

13th Session of the Open-ended Intergovernmental Working Group on the Prevention of the Corruption

Contribution of the Republic of Serbia

Promoting the use of information and communications technologies (ICT) for the implementation of the Convention

In relation to integrity in public procurement (Article 9)

Regarding the measures taken in terms of using the online platform for management and monitoring of public procurement in order to prevent corruption, improve transparency and ensure competition, Public Procurement Office made a big step forward.

Having in mind the provisions of the Public Procurement Law (hereinafter: PPL), one of the key novelties is the introduction of an e-platform. The provisions of the PPL introduced the obligation of electronic communication and electronic data exchange in public procurement procedures. The Public Procurement Portal, which was established on July 1st, 2020, represents a significant step forward in the process of digitalization of public procurement procedures. Compared to the previous Portal, whose main purpose was “advertising”, the new Portal is the unique information system that allows advertising and communication between different economic operators in public procurement procedures.

The new Portal enables contracting authorities to compile and publish plans and notices on the Portal, publish tender documents and decisions in public procurement procedures, as well as many other options and functionalities such as: e-submission of bids, e-auctions, dynamic procurement system, e-planning, e-complaints and e-catalog. Furthermore, the functionalities of the Portal were introduced to make the work easier for the users of the portal, such as: English version of the Portal, the possibility to submit the bid or part of the bid in a foreign language, the possibility of submitting an e-declaration in a foreign language. Besides, the Portal interface was adapted to work on mobile devices. The option of "smart lots" was introduced, which greatly facilitates the creation of public calls as well as the submission of bids in cases where the procedure involves a large number of lots.

The mechanism for monitoring irregularities in public procurement procedures enabling Public Procurement Office to monitor public procurement procedures at all phases was established on the Public Procurement Portal. This functionality of the Portal, which was

developed during 2021, greatly facilitates the process of monitoring over the entire public procurement system.

Also, in 2021, Public Procurement Office organized a series of trainings on the implementation of the PPL and Public Procurement Portal, as well as two trainings for representatives of the Special Anti-Corruption Department of the Higher Public Prosecutor's Offices and the Anti-Corruption Department of the Ministry of Interior. The participants of the webinars were presented disputable issues during the processing of cases of abuse related to public procurement.

During 2021, Public Procurement Office also presented the "Guide through the monitoring over implementation of regulations in the field of public procurement", in order to improve cooperation and coordination of competent institutions, which is extremely important for effective elimination of irregularities in the public procurement system.

All above mentioned indicates that the public procurement system is improved in terms of transparency and competition, as well as in terms of preventing corruption and eliminating irregularities in the public procurement system.

In relation to Public Reporting (Article 10)

(within the purview of the Commissioner for Access to Information of Public Importance and Personal Data Protection)

Law on Free Access to Information of Public Importance was adopted in 2004, and it provided mechanisms of transparency and accountability of public administration. Among other mechanisms, it introduced the obligation of Information Booklet – a set of standardized information on public authority that should be proactively published on the web site of each institution that has this obligation.

The scope of public authorities is defined in art. 3 of this Law and included (until adopted amendments in 2021) "A central government body, a territorial autonomy body, a local self-government body or an organization vested with public powers (hereinafter referred to as government body)", and there were around 3.800 such authorities. After adopted amendments in 2021, this scope is extended to over 11.000 public authorities and it includes:

- 1) body of the Republic of Serbia;
- 2) the body of the autonomous province;
- 3) body of the municipality, city, city municipality and the city of Belgrade;

4) public enterprise, institution, organization and other legal entity, which is established by a regulation or decision of the body referred to in item 1) to 3) of this paragraph;

5) a company whose founder or member is the Republic of Serbia, an autonomous province, a unit of local self-government, or one or more authorities referred to in item 1) to 4) of this paragraph with 50% or more of shares or stakes in the sum or with more than half of the members of the management body;

6) a company whose founder or member is one or more authorities from point. 1) to 5) of this paragraph with 50% or more shares or stakes in the sum;

7) a legal entity whose founder is a company from item 5) or 6) of this paragraph;

This obligation will be effective as of November 2022, and the novelty imposed is the form of this Information booklet – it should be an online platform, unlike its previous form in a text document (Word/PDF).

The content of Information booklet is defined in art. 39 of the Law, and elaborated in bylaw “Instructions for the preparation and publication of the Information Booklet on the work of public authorities”. The information proactively published consists of:

1) basic data on the body and the information booklet (including working hours and information on accessibility for persons with disabilities of the facilities used by the body);

2) organizational structure (organization chart);

3) names, contact details and description of the functions of the heads of organizational units;

4) description of the rules regarding the publicity of work;

5) description of competencies, authorizations and obligations;

6) description of actions within the competences, authorizations and obligations;

7) for collegial bodies, data on held sessions and description of the manner of decision-making;

8) stating the regulations that the body applies in its work and the regulations for the adoption of which it is competent;

9) listing strategies, programs, plans and reports adopted by the body;

10) citing the acts from item 8) and 9) of this paragraph which are in the process of preparation by the body;

11) list of services provided by the body to interested persons;

- 12) the procedure for the provision of services referred to in item 11) of this paragraph;
- 13) review of data on provided services referred to in item 11) of this paragraph;
- 14) financial data (data on the budget, ie financial plan and sources of income);
- 15) data on public procurement, including the public procurement plan and the list of concluded contracts on procurement of goods, services, works and real estate, with the values of concluded contracts, date of conclusion and duration;
- 16) data on state aid (with data on the subjects of subsidies and donations and their amounts);
- 17) data on performed inspections and audits of the body's operations;
- 18) data on paid salaries, salaries and other incomes, including data on salaries of management bodies, ie management and heads of organizational units;
- 19) data on the means of work and facilities that the body owns or uses;
- 20) storage of information carriers;
- 21) types of information in possession, including the content of databases and registers managed by the body;
- 22) types of information to which the authority provides access;
- 23) list of most frequently requested information of public importance;
- 24) information on the submission of the request, with addresses for receiving mail and e-mail and data on deadlines for handling the request, the right to a legal remedy and the person responsible for handling the request.

Information booklet is updated on a monthly basis.

If some information is not available in the Information booklet, one can submit request for access to information of public importance, and Law defines deadlines for responding to such requests (15 days, 40 days if the scope of requested information is large, or 48 hours if a request relates to information which can reasonably be assumed to bear on the protection of a person's life or freedom and/or the protection of public health and the environment). The access to information will not be granted if conditions from art. 9 are met – if granting access to it would

- 1) Expose to risk the life, health, safety or another vital interest of a person;
- 2) Jeopardize, obstruct or impede the prevention or detection of criminal offence, indictment of a criminal offence, pretrial proceedings, trial, execution of a sentence or enforcement of punishment, any other legal proceeding, or unbiased treatment and a fair trial;

- 3) Seriously threaten national defense, national and public safety or international relations;
- 4) Substantially undermine the government's ability to manage the national economic processes or significantly impede the achievement of justified economic interests;
- 5) Make available information or a document qualified by regulations or an official document based on the law as state, official, commercial or other secret, i.e. if such a document is accessible only to a specific group of persons and its disclosure could seriously legally or otherwise prejudice the interests that are protected by the law and override the access to information interest.

Also, a public authority shall not grant an applicant his/her right to access information of public importance if it would thereby violate the right to privacy, the right to protection of reputation or any other right of a person who is the subject of information except where:

- 1) The person concerned has given his/her consent;
- 2) Such information relates to a person, event or occurrence of public interest, especially in case of holder of public office or political figures, insofar as the information bears relevance on the duties performed by that person;
- 3) A person's behavior, in particular concerning his/her private life, has provided sufficient justification for a request for such information.

(within the purview of the Ministry of Interior)

In accordance with the article 224. paragraph 5. of the Law on Police, Internal Affairs Sector of the Ministry of the Interior, within three months from the end of the calendar year, publish the work report for the previous year, including the basic statistics on the activities undertaken and the results achieved. The annual work report is published on the website of the Ministry of the Interior.

The processing of requests for free access to information of public importance is carried out in accordance with the Law on Free Access to Information of Public Importance and secondary legislation adopted pursuant to this Law. Requests are processed without delay, and not later than within 15 days from the receipt of the request. If the request is approved, the applicant is informed whether the requested authority holds the information concerned, and the relevant document is presented or its copy issued to the applicant. If there are reasons for rejecting the applicant's request for information whether the requested authority holds the information concerned, a decision rejecting the request is made within 15 days at the latest, with a note that a complaint may be filed against it to the Commissioner for Information of Public Importance and Personal Data Protection. If in the course of the processing of the request it is established that the Ministry of the Interior does not hold the document containing the requested information and that, to its knowledge, the holder

thereof is another state authority, the request is forwarded to the Commissioner and the applicant is notified of the document's holder. The processing of requests for free access to information of public importance is governed by the Law on General Administrative Procedure, unless otherwise provided by the Law on Free Access to Information of Public Importance.

The public is informed about the organisation and functioning of a state administration body and transparency of its work through the information booklet, which is published and regularly updated. It is designed following the Instruction for the Preparation and Publication of Information Booklets on the Work of Public Authorities, which was adopted pursuant to the Law on Free Access to Information of Public Importance. The Instruction prescribes in detail the content and mandatory elements of information booklets, so they contain, *inter alia*, general information about the authority concerned, its organisational structure, names and surnames, contact details and descriptions of functions performed by heads of organisational units, description of rules related to the transparency of work, description of competencies, powers and obligations, public procurement data including public procurement plans, data on salaries paid, financial data (on the budget, financial plan and sources of income), etc.

(within the purview of the Public Policy Secretariat of the Republic of Serbia)

As a public administration authority competent for public policy coordination, the Public Policy Secretariat is in charge of managing the Unified Information System. The Unified Information System is the unified national electronic system in which the planning system participants input the content of their public policy documents and medium-term plans and perform reporting in accordance with the Law on the planning system of the Republic of Serbia.

A public administration body generates the report for the public policy documents implementation¹ by taking over relevant data from the Unified Information System, entered into the Unified Information System when drafting the given public policy document and during the drafting of mid-term plans that the given public policy document is being implemented through, and during reporting on the implementation of such mid-term plans, and by direct entry into the Unified Information System of the missing data.

Reporting on the results of the implementation of a public policy document is performed by publishing on the website of the proponent and/or adopting authority, within the deadlines prescribed for reporting, in accordance with the law regulating the planning system.

¹ as per Article 69 of the Regulation on the methodology of public policy management, impact assessment of public policies and regulations, and the content of individual public policy documents

Public administration bodies report to the Government on the implementation of a public policy document through the Unified Information System.

The Public Policy Secretariat provides continuous access to users for entering and downloading data from the Unified Information System according to their authorisations.

The Public Policy Secretariat informs the public by making publicly available through their website all development planning documents, public policy documents, mid-term plans and Reports on their implementation, mandatory for publication based on the law regulating the planning system.

The Unified Information System might provide an example of good practice as it enabled continuous monitoring and evaluation of the public policy documents, including those public policy documents that concern the fight against corruption.

For the time being, Unified Information System for public policy planning, monitoring, coordination and reporting is being used by the state administration authorities only. It is expected that UIS, once upgraded shall provide access of other stakeholders to the relevant public policy documents and reports on its implementation which are being created through UIS. For that purposes Public Policy Secretariat shall develop Online monitoring tool (OMT) which will be publicly available with all relevant data enter into UIS. As a good example for OMT model please see <https://monitoring.mduls.gov.rs/>.

In relation of participation of society (Article 13)

On June 16, 2021, the Government of the Republic of Serbia adopted the Decision on the establishment of the "e-Consultation" Portal, which is an integral part of the e-Government Portal, with the aim of enabling the public - in a unique and equal way, electronically (online), to participate in the process of preparation and adoption of public policy documents and regulations.

The e-Consultation portal was launched on December 16, 2021. The Public Policy Secretariat has determined a specific number of its civil servants having different roles in the administration of the e-Consultation portal: administrators, moderators, and evaluators.

This portal is envisaged and realised as a tool that would make the work of the government and its bodies even more transparent and provide a convenient way for citizens, civil society organisations, and professional communities to contribute to the whole process of creating public policy documents and regulations.

Public policy documents concerning the prevention and fight against corruption will be subject to public scrutiny/consultations through the e-Consultation portal, which will result

in improved public policy documents and regulations that suit the needs of the public, citizens, CSOs, SMEs, Academia, and all the interested parties.

Challenges to and good practices in anticorruption awareness-raising, education, training and research (article 13, 1 (c))

(c) Undertaking public information activities that contribute to non-tolerance of corruption, as well as public education programmes, including school and university curricula;

(within the purview of the Agency for Prevention of Corruption)

The Agency for Prevention of Corruption (hereinafter referred to as: APC) has been introducing and implementing education programs concerning corruption and co-operates with research and civil society organizations in implementing corruption prevention activities.

In 2013, with the EU support (Support to the establishment of the APC-IPA 2008) for the first time the integrated public raising awareness campaign (TV spots, radio spots, micro web site, social media, newspaper, forums, conferences/PR events, posters, brochures, internet banners, manuals, info phone lines, daily newspaper inserts, etc.) was implemented aimed at improving public understanding of corruption problem and prevention mechanisms.

In 2018 the APC organized campaign focused on promotion of the local and provincial anticorruption plans “LAP for stronger integrity” whereas in 2021 a public campaign "For public functions without corruption" was organized as to highlight the importance of preventing corruption in line with the public purpose.

In 2020, 2021 and 2022 the APC held the informative sessions for media and civil society organizations aimed at informing them on the novelties deriving from the new Law on Corruption Prevention as well as the new Law on Financing Political Activities (adopted in 2022) as well as various mechanisms of corruption prevention it has been implementing.

As to conduct its cooperation with civil society organizations in a systematic manner, the APC developed Guidelines for Cooperation with Civil Society Organizations, regulating principles, preconditions and types of the respective cooperation.

The modalities of cooperation include:

- 1) general support of the APC to the programmes or projects of civil society organizations;
- 2) cooperation of the APC with the civil society organizations in the programmes or projects;

3) partnership of the APC with the civil society organizations in the programmes or projects.

Support for civil society organizations realized through project funding is important for preserving continued participation of the civil society in the fight against corruption.

To date the APC has organized 13 public competitions for allocating grants to the civil society initiatives in the area of corruption prevention. The 14th public competition is currently underway. The respective support to the civil society, i.e. grants have also been envisaged by the Revised Action Plan for Chapter 23-subchapter Fight against Corruption.

Within the Twinning Project “Prevention and Fight against Corruption” in 2018 the Twinning (together with OSCE Mission to Serbia) experts drafted the Manual on Media Cooperation which offers guidance on the provision of information to news media, defined as information in any form provided to news and information media, and especially of information that has the potential to generate media attention, public interest, or inquiry.

Within the same Twinning IPA 2013 Project “Prevention and Fight against Corruption”, the APC organized workshops for civil society organizations and media representatives with the aim of ensuring more accurate reporting on APC’s activities, as well as better understanding of the role of the APC. The Twinning experts also drafted the analysis of cooperation between the APC and civil society organizations so as to identify potential obstacles as well as provide recommendations for its improvement and the insight into best practices of EU Members States on this matter. Civil society organizations also actively participated in this analysis after which a joint workshop was organized as to discuss the findings of the Twinning experts.

The APC also pays due attention to the youth involvement through various modalities, such as lectures, projects, competitions, joint activities, etc.

In the period 2010-2015 the APC organized competitions for primary, high school and university students in Serbia, inviting them to present their literary or journalist text, artwork, audio-visual work, and slogans on the given topic. The best works were given awards. These activities were focused on raising awareness of citizens, primarily pupils and their teachers, on the necessity for active involvement in fighting corruption. Schools, which had motivated and encouraged their pupils to participate in the competition several years in a row were awarded special prizes.

Within the project “Support to the ACA in Fight against Corruption” (implemented through technical assistance of the Norwegian Ministry of Foreign Affairs) the network of 42 interns was established in 2011 and 2012, consisting of young professionals, students of final study year or graduated students, selected from several faculties of social sciences. Six cycles of 4-

month internship program (each encompassing 7 interns) were organized, with the aim of contributing to general and professional awareness raising on fight against corruption through the education. They attended various lectures organized by the APC on a regular basis, pertaining to issues such as corruption prevention, political party funding, complaints and whistle-blower protection, control and prevention of conflict of interest, asset declaration control, registers, international anti-corruption legal framework, public relations, state administration, etc. They also participated in everyday APC's activities and gained their first professional experience. This project component was focused on bringing closer the significance of fight against corruption to young people and encouraging them to take into account their possible future professional engagement in the respective area. Internship candidates not having passed the selection process were also offered a three day seminar program on corruption prevention mechanisms and an additional seminar was organized for other students who had expressed an interest in undertaking this kind of education in the meantime. Several former interns have been working full time in the APC ever since.

As a follow up activity of this project, group of interns and internship candidates from 2011 and 2012 was offered a three day training program, in the form of training for instructors, based on which a group of peer educators on fight against corruption would be formed. After the training, a team was formed consisting of 22 educators, whose primary activity was promoting a competition launched by the APC on the occasion of the International Anti-Corruption Day. The educators promoted the competition in primary schools and high schools in Belgrade. Some team members, who were also members of non-government youth organizations, took on the project idea, and applied for donations in partnership with the APC.

With the technical assistance of the USAID Justice Reform and Government Accountability Project, in 2013 the APC developed partnership with the civil society and some universities of social sciences and humanities aiming to increase the knowledge and awareness over anti-cooperation issues among students. Project paid special attention to prevention of corruption through organization of specialized training courses to students and recent graduates in the field of anti-corruption, and by establishing network of interns. Topics of the training modules pertained to corruption as a cultural, economic, and political phenomenon, captured state theory, Serbia's anti-corruption legal framework, money laundering, public procurement, audit of public finances, free access to information, etc. The program, called "Anti-corruption skills" lasted for two months and after the series of lectures and workshops students took an exam, assessing their knowledge. Based on the results of the exam, seven students were selected to join sponsored internship at the APC. The internship program has lasted for three months.

Another example of youth involvement was the Project “Youth Sleuth: Engaging Serbia’s Youth to Fight Corruption through Investigative Journalism and Social Media” (implemented through technical assistance of the UNDP) in 2012-2013, aimed at reducing corruption by raising public awareness and fuelling intolerance. In partnership with civil society organizations and the APC, young journalists conducted independent, non-offensive and professional research based on which they wrote and disseminated stories, case studies and investigative articles on corruption through web sites, blogs, Facebook, Twitter, etc. A group of nine students and at the same time highly motivated young journalists was competitively selected to intern in three highly renowned civil society organizations which deal with corruption issues. These students were to research corruption in Serbia in parallel with acquiring investigative journalism skills. Their publication through social media was to both uncover facts and mobilize outcry against corruption. The respective civil society organizations were capacitated to coach and counsel young journalists, to provide them with information and baseline for investigative stories and help them publishing stories through Internet and social networks. As a result of the research work of these students, 34 investigative stories and 12 research blogs have been published, produced by nine young journalists who have been trained about the fight against corruption and investigative journalism; relevant authorities have acted upon recommendations from investigative stories; comprehensive study about the university curricula on investigative journalisms has been developed. There was also a Facebook page within this project, notably “Mi-To ne damo” (“We don't give bribe”), having been administered by young journalists themselves.

Within the IPA 2013 Service Contract "Prevention and Fight against Corruption" the APC participated in so called anti-corruption classes focused on raising awareness about recognizing the corruption, learning how to address it as well as the importance of prevention and fight against corruption. Up to date four anti-corruption classes for high-school students titled “Break the Chain! Say NO to Corruption!” were organized throughout Serbia. More than 850 high-school students attended the pertinent classes.

In the period 2019-2022 the APC hosted three interns through the Project supported by the OSCE Mission to Serbia for a period of three and later six months during which the respective interns were able to work closely with the relevant sectors of the APC and get acquainted with all its competences. The APC also provided ethics and integrity training for all interns (including the ones who were hosted by other relevant institutions).

In cooperation with a civil society organization in 2022 the APC also delivered training to high school pupils as well as students on corruption prevention mechanisms.

Within its purview, the APC coordinates and conducts ethics and integrity trainings in public administration. These trainings have been conducted through various modalities: training

for trainers, ethics and integrity trainings in cooperation with the National Academy for Public Administration, online ethics and integrity trainings.

As per the Article 99 of the Law on Corruption Prevention, the APC shall adopt and publish a training programme in the field of preventing corruption and strengthening integrity, as well as instructions on how to conduct the training. The APC shall professionally train the persons who will conduct the training. Public authorities shall conduct training of employees and managers, in accordance with the training programme and training instructions, and inform the APC in writing about the implementation of the training. The APC shall monitor the implementation of training in public authorities.

In accordance with the new Law on Corruption Prevention, the APC has adopted the Training programme in the field of preventing corruption and strengthening integrity as well as Instruction for conducting these trainings.

Training programme in the field of preventing corruption and strengthening integrity consists of four thematic chapters, as follows:

1) Values and role of employees in public authorities

- Values and relationship of values, morals and ethics;
- Integrity and the emergence of corruption at the personal level;
- The role of employees in public authorities;
- Code of Ethics - guardian of ethics in the work environment;
- Organizational culture (Iceberg model);

2) Risk situations for the emergence of corruption in the work environment

- Public and private interest of employees, conflict of interest;
- Risk situations for the occurrence of corruption in the work environment: performing additional work, receiving gifts, handling information, concluding contracts;
- Rules for managing risk situations;

3) The role of the code of ethics in resolving ethical dilemmas

- Ethical dilemma;
- Analysis of the ethical dilemma and decision making;
- Use of a code of ethics in resolving dilemmas;
- Potter's model of solving ethical dilemmas;

4) Responsibility for ethical conduct

- Responsibility and responsible behavior in the work environment;
- Classification of responsible and irresponsible behavior - quadrants of responsibility;

- Transformation of irresponsible into responsible behavior - Bruce Gordon's scale of responsibility;
- Promoting ethical behavior and motivating employees to act professionally.

The goal of the implementation of the Training program is to improve the professional standards of conduct of public authorities' employees and is conducted through workshops, methods and techniques of interactive lectures, panel discussions, group work, case study analysis.

The expected outcomes of the trainings (as per the respective Training Programme) are that after the training participant is able to: identify and adopt values and differentiate between values, moral and professional ethics; define roles of employees in the public sector; use norms of Code of Ethics as guidelines for professional conduct; recognize the difference between public and private interest and define conflict of interest; implement conflict of interest management rules; recognize ethical dilemma situation in a working environment; analyze ethical dilemma situation based on Potter's model and make a decision in line with the Code of Ethics and other regulations; define responsibility in a working environment; recognize forms of responsible and irresponsible conduct in a working environment and indicate examples of such a conduct; follows and promotes positive models of conduct in a working environment.

The APC organizes two types of trainings on ethics and integrity:

1. Training on Ethics and Integrity (basic training)
2. Training for Trainers on Ethics and Integrity (advanced training)

Until the end of year 2021, altogether 50.250 user accounts at on-line learning platform were registered, out of which 40.340 participants successfully finished on-line training by passing tests.

The APC has also developed and published the Manual for Ethic and Integrity Training. As of 2014 the APC organized 15 ToTs on Ethics and Integrity with 187 trainers being educated to independently perform training on Ethics and Integrity.

With an aim to strengthen the public integrity regime as well as to raise awareness on the importance of avoiding conflict of interest, as of its establishment the APC has been organizing and implementing conflict of interest and asset and income declarations tailor-made trainings for public officials. Trainings are aimed at informing public officials about their legal obligations related to avoidance and reporting of conflict of interest as well as asset and income declaration procedure. In cooperation with the National Academy for

Public Administration the APC has also been organizing trainings on preventing conflict of interest and asset and income declarations for public sector employees.

The APC drafted several publications such as Guide for Officials, and Guide through the practice, containing obligations of officials stemming from the law. The APC also drafted the Manuals for Officials in line with the new Law on Corruption Prevention (in 2020) and the Law on Amendments and Supplements to the Law on Corruption Prevention (in 2021).

As a preparation for implementation commencement of the Law on Corruption Prevention, with the support of the USAID Government Accountability Initiative in 2020 the APC has also drafted the Manual for Recognizing and Managing Conflict of Interest and Incompatibility of Offices aimed at strengthening integrity of public officials and public authority bodies. The Manual should serve public officials and general public to get acquainted with: (1) the rules on preventing conflict of interest; (2) restrictions related to discharging other offices or activities; (3) the guidelines and advice on means to identify risks for occurrence of conflict of interest i.e. conflict of interest related red flags; (4) situations and activities which must be circumvented as well as (5) what should be done in case public officials find themselves in such situations or in case they learn about or possess information that somebody else has found themselves in such situations. The respective Manual was also updated as per the amendments to the Law on Corruption Prevention (in 2021). Furthermore, in 2020, after the commencement of the implementation of the Law on Corruption Prevention, the APC developed a video material on conflict of interest.

At its YouTube channel MyIntegrity, the APC has also released educational movies, related to asset and income declarations, instructions on how to fill in asset and income declaration, gifts, registries, seven educational video materials dealing with the APC, Values of Public Sector Employees, Accountability Hierarchy, Ethical Dilemmas, Integrity, Gifts and Conflict of Interest as well as educational movie on lobbying.

The APC also organizes trainings for lobbyists as per the Law on Lobbying as well as ethics and integrity training for MPs in accordance with the Code of Conduct for MPs in cooperation with the Ethics Commission.

(within the purview of the Ministry of Interior)

During 2018, the Ministry of the Interior adopted the following bylaws related to the prevention of corruption:

- Rulebook on the manner of performing internal control,

- Rulebook on the manner of conducting the integrity test,
- Rulebook on the manner of controlling declaration of assets and changing of assets in the Ministry of the Interior,
- Instruction on Methodology for implementation of corruption risk analysis in the Ministry of Interior.

The adoption of the previously mentioned bylaws enabled the Ministry of the Interior to carry out preventive activities from the beginning of 2019, as follows:

- *Testing of integrity of the police officers* through an integrity test during which regular activities and tasks within the competence of the tested employee are not compromised, in confidentiality, and on the basis of a previously prepared and approved plan
- *Control of declaration and change in the assets declaration* of the police managers (in strategic, high, medium and operational level) and for employees in high-risk jobs as determined by the analysis of the risk of corruption who, based on their position, status or work place, do not fall under the obligation to declare their assets with the APC.
- *Conducting corruption risk analysis* - The corruption risk analysis in the Ministry includes risk identification, creation of a risk register and plans of preventive measures for their elimination.

Additionally, work is underway concerning amendments to the Instruction on Gifts in the Ministry of the Interior, which is to be aligned with amendments to the Law on the Prevention of Corruption.

In terms of capacity building activities, the Ministry of the Interior in cooperation with the Organization for Security and Cooperation in Europe (OSCE) is conducting training/course for training police officers to work on prevention and suppression of criminal acts related to corruption. The trainings started in 2016, based on the needs expressed by the General Police Directorate - Criminal Police Directorate and so far the training has been conducted for five groups of trainees (classes), therefore 140 police officers have completed it so far.

Furthermore, we note that the training is designed for police officers who perform or will perform activities to suppress economic crime related to corruption and that during the training they should acquire knowledge and skills for efficient and effective work in performing tasks and activities of preventing and suppressing corruption related criminal offences.

