



ANNEX 1

of the Commission Implementing Decision on the Special Measure 2016 for Anti-Corruption and Support to Key Reforms in favour of Ukraine

Action Document for EU Anti-Corruption Initiative in Ukraine

1. Title/basic act/ CRIS number	<u>EU Anti-Corruption Initiative in Ukraine</u> CRIS number: ENI/2016/039-657 financed under European Neighbourhood Instrument			
2. Zone benefiting from the action/location	Ukraine The action shall be carried out at the following location: Ukraine – nationwide, the project team will be based in Kyiv			
3. Programming document	Not applicable (It is a Special Measure)			
4. Sector of concentration/ thematic area	Good Governance, Rule of Law, Fight against Corruption	DEV. Aid: NO		
5. Amounts concerned	Total estimated cost: EUR 16.34 million Total amount of EU budget contribution EUR 15 million This action is co-financed in joint co-financing by Denmark for an amount of EUR 1.34 million			
6. Aid modality(ies) and implementation modality(ies)	Project Modality Indirect management with the Ministry of Foreign Affairs of Denmark (DANIDA) Direct management – procurement of services			
7 a) DAC code(s)	15113, 25010			
b) Main Delivery Channel	1.10000 PUBLIC SECTOR INSTITUTIONS			
8. Markers (from CRIS 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)	x	<input type="checkbox"/>	<input type="checkbox"/>
	Trade Development	<input type="checkbox"/>	x	<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"/>
9. Global Public Goods and Challenges (GPGC) thematic flagship	N/A			

SUMMARY

Two years ago the fight against corruption was declared to be one of the key political priorities of the new Ukrainian Government but has so far produced only limited tangible results. Since 2014, a comprehensive legal framework in line with European Standards has been adopted which notably foresees the creation of new anti-corruption institutions. However, the actual implementation of that framework and the establishment of the new institutions proved to be more difficult than expected due to resistance from vested interests, scarce financial allocations from the Central Government and limited experience. Parliamentary oversight is weak. Civil Society and the media play an important role but have limited resources.

The continued pervasiveness of corruption is detrimental to the investment climate, hinders the economic recovery of the country and erodes public trust in the state institutions and the political leadership. Moreover, the Ukrainian population is increasingly frustrated because it perceives that the fundamentals facets of the corrupt old system have not changed. In order to help translate the political priorities into tangible results, it is necessary to provide substantial technical and financial support to empower the new anti-corruption institutions and other relevant stakeholders to effectively carry out their work and to strengthen the external oversight over the reform process by Parliament, civil society and the media.

The proposed initiative will build on the successful features of the EU’s existing support while significantly stepping up EU assistance to anti-corruption reforms. It intends to establish a visible “one stop shop” support centre for a wide range of stakeholders involved in the fight against corruption in Ukraine. It will be able to provide a large variety of support – expertise, training, testing of personnel, IT supplies and equipment as well as additional funding opportunities for civil society – from a single source in a flexible and speedy manner. It will enhance donor coordination in the sector and increase synergies within the international donor community. Such increased EU support will not only contribute to the fight against corruption but also be an important signal to civil society and the Ukrainian public at large that the EU stands behind its demands for real reforms in this area.

Three areas of support are envisaged:

- **strengthening capacity to prevent and fight corruption** and bring corruption cases to justice. Direct beneficiaries are the newly created anti-corruption bodies (National Anti-Corruption Bureau, Specialised Anti-Corruption Prosecution Office, National Agency for Corruption Prevention, Asset Recovery and Management Office) and other relevant stakeholders;

- **enhancing parliamentary oversight** over reform implementation and parliamentary capacity to scrutinise and improve the strategic and legislative framework, including, as appropriate, the creation of an international advisory council to the Rada's Anti-Corruption Committee;

- **strengthening the involvement of civil society and the media in anti-corruption initiatives**, in particular by supporting awareness-raising and advocacy campaigns, analysis and research, monitoring of anti-corruption policies, media scrutiny into corruption cases, and investigative journalism. The programme will also implement, ideally with Civil Society Organisations, a number of anti-corruption pilot projects at local level (“Clean city projects”). These pilot projects would implement a broad range of anti-corruption tools and measures in a concentrated fashion and in a limited geographical area – towns or cities where local authorities are politically backing real change, thereby demonstrating that change is possible if conditions are right. Successful elements of these pilot projects could then be rolled out across the country.

This initiative will be implemented by the Ministry of Foreign Affairs of Denmark (DANIDA), which is already present in the country with an anti-corruption initiative together with UNDP, and will avail itself of the experience and expertise of EU Member States to deliver prompt solutions for multiple beneficiaries.

1 CONTEXT

Ever since the change of government in spring 2014, combatting corruption has become a top priority in the Ukrainian reform programme. A comprehensive new legal framework largely complying with European standards was adopted between October 2014 and October 2015. It provided for the establishment of new anti-corruption bodies such as the National Anti-Corruption Bureau, the Specialised Anti-Corruption Prosecution Office and the National Agency for Prevention of Corruption as well as for new mechanisms to fight corruption, such as an electronic system for asset declarations. A substantial contribution to this achievement was made by the pressure of an active civil society and strong international engagement. In particular the policy dialogue conducted with the EU in the framework of the Visa Liberalisation Action Plan (VLAP) has been highly instrumental.

Despite unprecedented efforts, there is still little progress when it comes to the actual repression of corruption and none of the serious criminal acts conducted under the former leadership have so far been successfully brought to justice. Recruitment for the new anti-corruption institutions was carried out transparently and successfully and resulted in the selection of competent staff, but also suffered from significant delays. The e-asset declaration system is not yet operational. Vested interests of the old and often corrupt bureaucracy in the judicial institutions in connivance with political forces linked to the monopolistic power structures in industry and business are a major source of resistance to these changes and persistently attempt to backslide the legislative framework. The continued pervasiveness of

corruption in Ukraine imposes significant economic costs on businesses, discourages domestic and foreign investment and stifles the much needed economic recovery of the country. The lack of real progress in the fight against corruption also leads to growing frustration and cynicism in the Ukrainian public which perceives that the fundamentals of the old corrupt system remain unchanged. This undermines public trust in the democratic institutions and weakens the legitimacy of the political leadership.

In order to help Ukraine translate its political priorities into tangible results, it is important to maintain and intensify the EU's support to Ukraine's advancing but still nascent anti-corruption reforms. As the different anti-corruption institutions are becoming operational there is an urgent need for enhanced support to capacity building that will allow them to quickly deliver concrete results. It is also necessary to strengthen the capacity of the Parliament to monitor the reforms as well as to reinforce the key role which civil society and the media are playing in this area. At the same time, the reform commitments requested from Ukraine in exchange for EU support, visa liberalisation and preferential access to EU markets, remain a powerful instrument to foster progress in the fight against corruption.

1.1.1 Public Policy Assessment and EU Policy Framework

For many years, Ukraine failed to implement effective measures and policies to curb corruption which is reflected in low scores for Ukraine in the key international corruption-related ratings¹.

Ukraine became member of the GRECO (Council of Europe's Group of States against Corruption) in 2006 after the Council of Europe Civil Law Convention on Corruption was ratified in 2005. In 2006 the Ukrainian parliament ratified the UN Convention against Corruption and the Council of Europe Criminal Law Convention on Corruption which came into force only in 2009 when the so-called first "anti-corruption package of laws" was adopted: the Law on Principles for Preventing and Counteracting Corruption, the Law on the Liability of Legal Persons for Corruption Offences and the Law on Amendments to Certain Legislative Acts of Ukraine regarding the Liability for Corruption Offences. Entering into force of this package was postponed twice and, finally, all three laws were revoked on 21 December 2010.

The EU-Ukraine cooperation Council noted slow progress in the implementation of the international recommendations until 2010. In reaction to the abolition of a package of anti-corruption laws in 2010, the EU introduced in 2011 objectives dealing with anti-corruption legislation and anti-corruption bodies in the **Visa Liberalisation Action Plan (VLAP)**.

After the events of Maidan, Ukraine's vibrant civil society successfully pushed for change. This process was supported by the international community who made financial assistance, closer association and visa-liberalisation conditional upon the adoption and implementation of reforms in this area.

In October 2014 an **Anti-Corruption legislative package**, including a **national strategy** (2014-2017), was adopted in close cooperation with civil society. **An action plan** (state programme) to implement the anti-corruption strategy followed in April 2015. The strategy

¹ In Transparency International's 2015 Corruption Perception Index Ukraine ranked 130 out of 168 countries and scored only one point better than in 2014.

identifies the main problems and required direction of anti-corruption policy in Ukraine, including: creating an effective institutional framework for anti-corruption policy; prevention of corruption in the elected bodies; ensuring integrity in the public service; prevention of corruption in the executive bodies and state owned enterprises, judiciary and law-enforcement bodies; prevention of corruption in public procurement and in the private sector; ensuring public access to information; effective criminalisation of corruption and law-enforcement; and public awareness raising.

The strategy foresees the creation of three new institutions which presents a major breakthrough in the reform of anti-corruption institutions in Ukraine to be checked against further implementation: 1) the National Anti-Corruption Bureau (NABU) in charge of investigating high-level corruption cases 2) the Specialised Anti-Corruption Prosecution Office in charge of prosecuting NABU cases and 3) the National Agency for the Prevention of Corruption (NAPC) in charge of anti-corruption policy development and implementation, anti-corruption screening of draft legal acts, research and training, verifying asset declarations and conflicts of interests of public officials, control of political party finances, whistle-blower protection.

Following the signature of the Association Agreement in 2014, the 2015 EU-Ukraine Association Agenda listed more precise short term priorities, in particular the implementation of the anti-corruption legal package adopted on 14 October 2014 and the setting up and effective functioning of both the National Anti-Corruption Bureau and the National Agency for the Prevention of Corruption:

- *It is important to engage in a comprehensive anti-corruption reform process with tangible results in the prevention and fight against corruption with clear responsibilities allocated to specialised bodies and allocated budget for the implementation of particular actions.*
- *It is equally important to address the prevention and fight against corruption at all levels of society, especially high-level corruption, in law enforcement bodies, customs, and tax-systems, and the transparency of funding through the development of ethical codes and specialised training.*
- *In order to ensure transparency and accountability at all levels, necessary conditions for civil society actors and independent media to monitor corruption should be created.*

In relation to its **international commitments**, Ukraine was recommended to implement its declared intention to fight corruption through following steps: 1) necessary legal changes 2) improved policy co-ordination 3) strengthening of law-enforcement anti-corruption efforts. From the three areas mentioned, significant progress was achieved in the legislative reform while some progress was achieved in policy coordination since the National Reforms Council and the National Council for Anti-Corruption Policy were set up and held first meetings. At the same time anti-corruption efforts in the area of law enforcement are yet to bring results since new institutions were only set up recently, while the old ones still need to complete their reorganisation.

Progress in implementing anti-corruption reforms is monitored by the **National Reform Council** (NRC) which publishes a track-record of reform tasks achieved per any given year. The NRC concluded that in 2015, progress was made on 59% of the tasks foreseen for that year but that significant delays had been encountered with the establishment of the National Agency for the Prevention of Corruption and related tasks, notably the system of e-asset declaration. The NRC also publishes the '**Anti-corruption Reform passport**', a brief annual

review based on a number of key strategic documents, including the Association Agreement between the EU and Ukraine and the Ukraine–IMF Memorandum. The passport was elaborated by the Anti-Corruption Reforms Task Force, a working group consisting of Government and donor representatives and focuses on the following goals: Effective mechanisms for prevention of corruption are established in public and private sectors; inevitability of responsibility and punishment for corruption is ensured; and the society professes "zero tolerance" to corruption.

Following five years of VLAP implementation, the significant legislative and institutional changes that took place allowed the European Commission to issue a positive assessment of the fulfilment by Ukraine of VLAP benchmarks fulfilment in April 2016.

Priorities 3 and 7 of the EU Roadmap for Engagement with Civil Society focus on support to CSOs for their engagement in anti-corruption work.

1.1.2 Stakeholder analysis

Following the main international commitments and the adoption of the national anti-corruption strategy, the institutional renewal started with the formation of a number of new bodies. Most of these institutions are in the process of being established and becoming operational, thus their capacities are as yet under-developed. The **National Anti-Corruption Bureau (NABU)** is a law enforcement body created in April 2015 following international recommendations to set up an independent law-enforcement agency dealing with high-level corruption cases. NABU started to be fully operational in December 2015 following the appointment of the head of the specialised anti-corruption prosecution office that is in charge of formally opening investigations and bringing high-level corruption cases to court. The NABU is tasked with investigating corruption involving high-ranking public or local government officials. The Bureau is managed by a Director appointed by the President of Ukraine upon the recommendation of the selection board for a seven-year period. Around 170 detectives will do investigative work. Two regional offices will be created in Lviv and Odessa. The NABU is formally a state law enforcement authority, not subordinated to the Government. A number of guarantees are included in the law to secure its independent functioning.

The **Specialised Anti-Corruption Prosecution Office, (SACPO)** was established in November 2015 with the appointment of its head and his deputy. The SACPO is responsible for opening investigations by NABU into high level corruption cases and for bringing these cases to court. The SACPO is formally part of the Public Prosecutor's Office but a number of safeguards ensuring its independence, especially its protection against arbitrary dismissal by the Prosecutor General, were introduced following the latest VLAP recommendations. So far, more than 50 investigations into high-level corruption have been initiated.

According to the Law that entered into force in April 2015, the **National Agency for the Prevention of Corruption (NAPC)** will take over from the Ministry of Justice the function of co-ordinator of the anti-corruption policy in Ukraine. The NAPC is responsible for the development and the implementation of the anti-corruption policy, monitoring the lifestyle of public officials, verifying declarations of assets and conflicts of interest of all public officials Ukraine-wide and for managing a system for electronic asset declarations, which is currently being developed under the auspices of the Ministry of Justice, albeit with significant delay. The Agency is also in charge of controlling political party funding and ensuring whistle

blower protection. The Agency will have about 300 staff located predominantly in Kyiv as well as four regional offices. The NACP has a collegiate leadership of 5 members –the selection of the last member is yet to be finalised. Preparatory work for setting up the Agency is ongoing and it is expected that NACP will become operational, with 1/3 of staff recruited, by July 2016.

The National Asset Recovery and Management Office (ARMO). The Law establishing the ARMO will come into force on June 11, 2016. The law sets up mechanisms for identifying, tracing and managing of tracing of assets derived from corruption and other crime, and provides for the establishment of an independent authority to carry out such activities. The adoption of the ARMO legislation is one of the crucial indicators of implementation by Ukraine of the VLAP. In addition, laws passed in December 2015 provide for respective amendments to the Criminal Procedure Code, Criminal Code and Civil Code with respect to streamlining seizure and special confiscation mechanisms. In addition, an electronic register for assets seized in criminal proceedings will need to be created and cooperation of the Ukrainian ARMO with its counterparts in other countries be established.

The State Bureau of Investigations (SBI) is a law enforcement agency expected to be established with the aim of preventing, detecting, combatting and solving crimes. Its remit includes investigating corruption-related offences committed by officials holding positions of high responsibility, certain categories of civil servants, judges and law enforcement officers, NABU officials and SACPO prosecutors with the exception of cases falling within the competence of the NABU.

Possible specialised anti-corruption courts– the new law on the judiciary and the status of judges adopted on 2 June 2016 foresees the possibility of creating specialised anti-corruption courts. The law reflects discussions between the Ukrainian authorities, civil society representatives and international donors. The necessity to guarantee a fair trial of corruption cases is key for the success of bringing offenders to justice.

The anti-corruption policy oversight, coordination and monitoring bodies include:

The Verkhovna Rada's Anti-Corruption Committee. In addition to its responsibility over the legislation on certain aspects of corruption and on the anti-corruption institutions, the committee is tasked with monitoring the overall implementation of anti-corruption reforms by the government as well as the anti-corruption “screening” of draft laws. The Committee’s leadership plans to establish an advisory council, composed of international experts, which would assist the Committee in its monitoring work and check compliance of proposed legislation and/or amendments tabled in the Rada with European and international standards and best practices.

The National Council for Anti-Corruption Policy is an advisory body under the President of Ukraine created in the context of the VLAP policy dialogue. Its duties consist of updating and improving the Anti-Corruption Strategy, monitoring of the corruption prevention and counteraction situation within Ukraine and improving coordination and cooperation among entities engaged in the implementation of anti-corruption reform. The Council is made up of government officials, community leaders and representatives of businesses.

The National Reforms Council (NRC) was established as a high-level reform coordination and monitoring body determining government reform priorities, making political decisions on

the content of reforms and coordinate the reform process. Members of the Council are national key policy makers: the President, the Prime Minister, the Chairman of the Verkhovna Rada, Ministers, Chairs of Parliamentary Committees, and four civil society representatives. In addition, NRC meetings are regularly attended by leaders of parliamentary coalition's factions, representatives of business associations and heads of other government authorities who are invited depending on the meeting agenda.

Other relevant bodies:

The State Financial Monitoring Service of Ukraine (SFMS) is Ukraine's Financial Intelligence Unit responsible for collecting, analysing and disseminating information regarding potential money laundering and suspected proceeds of crime. The SFMS therefore plays an important role in identifying possible financial crimes, including corruption.

The Public Prosecutor's Office (PPO) is responsible for opening criminal investigations and bringing cases to court. The 2014 Law on the PPO creates the legal framework for turning the old "procuratura" into a prosecution office compliant with European standards. However, the re-evaluation and renewal of the prosecutorial corps has so far not moved beyond the local level. It remains to be seen how the plans of the new Prosecutor General, appointed in May 2016, to reform the institution will be translated into action. As of April 2017, the selection, promotion and disciplinary sanctioning of prosecutors will be the responsibility of newly created self-governance bodies, notably the Qualification and Disciplinary Commission. The **Ministry of Economy, Development and Trade** is inter alia responsible for policy development and implementation in the area of public procurement. The public procurement process is particularly prone to corruption and the Ministry strives to put in place a system which will eliminate or at least significantly reduce the possibilities for corruption in the process. While the department is already supported by an existing EU project, this project may not cover all the needs in this area. **Investigative journalists/media** play an important role in uncovering corruption schemes, thereby compensating to some extent the lack of investigation into high-level corruption by law enforcement bodies. Print media also regularly publish reports by investigative journalists. However, journalists face significant obstacles in their investigative work, including financial, considering that proper research takes a long time and requires significant effort and expertise.

Civil Society Organisations (CSOs) play a key role in the reform process. Many of the laws adopted as part of the anti-corruption package in October 2014, were prepared with contribution of non-governmental organisations (NGOs), supported by donor funding. CSOs are also very active in advocating anti-corruption reforms in the country and monitoring how the adopted legislation is implemented in practice.

1.1.3 Priority areas for support/problem analysis

The dramatic events of the winter of 2013-2014 in Ukraine significantly affected the country's anti-corruption policy. The widespread corruption was one of the main reasons that instigated the mass demonstrations leading to the change of the government of the country. All political leaders pledged to eradicate corruption. However, although there are promising signs, notably with regard to the renewal of the anti-corruption institutional landscape, the implementation of the legislation is yet to bring results. The setup of new anti-corruption institutions in line with European and international norms and best practices may pave the way to a success story in the fight against corruption. It is crucial to fill all gaps in this course

by providing the necessary expertise, technical and political support to the main stakeholders such as the anti-corruption institutions, the Parliament, civil society and the media.

Issues to be addressed were identified as follows:

a) Weak operational capacities of anti-corruption institutions

Most of the anti-corruption institutions are yet to become fully operational. There is a lack of expertise, experience, exposure to international best practices, financial means and technical equipment which hampered the quick building-up of efficient operational capacities of those bodies. It is of utmost importance to support these new bodies so that they become new, effective and independent institutions which are trusted by the public and following the best EU and international standards and practices. Capacity of existing institutions to prevent and fight corruption also needs to be strengthened. Moreover, given the number of new actors in the sector, particular attention will need to be given to the proper coordination of their activities and the effective delineation of their respective competences.

b) Insufficient use of modern technologies and IT solutions by public bodies

Administrative processes in Ukraine institutions tend to be bureaucratic and paper-based. Modernisation of hardware and software is needed. The use of e-governance principles and methods is yet to be explored and implemented. In addition, the investigation of complex corruption cases or the verification of asset declarations cannot be efficiently carried out without the use of modern IT solutions and equipment. It is therefore essential to be able to provide stakeholders with the necessary expertise and supplies in order to allow them to effectively carry out their work.

c) Attempts to hamper reforms by antireformist forces/vested interests

Initiatives in creating necessary legal, regulatory and institutional framework as well as its enforcement face fierce resistance from anti-reformist forces. In order to facilitate progress, constant attention and pressure from civil society, media and international stakeholders is needed. The technical character of some of the issues at stake requires provision of experts’ analysis within a short-time frame. It is therefore essential to strengthen stakeholders that are monitoring the Government's reform progress and can exert political pressure to continue the reform process. Support to monitoring, awareness raising and investigation activities by civil society and independent media will play an important role in this respect. Strengthening over parliamentary oversight over of the implementation of anti-corruption reforms would also help addressing this issue.

d) Dispersed and ineffective public communication on reform implementation

There is no effective mechanism in place to ensure that actual progress on the implementation of reforms can be properly communicated to the general public, thereby reassuring the population that things are moving forward. Currently, the (limited) results are only communicated in a dispersed manner by the institutions themselves. Government institutions need support with the development of a public communication strategy on anti-corruption and the design of specific communication campaigns to help individual stakeholders to report about reform implementation in a more effective and coordinated manner.

2 RISKS AND ASSUMPTIONS

Risks	Risk	Mitigating measures
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	level (H/M/L)	
Lack of cooperation from the side of the beneficiaries	L	Continued policy dialogue, involvement of the beneficiaries in the preparation of the support to be provided by the initiative.
Potential decreased in the funding of the Government to the institutions supported by donors	M	Ensure that the programme does not fund recurrent costs, e.g. salaries of institution staff, but only one-time expenses.
Political resistances to the overall progress in anti-corruption reforms	H	Use of political dialogue in the framework of the Association Agreement and post-VLAP monitoring, reinforcing political pressure by formulating appropriate conditions under future Macro-Financial Assistance and possible sector budget support programmes; enhanced coordination of anti-corruption related conditionalities with the IMF; Coordination of common approaches with civil society, pro-reformist Ukrainian stakeholders and international donors.
Discrediting of project's initiatives/instrumentalisation of expertise/reputational risk	M-H	Focus on communication and proper visibility of the initiative; ensure close follow-up of project activities by the Steering committee to allow for adequate consequences if support is politically instrumentalised.
Assumptions		
<ul style="list-style-type: none"> ✓ The Government of Ukraine remains committed to support the action and the overall anti-corruption reform. ✓ The Government of Ukraine creates the remaining agencies to be supported (ARO/AMO) and ensures that the existing ones remain operational, notably by continuing to allocate them an appropriate budget, premises and sufficient staff (NAPC, NABU, SAPO). ✓ The Verkhovna Rada formally establishes the Parliamentary Advisory Council. 		

3 LESSONS LEARNT, COMPLEMENTARITY AND CROSS-CUTTING ISSUES

3.1 Lessons learnt

The EU contributed significantly to the adoption of new anti-corruption legislation and establishment of new anti-corruption bodies. An important impulse to this process was given by the Visa-Liberalisation Process which established stringent benchmarks, notably in the area of anti-corruption, to obtain a visa-free regime for Ukrainian citizens. The EU's financial assistance – the third Macro-Financial Assistance programme and the State Building Contract – reinforced the political pressure by establishing similar corruption-related conditions. A major technical assistance project targeting judicial reforms including anti-corruption ensured that the necessary expertise was provided to the nascent institutions and the legislator. The

proposed action should build on the successful features of existing initiatives while avoiding their shortcomings.

a) Need for a substantial, more comprehensive and flexible support programme

Existing support programmes, both of the EU and of other donors, in the area of anti-corruption created both the risk of overlap and of support gaps. Beneficiaries were sometimes overwhelmed by the plethora of assistance offers but often disenchanted by the complexity of the establishment of support programmes which make it impossible or excessively cumbersome to cover certain needs at a short notice, notably as regards the provision of IT solutions and equipment. As a result, beneficiaries often multiplied the same requests for support to the entire donor community, leading to a loss of efficiency, potential "competition" among donors as well as unnecessary resources spent on organising the same support in parallel with other donors and on intensive coordination among donors to avoid overlaps. Consequently, there is a need for a "one-stop-shop" support centre which is able to provide a wide variety of support modalities to a wide range of beneficiaries, and which is both sufficiently present and flexible to allow organising support quickly, thus diminishing the incentive for beneficiaries to apply simultaneously to various donors. Moreover, where the fight against corruption was only a component of a larger programme, resources allocated to this component were limited, thereby limiting the projects' ability to support several more large-scale initiatives simultaneously, such as expert-intensive mentoring programmes or larger-scale training programmes abroad. A new substantial programme, exclusively dedicated to anti-corruption, would not suffer from these constraints. Thirdly, although donor coordination has already improved a lot since 2014, there is still room for further enhancing it and reducing overlap. The size and one-stop-shop approach of the project would not only allow to offer a very wide range of expertise but also make it an ideal candidate for enhancing donor coordination and cooperation in this area. Finally, it is likely to attract smaller donors to closely cooperate with the one-stop-shop support centre.

b) Need for continued political pressure to ensure continued progress of reforms

The Visa-Liberalisation Process has been acknowledged as a very powerful tool to bring about change in the area of anti-corruption despite strong resistance from vested interests. Since this process is coming to an end, it will be crucial to ensure that the proposed action is flanked and accompanied by appropriate political pressure to ensure that reforms continue to move in the right direction and prevent a possible backslide. It will be important to include appropriate anti-corruption conditionalities in a possible future EU assistance programme. Improved coordination with other IFIs, in particular the IMF and the World Bank, would increase the political leverage of the EU.

3.2 Complementarity, synergy and donor coordination

Donors active in the area of anti-corruption meet regularly and have a good level of awareness of what the others are doing. This initiative is expected to take donor coordination to a further level and work together with each institution based on its capacity building plan and turn the current supply driven approach into one which better responds to the demands and requirements of respective institutions.

In order to ensure a unified EU approach to providing assistance to anti-corruption, the proposed action will closely coordinate with the anti-corruption experts of the EU Advisory Mission as well as with the EU funded projects implemented by Council of Europe.

3.1.1 EU Support

The current EU support to anti-corruption reforms consists of both, budget support and technical assistance projects. The EU's main vehicle to provide technical assistance to the institutions involved in fighting corruption is running out by the end of 2016. In addition to the measures listed below, the EU supports anti-corruption reform through sectoral initiatives such as with the European Union Border Assistance Mission and the Twinning with the State Fiscal Service addressing integrity in the customs/State Fiscal Service, as well as specific initiatives on deregulation, public procurement, decentralisation (U-LEAD), financial services and energy. Anti-corruption activities are also supported via grants for civil society organisations.

The State Building Contract (EUR 355 million) was developed immediately in early 2014 and provided a framework for policy dialogue between the EU and the Ukrainian authorities on key reform areas, in particular anti-corruption. It comprised EUR 355 million non-reimbursable financial support subject to achievement of specific benchmarks including the creation of an anti-corruption investigative bureau, a mechanism for checking e-declarations in order to prevent potential corruption, actions to be taken against 'illicit enrichment', improved competition and transparency in public procurement and increased access to public information. Given delays in implementation the implementation period was extended for a year until autumn 2016.

Support to Justice Sector Reforms Project, EUR 8.6 million, (2013-2016). Implemented by a consortium of EU Member States led by Justice Coopération Internationale (France). The project helped to develop the Justice Sector Reform Strategy and Action Plan 2015-2020 and provides expert assistance needed for the plans' timely implementation. One out of six components consists in provision of support to anti-corruption activities. Organizational support is being provided, as well as embedded long term expertise and short term experts for ad hoc needs. The project had an important role in the preparation of the anti-corruption legislation, the setup of the new agencies and the trainings provided to the Anti-corruption Bureau.

EU Advisory Mission (EUAM): Established in July 2014 with the mandate to provide strategic advice to Ukraine's civilian security sector; the Mission's current mandate runs until November 2017. EUAM's main focus is on the reform of the law enforcement agencies, notably the police. As a cross-cutting issue, support to anti-corruption reform is part of EUAM's activities with experts providing strategic advice and capacity building activities, notably training, to Anti-corruption Institutions (NABU, SAPO, NAPC) as well as the Prosecution Office and the judiciary.

Council of Europe Programmatic Cooperation Framework (PCF) – Fight against corruption component (EUR 1 million, 2015-2017): The PCF programme is a regional programme of a total of EUR 30 million which provides assistance to the Eastern Partnership countries in the field of human rights, justice, rule of law, information society and democratic governance. A specific component on the Fight against Corruption of EUR 1 million, is

included supporting NABU, SACPO and NACP through trainings, experience exchange, expert advice and review of legislation.

Macro Financial assistance, EUR 1.8 billion, disbursable in three tranches, the first of which was released on 22 July 2015. The disbursement of the remaining two tranches is conditional on the implementation of a number of reforms, including in the anti-corruption field.

3.1.2 Other donors' support

United States of America: several projects to support rule of law reform (total 52 million for the period 2015-2020), The USA are providing support (capacity building and equipment) to NABU, SACPO and the Public Prosecutor's office, support to civil society, to rule of law reforms and the introduction of e-governance.

United Kingdom's Department for International Development (DFID; EUR 10 million in the area of rule of law): In the scope of a large Rule of Law Programme, the UK provides support to NABU (support to setting up NABU, its setting up training and capacity building (embedded financial investigator), communication strategy and IT solutions).

Denmark/United Nations Development Programme (UNDP, EUR 3.7 million – until 2018): Denmark provides support to establishing the NACP (development of regulations, SOPs, guidelines, capacity building of staff); asset declaration database set-up (software development).

The World Bank – supported the development of Terms of Reference for the establishment of the asset-declaration database.

Canada: The Canadian EDGE project assisted the establishment of NABU, notably through the secondment (until end 2015) of a resident advisor on capacity and institution building as well as by providing office furniture.

The Organisation for Economic Cooperation and Development (OECD, total EUR 1.2 million): This country-specific project aims to strengthen the legal and institutional capacity to effectively detect, investigate and prosecute high-profile and complex corruption in Ukraine. Support is provided to NABU and SACPO through training and capacity building as well as the future ARO/AMO through assistance in establishing unified database of confiscated assets.

The new programme would complement the existing donor landscape. It would come in after the end of the existing Justice Sector Reform Programme, thereby being the only major EU technical assistance initiative in the area of anti-corruption. It would also be one of the few donor programmes to provide not only expert advice but also supplies, notably IT solutions.

Considering the significant support provided by donors to the anti-corruption area, enhanced needs of donor coordination arise. Beneficiary-led donor coordination covering the whole anti-corruption spectrum is challenging considering the independent nature of many institutions as well as the involvement of civil society, media and Parliament. In this respect, it is proposed that this sizeable initiative will also provide a platform to coordinate donors in the anti-corruption area, and gather the various institutions together on a regular basis.

3.3 Cross-cutting issues

Good governance: this action will envisage specific measures aimed at improving the fight against corruption, minimising opportunities for misuse of power and public funds.

Human rights and the rule of law: increased knowledge of EU standards and practices will raise democratic standards, involvement of civil society organisations will be a guarantee for an efficient and stable surveillance of the reform progress in the area covered by this action.

Other issues: in implementation of this Action attention will be paid to ensure *equal opportunities* and *gender equality*. Given the links between gender inequality and corruption, the particular needs for technical assistance to establish or strengthen mechanisms to advance gender quality and women's empowerment in the fight against corruption will be identified during the programme's inception phase.

4 DESCRIPTION OF THE ACTION

4.1 Objectives/results

This programme is relevant for the Agenda 2030. It contributes primarily to the progressive achievement of SDG targets Nr 16, 16.5, 16.6 and 16.a².

The **overall objective** of the programme is to improve the implementation of anti-corruption policy in Ukraine, thereby ultimately contributing to a reduction in corruption.

The **specific objectives** (SOs) are to:

- 1) Strengthen the operational and policy-making capacities of state institutions dealing with the prevention and the fight against corruption as well as the integrity of personnel of other justice sector institutions, in line with international norms and the best European practices;
- 2) Strengthen the Parliament's oversight of the reform implementation and its capacity to scrutinise and improve the strategic and legislative framework;
- 3) Enhance the capacity of civil society and media to contribute in fighting against corruption.

Results

Under SO1)

1.1 Newly created institutions function effectively, professionally and independently with trained personnel on best European practices; staff integrity of other relevant institutions improved;

1.2 Improved capacity of the judiciary to adjudicate corruption cases in an independent and impartial manner;

² Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

Goal 16.5 Substantially reduce corruption and bribery in all their forms.

Goal 16.6 Develop effective, accountable and transparent institutions at all levels.

Goal 16.a Strengthen relevant national institutions, including through international cooperation, for building capacity at all levels, in particular in developing countries, to prevent violence and combat terrorism and crime.

Under SO2)

2.1 Improved legal and regulatory framework;

2.2 An efficient oversight mechanism of the Parliament over the implementation of the anti-corruption reform and an enhanced ability to conduct anti-corruption assessments of draft legislation;

Under SO3)

3.1 Improved capacities of CSOs and media in exposing and investigating specific corruption cases;

3.2 Increased awareness of citizens on corruption mechanisms and anti-corruption activities;

3.3 Showcase of successful examples of fight against corruption at local level.

4.2 Main activities

Component 1: Strengthening Ukrainian institutional capacity in preventing and fighting corruption

1.1 Provision of expertise and European and international best practices through

- Trainings, in particular in the form of operational/investigative training ,mentoring and hands-on training including, as appropriate, by facilitating the creation of injoint investigative teams within existing bilateral or multilateral frameworks;

- Support to organisational development and human resources management;

- Analysis and recommendations on the strategic/legislative/regulatory framework, organisational structures and administrative processes, including on the interinstitutional communication and cooperation;

- Advice to the development and implementation of corruption risk analysis and integrity monitoring;

- Support to communication (including between the direct beneficiaries and other Ukrainian public institutions) and outreach activities.

1.2 Facilitation of international cooperation between the relevant Ukrainian anti-corruption/law enforcement authorities and relevant partners, in particular the relevant EU authorities/bodies (The European Anti-Fraud Office OLAF, Europol, Eurojust), authorities from EU Member States and/or neighbouring countries (e.g. Moldova, Georgia);

1.3 Needs analysis on information systems and procurement of agreed IT solutions and surveillance equipment;

1.4 Support of the anti-corruption reform measures in the judiciary, including by providing support to the creation of a new body responsibly for adjudicating corruption cases.

Component 2: Enhancing parliamentary oversight

2.1 Provision of expertise to the Parliament Anti-corruption Committee on the anti-corruption screening of legislative proposals as well as on structures and procedures of the Committee;

2.2. Support, as appropriate, the set up and functioning of an international advisory council for the Rada's Anti-corruption Committee.

Component 3: Strengthened oversight by civil society and the media

3.1 Support CSO activities in awareness raising campaigns, reforms monitoring, public perception and user satisfaction surveys, advocacy campaigns, policy dialogue, procurement/register monitoring, at central as well as at local level;

3.2 Support media activities to investigate specific corruption cases, programmes for investigative journalism, train journalists, provide appropriate analytical tools;

3.3 Launch regional pilot projects ("Clean city"), preferably carried out by Civil Society Organisations, to implement, in a concentrated fashion, a broad range of anti-corruption tools and measures in selected cities where there is strong local political backing for implementing reform in the area of anti-corruption. The pilot projects would support the development and implementation of anti-corruption programmes and innovative initiatives of civil society to visibly reduce corruption at local level (such as external monitoring activities, public procurement and service provision oversight, promotion of transparency and integrity). The exact geographical locations would need to be defined in coordination with the U-LEAD initiative in support of capacity building for decentralisation.

4.3 Intervention logic

This action is expected to contribute to scale up Ukraine's capacities to fight corruption. The programme is divided into three main components in line with the three specific objectives.

Component 1 will enhance the capacity of anti-corruption institutions.

Component 2 will strengthen the Rada's capacity to exercise parliamentary oversight and to hold the Government accountable for progress.

Component 3 will further increase the ability of civil society and the media to act as a watchdog over the reform process, raise public awareness about corruption and expose corruption cases through investigative journalism. Civil society will also be invited to develop innovative ideas for conducting regional/local pilot projects which visibly reduce corruption in a given location.

The proposed action builds on the successful elements of existing EU support in the fight against corruption in Ukraine and other countries in transition. It foresees the set-up of an innovative and flexible instrument that is able to respond on short notice to emerging demands of the new Ukrainian institutions bringing together resources from anti-corruption institutions in EU Member States.

The action intends to be a visible, one-stop support centre for the institutions aiming at fighting against corruption in Ukraine. It intends to be an anti-corruption initiative unprecedented in its comprehensiveness, involving a wide range of stakeholders, aiming to coordinate donors, enhance cooperation between Ukrainian institutions fighting corruption and EU Member States anti-corruption bodies and other international entities. Inputs to be delivered consist of specific short and long term expertise as well as equipment, exchange of experience events, training and analytical activities. Logistical support will contribute to the achievement of the results throughout. The action will take place mostly in Kyiv but also in the regions. It is based on the assumption that there is growing political will to fight against corruption, that institutions concerned will continue to receive the appropriate support from the Government, the Parliamentary advisory council will be supported by the Verhovna Rada

and that more than two years after Euromaidan there is increased awareness in wider society that only by fighting corruption can Ukraine develop further as a modern European state.

5 IMPLEMENTATION

5.1 Financing agreement

In order to implement this action, it is foreseen to conclude a financing agreement with the partner country, referred to in Article 184(2)(b) of Regulation (EU, Euratom) No 966/2012.

5.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 4.2 will be carried out and the corresponding contracts and agreements implemented, is 42 months from the date of entry into force of the financing agreement.

Extensions of the implementation period may be agreed by the Commission's authorising officer responsible by amending this decision and the relevant contracts and agreements; such amendments to this decision constitute technical amendments in the sense of point (i) of Article 2(3)(c) of Regulation (EU) No 236/2014.

5.3 Implementation modalities

5.3.1 Indirect management with the Ministry of Foreign Affairs of Denmark (DANIDA)

This action will be implemented in indirect management with the Ministry of Foreign Affairs of Denmark (DANIDA) in accordance with Article 58(1)(c) of Regulation (EU, Euratom) No 966/2012. This implementation entails the activities described in section 4.2 necessary to reach the objectives and results specified in the section 4.1. This implementation is justified because of:

- the good track record in preventing and fighting corruption of Denmark which scores as 1st in the Transparency International Corruption Perception Index 2015;
- long-standing experience in the successful implementation of EU-funded projects in third countries;
- proven expertise in the implementation of technical assistance projects in the area of good governance and anti-corruption projects,
- proven experience in Ukraine, in particular through its Good Governance program (2015-2018, DKK 60 million), which notably provides support to the establishment of the National Agency for the Prevention of Corruption (with UNDP), criminal justice reform (with the Council of Europe) and the Ombudsperson Office (with UNDP). DANIDA has also supported free media incl. investigative journalism in Ukraine since 2005 and civil society since 2009. Moreover, DANIDA co-finances the upcoming U-LEAD decentralisation programme (approximately DKK 40 million).

DANIDA would involve a number of other EU Member States, in the implementation of the programme and avail itself of their expertise and experience in the anti-corruption area.

The entrusted entity would carry out the following budget-implementation tasks: procurement procedures and conclusion of service and supply contracts, allocation of grants and execution of related payments.

5.4 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility in accordance with Article 9(2)(b) of Regulation (EU) No 236/2014 on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative budget

	EU contribution (amount in EUR million)	Indicative third party contribution (amount in EUR million)
5.3.1. Indirect management with the Ministry of Foreign Affairs of Denmark (DANIDA)	14.5	1.34
5.8 Evaluation and 5.9 Audit	0.5	
Totals	15	1.34

5.6 Organisational set-up and responsibilities

In order to ensure co-ordination between the action components and the numerous stakeholders, a Steering Committee (SC) will be established to guide action implementation. EU guidance of the implementation will be very important given that the reform area is a particularly sensitive one. The SC will include representatives of the beneficiaries, the implementing partner and the relevant European Union services. The implementing partner will ensure the proper functioning of the SC, including preparation of the agenda in consultation with the European Union, sending the invitations, preparation and follow up of the minutes. The SC will meet quarterly but can also be convened on an extraordinary basis at the request of the implementer or the European Union.

5.7 Performance monitoring and reporting

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. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (outputs and direct outcomes) as measured by corresponding indicators, using as

reference the logframe matrix. The report shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

5.7 Evaluation

Having regard to the importance of the action, mid-term and final evaluations will be carried out for this action or its components via independent consultants.

It will be carried out for problem solving, management- and learning purposes.

The Commission shall inform the implementing partner at least 15 days in advance of the dates foreseen for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

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

Indicatively, two contracts for evaluation services shall be concluded in April 2018 and in October 2019.

5.8 Audit

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

Indicatively, one contract for audit services shall be concluded in February 2018.

5.9 Communication and visibility

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated at the start of implementation and supported with the budget indicated in section 5.5 above.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country, contractors, grant beneficiaries and/or

entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Manual for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

APPENDIX - INDICATIVE LOGFRAME MATRIX (FOR PROJECT MODALITY)

The activities, the expected outputs and all the indicators, targets and baselines included in the logframe matrix are indicative and may be updated during the implementation of the action, no amendment being required to the financing decision. When it is not possible to determine the outputs of an action at formulation stage, intermediary outcomes should be presented and the outputs defined during inception of the overall programme and its components. The indicative logframe matrix will evolve during the lifetime of the action: new lines will be added for including the activities as well as new columns for intermediary targets (milestones) for the output and outcome indicators whenever it is relevant for monitoring and reporting purposes. Note also that indicators should be disaggregated by sex whenever relevant.

	Results chain	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources means and of verification	Assumptions
Overall objective: Impact	To improve the implementation of anti-corruption policy in Ukraine, thereby contributing to reducing the occurrence of corruption	<ul style="list-style-type: none"> - improved compliance with relevant GRECO and OECD recommendations - improved scoring/ranking of Ukraine in international anti-corruption rankings - reduced perception of and experience with corruption by citizens 	<ul style="list-style-type: none"> - 2015 Monitoring/Compliance reports by GRECO and OECD: recs outstanding - 2015 TI CPI (index 27 out of 100; place 130 out of 168) - 2015 KIIS/US funded study: 65% of citizens experience corruption 	<ul style="list-style-type: none"> - full compliance with relevant GRECO/OECD recommendations by 2019 - index in TI CPI increased to 33 by end 2019 - significant decrease in the number of citizens who had personal experience with corruption by 2019; - significant improvement in citizens' assessment of the effectiveness of anti-corruption measures 	<ul style="list-style-type: none"> OECD/GRECO reports International indices National surveys Media and civil society reports 	<ul style="list-style-type: none"> Overall political situation of the country remains stable Government continues to be at least nominally committed to reforms, including in the area of judiciary International donors continue to coordinate their support activities in the anti-corruption area

Specific objective(s): Outcome(s)	<p>1) Strengthen the operational capacities of state institutions dealing with prevention and fight against corruption as well as the integrity of judges and prosecutors following international norms and the best European practices</p>	<p>- increase in number of declarations on assets, conflict of interest, political party expenditure verified; - sanctions for non-compliance imposed</p>	0	From 0 to 100% in the period 2016-2019	Case statistics of anti-corruption institutions, notably NABU, courts, media and civil society reports	Same as for impact
		<p>- increase in number of high-level corruption cases investigated, brought to indictment and adjudicated - increase in number of assets seized and managed</p>	0	Significant number of sanctions (fines) imposed		
		<p>2/2016 NABU report: Investigated: 2 Indicted: 1 Sentenced: 0</p> <p>2015: about EUR 400</p>	Significant increase in investigations into high-level corruption, indictments, sentences and assets seized			
	<p>2) Strengthen parliamentary oversight over reform implementation and Parliament's capacity to scrutinise and improve the strategic and legislative framework</p>	<p>number of recommendations of international advisory council and/or Anti-corruption committee followed by Rada or government</p>	2016: 0	At least 50%	Reports from the advisory council, media and civil society reports	
	<p>3) Enhance the capacity of civil society and media to fight corruption (including advocacy campaigns, awareness-raising, analysis and research, monitoring of anti-corruption policies, media scrutiny into corruption cases and others), including by demonstrating the feasibility of progress in the fight against corruption at local level through targeted pilot projects ("clean city")</p>	<p>number of CSO activities supported and successfully implemented by the programme</p>	2016: 0	10-15 per year		
	<p>decrease in personal experience with corruption/increase in readiness to report corruption in the targeted municipality</p>	<p>numbers of corruption cases investigative journalism reported to the governmental authorities</p>	2016:	2019:		
			Survey to be conducted by project	Measurable decrease/increase	Surveys to be conducted, media and civil society reports	

Outputs	<p>Component 1 1.1 Newly created institutions function effectively, professionally and independently, personnel of all relevant institutions is recruited or, as appropriate, re-evaluated and appropriately trained with sufficient knowledge of best European practices</p>	Percentage of operational capacity (number of staff hired)	2016: NABU 50% NAPC: 1% ARMO: 0%	2018: All agencies are 100% staffed	Project reports, Agencies activity reports, media and civil society reports	See above
		Number of beneficiary staff trained by the project, number of staff satisfied with the trainings provided	0	To be established during contracting		
	1.2 Improved capacity of the judiciary to adjudicate corruption cases in an independent and impartial manner	Level of trust of population in the judiciary with respect to the adjudication of anti-corruption cases	2016: 5% (for the judiciary in general)	If specialised chambers are created and operational, at least 35%	Surveys by civil society	
			0			
	Component 2					
	2.1 Improved legal and regulatory framework					
	2.2 An efficient oversight mechanism of the Parliament over Anti-corruption reform implementation. and an enhanced ability to conduct anti-corruption assessments of draft legislation.	Number of reports issued by AC advisory council;	2016: 0	15		
		Percentage of recommendations taken on board	2016: 0	50%		
	Component 3					
	3.1 Improved capacities of CSOs and media in exposing and investigating specific corruption cases;	Number of investigative journalists supported	2016: 0	By 2019: 15		
3.2 Increased awareness of citizens on corruption mechanisms and anti-corruption activities	Number of events, campaigns etc. supported	2016: 0	2019: 25			
3.3 Showcase of successful examples of fight against corruption at local level	Number of successful regional showcases	2016: 0	By 2019: at least 3			

