



INSTRUMENT FOR PRE-ACCESSION ASSISTANCE (IPA II) 2014-2020

MULTI-COUNTRY

EU4 Rule of Law: Citizens Engagement for Public Integrity

Action summary

This action seeks to contribute to strengthening the rule of law in the Republic of Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, the Republic of North Macedonia and the Republic of Turkey through increased action in the fight against corruption. The action will pursue two interlinked specific objectives, namely to increase evidence-based anti-corruption policy-making and implementation and to increase civic engagement for public integrity, transparency and accountability.

It will benefit the targeted IPA II beneficiaries by producing enhanced knowledge on and engagement against corruption, thereby enabling targeted action by authorities and a strengthened civil society.

The action is in line with the EU enlargement process, Stabilisation and Association Agreements, the Western Balkans Strategy and the Sofia Declaration and Priority Agenda.

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Action Identification			
Action Programme Title	IPA II Multi-country Action Programme 2020 – part 1		
Action Title	EU4 Rule of Law: Citizens Engagement for Public Integrity (CEPI)		
Action ID	IPA 2020/041-818.07/MC/EU4 RoL-CEPI		
Sector Information			
IPA II Sector	9. Regional and territorial cooperation		
DAC Sector	15113 – Anti-corruption organisations and institutions		
Budget			
Total cost	EUR 2.625 million		
EU contribution	EUR 2.5 million		
Budget line(s)	22.020401- Multi-country programmes, regional integration and territorial cooperation		
Management and Implementation			
Method of implementation	Direct management		
<i>Direct management:</i> European Commission	Directorate-General for Neighbourhood and Enlargement Negotiations– Unit D.5 Regional Cooperation and Programmes		
Implementation responsibilities	Directorate-General for Neighbourhood and Enlargement Negotiations– Unit D.5 Regional Cooperation and Programmes		
Location			
Zone benefiting from the action	Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Turkey (and Serbia) ¹		
Specific implementation area(s)	N/A		
Timeline			
Final date for contracting including the conclusion of contribution/delegation agreements	At the latest by 31 December 2021		
Final date for operational implementation	72 months from the adoption of the Financing Decision		
Policy objectives / Markers (DAC form)			
General policy objective	Not targeted	Significant objective	Main objective
Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	X
Aid to environment	X	<input type="checkbox"/>	<input type="checkbox"/>
Gender equality (including Women In Development)	<input type="checkbox"/>	X	<input type="checkbox"/>

¹ Serbia has notified the European Commission of its decision to withdraw from part of this action. The partial inclusion of Serbia in this action is indicated with a bracket.

Trade Development	X	<input type="checkbox"/>	<input type="checkbox"/>
Reproductive, Maternal, New born and child health	X	<input type="checkbox"/>	<input type="checkbox"/>
RIO Convention markers	Not targeted	Significant objective	Main objective
Biological diversity	X	<input type="checkbox"/>	<input type="checkbox"/>
Combat desertification	X	<input type="checkbox"/>	<input type="checkbox"/>
Climate change mitigation	X	<input type="checkbox"/>	<input type="checkbox"/>
Climate change adaptation	X	<input type="checkbox"/>	<input type="checkbox"/>

1. RATIONALE

PROBLEM AND STAKEHOLDER ANALYSIS

The strengthening of the rule of law including the fight against corruption is a key criteria for all IPA II beneficiaries, both under the accession negotiations and the Stabilisation and Association Agreements (SAAs). In the **Western Balkans** (Albania, Bosnia Herzegovina, Kosovo, Montenegro, North Macedonia, (Serbia)) progress has been made in specific cases over time, however important shortcomings in the implementation of rule of law remain along with certain elements of state capture.² In **Turkey**, serious backsliding in the areas of rule of law and fundamental rights continues to be observed³. The European Commission includes in its enlargement package specific information on corruption and rule of law⁴.

The effective fight against corruption requires a two-fold approach: developing strong normative and institutional frameworks as well as societal change⁵. While several international and bilateral actors are currently involved in strengthening the efforts of domestic authorities to improve the normative and institutional framework in the fight against corruption, citizens' ownership of and engagement on the reform agenda are key to building sustainable societies and require further support.

This action will seek to contribute to strengthening the rule of law in Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Turkey through anti-corruption actions, building upon previous similar work undertaken in the EU. The action will produce relevant knowledge for decision-makers and civil society alike to allow them to take further action in the fight against corruption. In addition, it will foster an enabling environment for civil society in the targeted IPA II beneficiaries.⁶ Ultimately, the action will contribute to greater accountability and transparency in the targeted IPA II beneficiaries

The main **target groups** of this action include civil society, media, and key institutions of the targeted IPA II beneficiaries. Knowledge created by the action will be disseminated to civil society organisations (CSOs) and journalists/media. They will be facilitated to work in partnership both at local and regional levels. In addition to CSOs focused on anti-corruption, other CSOs working on subjects such as environment, women, and youth will also be targeted. This will allow for strengthening networking among actors across sectors.

Key decision- and policy-makers including ministries, parliaments, independent monitoring bodies, as well as law enforcement agencies, prosecution and judiciary in the targeted IPA II beneficiaries will be the direct interlocutors for the National Integrity System (NIS) assessments. They will be consulted in the assessments and receive concrete proposals on issues identified in the integrity systems, including gaps in the regulatory framework and enforcement of laws based on the findings.

² 2019 Communication on EU Enlargement Policy <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-communication-on-eu-enlargement-policy.pdf>

³ *ibidem*

⁴ Cf. Communication on EU Enlargement Policy, COM(2019) 260 final – Albania 2019 Report <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-albania-report.pdf> Commission Opinion on Bosnia and Herzegovina's application for membership of the European Union COM(2019) 261 final – Bosnia and Herzegovina 2019 Report <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-bosnia-and-herzegovina-analytical-report.pdf> Communication on EU Enlargement Policy, COM(2019) 260 final – Kosovo 2019 Report, <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-kosovo-report.pdf> Communication on EU Enlargement Policy, COM(2019) 260 final – Montenegro <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-montenegro-report.pdf> Communication on EU Enlargement Policy, COM(2019) 260 final – North Macedonia 2019 Report <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-north-macedonia-report.pdf> Communication on EU Enlargement Policy, COM(2019) 260 final – Serbia 2019 Report <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-serbia-report.pdf>

⁵ 2018 Western Balkan Strategy https://ec.europa.eu/commission/sites/beta-political/files/communication-credible-enlargement-perspective-western-balkans_en.pdf

⁶ *ibidem*

In growing recognition of how corruption can disproportionality affect especially poor women and girls, particularly in their access to essential public services, justice, and security and in their capacity to engage in public decision-making, the action will incorporate gender equality throughout its implementation.

The **ultimate beneficiaries** of the action are citizens from the targeted IPA II beneficiaries. The action will deploy a combination of awareness-raising and advocacy initiatives seeking citizens' engagement in public integrity.

OUTLINE OF IPA II ASSISTANCE

This action aims to contribute to strengthening the rule of law in the targeted IPA II beneficiaries through supporting increased action in the fight against corruption. It will pursue two interlinked specific objectives, namely 1) to increase evidence-based anti-corruption policy-making and implementation and 2) to increase civic engagement for public integrity, transparency and accountability.

The expected outputs of the action are:

- 1) Evidence-based findings and proposals from National Integrity Systems (NIS) assessments are produced;
- 2) Information about cases of corruption is gathered in a comprehensive public online database;
- 3) CSOs, local citizens groups and initiatives at the local and regional level are strengthened and connected;
- 4) A fully-fledged advocacy campaign on public integrity is developed.

The four outputs are designed to be mutually reinforcing.

The assessments of the performance of targeted beneficiaries' systems relevant to integrity, accountability and transparency through the so-called NIS assessments, will enable decision-makers to target reforms to needs as well as support civil society action. NIS assessments have proven to be a valuable tool to increase the understanding of governments and citizens of the institutional environment and dynamics that enable corruption and prevent the implementation of laws.

To allow for greater public scrutiny, a database of cases of corruption will be created. The public database can support monitoring of cases of corruption including in a way that resonates with citizens.

Initiatives and actors involved in anti-corruption work will be strengthened and connected, thus allowing for joint action.

The action will support a full-fledged advocacy campaign of CSOs and local groups, which will also serve as hands-on capacity development for newer or smaller citizens' initiatives. The campaign is aimed at increasing citizens' engagement on public integrity and helping to strengthen connections between CSOs and citizens.

The action benefits targeted IPA II beneficiaries by producing knowledge and engagement on corruption, thereby enabling targeted action by authorities and a strengthened civil society cooperating at local and regional levels.

RELEVANCE WITH THE IPA II MULTI-COUNTRY INDICATIVE STRATEGY PAPER AND OTHER KEY REFERENCES

The action is in line with the revised Multi-country Indicative Strategy Paper 2014-2020 (hereinafter the Strategy Paper)⁷ priorities on strengthening the rule of law, fighting against corruption, supporting civil society and promoting freedom of expression and media. This includes increased support for CSOs, including encouraging the involvement of stakeholders in reforms promoted by this action. Furthermore, as

⁷ C(2018) 3442, 31.05.2018 - IPA II Multi-Country Strategy Paper 2014-2020 <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20180817-revised-multi-country-indicative-strategy-paper-2014-2020.pdf>

highlighted in the Strategy Paper, regional networks are expected to make an important contribution to the development of the IPA II beneficiaries in the rule of law and fundamental rights.

In addition, as regards targeted IPA II Western Balkans beneficiaries, the action responds to the priorities of the 2018 Western Balkans Strategy (hereinafter the Strategy) and the first Flagship initiative "Strengthen the rule of law". In particular, it addresses three interrelated challenges mentioned in the Strategy, namely the lack of public accountability, deficiencies in the implementation and enforcement of laws and the shrinking environment for civil society. The action is also in line with the Sofia Priority Agenda that emphasises the need for enhanced efforts against corruption as well as the importance of civil society in the process of democratisation⁸.

As regards Turkey, the requirements for accession place the rule of law and fight against corruption at the centre of enlargement negotiations, making Turkey's participation in this action key.

LESSONS LEARNED AND LINK TO PREVIOUS FINANCIAL ASSISTANCE

This action builds on lessons learnt and achievements from previous EU-funded actions. These include the previous project on 'Strengthening National Integrity Systems in the Western Balkans and Turkey and tracking developments of anti-corruption efforts' and the project 'Ending impunity for grand corruption crimes in the Western Balkans and Turkey'.

These actions have pointed to the need to include under National Integrity Systems assessments a greater focus on understanding the interactions between various parts of the integrity systems and hence, various parts of society. These interactions can determine whether the system is successful as a whole⁹.

Past assessments have been very resource-intensive and lengthy and this has impacted on their ability to adequately feed advocacy efforts. This action therefore foresees to upgrade the NIS methodology to make it fit for purpose.

The set-up of a public online database on cases of corruption, as envisioned by the action, builds upon a previous successfully effort in EU Member States with the European Corruption Observatory. Building upon lessons learnt from the Observatory, the foreseen database is expanded to include not only media reports of cases of corruption but also official sources of publicly available information in order to ensure the reliability and quality of the information.

Finally, past actions have been primarily focused on producing knowledge. This action will be more hands-on in supporting concrete advocacy work to involve broader citizenry. This work will need to complement already on-going efforts and focus on connecting and broadening initiatives also in view of involving CSOs and citizens group not primarily tackling corruption.

⁸ Sofia Declaration https://www.consilium.europa.eu/media/34776/sofia-declaration_en.pdf

⁹ For previous results of National Integrity Systems Assessments, see <https://transparency.eu/project/national-integrity-systems-western-balkans/>

2. INTERVENTION LOGIC

LOGICAL FRAMEWORK MATRIX

		OBJECTIVELY VERIFIABLE INDICATORS			SOURCES & MEANS OF VERIFICATION	
		Quantitative and/or qualitative variable that provides a simple and reliable mean to measure the achievement of the corresponding expected result (i.e. outputs, outcomes, impacts). Indicators should have a clear measurement unit and are to be formulated in a neutral way.				
OVERALL OBJECTIVE(S) / (IMPACT(S))	INDICATOR'S NAME	BASELINES (INCL. VALUE & REFERENCE YEAR)	MILESTONES (INCL. VALUE & REFERENCE YEAR)	TARGETS (INCL. VALUE & REFERENCE YEAR)		
To contribute to strengthen the rule of law in the targeted IPA II beneficiaries through increased action in the fight against corruption	- Extent to which targeted IPA II beneficiaries make progress in the fight against corruption in line with EU <i>acquis</i>	(2020): Findings of EU enlargement reports 2020	(2022): Findings of latest EU enlargement reports in 2022 e a positive direction in the fight against corruption	(2023): Findings of latest EU Enlargement reports show a clear advancement in the fight against corruption	-EU Enlargement reports -Reports of other international organisations -Civil society assessments, including TI's corruption perception index	
SPECIFIC OBJECTIVE(S) / OUTCOME(S)	OBJECTIVELY VERIFIABLE INDICATORS (*)				SOURCES OF VERIFICATION	ASSUMPTIONS
<p>Specific Objective 1: To increase evidence-based anti-corruption policy-making and implementation</p> <p>Specific Objective 2: To increase civic engagement for public integrity transparency, and accountability</p>	<p>-Extent to which government policies, laws and initiatives are informed by the findings of the National Integrity Systems (NIS) assessments</p> <p>-Extent to which CSOs, experts and journalists use the information and findings identified by NIS assessment and the database of corruption cases</p> <p>-Number of citizens supporting the advocacy campaign through different forms of engagement</p>	<p>(2020): 0</p> <p>0</p> <p>0</p>	<p>(2021): At least one proposal stemming from NIS assessment is considered in decision making process in each beneficiary</p> <p>(2021):-By the end of 2021, at least one CSOs working on anti-corruption and one media outlet per beneficiary elaborates on the findings of NIS assessment and the information in the database</p> <p>(2021/2022): -at least 1.000 citizens per beneficiary by mid</p>	<p>(2023): At least one proposal from NIS assessment is supporting a government policy, law or initiative</p> <p>(2023): -At the end of the project, at least one new initiative on anti-corruption is brought forward by one CSOs or media outlet</p> <p>(2023):-at least 5.000 citizens per beneficiary by the end of the action</p>	<p>Observations, document review, key informant interviews, focus group discussions, media coverage, Laws and policies in each beneficiary EU enlargement reports NIS assessment reports Assessment reports, statements and reports from meetings with governments Social media views and shares, signatures of support, videos, photos and attendance records from public events</p>	<p>Conducive political, societal and economic environment in place in each targeted IPA II beneficiary</p> <p>Anti-corruption is one of the priorities for governments and non-state actors resulting in a general commitment to transparency, accountability and integrity</p> <p>Space for civil society work is not further restricted</p>

OUTPUTS	OBJECTIVELY VERIFIABLE INDICATORS (*)		project implementation		SOURCES OF VERIFICATION	ASSUMPTIONS
Output 1.1. (influencing Specific Objective 1): Evidence-based findings and proposals of national integrity systems (NIS) assessments are produced	-Number of NIS national and regional assessments along with proposals published and disseminated	6 beneficiary and 1 regional comparative analysis of 2015/16	(2022): -After 6 months of implementation, the structure of the NIS reports is agreed	(2023): -By the end of the action, 6 local and 1 regional comparative analysis completed	Document review, media monitoring, documentation Printed and soft copies of local and regional NIS assessment reports	Necessary information is made available by respective authorities and other NIS stakeholders
Output 1.2. (influencing Specific Objective 1): Information about cases of corruption is gathered in a comprehensive public online database	-Number of cases of corruption recorded in database -Number of visitors of the online database	0 0	(2022): -15 corruption cases per beneficiary in 2 nd year of implementation (2022): -1.000 visitors in 1 st year of implementation	(2023): -30 corruption cases per beneficiary (2023): -3.000 visitors by the end of the action	Published official reports and media reports Project reports Reports from meetings of CSOs/actors Database of corruption cases	Law on Right to Information is in force in all targeted beneficiaries Processes are in place to ensure information in database on cases of corruption is reliable
Output 2.1 (influencing Specific Objective 2): CSOs, local citizens groups and initiatives at the local and regional level are strengthened and connected	-Number of CSOs, local groups and initiatives engaged in anti-corruption efforts through project -Degree to which groups and initiatives report an increase in capacity through project actions	0 0	(2022): -25CSOs in 1 st year (2022): 50% increase reported	(2023): -50CSOs by the end of the action (2023): 80% increased reported	Press clipping Social media views and shares, signatures of support, videos, photos and attendance records from public events Viewership data collected online and from media service providers	Citizens engage in civic activity including public events
Output 2.2. (influencing Specific Objective 2): A fully-fledged advocacy campaign on public integrity is delivered	-Number of citizens reached through different campaign activities (events, exhibitions, competitions, festivals, petitions, online campaign etc.) -Number of personal stories developed -Number of local and regional events organised with decision makers- -Number of media reports about campaign actions	0 0 0 0	(2022): -2.000 citizens per beneficiary by action implementation (2022): -5 stories per beneficiary by mid action implementation (2022): -At least 1 event per each beneficiary (2022): -5 media articles in local media per beneficiary by mid-term	(2023): -10.000 citizens per beneficiary (2023): -10 stories per beneficiary (2023): -2 events per beneficiary and 2 regional events (2023): -10 media articles in local media per beneficiary	Activity evaluation sheets	

DESCRIPTION OF ACTIVITIES

The action foresees two different but interlinked outcomes, building upon actions to fight anti-corruption being implemented in EU Member States.

The following indicative activities are foreseen:

(Expected) Output 1.1. Evidence-based findings and proposals of National Integrity Systems (NIS) assessments are produced

Utilising the National Integrity System (NIS) concept and approach developed and promoted by Transparency International¹⁰, the action will produce an updated evidence-based analysis and assessment of the NIS of each targeted IPA II beneficiary, building upon previous NIS assessments while adopting an updated assessment methodology. The assessment will include the pillars of NIS, namely the legislature, executive, judiciary, auditor general, ombudsman, watchdog agencies, public service, media, civil society, private sector and international actors. Gender will be included as one of the indicators for assessing the integrity of institutions, both in terms of gender equality in institutions and the inclusion of women's concerns in institutional dynamics and goals. Relevant information for the assessments will be collected through a participatory approach, indicatively including but not limited to, interviews, focus groups and other consultative meetings with local actors and in particular public institutions to enhance consensus around findings.

Based on the assessment, tailor-made proposals on how to improve NIS will be developed for each targeted IPA II beneficiary and regionally, ensuring cross-beneficiary comparability.

Two-level (beneficiary and regional) reports, the latter including a comparative analysis of the results and proposals for each targeted IPA II beneficiary on its NIS will be produced, disseminated and discussed with concerned stakeholders.

(Expected) Output 1.2. Information about cases of corruption is gathered in a comprehensive public online database

Based on the experience of the European Corruption Observatory implemented in EU Member States¹¹ and its value added to inform citizenry, the action will create a public online database gathering cases of corruption. The database will include cases of corruption causing significant social harm, with a particular focus on corruption-prone sectors, such as healthcare, education, and environment, as well as political corruption and election campaign. Cases illustrating how corruption affects women will be included to the extent possible.

The aim of the database is to support watchdogs active on corruption (media, CSOs, citizens), including through providing a resource for the identification of trends. As such, the database will be an essential tool to feed the advocacy campaign (see below). The database can also serve policy makers as a living tool to monitor the state of play on corruption.

The primary source of the information in the database, in line with lessons learnt from the European Corruption Observatory, will be media reports and investigative journalist articles reporting on corruption. Additionally, to ensure full coverage, official sources of publicly available information will

¹⁰ For more information, see https://www.transparency.org/files/content/nis/NIS_AssessmentToolkit_EN.pdf

¹¹ For more information, see transparency.eu/project/european-corruption-observatory

also be drawn upon, as appropriate. Each case included in the database will pass a libel and fact check¹² to verify the validity of the information. Cases will be updated in the course of the action to reflect their evolution.

If the current pilot exercise conducted under on-going IPA support of gathering data on laws relevant to grand corruption proves successful, the scope of the database can be enlarged to encompass this element. In setting up the database, the action will take stock of possible other initiatives at the local level in order to capitalise on them and avoid overlaps.

(Expected) Output 2.1 CSOs, local citizens groups and initiatives at the local and regional level are strengthened and connected

The action will put forward activities aiming at strengthening partnerships and networks on anti-corruption at the local and regional level to galvanize the combined expertise and membership of civil society.

The action will initially identify and map existing actors such as CSOs, local citizens groups and initiatives, including organisations that do not exclusively work on anti-corruption but are addressing issues impacted by corruption (e.g. environment, youth, women's organisations) with a view to engage them in project activities and in particular advocacy. There will be a particular focus on women's organisations. A needs assessment will be conducted based on which capacity building and networking activities will be deployed.

Capacity building activities will take the form of roundtable discussions and concrete peer-to-peer support. A toolkit for local CSOs and actors will be developed and disseminated and training provided. Thematically, capacity building will primarily but not exclusively focus on knowledge of corruption and its impact, monitoring and reporting cases of corruption as well as strengthening evidence-based advocacy capacities, taking advantage of the expertise of the implementing partner and its affiliated entities.

The networking of actors will be promoted through on- and off line activities, such as discussion fora, development of common key messages and strategies such as on citizens outreach and the use of social media in a concerted manner. Increased networking will serve to identify complementarities and synergies amongst CSOs, local citizens groups and initiatives and consolidate/enable networks at the local level and regionally.

The strengthened partnerships and local/regional fora will also be used to develop and support the fully-advocacy campaign.

(Expected) Output 2.2. A fully-fledged advocacy campaign is delivered

The action will develop and deploy grassroots campaigns and actions aimed to interact with decision makers and other stakeholders in local and regional fora. The activities will aim to increase demand for putting public integrity and accountability at the centre of beneficiary reform agenda.

Grassroots campaigns will seek to involve local CSOs, networks and citizens and focus on transmitting concrete stories of corruption) including through sharing positive narratives and success stories. Indicative activities include production and screening of short videos, competitions, events targeting students and other key audiences, petitions and exhibitions. By hands-on engagement in grassroots campaigning and working side-by-side with more established civil society actors, the capacity of local actors will be strengthened. Media engagement will be an important part of the campaign to increase its outreach.

¹² Libel checks will be performed by law firms/lawyers specialised in libel laws and defamation, and fact checks will be conducted by investigative journalists of an established network of the implementing partner. This is in line with the policy of the implementing partner for all its publications that always undergo fact and libel checks.

The action will also interact and share knowledge including through events with other relevant actors in the field of anti-corruption in view of enhancing synergies. This includes presenting NIS findings, the corruption database and the grassroots campaigns to public institutions, international organisations, independent monitoring bodies, academia and wider civil society.

All outputs are connected and mutually reinforcing. The results of the NIS assessments (output 1) and the comprehensive public online database (output 2) will provide for concrete inputs to the advocacy campaign (output 4) which will also serve to strengthen partnerships of CSOs, local citizens groups and initiatives at the local level and regionally (output 3).

RISKS

The main risks and mitigation strategies associated with the implementation of the action are:

Risk 1: Stakeholders are not willing to participate and/or provide substantive inputs to the NIS assessments.

The lack of interest or refusal of relevant stakeholders to contribute to the NIS assessments will affect the implementation of the NIS assessment. However, it will also provide evidence for the analysis and feed the proposals, thus not compromising the overall implementation of the action. In addition, as a mitigating measure relevant stakeholders, including public institutions, will be associated from the outset of the action.

Risk 2: Citizens' low turnout in the advocacy campaign and CSOs/networks

This will be addressed by identifying also non-controversial, win-win topics to incorporate into the advocacy campaign and CSOs/networks. Additionally, cooperation with CSOs, investigative journalists, and relevant stakeholders will contribute to achieve the expected outputs and objectives of the action. Cooperation at the regional level will also foster the motivation to participate in the activities envisioned by the action.

CONDITIONS FOR IMPLEMENTATION

The targeted IPA II beneficiaries should allow and to the extent possible enable the effective implementation of this action by contributing to the NIS assessments and participating to fora and events where the findings are to be discussed.

3. IMPLEMENTATION ARRANGEMENTS

ROLES AND RESPONSIBILITIES

The action will be implemented by Transparency International (TI), represented by the Transparency International Secretariat (TI-S). Transparency International is acknowledged as a global coalition against corruption with well-established and recognised research capacities. Through its network of affiliated entities (TI Chapters) in Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Turkey (and Serbia), TI is uniquely placed to implement activities in the targeted IPA II beneficiaries on anti-corruption involving both authorities and civil society.¹³ TI-S will attribute two sub-grants to two local non-governmental organisations to cover for activities implemented in Albania.

¹³ Transparency International has 100 so-called "national chapters" that represent their field offices in its areas of intervention. For this action, 5 TI chapters will be engaged.

To ensure effective implementation of the action, periodic project meetings and workshops with all the implementers of the action will be organised. Regular meetings with the European Commission to discuss progress of the action and its challenges will be organised at least once a year.

METHOD(S) OF IMPLEMENTATION AND TYPE(S) OF FINANCING (SEE ANNEX IMPLEMENTATION – BUDGET)

This action will be implemented in direct management through a grant with Transparency International. The indicative duration of the contract will be 36 months.

4. PERFORMANCE MEASUREMENT

METHODOLOGY FOR MONITORING (AND EVALUATION)

Having regard to the importance of the action, a mid-term and ex-post evaluations will be carried out for this action or its components via independent consultants contracted by the implementing partner.

In case a mid-term evaluation is foreseen: it will be carried out for learning purposes, in particular with respect to extracting knowledge on the progress of implementation and challenges and learnings from execution approaches.

In case a final or ex-post evaluation is foreseen: it will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that new knowledge and a full-fledged advocacy campaigns will be produced through this action.

The evaluation reports shall be shared with the implementing partner and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate jointly decide on the follow-up actions to be taken and any adjustments necessary.

The evaluations should be carried out following the Directorate-General for Neighbourhood and Enlargement Negotiations guidelines on linking planning/programming, monitoring and evaluation¹⁴. It is recommended that a Reference Group comprising the key stakeholders of this action be set up to steer the evaluation process and ensure the required quality level of the evaluation outputs as well as the proper follow-up of the recommendations of the evaluation.

In addition, the action might be subject to external monitoring in line with the European Commission rules and procedures.

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process and part of the implementing partner's responsibilities.

5. CROSS-CUTTING ISSUES

GENDER MAINSTREAMING

The action will, to the extent possible, aim to promote gender equality in all its activities. In addition, women's organisations will be invited to participate in the action from its outset, in order to ensure that the needs and concerns specific to girls and women are considered throughout its design and

¹⁴ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/near_guidelines.zip

implementation. Particular attention will be placed in investigating stories and developing campaign tools depicting and telling stories of girls and women linked to corruption. Through cooperation with women's organisations, the action will produce proposals which take into account the need for greater inclusion of women in policy debate and their greater engagement in decision-making processes.

EQUAL OPPORTUNITIES

The action will encourage equal participation of stakeholders at various stages of the design and implementation. In detail, human rights CSOs representing a broad spectrum of crosscutting issues and a diversity of voices (e.g. persons with disabilities, women's rights, minorities, young people, LGBTIQ persons) will be identified and included in the NIS assessment and advocacy efforts.

Citizens' participation will be ensured through different channels including, among others, the strengthening of networks of CSOs across sectors that will advocate on preventing, reporting and fighting against corruption. In these platforms, the action will ensure a balanced participation of women and men. Research products and consultations will be made available in multiple languages, as per the local context, to ensure an inclusive environment and equal opportunities for engagement.

MINORITIES AND VULNERABLE GROUPS

Roma and LGBTIQ organisations from relevant IPA II beneficiaries will be engaged in the promotion of the NIS assessment findings at the local level, as well as organisations representing other ethnic majority communities. The action will support their advocacy engagement including through giving visibility to their activities on social media.

ENGAGEMENT WITH CIVIL SOCIETY (AND IF RELEVANT OTHER NON-STATE STAKEHOLDERS)

Substantial consultations, coordination and joint work between the implementing partner and local CSOs at the local and regional level are foreseen throughout the implementation of the action, as one of the key aims of the action is to strengthen the capacity and influence of CSOs to advocate on issues of public integrity jointly.

Furthermore, the action will aim to build and strengthen CSOs coordination on anti-corruption and public integrity at a regional level by engaging with relevant counterparts and strengthening existing actors.

Additional CSOs and independent media will be engaged in the advocacy campaign including through regional online campaigns, workshops, conferences and media outreach.

ENVIRONMENT AND CLIMATE CHANGE (AND IF RELEVANT DISASTER RESILIENCE)

There is no direct link to the EU environmental *acquis*. However, the action might have an impact on the environment and climate change including through increased emissions as a result of air travel and other means of transport to carry out research consultations and advocacy efforts such as workshops, conferences and other meetings. Furthermore, the printing and distribution of reports may also contribute to increased paper waste. As a result, the action will attempt to minimize its carbon footprint by encouraging virtual collaboration and usage of shared online platforms where appropriate, secure and available. When air travel is deemed necessary, carbon offset payments for air travel will be encouraged and supported. Furthermore, the action will principally focus on producing and disseminating electronic versions of reports, and only printing when necessary in order to reduce paper waste.

Climate action relevant budget allocation: EUR 0 million
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6. SUSTAINABILITY

Sustainability has been mainstreamed in the action design and is a key outcome to be achieved. It is fully expected that the benefits provided by the action will continue to support improved results following the completion of the action.

To promote the sustainability of the action, the stakeholders directly involved in increased anti-corruption action, i.e. authorities in a wide sense but also CSOs, media etc. will be directly involved in the implementation of the action. By engaging with public institutions in targeted IPA II beneficiaries, the action will create the opportunity for building consensus around the proposals and provide guidance to policy makers on key issues related to transparency, accountability and integrity, thus supporting policy level sustainability.

The database on cases of corruption, the strengthening of actors and support to campaign activities will empower local actors including media to carry out anti-corruption work themselves. This will yield benefits not only in the short-term but also in the longer perspective and will contribute to the sustainability of the action.

7. COMMUNICATION AND VISIBILITY

Communication and visibility will be given high importance during the implementation of the action. The implementation of the communication activities shall be funded from the amounts allocated to the action.

All necessary measures will be taken to publicise the fact that the action has received funding from the EU in line with the EU communication and visibility requirements in force. All stakeholders and implementing partners shall ensure the visibility of EU financial assistance provided through IPA II throughout all phases of the programme cycle.

Visibility and communication actions shall demonstrate how the intervention contributes to the agreed programme objectives, as well as the benefits of the action for the general public. Actions shall be aimed at strengthening general public awareness and support of interventions financed and the objectives pursued. The actions shall aim at highlighting to the relevant target audiences the added value and impact of the EU's interventions and will promote transparency and accountability on the use of funds.

Visibility and communication aspects shall be complementary to the activities implemented by the Directorate-General for Neighbourhood and Enlargement Negotiations and the EU Delegations/Office in the field. It is the responsibility of the implementing partner(s) to keep the EU Delegations/Office and the European Commission fully informed of the planning and implementation of the specific visibility and communication activities.