

**OPEN-ENDED INTERGOVERNMENTAL WORKING GROUP ON THE
PREVENTION OF CORRUPTION
THEMATIC COMPILATION OF RELEVANT INFORMATION SUBMITTED
BY Armenia
Article 8, Paragraph 5
Asset and Interest Disclosure Systems
Armenia (ninth session)**

II - Information requested from States parties in relation to asset and interest disclosure (art. 8, para. 5)

- **Description of the objectives of the declaration system applicable to public officials (prevention of conflict of interest, illicit enrichment, or both [dual system]).**

The declaration system of Armenia is mainly focused on declaration of assets which can respectively serve the objective related to detection and prevention of illicit enrichment. Nevertheless, the country has entered into a new phase of declaration system development which is marked by adopting legislation on interest declaration to be introduced in January 2019. This development will, in its turn, transform the Armenian declaration system into a dual objective type system.

The asset declaration system management is the prerogative of the Commission on Ethics of High-Ranking Officials (CEHRO) of Armenia. In mid-2018, however, the Corruption Prevention Commission will be established (according to the Law on Corruption Prevention Commission) on the basis of the CEHRO and will take the lead in regulating the process of declaration and inspecting and analyzing the declarations.

- **Where such a declaration system is in place, you may wish to provide information on the following:**
- **Types (categories) of public officials required to make declarations and approximate total number of persons submitting declarations;**

The scope of public officials having obligations of asset declaration submission includes **officials holding state positions** (the President of the Republic; the Prime Minister; deputies of the National Assembly; members of the Constitutional Court; judges, ministers and their deputies; general prosecutor and his/her deputies; prosecutors of marzes, the city of Yerevan and garrisons; chiefs, deputy chiefs and members of the state bodies established by law; chiefs and deputy chiefs of public administration bodies under the Government; chief of staff of the National Assembly and his/her deputies; chief of staff of the Constitutional Court; chiefs of diplomatic services operating in foreign states; the secretary of the National Security Council; advisors and assistants of the President of the Republic; advisors and assistants of the Chairperson of the National Assembly; advisors and assistants of the Prime Minister; chiefs of communities with a population number of 15 000 and more) and **public service positions** at the administrations of the President of the Republic of Armenia, National Assembly, bodies adjunct to the RA Government, ministries, state agencies operating in their governance

system, Special Investigation Service, RA Investigative Committee and Investigative Committee's Department, tax and customs services, RA Police, judicial and diplomatic services, regional administrations and permanently functioning bodies established by laws and others.

Currently, approximate number of public official declarants is 3 300. Together with the declarant officials, declarations shall be submitted by their related person (including spouse, minor child and all the persons living together with the declarant official) as well. The number of declarants currently supported by the system is more than 10 000.

- **Information that must be declared (assets, outside activities and employments, positions in companies, other associations, gifts and other benefits, liabilities, etc.);**

The scope of asset declaration contains information related to the property (immovable property, movable property, securities and other investment, loans, valuable (more than 8 million AMD), as well as income (remuneration for work or any other equivalent payment, royalties, interest and other compensation on received or given loans, profits, income received in games in casinos or lotteries, in kind or monetary gains in competitions or contests, property and monetary assets received as donation or aid, inherited property, insurance compensation, income received from entrepreneurship, income received from alienation of property, payment or other compensation for lease income from civil law contracts, lump-sum payments, income received from proprietary rights) received in monetary and non-monetary forms.

All the declaration information, except for identification data of property and persons, are open to general public and can be accessed from the official website of the CEHRO.

Meanwhile, the legal provisions obliging public officials to submit interest declarations shall enter into force in 2019. The interest declarations to be submitted to the Corruption Prevention Commission to be established in mid-2018 shall include information on shares in commercial organizations, involvement in their management, administrative and supervisory bodies, data related to trust managers, data related to his/her membership in non-commercial organizations, involvement in their management, administrative and supervisory bodies, data related to his/her membership in political parties, involvement in their management, administrative and supervisory functions, as well as information on contracts with state.

- **Frequency of declarations required;**

Asset declarations related to assuming and terminating office, shall be submitted within 30 days following the date of assuming and terminating it. Meanwhile, annual declarations as of 31 December of each year shall be submitted no later than March 31 of the following year.

- **How declarations are submitted (in paper format, electronically, in person) and the entities to which they are submitted;**

The asset declaration system management is centralized in the country and the declarations shall be submitted to the CEHRO. The CEHRO has legal functions of maintaining the register of declarations and regulation of declaration analysis process and publication of declarations. The declaration system is supported by an electronic declaration platform, which was introduced in 2013 and allows online filling in and submission of asset declarations. The system is a multi-pillar platform incorporating a registry of declarant public officials and their related persons, a section of completion and submission of declarations by declarants, a component of generating statistical reports as well as an instrument of declaration analysis. As mentioned earlier, the new Corruption Prevention Commission will regulate the process of declaration and inspect and analyze the declarations.

- **Availability of tools and advisory services that officials can use in order to comply with their disclosure-related obligations (guidelines for filling out forms, resources for learning about conflict of interest issues, resources for receiving tailored advice on specific conflict of interest situations, etc.);**

The CEHRO constantly provides guidance related to asset declaration issues through all available communications means. It has also developed a guideline for filling in the declarations to advise and guide the declarants in fulfilling their declaration submission obligation, which is integrated into the system.

- **Whether information is declared on assets of public officials' family members or members of public officials' households and under which circumstances such information is provided;**

Not only does the declarant, but also persons related to him/her have obligation of declaration submission. The scope of declarant related persons currently includes the family members (spouse and a minor child) as well as all the persons living together with the declarant official.

- **What mechanisms are in place for ensuring compliance with the obligation to disclose;**

The legal regulations stipulate **administrative sanctions** for violation of asset declaration regulations (late submission, submission with violations of submission requirements and procedures or submission by negligence of wrong and incomplete data in declaration), as well as **criminal punishment** for submission of false data or concealing the data to be declared in the declarations and maliciously non-submission of declarations.

Meanwhile, if, during the administrative proceeding, the conclusion is reached that there are indications of intentional failure to submit a declaration or submitting false information in the declaration or concealing the data subject to declaration – the case shall promptly (but not later than within three days) send the materials to the Prosecutor General's Office.

- **Whether there is public access to any of this information;**

Currently all the declaration information, except for identification data of property and persons, are open to general public and can be accessed from the official website of the CEHRO.

- **Any mechanism in place to carry out the verification/monitoring of the content of declarations; including information on the verification mechanism, such as:**

The CEHRO is vested with the power of declaration analysis through: 1) the compliance checking with the declaration submission rules and guidelines, 2) verification of the declared data. The CEHRO has authority to request and receive information and documents during declaration analysis from state and local self-government bodies, the Central Depository and other persons entitled to maintain shareholders' registry, credit bureaus. The legal regulations also ensure access of the CEHRO to databases of state and local self-government bodies as well as the specified private organizations. Since February 2015, the Commission has had an access to the state electronic databases of 1) the State Register of Legal Entities, 2) the State Register of Civil Status Acts, 3) the Population State Register, 4) the Transportation Vehicles Register and 5) the State Committee of Real Estate Cadaster.

- **How many disclosures are verified (all, a certain percentage, etc.);**

The electronic declaration system allows automated verification of all declarations in the system, as well as analysis of the existing data, including based on risk indicators.

- **What triggers verification (complaints, routine verification/ex-officio, notifications from other institutions, random selection, etc.);**

All the submitted declarations from 2012 were verified in line with existing regulations. The verifications are being triggered ex-officio after declaration submission cycles. Meantime, complaints and media publications also trigger verification.

- **What processes are involved in the verification/review process (checks for internal consistency, cross-checks with external databases, comparisons across years, identification of potential conflicts of interest, etc.);**

The Law on Public Service has vested the CEHRO with the power of declaration analysis through: 1) the compliance checking with the declaration submission rules and guidelines, 2) verification of the declared data. The CEHRO team checks the declarations for internal consistency, cross-checks with external databases as well as conducts comparisons across years.

Meantime the Corruption Prevention Commission is vested with expanded analysis and verification powers and tools. The Commission shall carry out the following: (1) inspection of compliance with the requirements for completing and submitting a declaration; (2) verification of the declared data; (3) mathematical analysis of the declared data; and (4) declaration analysis based on the risk indicators.

- **What information can be accessed during the verification/review process (from public officials or public and private sector entities);**

In the process of analysing declarations, the Commission may demand and receive from state and local self-government bodies, the Central Depository, and other persons entitled to maintain a register of securities holders (nominal holders), and Credit Bureaus (including through an electronic inquiry), information and documents about the official submitting the declaration and on persons who are part of his or her family, except for cases provided for by the Republic of Armenia Law on Bank Secrecy.

In the process of analysing declarations, interoperability of the Commission database with the databases — developed as prescribed by the legislation of the Republic of Armenia — of state and local self-government bodies, organisations specified in part 2 of this Article shall be ensured. Moreover, online access of the Commission to data subject to being declared shall be ensured.

The Commission may demand from a state or local self-government body, state or community institution, state organisation or the officials thereof to conduct studies free of charge and to

perform expert examinations free of charge, and provide the results, in relation to circumstances to be found by the Commission.

- **What happens once irregularities are identified (potential conflicts of interest, unjustified variations of wealth, inaccurate information, etc.);**

When the Commission, as a result of analysis of declarations, reaches the conclusion that the declaration has not been submitted within the period prescribed by law or has been submitted in violation of the relevant requirements and procedure or the declared data is incorrect or incomplete, it shall initiate proceedings regarding an administrative offence.

When the analysis of the declaration leaves doubt that the change of property (increase in property and/or reduction in liabilities) of the official submitting a declaration or a person who is part of his or her family is not reasonably justified by his or her lawful incomes, or they have property that is not declared or not fully declared, or the source of income is not lawful or credible, the Commission shall may request clarification or additional materials from the declarant by setting a time limit of at least 10 and at most 30 days for submitting them.

Where the declarant fails to provide clarification or additional materials within the specified time limit, or they are not sufficient to dispel the existing doubt, the Commission shall immediately, but not later than within a three-day period, send the materials to the Office of the Prosecutor General of the Republic of Armenia and adopt a decision on suspension of the proceedings. A copy of the decision shall, within a three-day period of its adoption, be sent to the declarant, and where the proceedings have been initiated on the basis of an application — to the applicant.

The Office of the Prosecutor General shall inform the Commission of the outcome of the examination of the materials, attaching a copy of its relevant decision.

- **Whether and to what extent the content of disclosures (in summary form or all information disclosed) or names of persons submitting declarations are made available to the public and other public sector entities and, moreover, how the information is made available (upon individual request, on-line, etc.);**

As mentioned above, all the declaration information, except for identification data of property and persons, are open to general public and can be easily accessed from the official website of the CEHRO.

- **Number of trained staff dedicated to collection, compliance, providing advisory services to officials, making disclosures publicly available, verification, sending referrals to other entities; what types of sanctions are available in the declaration system (for non-submission, actual conflict of interest, false statement, illicit enrichment, etc.).**

From 2012-2017 5 people. Since 2017 the number is 7. This number will be increased to 12 in 2018. Many processes are conducted through sophisticated system with automated analysis functions.

The legislation stipulates that a failure to submit declaration on time or submission of declaration with violations of submission procedures shall be sanctioned by a warning. If within 30 days the notice the declaration is not submitted or filed in compliance with the requirements on completing declarations or with the procedure of filing declarations, a fine shall be imposed on the official or his related person who had a responsibility of declaration.

Besides, if after 30 days the declaration is intentionally not submitted, the person responsible to submit a declaration shall be punished by a criminal sanction - a fine or by imprisonment for the term of up to two years with/or without deprivation of the right to hold certain posts or practice certain activities for up to 3 years. Separately, Presenting false information in a declaration or concealing data subject to declaring by a declarant official or his family member shall be punished with a criminal sanction - a fine or imprisonment for a maximum term of two years, with or without deprivation of the right to hold certain positions or to engage in certain activities for a maximum period of three years.

2. Challenges related to developing and adoption of the legal framework of the assets and interest disclosure system;

The main challenge of developing and adoption of the legal framework is that amendments shall be respectively reflected in the electronic declaration system, which can turn to be technically difficult and costly.

- **Challenges related to the functioning of the asset and interest disclosure system and in particular:**

- **Challenges related to submission of the declarations;**

The system of declaration submission is electronic in Armenia and it ensures filling in the declarations through an online platform. The declarant shall verify the submitted data with either electronic signature or by signing and submitting the hard copies as well. In the current situation, when most of the declarants have no electronic signature, the declarations are mostly verified by the declarants by sending signed hard copies. This situation hinders the effectiveness of the declaration system and is time and resource consuming, since the hard copies of signed declarations shall also be maintained, the electronic and hard copies of declarations shall be compared to make sure they are identical and etc.

- **Challenges related to verification of the declarations;**

There are challenges related to connecting through electronic declaration system with some of the state databases due to the differences in technical parameters of databases, which required additional technical solutions. On the other hand, not all information held in public bodies is digitalized.

One more challenge in declaration data verification is the information related to assets of public officials abroad which due to the lack of international cooperation does not allow receiving respective information.

- **Challenges related to the follow up and to imposing sanctions;**

Imposing administrative sanctions has no serious gaps to be addressed. However, there is no electronic system of case management related to proceedings in place, which makes proceedings time and resource consuming.

- **Challenges related to the transparency of the regime; and**

Not only is the declaration system in Armenia advanced and transparent (all the declaration information, except for identification data of property and persons, are open to general public), but also the CEHRO is keen on ensuring openness of its activities. The CEHRO communicates actively through its official website and other communication tools with its public officials, partners and citizens.

However, the registry of published declarations is searchable based on limited fields. The CEHRO aims to improve it allowing citizens conducting searches, exporting data and making analysis by the general consumers of the website.

- **Challenges related to resources limitations, lack of capacity, etc.**

The recent legal reforms on integrity system development ensured a fully-staffed (of 12 employees) team for the CEHRO by early October of 2017 and a functional independent body with a separate budget line in the state budget. Before 2017 the CEHRO did not have any staff, only 5 commissioners.

Meanwhile, in mid-2018, the Corruption Prevention Commission will be established on the basis of the CEHRO, and capacity building for both the employees transitioning to the new Commission - that will have 40 team members in 2018 and 55 in 2019 - as well as newcomers will be a challenge to face.

3. Do you consider that any technical assistance is required in order to allow you to fully implement this provision? If so, what specific forms of technical assistance would you require?

- **Legislative assistance:** Please describe the type of assistance

Legal assistance in cooperation with law enforcement institutions would be critical, particularly in regard to detection and proceeding illicit enrichment cases.

- **Institution-building:** Please describe the type of assistance

Assistance in technological development is of high importance and urgent in the following directions: enhancing declaration data verification capacity of the Commission through ensuring interoperability of electronic declaration system and digitalization of databases of public institutions as well as constructing case management system for the proceedings to be conducted by the Commission.

- **Policymaking:** Please describe the type of assistance

The Corruption Prevention Commission to be established on the basis of the CEHRO will be vested with legal power to participate in the development of anti-corruption policies in the country, which dictates institutional capacity building related to participation in policymaking. Hence, the assistance in respective capacity building would be of high value.

- **Capacity-building:** Please describe the type of assistance

Assistance in building capacity of training and guiding public officials would be critical.

- **Research/data-gathering and analysis:** Please describe the type of assistance

Learning about the analysis related to declaration system issues would be of high importance. Particularly, best practices of methodologies on declaration verification and analysis would be of great benefit.

- **Facilitation of international cooperation with other countries: Please describe the type of assistance**

International cooperation related to data exchange in the processes of declaration verification as well as initiated proceedings is important.

- **Others: Please specify**

States parties are also encouraged to provide a description of any such assistance already being provided, including donor information.

Asset disclosure

RA Law on Public Service provides the list of public officials who shall annually declare their assets and income. Article 32 of RA Law on Public Service states:

“Within the meaning of this Law, declarant officials shall be the high-ranking officials, as well as persons holding highest positions of the civil service but not acting as high-ranking officials, persons holding highest positions of the state service in Staff of the National Assembly of the Republic of Armenia, the Secretary General of the Ministry of Foreign Affairs of the Republic of Armenia and the head of a separate subdivision of Staff, persons holding highest positions in the Special Investigation Service of the Republic of Armenia, the Investigation Committee of the Republic of Armenia, state service of the Department of the Investigation Committee of the Republic of Armenia, the Chief of Staff of the Special Investigation Service of the Republic of Armenia and the deputy Chief of Staff, the heads and deputy heads of the state bodies operating in the field of management of the ministries of the Republic of Armenia, persons holding highest positions in the judicial service, persons holding highest and chief positions in special services, except for persons holding chief positions in the republican executive bodies of defence, national security and rescue services, persons holding chief positions in the Penitentiary Service and the Judicial Acts Compulsory Enforcement Service, prosecutors, investigators of national security authorities, tax and customs services, the Investigation Committee and the Special Investigation Service, heads of communities with a population of 15 000 and more, heads of the administrative districts of Yerevan, members of the Procurement Appeals Board.

2. A declarant official shall submit declarations on property and income to the Commission on Ethics of High-Ranking Officials as prescribed by this Law, and a high-ranking official – also a declaration on interests.
3. Declarant officials shall, in cases and in the manner provided for by this Law, submit a declaration on affiliated persons to the Commission on Ethics of High-Ranking Officials.
4. Within the meaning of this Law, persons within the composition of the family of a declarant official – his or her spouse, minor child (also the adopted child), the person under the guardianship or curatorship of the declarant official, any person jointly residing with the declarant official, shall, in cases and in the manner provided for by this Law for a declarant official, submit their declarations on property and income to the Commission on Ethics of High-Ranking Officials. The declaration of a minor child shall be submitted by the declarant official.
5. Within the meaning of this Law, a jointly residing person shall mean the person jointly residing with the declarant for 183 days and more before the day of assuming or leaving the position or during the year of submitting the declaration.
6. Failure by a declarant official, as well as a person within the composition of his or her family to submit declarations to the Commission on Ethics of High-Ranking Officials in compliance with the requirements, manner and time limits prescribed by the Commission on Ethics of High-Ranking Officials shall entail liability provided for by law.

7. The declarant official and a person within the composition of his or her family shall, by virtue of the fact of submitting the declaration, give their consent to the Commission on Ethics of High-Ranking Officials to become familiar with their credit history and information on the securities, including transactions made thereby over the reporting period.”. At the same time, high-ranking public officials are the President of the Republic; the Prime Minister; deputies of the National Assembly; members of the Constitutional Court; judges, ministers and their deputies; Chief of General Staff of Armed Forces of the Republic of Armenia and the deputies thereof, general prosecutor and his/her deputies; prosecutors of marzes, the city of Yerevan and garrisons; chiefs, deputy chiefs of the state bodies (commissions, councils) established by law and members of these commissions, councils; the chairperson of the Central Bank, his/her deputy and members of the board of the Central Bank; chiefs and deputy chiefs of public administration bodies under the Government; Head of the State Protection Service of the National Security Service adjunct to the Government of the Republic of Armenia and the deputies thereof, head of Penitentiary Service of the Ministry of Justice of the Republic of Armenia and the deputies thereof, Director of the Rescue Service of the Ministry of Emergency Situations of the Republic of Armenia and the deputies thereof, Chief Compulsory Enforcement Officer of the Ministry of Justice of Republic of Armenia and the deputies thereof, the chairperson and members of the Control Chamber; chief of staff of the National Assembly and his/her deputies; chief of staff of the Constitutional Court; members of the ethics commission for high-ranking public officials; the Mayor of Yerevan and his/her deputies; chiefs of diplomatic services operating in foreign states; ambassador-at-large, the secretary of the National Security Council; advisors and assistants of the President of the Republic; Chief Military Inspector and the deputies thereof, ambassador-at-large, press secretary and assistants, advisors and assistants of the Chairperson of the National Assembly; advisors and assistants of the Prime Minister; chiefs of communities with a population number of 50 000 and more as of 1 January of the previous year; as well as the chief of the Control Service of the President of the Republic and the chief of the Control Service of the Prime Minister.

Responsible body

According to RA Law on Public Service, the Ethics Commission for High Ranking Officials is responsible body for collecting, verifying and publishing Asset and Income Declarations. However, when RA Law on Commission for Prevention of Corruption enters into force, those powers will be transferred to that body. The declarations are being publish on its website: <http://ethics.am/en/>

Liability

The system of sanctions for the violation of interest or asset declaration legislation was implemented last year and respective provisions have come into force on July 1, 2017. The main first flow of declarations to be submitted upon the

enactment of sanction system is expected after the March 31 of 2018, which is the deadline for asset declaration submission for declarants including political official declarants.

Sanctions for violating asset and interest disclosure requirements are envisaged in below listed Articles:

RA Code on Administrative Offences

“Article 169.28 Failure to submit declarations to the Commission on Ethics of High-Ranking Officials within the prescribed time limits, or submission thereof in violation of the requirements set for filling in declarations or the procedure for the submission of the declarations, or submission of incorrect or incomplete data in the declarations negligently

Failure by a declarant official, as well as a person within the composition of his or her family (hereinafter referred to in this Article as “the declarants”) to submit the declarations provided for by the Law of the Republic of Armenia “On public service” (hereinafter referred to in this Article as “the declarations”) to the Commission on Ethics of High-Ranking Officials within the time limits prescribed by the Law of the Republic of Armenia “On public service”: – shall entail a warning.

Failure by a declarant to submit the declaration within 30 days following the application of the administrative penalty provided for by part 1 of this Article: –

shall entail imposition of a fine in the amount of two hundred-fold of the set minimum salary.

Submission of the declaration to the Commission on Ethics of High-Ranking Officials by a declarant in violation of the requirements set for filling in the declarations or the procedure for the submission thereof: –

shall entail a warning.

Failure by a declarant to submit the declaration in compliance with the requirements set for filling in the declarations or the procedure for the submission thereof within 30 days following the application of the administrative penalty provided for by part 3 of this Article: –

shall entail imposition of a fine in the amount of two hundred-fold of the set minimum salary.

Submission of incorrect or incomplete data in the declarations negligently by a declarant: –

shall entail imposition of a fine in the amount of two-hundred-fold to four-hundred-fold of the set minimum salary.”.

RA Criminal Code

“Article 314.2. Intentional failure to submit declarations to the Commission on Ethics of High-Ranking Officials

Intentional failure to submit declarations provided for by the Law of the Republic of Armenia “On public service” by the declarant official, as well as a person within the composition of his or her family, within 30 days after imposition of an

administrative penalty prescribed by parts 2 or 4 of Article 169.26 of the Code of the Republic of Armenia on Administrative Offences –

shall be punished by a fine in the amount of one-thousand-five-hundred-fold to two-thousand-fold of the minimum salary or by imprisonment for a term of maximum two years with or without deprivation of the right to hold certain positions or to engage in certain activities for a term of maximum three years”.

“Article 314.3. Submitting false data in declarations or concealing the data subject to declaration

Submitting false data in declarations provided for by the Law of the Republic of Armenia “On public service” or concealing the data subject to declaration by a declarant official, as well as persons within the composition of his or her family –

shall be punished by a fine in the amount of two-thousand-fold to three-thousand-fold of the minimum salary or by imprisonment for a term of maximum two years with or without deprivation of the right to hold certain positions or to engage in certain activities for a term of maximum three years.

The same act that has resulted in the failure to declare property or income of particularly large scale –

shall be punished by imprisonment for a term of two to four years with or without deprivation of the right to hold certain positions or to engage in certain activities for a term of maximum three years”.

Training sessions

Training programs envisaged by the Anti-corruption Strategy and Action Plan

Order on organizing training for anti-corruption focal points of the state bodies has been adopted by the order of the Minister of the Justice on 9 August, 2017. The Funds for the implementation of the program are allocated from the State budget. The training was conducted in September 2017, and as a result approximately 40 participants have been trained. The abovementioned program was aimed to strengthen the anti-corruption capacities of the focal points. These trainings will have continuous character. For that reason the anti-corruption training program for 2018 was approved by the order N 11-A of the Minister of the Justice, on 22 January, 2018. According to the Order N13 of 22.01.2018 of RA Minister of Justice, in 2018 trainings for 50 anti-corruption focal points of state executive bodies shall be organized. The funding of the trainings will be provided by RA state budget (RA Law on State Budget for 2018, appendix 1, part 09, group 05, class 02, point 12). Each focal point shall participate in 60 academic hour-long training.

The above mentioned training includes special parts on integrity of public servants and, particularly, conflict of interests, asset disclosure.

Training programs organized by Civil Service Council

At the same time, Civil Service Council organized

a) 23 trainings for civil servants in 2015-2017,

- b) trainings have been conducted both on a regular basis and as needed,
- c) the trainings were conducted by the National Institute of Labor and Social Research, “The Union of Armstate Servants” and “The freedom of information center” NGO and within the framework of the World Bank's “Public Sector Modernization Project”,
- d) The duration of the training programs was 6, 14, 24, 28 and 72 hours,
- e) 466 Civil Servants, having the supreme, chief, leading and junior positions, trained under the mentioned programs in 2015-2017;
- f) trainings have been funded from the state budget and other means not prohibited by law.

Training programs organized by Public Administration Academy of the Republic of Armenia

In 2015, Public Administration Academy of the Republic of Armenia held training courses for civil servants, which includes ethics, conflict of interest and anti-corruption component.

In 2015, training for 685 civil servants was carried out (supreme and chief positions – 385, leading and junior posts – 300) covering the following topics.

1. "Financial management" course

Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

2. "Organizational psychology" course

Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

3. "Public relations (PR) in the system of management" course

Ethical and legal grounds of PR (2 hours) and Ethics and Etiquette (4 hours)

4. "Managerial and personal skills development" course Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

5. "Effective management technologies" course

Professional and moral ethics of the public servant. Etiquette (4 hours)

In 2016, Public Administration Academy of the Republic of Armenia held training courses for civil servants, which includes ethics and anti-corruption component.

In 2016, training for 574 civil servants was carried out (senior and principal positions – 343, leading and junior posts – 231) covering the following topics.

1. "Financial management" course

Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

2. "Organizational psychology" course

Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

3. "Public relations (PR) in the system of management" course

Ethical and legal grounds of PR (2 hours) and Ethics and Etiquette (4 hours)

4. "Managerial and personal skills development" course Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

5. "Effective management technologies" course

Professional and moral ethics of the public servant. Etiquette (4 hours)

In 2017, Public Administration Academy of the Republic of Armenia held training courses for civil servants, which includes ethics and anti-corruption component.

In 2017, training for 590 civil servants was carried out (senior and principal positions – 360, leading and junior posts – 230) covering the following topics.

1. "Financial management" course

Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

2. "Organizational psychology" course

Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

3. "Public relations (PR) in the system of management" course

Ethical and legal grounds of PR (2 hours) and Ethics and Etiquette (4 hours)

4. "Managerial and personal skills development" course Professional and moral ethics of the public servant. Etiquette (4 hours) and corruption and mechanisms for combating corruption (4 hours)

5. "Effective management technologies" course

Professional and moral ethics of the public servant. Etiquette (4 hours)