	Ministry in charge of financial affairs
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Consolidated annual report on the status of internal financial audit in the public sector. Number of newly trained public administration managers and employees and certified internal auditors compared to 2013.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.6.8.**

*The Ministry of Finance reported that the total number of certified authorized internal auditors in the public sector of the Republic of Serbia by as of December 31, 2020 was 478. During the term of May 2020 15 candidates passed the exam. The total number of certified internal auditors for 2020 is not final, as the November term will be held in February 2021*

*4. due to the epidemiological situation.*

*The total number of employees of public funds beneficiaries who attended training courses by December 31, 2020, organized by the Central Harmonization Unit for Financial Management and Control, amounted to 2,604, and in 2020 24 participants attended these courses due to inability to organize courses for a large number of people. Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.7. Serbia effectively applies the new Law on Protection of Whistleblowers and monitors its application.

These are activities no. 2.2.7.1; 2.2.7.2 and 2.2.7.3, which are separately shown below.



**Activity 2.2.7.1.**

<b>Conduct training courses on the application of the Law on Protection of Whistleblowers for Police, Public Prosecutors and Judges, as well as for special departments for the repression of corruption in public Prosecutors' Offices and courts.</b>	
<b>Activity implementer</b>	Judicial Academy
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Training courses conducted for the police, public prosecutors and judges, as well as for special departments in public Prosecutors' Offices and courts. Percentage of police officers, public prosecutors and judges trained in implementing the Law on Protection of Whistleblowers compared to those in need of training.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.2.7.1.**

The Judicial Academy reported that, during December 2020, with the support of the USAID Government Accountability Initiative and in cooperation with the National Public Prosecutor's Office and the Whistle Association, it started carrying out activities aimed at supporting Public Prosecutors' Offices in the Republic of Serbia by organizing training courses concerning internal whistleblowing, ethics and integrity intended for employees of the State Prosecutors' Council (course conducted on December 17, 2020) and Public Prosecutors' Offices of the Republic of Serbia (course conducted on December 18, 2020), and that, given the current epidemiological situation, the courses were held online. For judges, whistleblower protection courses were not held due to the inability to organize all planned courses caused by the epidemiological situation. At the same time, the Judicial Academy reported that it was not in charge of training police officers under the Law on Protection of Whistleblowers. Given the fact that the Judicial Academy was designated as the sole implementer of this activity and the fact that it also included police officer training courses, the Agency was not able to assess the implementation of this activity.

**Activity 2.2.7.2.**

<b>Monitoring the implementation of the Law on Protection of Whistleblowers through the preparation of an annual report of the Ministry in charge of judicial affairs based on the periodic reports of competent institutions on the cases related to actions taken with regard to whistleblowing.</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary)
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	The report prepared and published by the Ministry in charge of judicial affairs with detailed statistical data.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.7.2.**

The Ministry of Justice reported that the pandemic caused objective difficulties in the collection of all necessary information for the preparation of the Law on Protection of Whistleblowers application reports, and that it was decided that one report should be made in 2021 which would cover both

2019 and 2020. It further reported that the prepared reports covered the period from the beginning of the application of the Law on Protection of Whistleblowers ending with 2018.

The website of the Ministry of Justice contains the following link: <https://www.mpravde.gov.rs/tekst/14518/izvestaji-o-primeni-zakona-o-zastiti-uzbunjivaca.php>, where the reports on the application of the Law on Protection of Whistleblowers were presented. The last (third) available report was prepared in October 2018, covering the period from July 2017 to June 2018. Since no annual reports on monitoring the implementation of this regulation have been prepared since then, the Agency assessed the activity as not implemented for this reporting period.

**Activity 2.2.7.3.**

<b>Monitoring the effects of the Law on Protection of Whistleblowers regarding the actions of state bodies upon whistleblowers' reports.</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary)
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	The report prepared and published by the Ministry in charge of judicial affairs on the actions of state bodies upon whistleblowers' reports.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.2.7.3.**

The Ministry of Justice submitted information that the first report on the monitoring of the effects of the Law on Protection of Whistleblowers would be prepared in 2021, which is why the Agency was not able to assess the implementation of the activity for this reporting period.

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.8. Serbia shall apply and assess the impact of measures taken to reduce corruption in vulnerable areas (health care, taxes, customs, education, local self-government, privatization, public procurement and police), take corrective measures where necessary and make initial records of a measurably reduced level of corruption in these areas.

These are activities no. 2.2.8.1; 2.2.8.2; 2.2.8.3; 2.2.8.4 and 2.2.8.5, which are separately shown below.



**Activity 2.2.8.1.**

<b>Strengthening HR capacities of the Public Procurement Directorate, especially with regard to the number and position of employees.</b>	
<b>Activity implementer</b>	Public Procurement Directorate
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Filled job positions.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.8.1.**

*The Public Procurement Office reported that the Rulebook on Internal Job Organization and Classification at the Public Procurement Office was adopted as a result of a need to strengthen the administrative and institutional capacities of the Republic of Serbia in the field of public procurements, with the aim of fulfilling all temporary criteria established by the European Commission within Chapter 5 – Public Procurements. The Public Procurement Office made a draft Rulebook on Internal Job Organization and Classification at the Public Procurement Office with competence forms for all employees, final job descriptions and documentation. After that, the document was submitted for opinion to the Ministry of Public Administration and Local Self-Government, Ministry of Finance and Human Resources. After the provision of positive opinions on the content by the Ministry of Finance, Human Resources and Ministry of Public Administration and Local Self-Government and approval of the Government of the Republic of Serbia, the Rulebook on Internal Job Organization and Classification at the Public Procurement Office entered into force on December 2, 2020.*

*The new Rulebook at the Public Procurement Office envisions a total of 36 classified positions, four of which are for civil servants in positions, which amounts to total 55 civil servants.*

*In June 2020, the Public Procurement Office had total 28 civil servants (executives and positions) out of maximum 38 civil servants envisaged by the then Rulebook and classified positions. As of June 1, 2020, a total of three persons started a fixed-term employment at the Public Procurement Office. As of December 31, 2020, the Public Procurement Office had 28 civil servants employed (executives and positions) out of total 55 civil servants envisaged by the new Rulebook and classified positions. However, the number of people with fixed-term employment increased to seven.*

*Bearing in mind that the new Rulebook on Internal Job Organization and Classification at the Public Procurement Office increased the total number of civil servants and fulfilled the prerequisites for further strengthening of personnel capacities, and that the number of people who started fixed-term employment increased, the Agency assessed the activity as implemented.*

**Activity 2.2.8.2.**

<b>Establish a new Public Procurement Portal equipped with new functionalities arising from the new Law on Public Procurement.</b>	
<b>Activity implementer</b>	Public Procurement Directorate
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	A new Public Procurement Portal established.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.8.2.**

The Office for Public Procurement reported that the new Public Procurement Portal, equipped with new functionalities arising from the new Law on Public Procurement<sup>33</sup>, started operating on July 1, 2020, the same moment the new Law on Public Procurement started applying. The Public Procurement Portal was developed with the expert support of GIZ Project "Support to Further Improvement of the Public Procurement System in Serbia" financed through the IPA 2013. After several addenda to the Contract from the beginning of implementation in July 2017, the project "Support to Further Improvement of the Public Procurement System in Serbia" was extended until June 2021 and introduced additional new functionalities on the Public Procurement Portal. Bearing in mind the aforementioned, the Agency assessed this activity as implemented.

**Activity 2.2.8.3.**

<b>Monitoring of measures related to the supervision and control of public procurements.</b>	
<b>Activity implementer</b>	Public Procurement Directorate The National Commission for the Protection of Rights in Public Procurement Procedures Ministry in charge of financial affairs
<b>Deadline</b>	Continuous, once a year
<b>Performance indicators</b>	The Public Procurement Directorate's report on the supervision of the implementation of the Law on Public Procurement. Report on the performance of the National Commission for the Protection of Rights in Public Procurement Procedures. Report of the Ministry of Finance on supervision of the execution of public procurement contracts
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.2.8.3.**

The Public Procurement Office reported that, in accordance with the legal obligation defined in Article 136, paragraph 3 of the then Law on Public Procurement<sup>34</sup>, it submitted the Report on the Supervision of the Implementation of the Law on Public Procurement for 2019 to the Committee of the National Assembly of the Republic of Serbia in charge of financial affairs, as well as to the Government of the Republic of Serbia. The Committee on Finance, the State Budget and Control of Public Spending of the National Assembly of the Republic of Serbia adopted this report at its fourth session held on November 9, 2020. The new report would be prepared by March 31 of the current year for the previous year, which is why the Public Procurement Office was not able to submit the final information.

33 Official Gazette of the RS, no. 91/19

34 Official Gazette of the RS, no. 124/12, 14/15 and 68/15

*The National Commission for the Protection of Rights in Public Procurement Procedures submitted operational statistical data, bearing in mind that the preparation of the annual Performance Report was in progress, and in accordance with Article 203 of the Law on Public Procurement, it should be submitted by this body to the National Assembly by March 31 of the current year for the previous year.*

*The Ministry of Finance reported that since 2019 it has not had an organizational unit in charge of the supervision of the execution of public procurement contracts, and they could not submit this data.*

*As this is a specific activity, which includes the competences of several institutions, not only the (first) activity implementer, and the deadline for the preparation of the final annual reports of the Public Procurement Office and the National Commission for the Protection of Rights in Public Procurement Procedures has not expired yet, the Agency could not assess the implementation of the activity for this reporting period.*

#### **Activity 2.2.8.4.**

<b>Training courses for police officers, prosecutors and judges to prosecute public procurement corruption cases more efficiently (compatible with the Financial Investigation Strategy).</b>	
<b>Activity implementer</b>	Public Procurement Directorate The National Commission for the Protection of Rights in Public Procurement Procedures Judicial Academy
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Percentage of trained police officers, public prosecutors, judges and employees of the Public Procurement Directorate compared to those in need of training.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

#### **Implementation of activity 2.2.8.4.**

*The Public Procurement Office reported that its representatives participated in two training courses in Ečka in September and October 2020 within the IPA 2013 Project „Prevention and Fight against Corruption“, organized by the US Department of Justice, Ministry of Justice of the Republic of Serbia, National Public Prosecutor's Office and Judicial Academy. They reported that joint training was also planned, but postponed for 2021 due to the epidemiological situation.*

*The Judicial Academy reported that it organized two two-day training courses for magistrates of misdemeanor courts from the territory of Niš and Novi Sad on the topic: „Public Procurement Misdemeanors“ in Niš (October 1-2, 2020) and Novi Sad (September 24-25, 2020), in cooperation with the USAID Government Accountability Initiative. On December 2, 2020, the Judicial Academy and the IPA 2013 Project "Prevention and Fight against Corruption" organized an online presentation on the topic of the analysis of regulations in the field of public procurements and privatizations, confiscated property arising from a criminal offense and liability of legal entities for criminal offenses in the fight against corruption.*

*In cooperation with the USAID Government Accountability Initiative and Bureau for International Narcotics and Law Enforcement Affairs, the Judicial Academy organized the fourth workshop about financial investigations and financial crime investigations in Belgrade in the period between September 10 and 11, 2020 for the prosecutors of the Special Anti-Corruption Department of the Higher Public Prosecutor's Office in Belgrade, representatives of the Customs Administration, Tax Police, Administration for the Prevention of Money Laundering, as well as representatives of the Department for the Fight against Organized Crime of the Ministry of the Interior.*

*The Judicial Academy further reported that ten online training courses on "Proactive investigations of corrupt cases, financial fraud and economic crime" were held during the reporting period as part of the International Fraud Investigation Certification Program. The Agency therefore assessed the activity as implemented for this reporting period.*

**Activity 2.2.8.5.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce corruption in the field of public procurements.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption Public Procurement Directorate The National Commission for the Protection of Rights in Public Procurement Procedures
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce corruption in the field of public procurements was developed and based on clear criteria.
<b>Agency's assessment</b>	<b>Activity was not implemented.</b>

**Implementation of activity 2.2.8.5.**

*The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project „Prevention and Fight against Corruption”, it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including public procurements). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.*

*In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.*

*The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.9. Serbia shall apply and assess the impact of measures taken to reduce corruption in vulnerable areas (health care, taxes, customs, education, local self-government, privatization, public procurement and police), take corrective measures where necessary and make initial records of a measurably reduced level of corruption in these areas.

This is activity no. 2.2.9.2, which is shown below.

**Activity 2.2.9.2.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce corruption in the privatization process.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption Ministry of Economy
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce corruption in the field of privatization was developed and based on clear criteria.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.9.2.**

*The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project „Prevention and Fight against Corruption”, it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including privatization). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.*

*In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.*

*The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report the Agency assessed the implementation of the activities related to the following interim benchmark:

2.2.10. Serbia shall apply and assess the impact of measures taken to reduce corruption in vulnerable areas (health care, taxes, customs, education, local self-government, privatization, public procurement and police), take corrective measures where necessary and make initial records of a measurably reduced level of corruption in these areas.

These are activities no. 2.2.10.1; 2.2.10.6; 2.2.10.10; 2.2.10.11; 2.2.10.16; 2.2.10.17; 2.2.10.18; 2.2.10.19; 2.2.10.25; 2.2.10.27; 2.2.10.31 and 2.2.10.32, which are separately shown below.

**Activity 2.2.10.1.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce corruption in health care.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption Ministry of Health
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce corruption in the field of health care was developed and based on clear criteria.
<b>Agency's assessment</b>	<b>Activity was not implemented.</b>

**Implementation of activity 2.2.10.1.**

The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project „Prevention and Fight against Corruption”, it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including health care). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.

In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.

The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.



**Activity 2.2.10.6.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce corruption in tax area.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce corruption in the field of taxes was developed and based on clear criteria.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.10.6.**

The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project "Prevention and Fight against Corruption", it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including taxes). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.

In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.

The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.

**Activity 2.2.10.10.**

<b>Preparation and adoption of the Operational Plan for Combating Corruption in the Tax Area.</b>	
<b>Activity implementer</b>	Tax Administration and Ministry of Finance, with the participation of civil society organizations
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Adopted Operational Plan for Combating Corruption in the Tax Area.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.10.10.**

The Tax Administration reported that it took actions to develop the Operational Plan for Combating Corruption in the Tax Area and that it was carrying out this activity with the participation of civil society organizations. As the deadline for the adoption had passed, the Agency assessed this activity as not implemented.

**Activity 2.2.10.11.**

Development of the Methodology for the Impact Assessment regarding measures taken to reduce corruption in education.	
<b>Activity implementer</b>	Agency for Prevention of Corruption Ministry in charge of education
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce police corruption was developed and based on clear criteria.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.10.11.**

The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project "Prevention and Fight against Corruption", it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including education). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.

In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.

The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.

**Activity 2.2.10.16.**

Development of mechanisms to strengthen the integrity of police officers: a) Performance of a corruption risk analysis for jobs at the police; b) Creation of prerequisites for normative regulation; integrity strengthening (modifying procedures and work methodology).	
<b>Activity implementer</b>	Ministry of the Interior
<b>Deadline</b>	For point a), IV quarter of 2021 For point b), III quarter of 2020
<b>Performance indicators</b>	Completed analysis of corruption risks at the Ministry of Interior. Risk register created. Developed work and action procedures and methodologies at the Sector.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>



#### **Implementation of activity 2.2.10.16.**

Through the adoption of the Law on Amendments to the Law on Police<sup>35</sup>, in 2018 the Ministry of the Interior prescribed in more detail the competences of the Internal Control Sector and the manner of implementation of new corruption prevention institutes (integrity test, corruption risk analysis and control of reporting and changes in financial status), after which all four by-laws drafted by this Sector were adopted.

They further reported that, as part of the Twinning Project "Strengthening Internal Control Capacity for Combating Corruption in the Ministry of Interior", which lasted from March 1, 2019 to December 20, 2020, manuals were written with partners from Lithuania and Romania to enable the development of standard operating procedures for the implementation of new institutes concerning the prevention of corruption. Due to the epidemiological situation, the project was postponed by two months, from July to September 2020, and completed in December 2020, when the manuals were finalized. The Internal Control Sector will use the manuals to develop standard operating procedures for the implementation of new institutes in the prevention of corruption (especially for the integrity test and financial status) based on the experience of the departments involved in the implementation of the Twinning Project. According to the information of the Ministry of the Interior, everything was already regulated by laws and by-laws and manuals were prepared within the Twinning Project, elaborating on the steps of conducting the integrity test and checking the financial status, after which standard operating procedures would be adopted.

As the preparation of the procedures is still to come, the Agency assessed the activity as not implemented.

The preparation of the corruption risk analysis for all positions in the Ministry of the Interior (due in the IV quarter of 2021) started last year, so the Agency did not evaluate it on this occasion.

#### **Activity 2.2.10.17.**

<b>Strengthening the capacities of the Internal Control Department in order to prevent and combat corruption in the police sector in accordance with the conducted analysis and change of the normative framework.</b>	
<b>Activity implementer</b>	Ministry of the Interior
<b>Deadline</b>	Continuous, ending with the IV quarter of 2021
<b>Performance indicators</b>	Strengthened capacities of the Internal Control Sector of the Police – more employees in the Internal Control Sector of the Police.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

#### **Implementation of activity 2.2.10.17.**

The Ministry of the Interior reported that, in October 2020, a donation of the UK National Crime Agency was granted to the Internal Control Sector and included

<sup>35</sup> Official Gazette of the RS, no. 24/18

equipment for secret surveillance at the amount of 23,500 pounds for the improved capacities employed for corruption investigations and integrity tests.

With respect to further strengthening of the accommodation capacities of the Internal Control Sector, such capacities were also expanded in terms of new offices and their equipment at the headquarters of this organizational unit (27 offices) and renovation of its regional centers.

The Ministry of the Interior further reported that the previous Action Plan for Chapter 23 comprised two analyses carried out in 2015 and completed in 2016, those being an analysis of the performance and conduct of the Internal Control Sector and an analysis of its legal framework, so the mentioned capacity building was performed in accordance with these analyses. In order to provide complete information, the Ministry of the Interior also reported that capacity building was also implemented in accordance with the change of the normative framework (as stated in this activity), i.e. the 2018 Law on Amendments to the Law on Police, as well as the by-laws adopted in the same year, which were already mentioned within the scope of activity 2.2.10.16.

Even though there is no information on any increase in the number of employees in the Internal Control Sector, the Agency assessed the activity as implemented for this reporting period by evaluating the essence of the activity and the fact that it was evident from the submitted report that the activities were undertaken to strengthen the overall capacity of the Internal Control Sector.

**Activity 2.2.10.18.**

<b>Continuous integrity education of employees of the Internal Control Department and all employees at the Ministry of the Interior.</b>	
<b>Activity implementer</b>	Ministry of the Interior Academy of Criminalistics and Police Studies
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Percentage of employees at the Ministry of the Interior trained on integrity compared to those in need of training.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.2.10.18.**

The Ministry of the Interior reported that three representatives of the Internal Control Sector attended the round table on September 10, 2020, which was organized within the Council of Europe's Project "Enhancing the Protection of Human Rights of Prisoners" concerning the "Analysis of regulations on police authority". They further reported that on November 5, 2020, eight representatives of the Internal Control Sector and Data Protection and Security Department of the Ministry of Interior participated in a specialized online training course titled "Strengthening the Capacity of the Internal Control Sector in Performing Security Checks" organized by the OSCE Mission in the Republic of Serbia, the Geneva Center for the Democratic Control of Armed Forces (DCAF) within the project

*"Regional Police Cooperation and Integrity Building in the Western Balkans (PCIB)" with the support of the Twinning Project „Strengthening the Capacity of the Internal Control Sector for Combating Corruption at the Ministry of Interior”.*

*As part of the Twinning Project „Strengthening Internal Control Sector Capacity for Combating Corruption at the Ministry of Interior“, the following courses were held:*

*November 4 - 6, 2020: eight police officers of the Internal Control Sector participated in the online training course "Strengthening the Capacity of the Internal Control Sector to Efficiently Take Special Investigative Actions", held by three lecturers from the Lithuanian Special Investigations Service;*

*November 25-26, 2020: six police officers of the Internal Control Sector, as well as members of the task forces for conducting corruption risk analysis with the Police Administration, special and separate police units, participated in an online training course on conducting corruption risk analysis and making a corruption risk register, which was held by two representatives of the Lithuanian Special Investigations Service;*

*December 10 - 11, 2020: eight police officers of the Internal Control Sector participated in an online training course "Training of the Sector Police Officers in the Field of Suppression of Internal Corruption by the Sector through Criminal Investigations", held by three lecturers from the Lithuanian Special Investigations Service and Anti-Corruption General Directorate of the Romanian Ministry of the Interior.*

*Bearing in mind the aforementioned courses, the Agency assessed the activity as implemented for this reporting period.*

#### **Activity 2.2.10.19.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce police corruption.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption Ministry of Interior and relevant civil society organizations
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce police corruption was developed and based on clear criteria.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

#### **Implementation of activity 2.2.10.19.**

*The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project "Prevention and Fight against Corruption", it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight*

*Risk Areas (including police). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.*

*In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.*

*The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.*

**Activity 2.2.10.25.**

<b>Strengthening the capacities of the Internal Control Department through the procurement of relevant equipment, IT equipment, uniforms and the employment of 15 people.</b>	
<b>Activity implementer</b>	Customs Administration, Ministry in charge of financial affairs
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Strengthened capacities (relevant equipment, IT equipment, uniforms, etc.). Number of classified jobs increased by 13 in 2021.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.2.10.25.**

*The Customs Administration reported that the activity was not carried out because no competition was announced for the employment at the Internal Control Department. With this in mind, the Agency assessed the activity as not implemented for this reporting period.*

**Activity 2.2.10.27.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce customs corruption</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption In cooperation with Customs Administration, Ministry of Finance
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce customs corruption was developed and based on clear criteria.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

#### **Implementation of activity 2.2.10.27.**

The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project "Prevention and Fight against Corruption", it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including customs). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.

In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.

The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.

#### **Activity 2.2.10.31. (assessed as two activities)**

Assemblies of autonomous provinces and local self-governments shall adopt local action plans and establish a permanent working group to monitor the implementation of local action plans.	
<b>Activity implementer</b>	<b>For adoption:</b> <b>Assemblies of autonomous provinces and local self-governments</b>
	<b>For reporting:</b> <b>Agency for Prevention of Corruption</b>
<b>Deadline</b>	For adoption: IV quarter of 2020 For reporting: continuously, until the fulfilment of the obligations by local self-governments and autonomous provinces
<b>Performance indicators</b>	Local action plans adopted. Formed working group for the monitoring of their implementation. Assemblies of local self-government units and autonomous territorial units adopted their anti-corruption plans and formed groups to monitor their implementation in accordance with the model of the Agency for Prevention of Corruption.
<b>Agency's assessment</b>	<b>The adoption part of the activity was not implemented, whereas its reporting part was implemented.</b>

#### **Implementation of activity 2.2.10.31.**

The Agency reported that, in the period between the beginning of April 2017, when it published the Model LACP, and December 15, 2020, a total of 106 LSGUs adopted LACPs, i.e. 73% of the 145 LSGUs subject to this obligation (excluding the territory of Kosovo and Metohija). The Agency was informed by 33 LSGUs that they did not develop LACPs, and six of them did not submit data on LACP development and the formation of bodies for their monitoring.

*Out of total 106 plans submitted by the LSGUs to the Agency, 85 were made in accordance with the Model, 14 were partly made in accordance with the Model, five adopted plans did not correspond to the Model in terms of both the form and the content, whereas two LSGUs did not provide sufficient information to allow the Agency to establish whether the LACP was made in accordance with the Model. The reasons for partial compliance of individual LACPs lied in the fact that the working groups included no representatives of civil society in the drafting of some plans, some LSGU reports on the adoption of the LACPs contained no explanation as to why certain measures were not assumed from the Model, etc.*

*A total of 34 LSGUs formed a body in charge of monitoring the implementation of LACPs, 22 of which were formed mainly in accordance with the Model, one partly complied and seven had significant deviations, while four bodies provided no sufficient information for the assessment of compliance. During the formation of bodies for monitoring the implementation of LACPs, that is, during the appointment of the members, there were no representatives of civil society in certain committees, and some LSGUs had to announce public competition again to appoint the body members because there were not enough candidates who submitted an application for the competition.*

*In four LSGUs, the following changes occurred: one LSGU audited the existing LACP with expert support and three LSGUs reported that they formed the bodies, one of which completed the entire appointment process in accordance with the Model, whereas the other two formed anti-corruption committees composed of councilmen and members of the Council, which is not in accordance with the Model.*

*An overview of the adoption of LACPs and formation of the bodies for their implementation is available on the Agency's website at the following link: <http://www.acas.rs/wp-content/uploads/2020/12/Tabela-sa-podacima-o-LAP-ovima-4.-kvartal-2020.godine.pdf?pismo=lat>.*

*As stated above, the Agency assessed this activity as two separate activities. Bearing in mind that the deadline for the adoption of LACPs was the IV quarter of 2020, and that the obligations were not fulfilled by all LSGUs, the Agency assessed the first activity as not implemented, while the second activity was assessed as implemented for this reporting period, since the Agency continuously monitors and reports on the adoption of LACPs, as well as on the formation of bodies monitoring their implementation.*

**Activity 2.2.10.32.**

<b>Development of the Methodology for the Impact Assessment regarding measures taken to reduce local self-government corruption.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	The methodology for the Impact Assessment regarding measures taken to reduce local self-government corruption was developed and based on clear criteria.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>



### **Implementation of activity 2.2.10.32.**

The Agency reported that it worked on the implementation of this activity and that, with the expert support provided through the IPA 2013 Project „Prevention and Fight against Corruption”, it developed a Draft Methodology for the Preparation of the Impact Assessment of Measures Taken with the Aim of Reducing Corruption in Eight Risk Areas (including local self-government). The Agency published an invitation for the interested public to submit comments on the website at the following link: <http://www.acas.rs/poziv-zainteresovanoj-javnosti-za-dostavljanje-komentara-na-nacrt-metodologije-za-izradu-procene-uticaja-mera-preduzetih-sa-ciljem-smanjenja-korupcije-u-ranjivim-oblastima/>.

In addition, it also submitted a comment submission invitation to the competent institutions, as well as civil society organizations that participated in the preparation of alternative reports on the implementation of strategic documents for the fight against corruption.

The comments received were sent to an expert in charge of the development of the methodology who dealt with the document completion and, according to the information provided, the final document was expected in early 2021. Bearing in mind that the Agency assessed only the information on the activities undertaken as of December 31, 2020, as well as the deadline for the implementation of this activity, the Agency assessed the activity as not implemented.

In the same Section of the Revised Action Plan for Chapter 23 - Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following recommendation under the Screening Report:

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

These are activities no. 2.2.11.1; 2.2.11.2 and 2.2.11.3, which are separately shown below.

### **Activity 2.2.11.1.**

<b>Joint activities aimed at the encouragement and more effective participation of citizens in the fight against corruption.</b>	
<b>Activity implementer</b>	Office for Cooperation with Civil Society
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Joint activities aimed at the encouragement and more effective participation of citizens in the fight against corruption are continuously implemented.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

### **Implementation of activity 2.2.11.1.**

The Ministry of Human and Minority Rights and Social Dialog, which assumed the competence of former Office for Cooperation with Civil Society, reported that there were no joint activities aimed at the encouragement and more effective participation of citizens in the fight against corruption during the reporting period. With this in mind, the Agency assessed the activity as not implemented for this reporting period.

**Activity 2.2.11.2.**

<b>Further improvement of the system of transparent financing of civil society organizations through:</b> <ul style="list-style-type: none"> <li>- monitoring the implementation of the Regulation on Program Support Funds or Missing Funds for Programs of Public Interest Implemented by Associations</li> <li>- strengthening the capacity of public administration employees.</li> </ul>	
<b>Activity implementer</b>	Office for Cooperation with Civil Society
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	The summary report of the Office for Cooperation with Civil Society contains relevant information about the Regulation implementation. Number of training courses held for public administration employees in relation to the number of planned training courses on the system of transparent financing of civil society organizations.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.2.11.2.**

The Ministry of Human and Minority Rights and Social Dialog (which assumed the competence of former Office for Cooperation with Civil Society) submitted information that the activities related to the significant improvement of the E-Calendar competition base were initiated during the reporting period, which should be opened for completion by public administration bodies in the first quarter of 2021. In accordance with the provisions of the Regulation on Program Support Funds or Missing Funds for Programs of Public Interest Implemented by Associations<sup>36</sup>, comprehensive Calendar of Public Competitions containing information about all planned public competitions for financing projects and programs of associations and other civil society organizations from the budget of the Republic of Serbia and public administration bodies with all three levels of government (national, provincial and local) represents a significant step towards greater transparency of public administration bodies and prevention of potential corruption in the field of civil society project funding, while improving the availability of information about the budget funds for these purposes from the earliest stage of their planning, as assessed by the Ministry of Human and Minority Rights and Social Dialog.

One of the most important novelties and improvements of the competition E-calendar, expected during 2021, is the linking of information about planned and allocated funds, which will significantly increase the transparency of the entire allocation process. This improvement will allow a search as per different criteria and a search of funds beneficiaries, not just their planned purpose, which was the primary function of this calendar.

The Ministry of Human and Minority Rights and Social Dialog further reported that, during the reporting period, the National Academy of Public Administration held an online training course about strengthening capacities of public administration employees in connection with higher transparency in the procedures involving budget funds allocation to civil society organizations. After somewhat improved epidemiological situation a set of training courses in this area is planned in cooperation with the Standing Conference of Towns and Municipalities.

<sup>36</sup> Official Gazette of the RS, no. 16/18



*At the beginning of 2020, former Office for Cooperation with Civil Society planned to hold a number of training courses for employees in local self-government units who did not undergo training during 2018 and 2019 with the Standing Conference of Towns and Municipalities. However, the plans were postponed, primarily due to the declaration of a state of emergency. During the summer, former Office for Cooperation with Civil Society sent an official letter to the contact persons for cooperation with civil society in local self-government units to state whether they would be technically able to attend online training courses and meetings on this topic and received only 10% of affirmative replies, so the training was postponed for the following period, upon improvement of the epidemiological situation.*

*Former Office for Cooperation with Civil Society completed the report related to the information about allocated funds in 2018 in the first half of 2020. As certain structural changes occurred in the meantime, that is, the Office for Cooperation with Civil Society stopped working on October 26 and its tasks and mandate were assumed by the Ministry of Human and Minority Rights and Social Dialog, in addition to a significant reduction in the number of employees, there was a delay in data collection for 2019 and the commencement of the preparation of this report.*

*As the Ministry of Human and Minority Rights and Social Dialogue did not submit information related to the monitoring of the implementation of the Regulation on Program Support Funds or Missing Funds for Programs of Public Interest Implemented by Associations, the Agency was not able to assess the implementation of the activity for this reporting period.*

#### **Activity 2.2.11.3.**

<b>Public competitions for the allocation of funds to civil society organizations for anti-corruption projects aimed at initiatives at national and local initiatives, as well as anti-corruption media initiatives.</b>	
<b>Activity implementer</b>	Agency for Prevention of Corruption
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Civil sector involved in the fight against corruption on the basis of conducted competitions for donations to civil society organizations in support of the projects in this area.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

#### **Implementation of activity 2.2.11.3.**

*The agency reported that it completed the 11th competition for the allocation of funds to civil society organizations for the implementation of anti-corruption projects in the reporting period. The funds were allocated to the Bečej Youth Association (BUM) for the project "Towards Higher Transparency and Accountability in Decision-Making Processes". The project is ongoing, with active monitoring by the Agency. Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.*

### 4.3. Repression of corruption

Within Section 2.2. of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption related to the prevention of corruption in this Report, the Agency assessed the implementation of activities related to the following interim benchmark:

2.3.1. Serbia shall revise its Criminal Code and provide an effective solution to deal with criminal offenses against economy, and in particular criminal offense of abuse of office by a responsible person.

These are activities no. 2.3.1.1; 2.3.1.2 and 2.3.1.3, which are separately shown below.

#### Activity 2.3.1.1.

<p><b>Monitoring the application of the amended Criminal Code for corrupt and economic criminal offences, with the obligation of the police, the Public Prosecutor's Office and courts to submit annual statistical reports on initiated and completed proceedings to the Ministry in charge of judicial affairs.</b></p> <p><b>The Ministry of Justice should draw up a single annual report and publish it on the website.</b></p>	
<b>Activity implementer</b>	Ministry of the Interior National Public Prosecutor's Office Supreme Court of Cassation Ministry in charge of judicial affairs (State Secretary for Corruption Issues)
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Annual report published.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

#### Implementation of activity 2.3.1.1.

*The Ministry of Justice submitted information that the report would be prepared in 2021. The Ministry of the Interior submitted information that, during the reporting period, the number of recorded criminal offenses against official duty – abuse of office was 112 (Art. 359 of the Criminal Code); number of recorded criminal offenses of the abuse of office by a responsible person was 48 (Art. 227 of the Criminal Code), and that the number of recorded criminal offenses of abuse in connection with public procurement was 20 (Art. 228 of the Criminal Code).*

*The National Public Prosecutor's Office reported that, in accordance with the Mandatory Instructions of the National Public Prosecutor A no. 146/2018 dated March 1, 2018, the Prosecutor's Office for Organized Crime and special departments for the repression of corruption at the Higher Public Prosecutors' Offices should submit quarterly reports to the National Public Prosecutor's Office on initiated and completed proceedings in connection with cases of economic crime and corrupt cases. Based on the above reports, the National Public Prosecutor's Office is monitoring the actions of the Prosecutors' Offices in this area.*

*As the Ministry of Justice will prepare and submit a consolidated report in 2021, the Agency was not able to assess the implementation of the activity for this reporting period.*

**Activity 2.3.1.2.**

<b>Training of judges and prosecutors for the application of the Criminal Code.</b>	
<b>Activity implementer</b>	Judicial Academy
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Number of training courses held in relation to the number of planned training courses.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.3.1.2.**

The Judicial Academy reported that, due to the epidemiological situation, it was not able to carry out this activity, which is why the Agency assessed it as not implemented for this reporting period.

**Activity 2.3.1.3.**

<b>Monitoring the application of the amended criminal offense of abuse of office by a responsible person, which contains the mechanism of legal subsidiarity, which came into effect on March 1, 2018, which is why the monitoring should cover the criminal events after March 1, 2018.</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) National Public Prosecutor's Office
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Annual report published.
<b>Agency's assessment</b>	<i>Activity cannot be assessed.</i>

**Implementation of activity 2.3.1.3.**

The Ministry of Justice submitted information that the report would be prepared in 2021.

In addition, the National Public Prosecutor's Office reported that, in accordance with the Mandatory Instructions of the National Public Prosecutor A no. 146/2018 dated March 1, 2018, the Prosecutor's Office for Organized Crime and special departments for the repression of corruption at the Higher Public Prosecutors' Offices should submit quarterly reports to the National Public Prosecutor's Office about actions concerning cases formed on the basis of criminal charges for the criminal offense of abuse of office by a responsible person under Art. 227 of the Criminal Code. Based on the above reports, the National Public Prosecutor's Office is monitoring the conduct of criminal events after 1 March 2018.

Considering that the information will be submitted in 2021, the Agency was not able to assess the implementation of the activity for this reporting period.

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following interim benchmark:

2.3.2 : Serbia carries out an analysis of the organizational structure and state authorities before amending the Law on Organization and Competence of State Authorities in Suppression of Organized Crime, Corruption and Other Especially Serious Crimes. Serbia pays particular attention to capacity-building of the Public Prosecutors' Offices and police and provides necessary financial and personnel support and training. Interagency cooperation and intelligence exchange are significantly improved in a safe and secure manner.

These are activities no. 2.3.2.1; 2.3.2.2; 2.3.2.4; 2.3.2.7; 2.3.2.10; 2.3.2.11 and 2.3.2.13, which are separately shown below.

**Activity 2.3.2.1.**

<b>Analyzing the compliance of the RS normative framework with the FATF recommendations for conducting financial investigations in parallel with criminal investigations, based on which a planning document in the field of combating financial crime will be drafted. (AP link for Chapter 24, activity 6.2.5.4.)</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) National Public Prosecutor's Office Prosecutor's Office for Organized Crime Ministry of the Interior Administration for the Prevention of Money Laundering
<b>Deadline</b>	<b>For analysis: IV quarter of 2020</b> For the planning document: IV quarter of 2021
<b>Performance indicators</b>	Completed analysis of the compliance of the normative framework with the relevant FATF recommendations. Drafted planning document in the field of combating financial crime.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.3.2.1.**

*The Ministry of Justice reported that the preparation of the analysis of compliance of the normative framework of the Republic of Serbia with the FATF recommendations for conducting financial investigations in parallel with criminal investigations was started and that the analysis was expected to be carried out by the end of the II quarter of 2021. Bearing in mind the deadline for the preparation of the analysis, the Agency assessed this activity as not implemented.*

**Activity 2.3.2.2.**

<b>Strengthening the capacities of the Financial Investigation Unit of the RS Ministry of the Interior based on the results of the analysis performed. (AP - related activity for Chapter 24, activity 6.2.5.3.)</b>	
<b>Activity implementer</b>	Ministry of the Interior
<b>Deadline</b>	From the II quarter of 2016 on
<b>Performance indicators</b>	The number of employees in the Financial Investigation Unit has increased from 57 to 63 police officers. Conducted training courses. Percentage of employees trained in the Financial Investigations Unit of the Ministry of the Interior compared to those in need of training.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.3.2.2.**

The Ministry of the Interior reported that the number of classified positions in the Financial Investigation Unit was 64, while the number of filled positions, i.e. the number of employees was unchanged compared to the previous reporting period and amounted to 60. In this reporting period, no internal or public competitions were held to fill these positions, and no definite- or indefinite-time employments were started at the Financial Investigation Unit of the Ministry of the Interior.

The police officers of the Financial Investigation Unit participated in the following training courses during the reporting period:

- three training courses on financial crime in June (Vrnjačka Banja and Niš) and July (Novi Sad) organized by the USAID and Judicial Academy;
- two webinars on the reuse of confiscated property in December 2020, organized by the OSCE Mission;
- webinar on fight against money laundering in December 2020 organized by the US Embassy.

For the purpose of clarifying the analysis relevant for this activity, the Ministry of the Interior submitted information that the said activity was related to the activity from the previous Action Plan for Chapter 24 (previous activity no. 6.2.5.6), which referred to the strengthening of capacities of the Financial Investigation Unit based on the analysis of the performance of the Financial Investigation Unit. This analysis was carried out by the OSCE expert Alberto Perduca, Italian prosecutor, who was on an expert mission in May 2015.

Even though there were no new employees in the reporting period, the Agency assessed the activity as implemented for this reporting period while evaluating the essence of the activity and the fact that it was evident from the submitted report that the measures taken aimed at strengthening the professional capacities of the Financial Investigations Unit.

**Activity 2.3.2.4.**

<b>Continuous training of police officers, public prosecutors and judges in conducting financial investigations, monitoring money flows, proactive approaches and special investigative techniques. (Related activity - Chapter 24, activity 6.2.5.2.)</b>	
<b>Activity implementer</b>	Judicial Academy
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Percentage of police officers, public prosecutors and judges trained in conducting financial investigations, monitoring money flows, proactive approaches and special investigative techniques in relation to those in need of training.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.3.2.4.**

The Judicial Academy reported that the training under the International Fraud Investigation and Anti-Money Laundering Certification Program is underway. The program is funded by the Office for Overseas Prosecutorial Development, Assistance and Training with the US Ministry of Justice (OPDAT) and the Judicial Academy. It is intended for judges of basic and higher courts, basic and higher public prosecutors and their deputies, police officers and independent participants. Its focus is on the development and increased capacities of judges, prosecutors, police and liaison officers related to the investigation and prosecution of corrupt cases, financial frauds and economic crime. After all stages of specialist training in the field of detection of money laundering, participants will be prepared to take an exam to obtain an international certificate for work in this area.

The Judicial Academy further reported that four one-day seminars for 32 participants were held during the reporting period as follows:

- September 14, 2020 - Hotel "M" in Belgrade (eight participants);
- September 15, 2020 - Hotel „M“ in Belgrade (eight participants);
- October 15, 2020 - Hotel „M“ in Belgrade (eight participants) and
- October 16, 2020 - Hotel „M“ in Belgrade (eight participants).

The Agency therefore assessed the activity as implemented for this reporting period.



**Activity 2.3.2.7.**

<b>Strengthening the capacities of the Prosecutor's Office for Organized Crime and special departments for the repression of corruption of Higher Public Prosecutors' Offices through training on the application of new mechanisms prescribed by the Law on Organization and Competence of State Authorities for the Suppression of Organized Crime, Terrorism and Corruption (liaison officers, task forces, Financial Forensics Service) (related activity - Chapter 24, activity 6.2.2.3.)</b>	
<b>Activity implementer</b>	Judicial Academy Prosecutor's Office for Organized Crime Special departments for the repression of corruption of the Higher Public Prosecutors' Offices
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Percentage of employees trained compared to those in need of training.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.3.2.7.**

The Judicial Academy provided information that two two-day "Money Laundering and Terrorist Financing" training courses for higher public prosecutors were held during the reporting period as part of the International Fraud Investigation and Anti-Money Laundering Certification Program in Belgrade on September 14-15 and October 15-16, 2020.

In cooperation with the IPA 2013 Project "Prevention and Fight against Corruption" and the US Ministry of Justice (OPDAT), on September 30 and October 20, 2020, the Judicial Academy held a training course through the method of trial simulation for special anti-corruption departments (judges, prosecutors, members of the police and Tax Administration) on the following topics: reporting of police officers; role of a prosecutor and police inspector in criminal investigations; sources of information and role of liaison officers; role of a financial forensic accountant or expert as a professional; draft indictment – use of the order of evidence and its application in case studies; preparation and confirmation of indictments; presentation of draft indictments and discussion between a prosecutor and judge; preparation for the trial/preliminary hearing; examination of witnesses; discussion about presented evidence and potential judicial assessment.

The Prosecutor's Office for Organized Crime reported that its representatives attended the webinars and workshops with the following topics: combating money laundering, efficient use of the proceeds of crime, forensic method for analyzing written statements, criteria for the best financial offer in public procurements and their implementation via the public procurement portal, combating money laundering and terrorist financing, financial investigations, cryptocurrencies and digital evidence, gambling fraud, understanding of financial technology companies, transnational organized crime and regional cooperation, etc.

The Prosecutor's Office for Organized Crime further reported that, in accordance with the new Law on Organization and Competence of State Authorities in Suppression of Organized Crime, Terrorism and Corruption, it was foreseen that the coordination of special departments of higher public prosecutors' offices for the repression of corruption should be carried out by the Prosecutor's Office for Organized Crime, which should convene at least monthly meetings with the heads of special departments to coordinate their work. Bearing in mind the limitations caused by the pandemic, the Prosecutor for Organized Crime

and the Deputy Prosecutor, who is in charge of coordinating the work of special departments for the repression of corruption, held one meeting (October 5, 2020) with all four heads of these departments of the Higher Public Prosecutors' Offices. Due to the inability to meet, the Deputy Prosecutor for Organized Crime had a daily phone/e-mail communication with the heads of the special departments.

As the aforementioned training courses were used to strengthen the capacities of the Prosecutor's Office for Organized Crime and special departments for the repression of corruption of Higher Public Prosecutors' Offices, the Agency assessed the activity as implemented for this reporting period.

**Activity 2.3.2.10.**

Strengthening the capacities of the Financial Forensics Service at the Prosecutor's Office for Organized Crime and other relevant bodies. (Related activity - Chapter 24, activity 6.2.2.6.)	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) National Public Prosecutor's Office for Organized Crime
<b>Deadline</b>	Continuous, starting from the IV quarter of 2020
<b>Performance indicators</b>	Established team of economic forensic experts at the Prosecutor's Office for Organized Crime. Conducted training courses for economic experts. Number of training courses held in relation to the number of planned training courses.
<b>Agency's assessment</b>	<b>Activity was implemented.</b>

**Implementation of activity 2.3.2.10.**

The Ministry of Justice reported that the Prosecutor's Office for Organized Crime and special departments for the repression of corruption at the Higher Public Prosecutor's Office in Belgrade and Novi Sad each have one financial forensic scientist.

The National Public Prosecutor's Office also submitted information that, in accordance with the Rulebook on Internal Job Organization and Classification, the Prosecutor's Office for Organized Crime and special departments for the repression of corruption at the Higher Public Prosecutor's Office in Belgrade and Novi Sad each have one financial forensic scientist, and that they underwent proper specialist training for work in this area (finance, accounting, auditing, banking, stock exchange and commercial business).

The Prosecutor's Office for Organized Crime also reported that a financial forensic scientist was employed at the institution and underwent proper training to work in these areas. Another financial forensic scientist should be hired in the upcoming period.

The financial forensic officer of the Prosecutor's Office for Organized Crime is involved in the project "Preparatory Training for Accredited CFE and CAMS Courses" conducted by the OSCE, where the participants include



*the representatives of the police, Public Prosecutor's Office and Anti-Money Laundering Administration from Bosnia and Herzegovina, Northern Macedonia, Montenegro and Albania. As part of this project she was a lecturer in six webinars in the period between September and November 2020 covering the following topics: presentation of the Association of Certified Fraud Examiners (ACFE) and Association of Certified Anti-Money Laundering Specialists (ACAMS) – information about exam preparation and details, as well as the functioning of the associations themselves; money laundering – frequent doubts, modern trends and best practice experiences; corrupt crimes and best practice experiences.*

*In addition, on September 10, 2020, the financial forensic scientist was a lecturer at an advanced financial investigation training organized by the USAID. The participants of this training were representatives of the Ministry of the Interior, Higher Prosecutors' Offices, Customs Administration, Tax Police and Administration for the Prevention of Money Laundering. The Manual on Investigation and Prosecution of Corruption Offenses, with the financial forensic officer of the Prosecutor's Office for Organized Crime as one of the authors, was previously drafted under this project.*

*An international scientific conference was organized by the Institute for Comparative Law, Institute of Criminological and Sociological Research and the Judicial Academy in October 2020; its title was "The Role of Society in the Fight against Corruption" and the financial forensic scientist used it to talk about the importance and role of financial forensics in practice.*

*The financial forensic scientist also held two presentations on the topic of "Career in Financial Forensics" intended for students of the Faculty of Economics in Belgrade (November 2020) and Faculty of Business Economics at the Singidunum University in Belgrade (December 2020).*

*The forensic scientist also attended a webinar "Fight against Money Laundering and Financing of Terrorism" organized by the US Ministry of Justice and held on September 1-3, 2020. She also participated in webinars organized by the Judicial Academy on the topic of "Financial Investigations", including liability of legal entities (November 2020), "Financial Investigations, Cryptocurrencies and Digital Evidence" (November 2020) and "Comparative Legal Analysis on the Role of Financial Forensic Scientists in Criminal Proceedings" (November 2020), organized under the USAID Government Accountability Initiative.*

*As part of International Fraud Prevention Week, the financial forensic scientist attended the webinars organized by Deloitte Academy on November 16-17, 2020, which were held with the support of the ACFE branch in Serbia, Serbian Chamber of Commerce, Agency for Prevention of Corruption, Institute for Standardization and Transparency of Serbia, while on November 18-19, 2020, she attended the webinars organized by the ACFE branch in Serbia and the Association of Banks of Serbia.*

*In 2020, the financial forensic scientist had several contacts with financial forensics experts from special departments for the repression of corruption at the Higher Prosecutors' Offices in Belgrade and Novi Sad with regard to the work methodology related to cases.*

*Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.*

**Activity 2.3.2.11.**

<b>Adoption of the new Rulebook on Job Classification by the Prosecutor's Office for Organized Crime and special anti-corruption departments, in accordance with the conducted human resource capacity needs analysis at the POOC and special anti-corruption departments of the Higher Public Prosecutors' Offices. (Related activity - Chapter 24, activity 6.2.2.7.)</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) Prosecutor's Office for Organized Crime National Public Prosecutor's Office Higher Public Prosecutors' Offices in Belgrade, Novi Sad, Niš and Kraljevo State Prosecutorial Council
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Completed analysis of needs for the expansion of human resource capacities. Adopted amendments to the Rulebook on Job Classification.
<b>Agency's assessment</b>	<b>Activity was not implemented.</b>

**Implementation of activity 2.3.2.11.**

The Ministry of Justice reported that it would take the Draft Rulebook on Job Classification at the Prosecutor's Office for Organized Crime and special anti-corruption departments into consideration after the responsible entities had completed the Draft.

The National Public Prosecutor's Office submitted information that, within the framework of the IPA 2013 Project "Prevention and Fight against Corruption", the Analysis of the Capacity and Competence of the Authorities for Effective Detection, Investigation and Prosecution of Corruption was conducted and published in July 2019. By means of this analysis, the necessary number of deputy public prosecutors and administrative staff was determined. The analysis was conducted for the period from March 1, 2018 to March 1, 2019. Accordingly, the National Public Prosecutor's Office believes that, in order to obtain information about actual needs, it is necessary to carry out an analysis after the end of the three-year period of work. After conducting the new analysis, the Draft Rulebooks on Internal Job Organization and Classification at the Prosecutor's Office for Organized Crime and special anti-corruption departments would be composed.

As the Rulebook on Job Classification at the Prosecutor's Office for Organized Crime and special anti-corruption departments was not adopted within the stipulated deadline, the Agency assessed the activity as not implemented.

**Activity 2.3.2.13.**

<b>Development of an analysis of technical equipment needs at the Prosecutor's Office for Organized Crime and special anti-corruption departments of the Higher Public Prosecutors' Offices. (Related activity - Chapter 24, activity 6.2.2.9.)</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) Prosecutor's Office for Organized Crime
<b>Deadline</b>	IV quarter of 2020
<b>Performance indicators</b>	Completed analysis of technical equipment needs.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.3.2.13.**

*The Ministry of Justice reported that this activity was directly related to activity 2.3.2.11 which precedes it, i.e. that the preparation of the analysis of technical equipment needs at the Prosecutor's Office for Organized Crime and special anti-corruption departments of the Higher Public Prosecutors' Offices must be preceded by the preparation of an analysis of needs for the strengthening of administrative capacities of the Prosecutor's Office for Organized Crime and special anti-corruption departments.*

*The National Public Prosecutor's Office confirmed that the implementation of this activity was conditioned by the implementation of activity 2.3.2.11 and that it was possible to make an analysis of actual technical equipment needs after determining the needs for administrative capacities. At the same time, the National Public Prosecutor's Office suggested that they should be one of the activity implementers, bearing in mind the necessity of the analysis of technical equipment needs for the special departments for the repression of corruption of the Higher Public Prosecutors' Offices.*

*Bearing in mind the deadline for the implementation of this activity, as well as the fact that it was directly conditioned by the implementation of activity 2.3.2.11, the Agency assessed it as not implemented.*

In the same Section of the Revised Action Plan for Chapter 23 - Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following recommendation under the Screening Report:

2.3.3. Effective investigations of all allegations of corruption in privatization cases to ensure full transparency and accountability in order to avoid similar cases in the future.

This is activity no. 2.3.3.2, which is shown below.

**Activity 2.3.3.2.**

Regular meetings of the Anti-Corruption Council, National Public Prosecutor's Office and Prosecutor's Office for Organized Crime for the purpose of better execution of the recommendations set out in Council's Reports.	
<b>Activity implementer</b>	Anti-Corruption Council National Public Prosecutor's Office Prosecutor's Office for Organized Crime
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Regular meetings.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.3.3.2.**

*The National Public Prosecutor's Office reported that the meetings with representatives of the Anti-Corruption Council and the Prosecutor's Office for Organized Crime were not held due to the COVID-19 pandemic and epidemiological measures and recommendations of the Government of the Republic of Serbia. With this in mind, the Agency assessed the activity as not implemented for this reporting period.*

In the same Section of the Revised Action Plan for Chapter 23 - Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following recommendation under the Screening Report:

2.3.5. The legislative and institutional framework shall allow for an effective temporary or permanent confiscation and management of assets arising from a criminal offense, which would lead to more confiscation cases, as well as the following interim benchmark:

Serbia shall establish the initial records of efficient and effective investigations (including financial investigations), prosecutions, convictions and seizures of property in corruption cases, including high-level corruption cases. (Serbia shall apply a zero-tolerance policy for information leaks related to planned or ongoing corruption investigations and provide sanctions in these situations – covered within item 2.3.7).

These are activities no. 2.3.5.1 and 2.3.5.2, which are shown below.

**Activity 2.3.5.1.**

<b>Improving the capacity of the Directorate for Confiscated Property Management through training, especially in the part related to the management of property confiscated from legal entities.</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) Directorate for Confiscated Property Management
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Conducted training courses. Percentage of trained employees at the Directorate for Confiscated Property Management compared to those in need of training.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.3.5.1.**

The Ministry of Justice reported that during the year of 2020 the employees of the Directorate for Confiscated Property Management attended the following training courses organized by the Judicial Academy, in accordance with the signed contract: "Guidelines for Establishing a Unique Methodology for the Preparation of Reports and Uniform Monitoring of Cases of Money Laundering and Terrorist Financing" (March 5, 2020); "Special Anti-Corruption Departments Operational Teams" (April 29, 2020); "International Fraud Investigation and Anti-Money Laundering Certification Program" (October 14-15, 2020); "Application of the Law on Organization and Competence of State Authorities in Suppression of Organized Crime, Terrorism and Corruption" and "Understanding Financial Documentation" (October 16, 2020).

Regarding the fact that the steps were taken to strengthen the capacities of the representatives of the Directorate for Confiscated Property Management, the Agency assessed the activity as implemented for this reporting period.

**Activity 2.3.5.2.**

<b>Improving international cooperation by concluding contracts with the directorates from the regional and EU countries. (Related activity - Chapter 24, activity 6.2.6.6.)</b>	
<b>Activity implementer</b>	Ministry in charge of judicial affairs (State Secretary for Corruption Issues) Directorate for Confiscated Property Management
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Number of contracts concluded with the directorates from the regional and EU countries.
<b>Agency's assessment</b>	<i>Activity was not implemented.</i>

**Implementation of activity 2.3.5.2.**

The Ministry of Justice reported that the procedure was underway. The opinion of the Ministry of Foreign Affairs was obtained regarding the legal nature of this type of contract, which is a type of international

*treaty and the procedure for their conclusion, in accordance with the Vienna Convention on the Law of Treaties and Law on Conclusion and Enforcement of International Treaties<sup>37</sup>. A draft agreement on the division of assets with foreign countries has been drafted and will be submitted as a proposal for the basis of negotiations with stakeholders. After receiving positive responses from the informed parties, the Government of the Republic of Serbia adopted the Draft Contract and Basis for Negotiations Aimed at Concluding Property Division Contracts with Spain, Montenegro, Bosnia and Herzegovina and Republika Srpska, which received the Draft Contracts. Spain has submitted a reply to the Draft Contract and the proposed texts of both parties are currently being harmonized.*

*Even though significant steps were taken to implement the activities, the Agency assessed the activity as not implemented for this reporting period, bearing in mind the performance indicator stipulating the number of concluded contracts with directorates from the regional and EU countries.*

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in this Report, the Agency assessed the implementation of the activities related to the following interim benchmark:

2.3.7. Serbia shall establish the initial records of efficient and effective investigations (including financial investigations), prosecutions, convictions and seizures of property in corruption cases, including high-level corruption cases - covered under 2.3.5.). Serbia shall apply a zero-tolerance policy for information leaks related to planned or ongoing corruption investigations and provide sanctions in these situations.

These are activities no. 2.3.7.3 and 2.3.7.4, which are separately shown below.

**Activity 2.3.7.3.**

<b>Increased level of IT protection by creation of the so-called early warning system and alarm system.</b>	
<b>Activity implementer</b>	Ministry of the Interior
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Increased level of IT protection. The so-called early warning system and alarm system established.
<b>Agency's assessment</b>	<b><i>Activity was implemented.</i></b>

**Implementation of activity 2.3.7.3.**

*The Ministry of the Interior submitted information that, during the reporting period, there were continuous efforts on increasing the level of IT protection and several test alarm systems were implemented in accordance with the area of competence of the Sector for Analytics, Telecommunications and Information Technology of the Ministry of the Interior. As the activity is implemented continuously, in accordance with the test results, the systems that meet the criteria are put into production mode. At this moment, one of the systems is used in everyday operation, but is constantly improving and is still considered to be in the testing process.*

<sup>37</sup> Official Gazette of the RS, no. 32/13

*Bearing in mind that one of the systems is already in use, regardless of the fact that it still tested, the Agency assessed the activity as implemented for this reporting period.*

**Activity 2.3.7.4.**

<b>Monitoring the sanctioning of regulation violations to prevent the disclosure of confidential information and a prepared analysis of the application of regulations and recommendations.</b>	
<b>Activity implementer</b>	Ministry of the Interior National Public Prosecutor's Office
<b>Deadline</b>	Continuous
<b>Performance indicators</b>	Number of regulatory violation cases related to the prevention of the disclosure of information. Completed analysis of the application of regulations and recommendations.
<b>Agency's assessment</b>	<i>Activity was implemented.</i>

**Implementation of activity 2.3.7.4.**

*The Ministry of the Interior reported that the Niš Police Directorate completed two disciplinary proceedings were completed during the reporting period with regard to the disclosure of confidential information referred to in Article 207, paragraph 1, item 10 of the Law on Police<sup>38</sup> and both proceedings ended with the imposition of a disciplinary measure – fine.*

*According to the report of the National Public Prosecutor's Office, no notice was submitted to this institution during the reporting period about a reasonable doubt that any violations of regulations on the prevention of disclosure of information were committed. The National Public Prosecutor's Office reported that the analysis was made in 2018, when the ideal model and instructions were created and forwarded to all Prosecutors' Offices.*

*Bearing in mind the aforementioned, the Agency assessed the activity as implemented for this reporting period.*



# 5.

## RECOMMENDATIONS

### 5.1. In the area of coordination

1. Establish a fully operational coordination and oversight mechanism, as defined by the Revised Action Plan for Chapter 23;

### 5.2. In the area of reporting quality improvement

2. When submitting information, the reporting entities should be guided by the core of the activity itself and the performance indicator, as well as submit complete information to facilitate the implementation assessment;
3. For continuous capacity-building and training activities, the reporting entities must provide information on the ratio of the number (percentage) of trained employees and planned number of training courses, or the percentage of trained employees compared to those in need of training so as to create an (or use the existing) annual plan with baseline and target values, and they must provide the Agency with information on the fulfilment of such plan in the reports, so that it can be observed how the capacity strengthening contributes to the fulfilment of the institutions' competence;
4. As for activities involving proceedings, it is necessary to include information on the outcome of completed proceedings;

### 5.3. In the area of closer definition of certain activities, implementers and performance indicators

5. It is necessary to change the already changed names of institutions (e.g. after adopting new regulations, such as the Law on Prevention of Corruption, Law on Public Procurement and Law on Ministries);
6. It is required to consider the recommendations of the reporting entities themselves, which are listed under individual activities, and to amend the document in accordance with the recommendations, and in the event that some of them are not acceptable, such conclusion should be thoroughly explained and properly presented to the specific entity;
7. Regarding performance indicators, which contain only a report of a certain institution, it is necessary to amend the performance indicators so as to define the elements they should contain and which arise from the activity itself, given the fact that the report itself is the source of data verification, not the performance indicator in the narrow sense of the word;
8. The performance indicators referring to an article of a particular law, which has not yet been adopted, need to be amended, because it is not yet known which article of the amended law will relate to the competence of the reporting entity;
9. It is necessary to exclude the performance indicators covering institutions that are not competent for the implementation of activities;
10. It is necessary to exclude the performance indicators that are not directly related to the implementation of activities or are not the responsibility of the institution designated as the implementer;

11. It is necessary to redefine parts of the activities which are not under the area of competence of the define activity implementer and designate another appropriate activity implementer;
12. The deadlines related to the analysis of the effects on regulations and evaluation of the performance of these regulations should be adjusted according to the Law on the Planning System of the Republic of Serbia<sup>39</sup> (Art. 1, 2, 40 and 41 of the Law on the Planning System of the Republic of Serbia);
13. With the exception of the analysis of the regulation effects, in case it is determined that a particular report should be produced on an annual basis, it should be prepared on an annual basis, otherwise the deadline for implementation should be changed;
14. In case of activities that include meetings, it is necessary to define the performance indicators more closely so as to determine the outcome of the meetings, in addition to their regular organization;
15. In case of activities where an institution states that an analysis has already been carried out before, it is necessary to clarify whether the analysis has already been completed or the analysis in question is new. If the analysis has already been completed, it is necessary to exclude the performance indicator and adjust the activity, and if it is not, the performance indicator should be redefined and should clearly indicate which institution should carry out such analysis.

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<sup>39</sup> Official Gazette of the RS, no. 30/18



# 6.

## GENERAL NOTES ON IMPLEMENTATION SUPERVISION

## 6.1. Revision of the Action Plan for Chapter 23

At the third Intergovernmental Conference held in Brussels on July 18, 2016, the Republic of Serbia opened Negotiating Chapters 23 (Judiciary and Fundamental Rights) and 24 (Justice, Freedom and Security). Following the recommendations for Chapter 23 under the European Commission's Screening Report, made on the basis of the conclusions of the explanatory and bilateral meetings of analytical review of legislative compliance, and after consultations with relevant actors and civil society, on April 27, 2016 the Government of the Republic of Serbia adopted the Action Plan for Chapter 23. One of the recommendations of the European Commission for the Republic of Serbia was to "adopt one or more detailed action plans with a harmonized schedule, established and clear goals and deadlines, as well as the necessary institutional framework and adequate estimates of costs and financial funds in the following areas: judiciary, 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. At the said Intergovernmental Conference, the European Union's Common Position on Chapter 23 was presented, including 50 interim benchmarks defined to assess further progress of the Republic of Serbia<sup>40</sup>.

Revised Action Plan for Chapter 23 was adopted by the Government of the Republic of Serbia on July 10, 2020.

As stated in the Revised Action Plan for Chapter 23, the revision of the Action Plan for Chapter 23 was necessary in order to make an overview of the activities, which clearly indicate the future direction (with the establishment of new, realistic deadlines) and corrections in the formulation of the activities so as to properly reflect the recommendations from the screening reports and interim benchmarks, as well as eliminate the observed difficulties in the execution and monitoring of the implementation of the activities. During the revision process, the goal was to make the corrections properly reflect the recommendations of the screening reports and the interim benchmarks, taking into account the assessments of the activity fulfilment made by the Council for the Implementation of the Action Plan for Chapter 23, contributions of the responsible institutions – implementers of the activities of the Action Plan for Chapter 23, as well as difficulties observed in the implementation and monitoring of the implementation of the activities.

As also foreseen by the Revised Action Plan for Chapter 23, supervision over the implementation of the activities planned under this document is entrusted to the Coordinating Body. During the performance of the tasks entrusted to it, expert and administrative technical support shall be provided by the Coordinating Body Secretariat. The Coordinating Body shall carry out the supervision by analyzing and reviewing the draft reports on implementation, make recommendations to improve the implementation of the Revised Action Plan for Chapter 23 and launch an early warning mechanism in case of delays or other implementation problems. This Body shall adopt the implementation reports and send them to the European Commission, Government of the Republic of Serbia and National Assembly. The members of the Coordinating Body shall be appointed by the Government and shall consist of officials of the highest rank coming from the institutions in charge of the implementation of the main part of the activities referred to in the Revised Action Plan for Chapter 23.

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

## 6.2. Implementation supervision

Acting in accordance with Art. 38, paragraph 2 of the Law on Prevention of Corruption, the Director of the Agency enacted the Instructions on the Method of Reporting about the Implementation of Strategic Documents<sup>41</sup>.

In addition, the Agency, supported by *IPA 2013* Project "Prevention and Fight against Corruption", prepared the Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, which were published on the Agency's website<sup>42</sup>.

In the process of preparing for the supervision of the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, the Agency sent a letter to all institutions responsible for the implementation of Sub-Chapter: Fight against Corruption, both to those who are the implementers of individual activities<sup>43</sup> and those involved in the implementation of individual activities<sup>44</sup>. While sending the letter, the Agency took into account the changes resulting from the adoption of the Law on Ministries, whose entry into force lead to the termination of the Office for Cooperation with Civil Society and Office for Human and Minority Rights, which are listed as the implementers of activities in the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, and whose competences were assumed by the Ministry of Human and Minority Rights and Social Dialog; also, the Public Procurement Directorate changed its name to the Public Procurement Office, in accordance with the Law on Public Procurement, which came into effect on July 1, 2020. The Anti-Corruption Agency also changed its name to the Agency for the Prevention of Corruption starting from the effective date of the Law on Prevention of Corruption, that is, September 1, 2020.

By means of the aforementioned letter, the Agency informed all the aforementioned institutions about the provisions of the Law on Prevention of Corruption related to the supervision of strategic documents, adoption of the Instructions on the Method of Reporting on the Implementation of Strategic Documents and Guidelines for Reporting on the Implementation and Supervision of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, which have already been available on the Agency's website and e-mailed to the competent institutions. The Agency further informed them about the need to appoint persons authorized to coordinate, monitor the implementation and report on the implementation of the activities

41 Official Gazette of the RS, no. 145/20

42 See at: [www.acas.rs/wp-content/uploads/2020/12/Smernice\\_za\\_izveštavanje\\_ACAS\\_cir\\_final.pdf](http://www.acas.rs/wp-content/uploads/2020/12/Smernice_za_izveštavanje_ACAS_cir_final.pdf)

43 The letter was sent to the following institutions: the Government of the Republic of Serbia, Ministry of Justice, Council for Combating Corruption, National Public Prosecutor's Office, Prosecutor's Office for Organized Crime, Ministry of Finance, Tax Administration, Customs Administration, Ministry of Health, Ministry of Education, Science and Technological Development, Ministry of Interior, Ministry of Public Administration and Local Self-Government, Ministry of Human and Minority Rights and Social Dialog, National Academy of Public Administration, Human Resources, High Civil Service Council, Judicial Academy, Public Procurement Office and Commissioner for Information of Public Importance and Protection of Personal Data

44 The letter was sent to the following institutions: National Assembly of the Republic of Serbia, Directorate for the Prevention of Money Laundering, Ministry of Economy, State Prosecutorial Council, Higher Public Prosecutor's Office in Belgrade, Higher Public Prosecutor's Office in Novi Sad, Higher Public Prosecutor's Office in Niš, Higher Public Prosecutor's Office in Kraljevo, Directorate for Confiscated Property Management, Supreme Court of Cassation, Misdemeanor Court in Belgrade, National Electoral Commission, National Commission for the Protection of Rights in Public Procurement Procedures, National Bank of Serbia, Business Registers Agency, Central Securities Depository and Clearing House, National Geodetic Authority; National Pension and Disability Insurance Fund, National Health Insurance Fund, National Property Directorate, National Public Policy Secretariat, State Audit Institution and Criminal Police University



## 6. GENERAL NOTES ON IMPLEMENTATION SUPERVISION

from the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, their duties, manner of reporting, as well as the fact that the implementers' reporting to the Agency will be carried out on a quarterly basis, i.e. four times a year. Considering the circumstances primarily caused by the COVID-19 pandemic, as well as the effective date of the Law on Prevention of Corruption, the Agency decided that the first reporting cycle should cover the period from July 10 (when the Revised Action Plan for Chapter 23 was adopted) to December 31, 2020, that is, to include activities due in the III and IV quarters of 2020, as well as the continuous activities. In the same letter the institutions received information about this and the deadline for the submission of the reports by January 15, 2021.

All institutions that are implementers of individual activities appointed the persons authorized to coordinate, monitor the implementation and report on the implementation of the activities referred to in the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, enabling the Agency to draw up internal records of the activity implementers and reporting entities. After that, the Agency provided the appointed persons with a reporting reminder with the deadline for report submission by January 15, 2021, referring them once again to the Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption. In accordance with this document, reporting forms were submitted to the appointed contact persons.

Reports on the implementation of activities in the period from July 10 to December 31, 2020, that is, activities due in the III and IV quarters of 2020, as well as continuous activities, were submitted to the Agency on a proper form by all institutions that are activity implementers, including institutions that are not the primary activity implementers, but rather have information relevant to the implementation.

Even though certain institutions have taken a proactive approach and reported activities that are not due yet, the Agency has not specifically addressed these activities for the purpose of preparing this report, since their implementation is ongoing and it will address them individually once they are due or completed. An exception was made only in cases where they were related to activities due in this reporting period.

In addition, there are activities, even though marked as continuous, which unequivocally require assessment within a certain period (e.g. continuously or six months from the adoption of the amendments to the law) and, as such, are not due yet, or the deadline for the implementation of the previous, conditional activity has not yet expired.

During the preparation of the report, the Agency requested additional information from certain institutions that provided answers within the stipulated deadlines. Additional information was requested in order to complete the arguments for the assessment of the activities provided by the Agency in the report.

### 6.3. Challenges in the process of implementation supervision

One of the key challenges, which significantly affected the status of activity implementation, relates to the pandemic, which caused a delay or postponement of the implementation of activities or part of activities the Agency assessed in the reporting period. The pandemic primarily affected capacity-building activities and inter-institutional cooperation and coordination.

An additional challenge was the fact that the Government of the Republic of Serbia was formed on October 28, 2020, which caused a delay or, in best case, the very beginning of the implementation of certain activities within the area of competence of the Government ministries.

In addition, there are activities which are conditioned by the implementation of other activities, most often in terms of the adoption of laws or implementation of analyses, which is why the activities were assessed as not implemented for this reporting period in case a specific law was not adopted or analysis completed.

The challenge in the supervision of implementation is also reflected in the fact that several institutions, in accordance with the positive laws of the Republic of Serbia, drew up the final annual reports for the previous year in the current year, which was why they were not able to present the final data, including the accompanying statistical data. This includes the reports prepared by the institutions this year for different reasons, which is why they were also unable to provide the final data.

Some institutions did not fully cover the performance indicators, however, when it was clear and evident from their report that steps were taken towards their implementation, the Agency assessed such activities as implemented and indicated how this challenge could be overcome in its recommendations.

There are activities in relation to which certain institutions have declared that they are not competent, which is also recognized in the recommendations as an area that needs to be improved.

It can be said that the quality of the reporting is not uniform, but as this is the first report on the supervision of the implementation of the new, Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, the Agency will be able to explain this segment in more detail in the future reporting cycles. Nevertheless, it is important to note that there are also examples of good practice of the institutions which have submitted complete reports and covered the entire essence of the activities and performance indicators.

The remaining challenges are stated in the recommendations.

## 6.4. Methodological framework

The basis of the methodological framework consists of the Guidelines for Reporting on the Implementation and Supervision of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption.

Supervision of the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption means that the Agency: collects information about the implementation of the activities referred to in the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, gives an assessment of the level of fulfilment of the activities and submits the report to the National Assembly.

In addition to overseeing the implementation of strategic documents and submitting the report to the National Assembly regarding their implementation and recommendations for actions, the Agency will provide recommendations for the responsible entities on how to eliminate oversights during the implementation of the strategic documents and initiate amendments thereto.

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

1. manner in which the Agency collects information and data on the implementation of activities from the activity implementers, or manner in which activity implementers report to the Agency;
2. manner in which the Agency treats the information and data obtained and submits the report thereon to the National Assembly;
3. manner in which the Agency delivers opinions with recommendations for the activity implementers to overcome difficulties and improve the quality of reporting and
4. manner in which the Agency initiates amendments to the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption.

For the assessment of the status of these activities, the main source of information for the Agency were the reports of the reporting entities. For this reason, the reporting entities were required to verify in the report forms that the activities were actually carried out.

In addition to the reports of the reporting entities, other sources of information were available to the Agency for the analysis of the context in which certain activities are carried out and better understanding of the situation in the area subject to reporting, such as: research in a specific area subject to the monitoring, reports of other independent state bodies on the situation in certain areas, reports on the work of public authorities which are the activity implementers, etc.

The assessment of the activity status should give an answer to the question of whether and to what extent the activities are being carried out. On the basis of the reports submitted by the reporting entities to the Agency, as well as the comparison of the answers from the reports with the essence of the specific activity and the performance indicators, the Agency used this report to present one of the following assessments of each activity status:

1. activity was implemented;
2. activity was not implemented or
3. activity cannot be assessed

based on the parameters shown in the table below.

For the preparation of the report, the Agency used only data related to the reporting period, not the activities carried out in the first quarter of 2021. Certain institutions subsequently delivered information about the implementation of these activities or additional steps taken with the aim of completing the implementation of the activities due in the reporting period, however, for the purpose of making coherent reports, the Agency will present them in the following quarterly reports and the next report, which will be submitted to the National Assembly by March 31, 2022.

This report was also an opportunity to test the aforementioned, essentially instructional, Guidelines in practice, so, during the supervision, the Agency observed certain shortcomings which should be corrected due to the fact that only after the testing of the methodological framework it will be possible to determine what works well in practice and what should be improved. With this in mind, and in order to ensure the methodological coherence of the report, the Agency tried to assess both the essence of the activity and performance indicators in each individual case. In situations where the performance indicator was not defined properly, as recognized through the recommendations, the Agency relied on the purpose of the activity itself and the goal that should or should have been achieved through its implementation. In this regard, the following table shows the assessment of individual activity status which is in line with the Agency's assessment after the Guidelines testing.

Notwithstanding certain inaccuracies in the process of drafting this report, the Agency used the already available translation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption in Serbian published on the website of the Ministry of Justice when entering individual activities, recommendations from the screening reports and interim benchmarks.

### 6.5. Individual activity status assessment table

Activity status	Assessment criteria/Explanation
1. Activity was implemented	<p>The activity was implemented because:</p> <ol style="list-style-type: none"> <li>1) it was completed within the stipulated deadline and in accordance with the envisaged steps for its implementation and defined performance indicators;</li> <li>2) because the purpose of the activity indicates that steps were taken towards its implementation (especially in the case of continuous activities), even though it does not fully comply with the performance indicator.</li> </ol>
2. Activity was not implemented	<p>The activity was not implemented because:</p> <ol style="list-style-type: none"> <li>1) it was not completed within the stipulated deadline and in accordance with the envisaged steps for its implementation or defined performance indicators;</li> <li>2) because the purpose of the activity indicates that no steps were taken or completed towards its proper implementation;</li> <li>3) because it is conditioned by another activity, which has either not been carried out or is being carried out.</li> </ol>
2. Activity cannot be assessed	<p>The activity could not be assessed because:</p> <ol style="list-style-type: none"> <li>1) no data were provided to understand how the activity was carried out;</li> <li>2) the activity implementer was not properly designated in all aspects of the activity implementation.</li> </ol>

# 7.

## LIST OF ABBREVIATIONS

## 7. LIST OF

<b>Agency</b>	Agency for Prevention of Corruption
<b>Guidelines</b>	Guidelines for Reporting on the Implementation and Supervision of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption
<b>Council</b>	Anti-Corruption Council
<b>Ministry of Interior</b>	Ministry of the Interior
<b>POOC</b>	Prosecutor's Office for Organized Crime
<b>SAI</b>	State Audit Institution
<b>HR</b>	Human Resources
<b>Commissioner</b>	Commissioner for Information of Public Importance and Protection of Personal Data
<b>CC</b>	Criminal Code
<b>IPA</b>	Instrument for Pre-Accession Assistance of the European Union
<b>USAID</b>	US Agency for International Development
<b>OSCE</b>	Organization for Security and Cooperation in Europe
<b>ODIHR</b>	OSCE Office for Democratic Institutions and Human Rights
<b>EU</b>	European Union
<b>SIGMA</b>	Joint initiative of the European Union and the Organization for Economic Cooperation and Development for the support of improvement in governance and management
<b>GIZ</b>	German Agency for International Cooperation
<b>DCAF</b>	Geneva Center for the Democratic Control of Armed Forces
<b>PCIB</b>	Regional Police Cooperation and Integrity Building Program in the Western Balkans
<b>LSGU</b>	Local self-government unit
<b>LACP</b>	Local anti-corruption plan
<b>Model</b>	Model local anti-corruption plan
<b>OPDAT</b>	Office for Overseas Prosecutorial Development, Assistance and Training
<b>CAMS</b>	International Anti-Money Laundering Certification Program
<b>ACAMS</b>	Association of Certified Anti-Money Laundering Specialists
<b>CFE</b>	International Fraud Investigation Certification Program
<b>ACFE</b>	Association of Certified Fraud Investigators







