

*Convinced* of the importance of development of democratic institutions, respect for the rule of law and full respect of human rights and minority rights;

*Aware* of the threat of corruption to economic development and social values;

*Recognising* the commitment expressed in the “Resolution on Ascension to the European Union” of the National Assembly of the Republic of Serbia and the determination to meet all necessary prerequisites and all international obligations of the Republic of Serbia;

*Taking as the starting point the* «Comprehensive EU policy in combating corruption»;

*Bearing in mind* the “Ten principles for enhancing combating corruption in countries joining the European Union, candidate countries candidates and other third countries»;

Pursuant to article 73, paragraph 2 of the Constitution of the Republic of Serbia and article 1340 of the Rules of Procedure of the National Assembly of the Republic of Serbia (“Official Gazette of the RS”, no. 56/05 – edited text)

The National Assembly of the Republic of Serbia, on the Seventh session of the Second sitting in 2005, held on 8 December 2005, has adopted the

## **DECISION ON DETERMINING THE NATIONAL STRATEGY FOR COMBATING CORRUPTION\***

1. This decision sets forth the National Strategy for Combating Corruption.

The National Strategy for Combating Corruption is printed with this Decision and comprises an integral part thereof.

2. The Government is hereby obligated to:

a) draft an Action Plan for implementing of the National Strategy for Combating Corruption;

b) provide funds for implementing of the Action Plan for implementing of the National Strategy for Combating Corruption;

c) ensure drafting of sector action plans for combating corruption;

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\* "Official Gazette of the Republic of Serbia", No. 109/05 from 9 December 2005.

d) propose enactment of legislation on an independent and autonomous anti-corruption body.

3. All government authorities provided under the National Strategy for Combating Corruption are hereby obligated to directly co-operate in developing this strategy, drafting and implementing the Action Plan, as well as sector action plans for combating corruption.

4. The body specified in item 2 (subtitle "g") hereof is obligated to report to the National Assembly on implementing this Decision at least once a year.

5. This Decision shall come into force on the eighth day of publication in the "Official Gazette of the RS".

# NATIONAL STRATEGY FOR COMBATING CORRUPTION

## CHAPTER I: INTRODUCTION

Corruption is a manifestation equally damaging in all societies irrespective of their level of development. The problem of corruption in societies making a transition towards democracy is bigger and more serious, as new demands dictate numerous tasks while the funds and means for their realisation are still undeveloped or insufficient.

Corruption destroys the essence of the state and thus its suppression to a level of acceptability commensurate with standards of the world we live in, is a requisite without which the state cannot be identified as a state ruled by law.

The fight against corruption must be an organised and long-term process of applying of purpose-defined measures for prevention and suppression of corruption. Despite that certain important anti-corruption legislation has been passed, the fight against corruption did not achieve adequate results. The number of prosecuted corruption cases is disproportionate with the number of suspected and publicly pointed out instances of corruption.

A widespread perception is that corruption is one the more serious social problems and that measures undertaken to date in combating corruption have been insufficient. Successful combating of corruption is one of the factors that is appreciated in the process of ascension to the European Union, as well as in assessing the harmonisation with Council of Europe standards. Assessment of the Group of states against corruption of the Council of Europe (GRECO), that is expected in 2005, will be important for evaluation of the success of the institutional and legislative framework, and for evaluation of the applied anti-corruption strategy, which is one of the crucial requirements of Pillar 3 of ascension to the European Union.

There is insufficient social awareness that every form of corruption is destructive and that corruption is not only bribery. The National Strategy for Combating Corruption (hereinafter “the Strategy”) has as its objective to formulate and recommend measures that would in short, medium and long term contribute to suppression of corruption.

Corruption manifests itself where a) opportunity and b) interest is present. The Strategy focuses on both these factors. Opportunity must be eradicated through systemic reforms, and interests eliminated through measures that increase risk and reduce gain.

The Strategy includes three key elements:

- a) efficient enforcement of anti-corruption legislation,
- b) prevention, that implies elimination of opportunities for corruption and
- c) awareness-raising and education of the general public aiming at public support for implementing of anti-corruption Strategy.

All elements of the Strategy have to be applied concurrently and in co-ordination. This would achieve their mutual support and their aggregate effect would be stronger.

Recommendations of the Strategy will be specified in the Action Plan that shall provide particular activities, actors tasked with their undertaking and the time-frame for realisation.

The rule of law in efficient institutions, with easy access to justice and simple and transparent proceedings, may be achieved by consistent implementation of the Strategy and Action Plan without exceptions and their timely harmonisation with identified problems.

### 1. Definition of corruption

Corruption is a relationship based on misfeasance in the public or private sector with the aim to acquire gain for oneself or another.

### 2. International standards

#### a) Achieved international standards

Ratified:

- UN Convention Against Corruption;
- UN Convention against trans national organised crime;
- Criminal Law Convention on Corruption of the Council of Europe;
- CoE Convention on laundering, seeking, seizure and confiscation of proceeds of a crime.

Signed:

- Civil Law Convention on Corruption of the Council of Europe.

Participation in initiatives to combat corruption:

- Group of states against corruption (GRECO);
- CoE Program against corruption and organised crime in Europe (PACO);
- CoE Program against corruption and organised crime in Southeast Europe (OCTOPUS);
- Stability Pact Anti-corruption Initiative for Southeast Europe (SPAI);
- Select Committee of Experts of the Council of Europe for evaluation of measures for prevention of money laundering (MONEYVAL);
- Southeast Europe Co-operation Process (SEECOP);
- International Chamber of Commerce Program for fight against corruption.

#### b) Future essential standards

The following international agreements have to be ratified:

- Civil Law Convention on Corruption of the CoE;
- Additional Protocol to the CoE Criminal Law Convention on Corruption.

### 3. Prerequisites for the Strategy

- Political will;
- Respect for freedoms and rights of citizens;
- Reality, continuity, consistency, gradualness and co-ordination in realisation;
- Comprehensive and consistent implementation in respect of all corruption types and entities;
- Harmonisation of preventive, repressive and educational measures;
- Oversight and accountability for implementing the Strategy, with clearly define duties and time-frames;
- Periodic evaluation of achieved results and harmonisation with new needs;
- Co-operation of the public and private sectors, civil society and citizens.

#### 4. Goals

The goal of the Strategy is reducing corruption and attaining an anticorruption culture commensurate with developed European countries through achievement of the following goals:

- lasting elimination of opportunities for occurrence and developing of corruption;
- establishing of legislative and institutional framework for prevention and suppression of corruption;
- consistent establishing of criminal and moral accountability for unlawful activities;
- establishing desired ethical standards;
- efficient application of internationally established standards in this field;
- transparent financing of political parties, elections and election campaigns;
- prevention of conflict of interest in the public sector;
- lawful and responsible enforcement of decisions;
- increasing functional efficiency of law enforcement bodies and oversight institutions;
- public administration reform with the objective of higher professionalism and transparency;
- open and transparent proceedings related to planning and use of budget funds, and public control of use of budget funds;
- training and assistance to the private sector in implementing anti-corruption measures;
- defining the role of the media in combating corruption;
- prompting citizens and the civil society to get involved in the fight against corruption;
- co-operation and raising general awareness on the rights and duties of government authorities, commercial entities, civil society and citizens in respect of corruption;
- joining the regional and international fight against corruption.

#### 5. Current situation

Corruption represents a serious social problem. . This contention is supported by the views of citizens, declared priorities of political parties and analysis of international organisations. The proportions of corruption cannot be determined. Thus, when assessing the prevalence of corruption, public opinion polls conducted on qualified sample and analysis of perceived corruption are used, with necessary reservations.

During the past several years citizens place corruption as the fourth most important problem in the society (after poverty, unemployment and general crime). Public opinion polls indicate that citizens consider corruption in Serbia widespread, and that this

viewpoint is based to lesser degree on personal experience and more on preconceptions and stories of others. These researches show that a large number of citizens do not report even cases of “small” corruption, of which they have direct knowledge, which is understandable in cases when the citizens themselves are giving bribes.

The fight against corruption to date mainly focused on promoting the legislative and institutional framework. Dissatisfaction of the general public with the speed and quality of changes of living conditions and unstable political scene represent factors that hinder implementation of anti-corruption measures. Some anti-corruption measures were adopted prior to adoption of a strategic document on the fight against corruption and, hence, were insufficiently compatible.

Some forms of corruption are punishable by current criminal legislation. In addition to the standard forms of accepting and giving bribes and «criminal offences of corruption», introduced into the legal system in 2001, there is a number of others that may contain the element of corruption. According to statistical data for the period 2000-2003, criminal offences with the element of corruption account for 4-5% of the overall number of reported criminal offences. Approximately 15% of these charges resulted in convictions. Based on data from other sources, an impression is reached that these criminal offences have a high so-called «dark prevalence of criminality». The problem in uncovering corruption is that only participants in the prohibited activity have cognisance of the criminal offence and, consequently, have no interest in reporting it.

## 6. Causes of corruption

- a) Economic: structure and transformation of ownership, excessive state intervention in the economy, disrespect of market rules, poverty.
- b) Political: outdated and inappropriate constitutions, manner of functioning of political parties, uncertain statehood status, long-term international isolation, existence of informal power centres, absence of consensus on strategic goals of development of the country.
- c) Legal: non-application or selective enforcement of regulations, legal gaps, unharmonised statutory regulations.
- d) Institutional: absence or dysfunction of institutions, insufficient co-ordination, staffing inadequacy and insufficient equipping, incompetence of institutions.
- e) Historical: fast changes in the system of social values, legacies of wars in the former Yugoslavia, lack of professionalism, customs.

## 7. Consequences of corruption

- a) economic:
  - Endangerment of market economy;
  - Reduced GNP;
  - Decrease in investment;
  - Increased indebtedness of the country;
  - Increase in poverty of citizens;

- b) socio-political:
- Undermining of democratic institutions;
  - Increase of cost of functioning of the state;
  - Distrust of citizens in state institutions;
  - Expansion of organised crime;
  - Destruction of moral values of the society;
  - Apathy among citizens.

## CHAPTER II: SYSTEMS AND FIELDS

### 1. THE POLITICAL SYSTEM

The political system has a decisive role in the fight against corruption. The success of that fight depends to large extent on the resolve and ability of factors of the political system to confront corruption. Therefore, existence and stability of political will, adoption and enforcement of relevant regulations and policy represent the prerequisites for implementing the Strategy.

The political system is frequently the source of some forms of corruption. Lack of harmonisation between constitutional norms and legislative solutions on election of MPs, unresolved conflict between the public and private interests, incomplete transparency in the work of government authorities and political parties, inadequate control of the role of money in politics, demagogic low salaries of the highest officials and treatment of corruption cases in light of political showdowns and not as criminal offences, present a an obstacle not only for the realisation of the role of the political system in fighting corruption but also for attainment of social consensus and confidence of citizens in respect of implementing the necessary.

Recommendations:

- Commitment of the State Union of Serbia and Montenegro for quicker ratification of international instruments for combating corruption,;
- Strengthening co-operation of government authorities of member republics of the State Union in combating corruption;
- Enhancing publicity and transparency in the work of government authorities;
- Timely publishing of detailed reports regarding voting and other MPs' activities;
- Increasing efficiency of the oversight function of the National Assembly;
- Introducing elements of direct election (by name) of MPs into the election system;
- Harmonisation of the constitutional status of MPs and the manner of their election;
- Establishing clear and objective criteria for evaluation of Government's efforts in combating corruption;

- Ensuring adequate remuneration for officials with consistent determination of accountability for discharge of office, including dismissal;
- Adoption of standards of integrity in highest government bodies;
- Introducing the requirement for government authorities to respond within statutory deadline to relevant questions from anti-corruption bodies;
- Introducing the obligation of public authorities to periodically submit reports on implementation of anti-corruption measures from their purview;
- Introducing a ban on partisan activity for certain categories of officials;
- Developing regulations on prevention of conflict of interest in discharge of public office;
- Limitation of immunity regarding appearance and statements given in discharge of public office (material immunity);
- Developing regulations on financing of political parties;
- Introducing the obligation for the Government to publish decisions on appointment and dismissal with an explanation of meeting the criteria and/or reasons;
- Ensuring special control of harmonisation of regulations and their consistency from the viewpoint of combating corruption;
- Enacting of law on lobbying and ensuring transparency in lobbying;
- Enacting a code of conduct of MPs and employees in the National Assembly Secretariat, with mandatory stipulation of ban of corruptive behaviour and ensuring its effectiveness;
- Introducing a limitation of passive electoral right for persons effectively convicted for criminal offences with element of corruption.

## **2. JUDICIARY AND POLICE SYSTEM**

Independence, impartiality, efficiency and accountability in the judiciary and the police are a prerequisite for creating a state ruled by law, and their strengthening the primary task. Current legislative measures are directed at prevention and sanctioning corruptive behaviour, but corruption still exists. This is indicated by public opinion, phenomena that with a degree of probability indicate that the issue in question is corruption, and a small number of uncovered and prosecuted corruption criminal offences against judicial and police employees.

Recommendations:

- Statutory definition of corruption;
- Introducing liability of legal entities for criminal offences;

- Introducing separate record of legal entities convicted for criminal offences and their elimination from public tenders;
- Establishing clear and common election criteria for nomination of judges and holders of public prosecution office (hereinafter “holders of judicial office) and their dismissal;
- Establishing specialised departments of public prosecution for criminal prosecution of serious corruption cases;
- Introduction of disciplinary accountability of holders of judicial office;
- Introducing preventive measures and controlling mechanisms for prevention of conflict of interest for holders of judicial office;
- Ban on political activity of holders of judicial office;
- Ban on political engagement of holders of judicial office;
- Adopting and integrity plan in courts and prosecution;
- Monitoring of complaints against holders of judicial office, particularly in cases with corruption element;
- Passing of a code of conduct of holders of judicial office, with mandatory regulation of the ban on corruptive behaviour and ensuring its effectiveness;
- Specialist advanced training of holders of judicial;
- Introducing periodic mandatory analysis of the work of bodies engaged in uncovering, prosecution and adjudication;
- Establishing tenure of office for holders of judicial functions;
- Mandatory periodical evaluation of the work of holders of judicial office based on predetermined criteria;
- Autonomy of judicial budget;
- Accelerating of court proceedings;
- Mandatory publication of effective court decisions in criminal cases with corruption element and organised crime cases;
- Ensuring effective enforcement of court verdicts;
- Suppression of corruption within court administration;
- Training of holders of judicial office for conducting pre-trial criminal proceedings;
- Mandatory subsequent review of prosecution decisions not to instigate or discontinue proceedings for criminal offences with corruption element, or in cases of procrastination of criminal proceedings;

- Elimination of influence of political structures on pre-trial proceedings;
- Amending the Criminal Procedure Code with the objective of more effective uncovering and prosecution of criminal offences with corruption element;
- Introducing prosecutorial investigation, with amendments of competencies of the investigative judge;
- Protection of persons reporting corruption and witnesses;
- Specifying statutory regulations on application of special investigation techniques;
- Expanding use of special investigative techniques for criminal offences with corruption element;
- Amending procedural regulations with the objective of prevention of their abuse by parties in proceedings;
- Consistent application of regulations on mandatory confiscation of benefits deriving from corruption;
- Transferring the burden of proof to the defendant in cases of seizure of material gain;
- Forming of a separate organisational unit for managing temporarily seized, frozen and confiscated assets;
- Introducing restrictions for persons effectively convicted for criminal offences with corruption element;
- Analysis and amending of regulations on the State Advocate;
- Consistent implementing of the code of professional ethics of lawyers and ensuring its effectiveness;
- Establishing independent and specialised institutions to provide expertise in criminal proceedings;
- Enactment of Police Act and relevant by-laws;
- Increasing the number of police officers engaged in combating corruption;
- Providing relevant expertise and constant specialisation of police staff engaged in combating corruption;
- Providing adequate salaries and work conditions for police officers;
- Eliminating political criteria in selecting police staff, in favour of professionalism;
- Ban on political engagement of police staff;

- Enhancing internal and external oversight of police work and ensuring institutional efficiency;
- Consistent enforcement of police accountability in cases of violation of law;
- Material investments in modernising the criminal investigation police department.

### **3. THE SYSTEM OF PUBLIC ADMINISTRATION, TERRITORIAL AUTONOMY, LOCAL SELF-GOVERNMENT AND PUBLIC SERVICES**

Implementing of the legal framework in the battle against corruption is not possible without active participation of public administration, territorial autonomy, local self-government (hereinafter “administrative authorities”) and public services. Flawed regulations and experience acquired by staff enable in some cases of arbitrary decision-taking may constitute a source for corruption. Therefore, upgrading of statutes, precise regulation of the scope of rights and transparent procedures are an essential prerequisite to avoid corruption. It is necessary to introduce a clear and effective principle of personal accountability of public administration and public services staff for lawful, efficient and quality work.

#### Recommendations:

- Implementing the Strategy for public administration reform;
- Commencement of work of the Administrative Court;
- Improving regulations governing: the work of the Government, public agencies, the Protector of Citizens (Ombudsman), public administration, territorial autonomy, local self-government, public servants, public services, as well as the general administrative procedure and administrative disputes;
- Consistent application of regulations on free access to information of public importance;
- Improving co-operation of public administration organs in combating corruption;
- Review of the discretionary powers of public administration and public services staff;
- Consistent application of the principles of work of public administration: depolitisation, professionalism, rationalisation, modernisation and the principle of open government, as well as review of the job classification in all public administration bodies, pursuant to the above principles;
- Establishing mechanisms guaranteeing impartial, objective and apolitical selection of staff and their promotion;
- Ensuring adequate salaries and working conditions of civil servants and public services employees;
- Establishing an efficient system of control and accountability of civil servants and public services employees;

- Protection of civil servants and public services employees who refuse to obey unlawful instructions of their superiors;
- Adoption of an integrity plan in government and public services;
- Passing of a code of conduct of public and civil servants, with mandatory stipulation of the ban on corruptive behaviour and ensuring its effectiveness;
- Definition of rules on prevention of conflict of interest, on engaging in political and public activities, receiving gifts and protection of official information;
- Introducing rules on movement of staff from the public to the private sector and ban on exploiting former official status;
- Establishing mechanisms for reporting unlawful and unethical work of civil and public servants and mechanisms for protection of persons reporting such behaviour (“whistle blowers”);
- Consistent control of application of regulations on payment of administrative fees;
- Defining and implementing measures to simplify procedures for exercising the rights of citizens before public administration bodies and public services, with primary objective of obtaining documentation in one place;
- Statutory regulation of criteria for determining the degree of confidentiality of documents and procedures for their safe-keeping;
- Interconnecting of the IT systems of the Tax Administration, Public Payment Directorate, Customs Administration, the Republic Pension and Disability Insurance Fund, and the Ministry of Internal Affairs as a single information system of public administration organs;
- Introducing the principle of rotation of civil servants and public services staff on jobs susceptible to corruption;
- Adopting and implementing separate action plans for combating corruption in areas most susceptible to corruption;
- Systematic advanced professional education of civil servants and public services staff.

#### **4. PUBLIC FINANCE SYSTEM**

Public finance and budget spending constitute approximately 45% of the GNP. Hence, planning, collection, disbursement, publicity and control of public finance are exposed to high risk of corruption, with serious consequences. Reforms in the customs, tax and budget systems lead towards creating of a less corruptive ambient. Flaws in the legal framework and belated application of particular new legislative regulations present a serious problem. Absence of adequate control mechanisms is particularly visible..

Recommendations:

- Consistent adherence to the principle of comprehensiveness of the budget, and elimination of non-budgetary funds;
- Completing of a single system of managing the accounts of budget spending units;
- Unification of accounting and budget classification and chart of accounts plans;
- Establishing mechanisms for evaluation of appropriateness of spending unit needs in planning of the budget;
- Introducing efficient control of borrowing and establishing direct link with planned inflow of money;
- Transforming of the provisional Treasury account in the permanent Treasury account;
- Introducing a modern IT system in the Treasury and Public Payment Administration;
- Enhancing transparency in spending budget funds;
- Enhancing current regulations on Treasury operations;
- Creating a Supreme Auditing institution;
- Establishing efficient control of budget execution by the legislative;
- Creating material and legislative conditions for efficient discharge of budgetary inspection and audit tasks;
- Organising budget inspection and auditing at local level;
- Introducing a system of internal financial control of all budget spending units and mandatory social insurance organisations,;
- Increase in the number of public finance controllers and auditors;
- Free access to information relating to planning and execution of the budget.
- Harmonisation of tax regulations with EU regulations;
- Introducing synthetic personal income tax and self-taxing of entrepreneurs' income;
- Transfer of competencies for local tax administration to local level;
- Reducing the number of forms of taxes;
- Improving tax collection efficiency;
- Strengthening the Tax Administration's internal control service and establishing external control;
- Automatisation of tax procedure by introducing an IT system with single data base;

- Modernisation of Tax Administration that includes transfer from functional to client organisation.
- Consistent application of task and job division and rotation of customs service staff;
- Developing customs methodology;
- Automatisation of customs proceedings by introducing a contemporary IT system with single data base;
- Establishing links with custom services of other countries with the objective of information exchange.
- Developing and strict application of regulations in the public procurement field;
- Establishing an efficient mechanism for control of appropriateness and justifiability of planned public procurement;
- Establishing control mechanisms for procurement realisation;
- Ensuring autonomy and independence of the Commission for protection of rights from the executive branch.

## **5. ECONOMIC SYSTEM**

Prevention of corruption within the economy requires special measures, both due to interdependence of the economy and other sectors and because of corruptive habits within itself. The economy is in a difficult position due to long-term crisis and current reform processes.

Recommendations:

- Limiting the role of the state in the economy to establishing basic rules for fair competition, freedom of contracting, creating a business-friendly environment and regulating larger-scale market disruptions;
- Rectifying lack of congruousness and contradiction between individual systemic economic regulations (Law on Economic Entities, Securities Act and Economic Entities Registration Act...)
- Enhancing transparency of privatisation processes and proceedings;
- Creating and independent privatisation oversight body;
- Awareness raising of citizens regarding their rights in potential privatisation processes and the overall effects of privatisation;
- Developing a clear and effective competition policy;
- Establishing mandatory internal control in the public sector;
- Instituting independent external accounting audit of the of the largest economic entities;

- Strengthening independence and professionalism of specialised auditing institutions and the Accounting and Audit Commission;
- Strengthening a completely new, consistent and up-to-date book-keeping system, in accordance with international bookkeeping standards;
- Introducing integrity plans for economic entities;
- Enforcing a ban on obtaining tax relief for payment of funds for unlawful purposes;
- Passing a Code of Ethics and establishing mechanisms for its implementation;
- Creating reliable mechanisms within companies for employees wishing to report corruption and ensuring their security;
- Active promotion of the code of good business practise of the International Chamber of Commerce;
- Abolishing provisions of receiving of gifts as a manner of financing of agencies with public authority;
- Improvement of corporate management.

## **6. MEDIA**

Corruption in the media renders objective informing senseless and prevents public scrutiny over social activities. Professional work is under temptation to acquire unlawful gain, while the society that should be served by the media is sustaining damage. Damage is not easily rectifiable, thus prevention of corruption due to the effect of anticorruption awareness raising is very important.

### Recommendations:

- Separation of the advertising function and information function within the media activity;
- Transparent insight into media ownership and prevention of monopoly therein;
- Transparency of financial transactions of the media;
- Developing regulations on the status, rights and operation of the media with the objective to create conditions for their independent work;
- Ensuring conditions for the work, autonomy and independence of the Republic Broadcasting Agency and Telecommunication Agency;
- Introducing a common code of ethics for journalists, with mandatory regulation of the ban on corruptive behaviour and ensuring its effectiveness;
- Ensuring independence of journalists in professional duties with consistent implementation of accountability for violation of the journalists' code of ethics;

- Enhancing regulations on accountability for public statements;
- Preventing discrimination in the relations of public authorities towards the media;
- Implementing the principle of incompatibility of journalist work and political activity;
- Permanent education of journalists on the forms of improper influence on their work, on forms of corruption, on investigative journalism, and their protection;
- Providing effective mechanisms for legal protection of journalists in cases of unfounded denial of information;
- Providing adequate sanctions for media influence peddling.

## **7. PARTICIPATION OF THE CIVIL SOCIETY AND THE PUBLIC IN COMBATING CORRUPTION**

No effort of the public authorities, international organisations or civil society organisations in suppression of corruption will be effective over time if the general public does not support these efforts. The citizens are part of the anticorruption strategy but also its objective. This Strategy has as its goal to change the culture where corruption is tolerated. The citizens, through exercising their electoral right, may control and “punish” the incumbents in office with whose ethics or results they are dissatisfied, and/or “reward” those who were honest and diligent.

NGOs have to earn their legitimacy through openness, courage and quality of their actions. They can successfully act in combating anticorruption but may also themselves become the source and means of corruption, as they operate within an inadequate legal and social environment which hinders their work, creates dependence on donors and represents an obstacle for effective control of the quality of their work.

Guilds and professional associations may frequently observe issues related to typical manifestations of corruption more quickly and better than public authorities. Consequently, their role is to uphold and promote the level of ethics among members and sanction unacceptable behaviour. The majority of professional associations do not possess the prerequisites to realise their role in fighting corruption, whilst those discharging public authority are exposed to the danger where their monopolistic status may become the source of corruption.

The issue of ownership transformation in sports organisations is not regulated which, together with potential influence by political structures, creates suspicion of corruption.

Recommendations:

- Implementing continued awareness raising campaign among citizens regarding corruption and how to combat it;
- Introducing programs of basic education on corruption in educational institutions;
- Informing citizens on undertaken anticorruption measures and effects thereof;

- Informing citizens of regulations on free access to information of public importance;
- Providing effective legal remedies in cases of unfounded denial of information;
- Introducing reliable mechanisms for submitting of complaints by citizens and the obligation of public authorities to respond to them within statutory deadlines;
- Including of citizens associations in the activities of public authorities in combating corruption;
- Promoting the work of professional associations in fighting corruption;
- Reform of legislation in the field of citizens associations;
- Granting budgetary funds and tax relief to citizens associations based on clear criteria in a transparent procedure;
- Ensuring full transparency of financial transactions of the work of citizens associations;
- Control of spending of budgetary funds granted to citizens' associations;
- Introducing and application of ethic rules in citizens' associations;
- Timely informing of citizens' associations on the possibility to obtain funds from the budget;
- Enacting regulations on privatisation of sports organisations.

### **CHAPTER III: STRATEGY IMPLEMENTATION**

A separate law shall establish an autonomous and independent body with the following competencies:

1. Monitoring of implementation of the Strategy and Action Plan;
2. Co-ordination of government authorities in combating corruption;
3. Enforcing of regulations from the field of conflict of interest resolution for officials in all branches of the government;
4. Control of implementation of regulations governing financing of political parties and election campaigns;
5. Monitoring the work of bodies engaged in the battle against corruption;
6. Developing integrity plans in the public and private sector;
7. Initiating amendments to and enactment of regulations of government authorities;
8. Regular periodic reporting to the National Assembly and publicity of work;
9. International and regional co-operation in combating corruption.