

## **Standard Summary Project Fiche – IPA decentralised National programmes**

### **1. Basic information**

- 1.1 CRIS Number : TR2009/0136.06  
1.2 Title : Strengthening the coordination of anti-corruption policies and practices  
1.3 ELARG Statistical code: 36-Political Criteria  
1.4. Location : TURKEY

### **Implementing arrangements:**

**1.5 Implementing Agency** : Central Finance and Contracting Unit

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TÜRKİYE

It is proposed to implement this Project under a direct grant agreement with the Council of Europe

### **1.6 Beneficiary (including details of SPO):**

**Main Beneficiary** : Prime Ministry Inspection Board  
Başbakanlık Teftiş Kurulu Başkanlığı  
Necatibey Caddesi No:108 Başbakanlık Yeni Bina  
Yücetepe/Ankara

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**Co-Beneficiaries** : Ministry of Interior Inspection Board  
Hamdi Metin-Deputy Head of Board  
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Ministry of Finance Inspection Board  
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Ministry of Justice  
Şener DALYAN-General Director of International-  
[sener.dalyan@adalet.gov.tr](mailto:sener.dalyan@adalet.gov.tr)

### **Financing:**

- 1.7 Overall cost (VAT excluded)<sup>1</sup>: € 1.600.000
- 1.8 EU contribution : € 1.360.000
- 1.9 Final date for contracting : 2 years after the signing financing agreement
- 1.10 Final date for execution of contracts: 2 years following the end of contracting deadline
- 1.11 Final date for disbursements: 1 year after the end date for the execution of contracts

## **2. Overall Objective and Project Purpose**

2.1 Overall Objective: To contribute to achieve more efficient and effective structure in the fight against corruption in Turkey

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<sup>1</sup> The total cost of the project should be net of VAT and/or other taxes. Should this not be the case, the amount of VAT and the reasons why it should be considered eligible should be clearly indicated (see Section 7.6)

## 2.2 Project purpose:

- a. To enhance the expertise of the inspectors, auditors and controllers of different institutions about modern investigation and reporting techniques, cooperation, data collection and analysis, information sharing and developing sector specific anti-corruption policies
- b. To enhance the expertise of PMIB Inspectors on (i) coordinating the corruption investigations and implementing anti-corruption policies across relevant agencies and (ii) monitoring the implementation of national anti-corruption strategies.

## 2.3 Link with AP/NPAA / EP/ SAA :

### Short term priority of AP 2008

#### Anti-corruption policy

— Develop a comprehensive anti-corruption strategy, including the fight against high-level corruption, and a central body to oversee and monitor its implementation, including through establishing statistical data. Improve coordination between all institutions involved.

### NPAA 2003- PRIORITY 24.5 Organised Crime, Fraud and Corruption

Efforts will continue for the adoption and implementation of the EU acquis on organized crime, fraud, corruption and people smuggling. Administrative capacity and co-operation between different law-enforcement bodies will be enhanced and international cooperation in these fields will be intensified.

Adoption and implementation of the EU acquis and strengthening of the administrative capacity and co-operation between different line institutions in the fields of fraud, corruption and organized crime will continue and international co-operation in these fields will be improved.

### NPAA 2008- POLITICAL CRITERIA

#### 1. Functionality of Public Administration

“Within the scope of the fight against corruption, the Prime Ministry Inspection Board, which carries out the secretariat work for the “Commission on Improving Transparency in Turkey and Enhancing Good Governance in Public Sector” continues effectively its works on improving transparency and enhancing good governance, and ensuring coordination among institutions fighting against corruption and development of strategy on the fight against corruption.”

## 2.4 Link with MIPD :2008-2010 MIPD

### Institution Building Priority

Support for the fight against corruption and protection of EU financial interests;

### Expected Result

A comprehensive strategy and an integrated set of measures for fighting corruption will be in place and progressively implemented and central and decentralized levels.

## **2.5 Link with National Development Plan (where applicable) :**

### **9<sup>th</sup> development plan of Turkey(2007-2013)**

**Paragraph 297:** Conventions of the European Council towards fighting against corruption were approved and Turkey became a member of the Group of States against Corruption (GRECO). In addition, United Nations Convention against Corruption was ratified and the Laws to Prevent Bribery of Foreign Publics in International Business Transactions was enacted in order to ensure harmonization with the OECD Convention.

**Paragraph 380:** To ensure transparency, there will be an effective fight against corruption and organised crime activities and exertion of influence will be prevented.

## **2.5 Link with national/ sectoral investment plans(where applicable):**

### **Draft Anti-Corruption Plan of Turkey (2009-2013)**

Coercive Measures 1: Enhance coordination, information sharing and cooperation between judiciary, law enforcement units and inspection boards.

## **3. Description of project**

### **3.1 Background and justification:**

The EC Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey<sup>2</sup> which indicated that with regard to the anti-corruption policy the government needed to fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them. Additionally, recent EU's Progress Reports on Turkey suggest that waste and misuses have remained major challenges in the public sector. These phenomena need to be addressed not only at the policy level but also at the stages of the fight-against-corruption in field, the same reports proposed.

For instance, in the 2008 Progress Report, the issue of corruption was referred as:

*“Overall, there has been limited progress in the area of anti-corruption. Corruption remains a widespread issue. There has been limited progress towards strengthening the legal framework and institutional set-up to fight corruption. The continuing absence of an overall strategy, action plan and coordination mechanism is a cause for continuing concern in this area. Turkey needs to develop a track record of investigations, prosecutions and indictments of allegations of corruption across existing agencies in an integrated way.”*

The legal framework in the country includes severe measures in preventing corruption, and various tools that fall varying agencies' purview. In due respect, public prosecutors with the help of Turkish National Police and Gendermerie play a key role in investigating

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<sup>2</sup> COUNCIL DECISION of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey (2006/35/EC).

allegations of fraud and corruption and in bringing those who are liable for misconduct before the relevant courts.

Yet, waste and misuses do not only seem to be limited to the private persons and firms. As some reports and assessments such as GRECO suggest the public sector is also prone to the negative effects of the misuses. In finding out the liable officials and recovering the losses, the Inspection Boards within the major agencies are in charge of carrying out administrative investigations. As the inspectorates are equipped with a well-established rules and standards, the legal framework appears to be too broad and a bit sophisticated which have a potential to cripple the efficiency and effectiveness of the investigations. Besides, newly-created internal audit units may pose an issue that the roles of the two bodies may be overlapping in certain cases. In a world where new methods and technologies are widely used for misuses and fraud, the inspectorates need to be educated more on these novelties in order to better eliminate and deter fraudulent activities. This observations point to the fact that an awareness raising programme which would deliver trainings on contemporary anti-corruption policies and methodologies would not only benefit the investigative capacity of the inspectorates but also the government's performance for it.

At this juncture, brief information on the anti-corruption institutions seems relevant:

Corruption investigations are carried out by the inspection boards of ministries and or if there is a case which permeates several ministries than the investigations are carried out by a team of inspectors which is led by Prime Ministry Inspectors. In addition, given the work by the Organized Crime unit of the police, MASAK, and the Council of Ethics for Public Service, there is a need for strengthening inspection role of ministries into corruption allegations to address those areas not currently covered by either agency and which are often managed in European countries by audit agencies.

The Prime Ministry Inspection Board (PMIB) is currently drafting and implementing a new anti-corruption strategy including measures that should be taken. Several challenges have been observed and experienced during the implementation period of the first anti-corruption strategy such as;

- insufficient number of experienced employees on implementing such strategies,
- administrative inability to measure the impact of the measures taken.

PMIB is the lead unit and coordinator of corruption investigations that involve high level bureaucrats and that require investigations in several ministries. Here, the PMIB has identified a number of problems.

- Absence of training in determining the corruption prone sectors and areas means that ministry inspection boards have weaknesses in having systematic approach to their work.
- Lack of investigative training leads usage of different investigation and reporting techniques by different inspection boards.
- PMIB sometimes faces problems in monitoring and following the corruption cases that are investigated by other inspection boards and law enforcement units which

sometimes causes duplication and prevents the possibility to produce statistics on the number of corruption cases that are investigated or prosecuted in total (it also requires such information to promote general prevention measures for areas of vulnerability).

Generally there is a need to review the legislative framework to support greater use of information, of joint investigations and sanction options.

This project will increase the efficiency and productivity of the inspectors both in PMIB and in line ministries who are good at carrying out investigations in traditional ways which have been used for years but do not know using IT technologies and carrying out investigations based on analysis of sectors and areas which are more open to corruption.

### **3.2 Assessment of project impact, catalytic effect, sustainability and cross border impact (where applicable)**

Project will produce the following outputs:

- Strategic approach to corruption investigations
- Improvement in the coordination of corruption investigations lead by PMIB
- Enhanced cooperation and information sharing among anti-corruption institutions
- Data collection and analysis
- Well designed and implemented anti-corruption strategies

The development of above-mentioned skills within Inspection Boards will lead to more efficient struggle against corruption. Allegations will be handled in a more specialized and cooperative way. Thus, the investigations will be carried out faster and more cases will be resolved in a year. Specialization in different methods of anti-corruption struggle will enable experts to produce more comprehensive solutions to the problems.

The outcomes of this project will have long lasting effects on the efficiency of the anti-corruption structure of Turkey. Analysis of the current system will show the deficiencies in the system and those deficiencies would be included in anti-corruption strategies that will be developed in the future.

Trainings will increase the number of inspectors who know modern investigation techniques and they will have the opportunity both to use that knowledge and to pass to their fellows and new recruits.

This project will prepare the institutional capacity to develop sector specific anti-corruption strategies ready and once the project is completed, more projects, strategies and studies can be produced.

Finally, the overall impact of the projects together with other projects dealing with corruption will be increased economic and social well being of our citizens.

### **3.3 Results and measurable indicators:**

<b>RESULTS</b>	<b>Measurable Indicators</b>
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<p>1-The current legislative framework covering investigations, information sharing, anti-corruption strategies and coordination of investigations is analyzed and compared with the requirements international conventions. Based on the results, investigation guide, reporting standards are developed.</p>	<ul style="list-style-type: none"> <li>- Decrease in the number of recommendations made in the Peer Review and GRECO evaluation reports</li> <li>-Decrease in the gaps between the UNCAC and domestic regulations</li> </ul>
<p>2-Data regarding investigations of corruption cases is gathered and analysed, and corruption map of risky areas are produced.</p>	<ul style="list-style-type: none"> <li>-Number of cases opened based on data analysis</li> <li>-Number of analytic research conducted via data</li> </ul>
<p>3-Inspectors are trained on developing sector specific anti-corruption strategies, coordinating corruption investigations, modern investigation and reporting techniques and sharing information.</p>	<ul style="list-style-type: none"> <li>-Quality of the strategies prepared</li> <li>-Positive assessment for the fighting against corruption efforts in the Country Progress Reports issued in 2012</li> <li>-Decrease in the number of recommendations made in the Peer Review and GRECO evaluation reports.</li> <li>-Number of reports accepted by the prosecutor's office to be carried to the court</li> <li>-By the end of 2012, at least 20 % improvement of Turkey's score in the Corruption Perception Index revealed by Transparency International every year.</li> <li>-By the end of 2012, at least 20 % improvement of Turkey's gap in actual implementation of legal framework which is currently 23 points (legal framework: 83 of 100 and actual implementation 60 of 100) according to Global Integrity Report in 2007.</li> </ul>

### **3.4 Activities:**

The activities will be carried out via direct grant and a supply contract. Once the activities stated below are completed, the expertise of the inspectors would increase to the level of those working in anti-corruption agencies of EU institutions such as DG OLAF. Additionally, the supply contract will enable PMIB to buy the necessary technical equipment that it needs to possess to function effectively and efficiently.

**RESULT 1-**The current legislative framework covering investigations, information sharing, anti-corruption strategies and coordination of investigations is analyzed and compared with the requirements international conventions. Based on the results, investigation guide, reporting standards are developed.

**Activity 1.1:** The current legislative framework regulating the investigations, coordination of investigations, information sharing and intelligence and its implementation is analyzed and reports are prepared via working groups composed of academicians and public officials. The findings of the reports are discussed in a conference.

**Activity 1.2:** International, particularly EU, standards and regulations on corruption investigations, coordination-cooperation and information sharing are reviewed and a report is prepared by a team of experts and discussed.

**Activity 1.3:** Compliance of the domestic regulation to the United Nations Convention against corruption, OECD Foreign official anti bribery regulation and EU Criminal Law and Civil Law Convention is analyzed and gap analysis reports are prepared by a team of experts composed of national and international experts.

**Activity 1.4:** Based on the findings of the reports of Activity 3, policy reports that address possible measures that can be taken to fulfill the requirements of the conventions are prepared by working groups composed of representatives from relevant institutions.

**Activity 1.5:** In order to prevent implementation of different methods an investigation guide is prepared and disseminated to all inspectors, auditors and controllers

**Activity 1.6:** Reporting standards are set out by a working group and disseminated to all inspectors, auditors and controllers in a conference

**RESULT 2-**Data regarding corruption investigations is gathered and analysed, and map of corruption prone areas are produced.

**Activity 2.1:** 20 Inspectors are trained on collecting and analyzing corruption related data in an EU institution and trained inspectors transferred their knowledge to 200 inspectors.



**Activity 2.2:** The map of corruption prone areas is prepared and appropriate strategies to tackle those risky areas are prepared via working group composed of members from government agencies, private sector and NGO's.

**RESULT 3-**Inspectors are trained on developing sector specific anti-corruption strategies, coordinating corruption investigations, modern investigation and reporting techniques and sharing information.

**Activity 3.1:** 10 inspectors are trained at a relevant EU institution on developing anti-corruption strategies and successfully implementing and monitoring them. A Users' Guide on AC Strategy drafting and implementing is prepared by those inspectors with assistance from international experts.

**Activity 3.2:** 10 PMIB inspectors are trained in the coordination of corruption investigations and enhanced cooperation and information sharing among anti-corruption institutions at a relevant EU.

### **3.5 Conditionality and sequencing:**

There is no conditionality for the project, but once the draft anti-corruption strategy plan of Turkey is endorsed, this project will directly address to one of the objectives foreseen in the strategy plan. The draft strategy includes an objective which is enhancing coordination, cooperation and information sharing among anti-corruption institutions. This is also an issue which repeatedly mentioned in peer review analysis and GRECO reports.

The sequence that this project follows;

- First, we are planning to analyse the current legal and practical anti-corruption structure. And then compare it with international standards and regulations. In the meantime, we are planning to get our domestic regulations compared with the requirements of international anti-corruption conventions.
- Once we get the results of these studies, we are proposing preparation of an investigation guide and reporting standards which will bring unity to the way investigations are carried out and reports are prepared.
- The next step is to get the technical and human infrastructure that is needed to gather and analyse corruption data ready. Lack of adequately stored data and human capital pre-empts decision makers from prioritizing their limited resources to tackle corruption.
- After the completion of the above mentioned activities, plan is to teach as many inspectors as possible to use those tools effectively because you may have all the tools ready but still you need to have handful of employees whose mindset is ready to use them.

### **3.6 Linked activities:**

Ethics for the prevention of corruption is the first project that has been implemented in this very important field. PMIB has a member in the steering committee of that project. That project has definitely raised the amount of awareness about corruption and this project will

prevent that awareness from vanishing. Studies that are carried out in that project such as corruption in land registry, conflict of interest and corruption in local governments will contribute to the activities of this project because those studies will be used in the activities.

### **3.7 Lessons learned:**

Several challenges have been observed and experienced during the implementation period of the first anti-corruption strategy such as insufficient number of experienced employees on implementing such strategies, administrative inability to measure the impact of the measures taken. PMIB is the lead unit and coordinator of corruption investigations that involve high level bureaucrats and that require investigations in several ministries. Here, the PMIB has identified a number of problems. Absence of training in determining the corruption prone sectors and areas means that ministry inspection boards have weaknesses in having systematic approach to their work. Lack of investigative training leads usage of different investigation and reporting techniques by different inspection boards. PMIB sometimes faces problems in monitoring and following the corruption cases that are investigated by other inspection boards and law enforcement units which sometimes causes duplication and prevents the possibility to produce statistics on the number of corruption cases that are investigated or prosecuted in total (it also requires such information to promote general prevention measures for areas of vulnerability).

Lack of adequately stored data on corruption which is recommended by both in GRECO reports and in the latest peer-review mission report of EC pre-empts decision makers from directing their limited resources to areas on which corruption has more devastating effects.

Ethics for prevention of corruption project has definitely raised the amount of awareness about corruption and to increase the level of that awareness, more projects are needed.

**4. Indicative Budget (amounts in EUR)**  
**TR2009/0136.06**

			SOURCES OF FUNDING										
			TOTAL EXP.RE	TOTAL PUBLIC EXP.RE	IPA COMMUNITY CONTRIBUTION		NATIONAL PUBLIC CONTRIBUTION					PRIVATE CONTRIBUTION	
ACTIVITIES	IB (1)	INV (1)	EUR (a)=(b)+(e)	EUR (b)=(c)+(d)	EUR (c)	% (2)	Total EUR (d)=(x)+(y)+(z)	% (2)	Central EUR (x)	Regional/ Local EUR (y)	IFIs EUR (z)	EUR (e)	% (3)
Activity 1													
Direct Grant	X		1 400 000	<u>1 330 000</u>	<u>1 190 000</u>	<u>89,5</u>	<u>140 000</u>	<u>10,5</u>				70 000	5
Activity 2													
Supply contract		X	200 000	200 000	<u>170 000</u>	<u>85</u>	<u>30 000</u>	<u>15</u>					
TOTAL IB			1 400 000	<u>1 330 000</u>	<u>1 190 000</u>	<u>89,5</u>	<u>140,000</u>	<u>10,5</u>				70 000	5
TOTAL INV			200 000	200 000	<u>170 000</u>	85	30 000	15					
<b>TOTAL PROJECT</b>			<b>1 600 000</b>	<b>1 530 000</b>	<b><u>1 360 000</u></b>		<b><u>170,000</u></b>					<b>70 000</b>	

NOTE: DO NOT MIX IB AND INV IN THE SAME ACTIVITY ROW. USE SEPARATE ROW  
Amounts net of VAT

(1) In the Activity row use "X" to identify whether IB or INV

(2) Expressed in % of the **Public** Expenditure (column (b))

(3) Expressed in % of the **Total** Expenditure (column (a))

## 5. Indicative Implementation Schedule (periods broken down per quarter)

Contracts	Start of Tendering	Signature of contract	Project Completion
Direct Grant	-	III. Quarter 2010	III. Quarter 2012
Supply Contract	I. Quarter 2010	III. Quarter 2010	III. Quarter 2011

All projects should in principle be ready for tendering in the 1<sup>ST</sup> Quarter following the signature of the FA

## 6. Cross cutting issues (where applicable)

### 6.1 Equal Opportunity

Project implementation will take into account gender equality such as working groups will be composed of men and women inspectors. Corruption data will be disaggregated by gender to see whether gender has any impact on the possibility of involving in a corrupt behaviour.

### 6.2 Environment

Project will have no negative effect on the environment. To prevent waste of paper, unless needed, all communications will be done via e-mails.

### 6.3 Minorities and Vulnerable Groups

According to the Turkish Constitutional System, the word minorities encompass only groups of persons defined and recognized as such on the basis of multilateral or bilateral instruments to which Turkey is a party.

The project will in no way harm the rights of any individuals (including disabled people) or entities to apply for the registration of their industrial property rights, or hinder the use of their rights for oppositions, complaints, appeals, or any other rights thereof before the public institutions of Republic of Turkey.

### 6.4 Civil Society

In the implementation phase of project activity 8, there will be civil society participation. Their experiences and opinions will have precious contribution in determining corruption prone areas and developing policies.



## ANNEXES

### 1- LOGICAL FRAMEWORK MATRIX in STANDARD FORMAT

LOGFRAME PLANNING MATRIX FOR Project Fiche		Programme name and number	strengthening the coordination of anti-corruption policies and practices
		Contracting period ) expires: FA+ 2 years	the final date for disbursement: 1 year after the end date for the execution of contracts
		Total budget : 1.600.000- Euro	IPA budget: 1.360.000- Euro
<b>Overall objective</b> To contribute to achieve more efficient and effective structure in the fight against corruption in Turkey	<b>Objectively verifiable indicators</b> By the end of 2012, at least 20 % improvement of Turkey's score in the Corruption Perception Index revealed by Transparency International every year.  -By the end of 2012, at least 20 % improvement of Turkey's gap in actual implementation of legal framework which is currently 23 points (legal framework: 83 of 100 and actual implementation 60 of 100) according to Global Integrity Report in 2007.	<b>Sources of Verification</b> -TI Corruption perception Index -Global Integrity Report	
<b>Project purpose</b>	<b>Objectively verifiable indicators</b>	<b>Sources of Verification</b>	<b>Assumptions</b>

<p>a. To enhance the expertise of the inspectors, auditors and controllers of different institutions about modern investigation and reporting techniques, cooperation, data collection and analysis, information sharing and developing sector specific anti-corruption policies</p> <p>b. To enhance the expertise of PMIB Inspectors on (i) coordinating the corruption investigations and implementing anti-corruption policies across relevant agencies and (ii) monitoring the implementation of national anti-corruption strategies.</p>	<p>Positive assessment for the fighting against corruption efforts in the Country Progress Reports issued in 2012.</p>	<p>EU Commission Country Progress Reports</p>	
<p><b>Results</b></p>	<p><b>Objectively verifiable indicators</b></p>	<p><b>Sources of Verification</b></p>	<p><b>Assumptions</b></p>
<p>1. The current legislative framework covering investigations, information sharing, anti-corruption strategies and coordination of investigations is analyzed and compared with the requirements international conventions. Based on the results, investigation guide, reporting standards and code of ethics for inspectors are developed.</p>	<p>- Decrease in the number of recommendations made in the Peer Review and GRECO evaluation reports</p> <p>-Decrease in the gaps between the UNCAC and domestic regulations</p>	<p>-GRECO Reports -UNCAC evaluation reports -EU Progress Reports</p>	

<p>2. Data regarding corruption investigations is gathered and analysed, and map of corruption prone areas is produced.</p> <p>3. Inspectors are trained on developing sector specific anti-corruption strategies, coordinating corruption investigations, modern investigation and reporting techniques and sharing information.</p>	<p>-Number of cases opened based on data analysis</p> <p>-Number of research conducted via data</p> <p>Positive assessment for the fighting against corruption efforts in the Country Progress Reports issued in 2012</p> <p>-Decrease in the number of recommendations made in the Peer Review and GRECO evaluation reports.</p> <p>-Number of reports accepted by the prosecutor's office to be carried to the court</p>		
<b>Activities</b>	<b>Means</b>	<b>Costs</b>	<b>Assumptions</b>
<p><b>1.1.</b> The current legislative framework regulating the investigations, coordination of investigations, information sharing and intelligence and its implementation is analyzed and reports are prepared via working groups composed of academicians and public officials. The</p>	<p>1 x Direct Grant</p> <p>1xSupply</p>	<p>1.400.000 EURO</p> <p>200.000 EURO</p>	



findings of the reports are discussed in a conference.

**1.2:** International, particularly the EU, standards and regulations on corruption investigations, coordination-cooperation and information sharing are reviewed and a report is prepared by a team of experts and discussed.

**1.3:** Compliance of the domestic regulation to the United Nations Convention against corruption, OECD Foreign official anti bribery regulation and EU Criminal Law and Civil Law Convention is analyzed and gap analysis reports are prepared by a team of experts composed of national and international experts.

**1.4:** Based on the findings of the reports of Activity 3, policy reports that address possible measures that can be taken to fulfill the requirements of the conventions are prepared by working groups composed of representatives from relevant

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institutions.

**1.5:** In order to prevent implementation of different methods an investigation guide is prepared and disseminated to all inspectors, auditors and controllers

**1.6:** Reporting standards are set out by a working group and disseminated to all inspectors, auditors and controllers in a conference

**2.1:** 20 Inspectors are trained on collecting and analyzing corruption related data in an EU institution and those trained inspectors transferred their knowledge to 200 inspectors.

**2.2:** The map of corruption prone areas is prepared and appropriate strategies to tackle those risky areas are prepared

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via working group composed of members from government agencies, private sector and NGO's.

**3.1:** 10 inspectors are trained at a relevant EU institution on developing anti-corruption strategies and successfully implementing and monitoring them. A Users' Guide on AC Strategy drafting and implementing is prepared by those inspectors with assistance from international experts.

**3.2:** 10 PMIB inspectors are trained in the coordination of corruption investigations and enhanced cooperation and information sharing among anti-corruption institutions at a relevant EU

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