

Republic of Macedonia
STATE COMMISSION
FOR PREVENTION OF CORRUPTION

STATE PROGRAMME

FOR PREVENTION

AND REPRESSION OF CORRUPTION AND

REDUCTION OF CONFLICT OF INTEREST

WITH ACTION PLAN 2016 – 2019



Republic of Macedonia

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2016 - 2019**



Skopje, December 2015

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INTRODUCTION

Corruption represents a fundamental challenge to modern societies in general. It undermines free competition, market economy, democratic institutions and rule of law. If not controlled, it can turn into a systemic problem that threatens sustainable development, prevents social progress and jeopardizes democratic achievements. It has to be pointed out that favouring illegal private gains over public good overrides democratic values, human rights, moral values and justice, which is contrary to public interest and a threat to the wellbeing and safety of those who respect the laws.

Fight against corruption is a comprehensive, complex and long-term process that requires involvement of the overall society and taking initiatives at all levels. The state anti-corruption policies and activities for combating corruption can be more successful if not isolated solely within the frames of the institutions in charge of combating corruption.

Corruption and conflict of interests are inter-related and layered social phenomena and their curtailment requires a holistic approach, i.e. inclusion of a greater number of social entities that would contribute through coordinated, specific, achievable and effective activities.

Therefore, the State Programme represents a comprehensive anti-corruption strategy that fosters the consensus about the need to take coordinated, systemic and comprehensive action against corruption in line with the country's strategic objectives on combating corruption and development and reform processes.

Based on its legal competences prescribed in Article 49, paragraph 1 of the Law on Prevention of Corruption and Article 21, paragraph 1 of the Law on Prevention of Conflict of Interests, the State Commission for Prevention of Corruption (hereinafter referred to as the *SCPC*) coordinates the process of the drafting and the adoption of the State Programme for Prevention and Repression of Corruption and the State Programme for Prevention and Reduction of Conflict of Interests with a corresponding Action Plan for their implementation.

Considering the fact that corruption and conflict of interests are two inter-related negative phenomena, the SCPC decided to design these two State Programmes as part of a single process and as a single document, thus fulfilling the obligations resulting from these two laws.

The State Programme for Prevention and Repression of Corruption and the State Programme for Prevention and Reduction of Conflict of Interests with the Action Plan for 2016-2019 (hereinafter referred to as the State Programme 2016-2019) is based on and is a continuation of the previous anti-corruption strategies, in line with the commitments of the country resulting from the ratified anti-corruption conventions and international standards, as well as the national legislation, based on the good domestic and international practices. The State Programme 2016-2019 applies the integrated approach directed to five strategic objectives related to the strengthening of the systems for prevention and repression of corruption and conflict of interests, capacities and autonomy of the law enforcement bodies, the public involvement in the prevention and repression of corruption and conflict of interests,

as well as efficient coordination of anti-corruption activities and monitoring and evaluation of its implementation.

This approach of the State Programme 2016-2019 raises the fight against corruption and conflict of interests at a higher level than the sectoral approach and provides a strategic framework for designing individual strategies and action plans for prevention and fight against corruption and conflict of interests.

The concept of the State Programme 2016-2019 focuses on its implementation and impact. The relevant entities in charge of the implementation of the activities are expected to demonstrate exceptional commitment, accountability and reporting.

1. GENERAL OVERVIEW

1.1 Fight against corruption as a continuous process

The progress in the integration of the country into the European Union requires increased transparency and accountability as part of the value and integrity system. Strengthening the integrity as an integral part of the anti-corruption policy is an objective and an alleviating factor for the success of the reforms and progress in all social spheres. Anti-corruption policies represent a continuous process for strengthening of the democracy and creating the required preconditions and mechanisms for economic, social and political progress.

The country needs to demonstrate resoluteness and strategic depth when taking thought-tough, specific, comprehensive, sustainable and effective activities to prevent the corruptive practices.

1.2 Challenges to the adoption of the anti-corruption strategy and importance of the strategy

The first challenge that all countries are faced with when adopting an achievable and effective anti-corruption strategy is the need for dedicated internal leadership and commitment at the highest level.

The political culture, readiness and motivation for changes are the second challenge.

The third challenge is related to the in-depth analysis, identification and assessment of the risk of corruption and conflict of interests in certain social spheres.

The importance of the anti-corruption strategies can be seen in the coordination of the activities for prevention and repression of corruption and conflict of interests and joining and unification of the commitments of all stakeholders that are in charge of their implementation.

2. VISION AND MISSION OF THE STATE PROGRAMME 2016-2019

Vision: Society based on integrity, transparency, responsibility, accountability and creating a strong anti-corruption culture.

Mission: Designing and implementing structural policies for effective prevention and fight against corruption and conflict of interests through synergy of the commitments of all social actors.

3. PREVIOUS STATE PROGRAMMES

The continuity and high level of commitment of the SCPC to finding comprehensive solutions for overcoming corruption and conflict of interest, as well as coordinating all factors in the development of the strategic documents is demonstrated by the activities foreseen in the previous programmes, their implementation and the findings and recommendations taken into consideration when designing the subsequent state programmes.

So far, the SCPC has adopted the following state programmes:

- State Programme for Prevention and Repression of Corruption with Action Plan, 2003

The activities foreseen in this state programme were primarily directed towards the development and strengthening of the anticorruption legal and institutional framework.

- Annex to the State Programme for Prevention and Repression of Corruption – Measures for Prevention and Repression of Corruption within the Local Self-government with Action Plan, 2005

The purpose of this Annex was to introduce a system of measures for prevention of corruption within the local self-government during the transferring of competences from the central to the local level.

- State Programme for Prevention and Repression of Corruption with Action Plan, 2007

This State Programme was based on the six pillars of the national integrity system. The Action Plan also contained the indicators for monitoring the implementation of the activities, as well as key performance indicators used by certain institutions.

- State Programme for Prevention and Reduction of Conflict of Interests with Action Plan, 2008

It is a separate strategic document that identifies nine risk areas prone to conflict of interests and includes measures to mitigate the risks.

- State Programme for Prevention and Repression of Corruption and State Programme for Prevention and Reduction of Conflict of Interests with Action Plan, 2011

The last State Programme was based on the sectoral approach and 11 sectors were identified as high-risk areas with respect to corruption and conflict of interests.

4. APPROACH

4.1 What is this strategic document about

The State Programme 2016-2019 is a national strategy for prevention and fight against corruption and conflict of interests, which is coordinated and in line with the strategic and reform processes in the country and it represents a general framework for a coordinated and comprehensive fight against corruption and conflict of interests.

The State Programme contributes to the strengthening of the integrity and building of citizens' trust in the institutions; it promotes the principle of zero tolerance to corruption and efficient rule of law in the country.

This document takes a result-oriented approach and calls for joint action and proactive behaviour and engagement by all institutions, independent bodies, civil sector, private sector, media and the overall community in the fight against corruption and conflict of interests.

4.2 State Programme drafting and adoption approach

During the second quarter of 2015, the SCPC started drafting the State Programme 2016-2019. To that end, a Coordinative Group for the Drafting of the State Programme was established at the SCPC. Numerous working meetings were held with civil society and international organizations in order to support the drafting of the programme. Cooperation with the Ministry of Justice was also established for their inclusion in all stages of the drafting of the State Programme 2016-2019.

In the course of July 2015, the guidelines for the drafting of the State Programme were drawn up by taking into account the experience resulting from the previous state programmes, as well as comparative experience.

In August 2015, the Operational Plan for the Adoption of the State Programme 2016-2019 was made and adopted and a working group was established with representatives of the institutions that would participate in the drafting of the Programme.

Furthermore, for the purpose of successful realization of the objectives and goals set for the adoption of the State Programme, the SCPC established cooperation with the OSCE Mission to Skopje and the Macedonian Center for International Cooperation, which resulted in the provision of expert support.

In the period from 30.9.-2.10.2015, with the support of the OSCE Mission to Skopje, a workshop was conducted with representatives of the relevant institutions, civil society organizations, private sector, international community and experts in this sphere and the content and guidelines for the State Programme 2016-2019 were presented.

Following the workshop, the representatives of the relevant institutions submitted their proposals, comments and opinions on the contents of the State Programme which referred to the identification of the problems and risks of corruption and conflict of interests with respect to the institutional competences and proceedings. Their input served as a basis

to determine and define the Action Plan measures for the implementation of the State Programme 2016-2019.

In cooperation with the Macedonian Center for International Cooperation, on 5-6.11.2015 the SCPC conducted a second workshop dedicated to the drafting of the Action Plan for the implementation of State Programme 2016-2019. The participants in the workshop were divided into several working groups and they presented their findings and viewpoints on the joint activities that were organized to draft the Action Plan.

In addition, several working meetings were also held with representatives of the relevant institutions in order to round up the activities related to the Action Plan.

The SCPC adopted the State Programme 2016-2019 on 07.12.2015.

4.3 Main guidelines for the drafting of the State Programme 2016-2019

- The United Nations Convention against Corruption;
- EU Progress Reports on the country;
- List of Urgent Reform Priorities for the country issued by the European Commission (June 2015);
- Priorities set in the National Programme for the Adoption of the Acquis Communautaire (NPAA);
- Recommendations from the GRECO evaluations for the country;
- Europe 2020 Strategy, "Governance for Growth" Pillar, "Effective Public Services, Anti-Corruption and Justice" Dimensions;
- Survey on Citizens' Perceptions of Corruption and Conflict of Interests and qualitative sectoral analysis;
- Activities foreseen in the State Programme 2011-2015 which were not implemented, but are still particularly relevant to the prevention of corruption and conflict of interests.

4.4 Principles of the State Programme 2016-2019

- Rule of law
- Fact-based planning, monitoring and evaluation of the implemented anti-corruption measures
- Comprehensiveness and inclusion through coordinated activities of all stakeholders and creating a strong coalition for prevention of corruption and conflict of interests.
- Transparency for the purpose of timely familiarization of the public with the adopted anti-corruption policies, the existence of adequate mechanisms for communication and consultations with the public and visibility of the anti-corruption commitments for the planned proceedings, as well as proceedings-related reporting;
- Results-orientation by setting specific, measurable, attainable, relevant and time-bound objectives and activities

- Flexibility and responsiveness of the State Programme 2016-2019 to changes, updates and upgrades using new contents in line with the social, economic and political changes.

4.5 Factors that Influence the successful implementation of the State Programme 2016-2019

The main preconditions for a successful implementation of the State Programme 2016-2019 include a clearly expressed and practically demonstrated political and institutional will, full commitment, coordination and cooperation of all social actors, sustainable financial support, efficient monitoring and evaluation of the implementation, as well as regular amendments and updating of the State Programme 2016-2019.

5. GOAL OF THE STATE PROGRAMME 2016-2019

The State Programme 2016-2019, together with the strategic reform processes, represents a general framework for comprehensive prevention and fight against corruption and conflict of interest, which implies identification of the priority actions required to overcome the risk of corruption, but also affirmation of the positive social values such as integrity, transparency, responsibility and accountability.

6. STRATEGIC OBJECTIVES, AREAS AND ACTIVITIES

The special strategic objectives that are based on the activities from the Action Plan for the implementation of the State Programme 2016-2019 include:

- Strengthened institutional system and legislation for prevention of corruption and conflict of interest;
- Improved repression of corruption ;
- Strengthening of the capacities and independence of the law enforcement bodies ;
- Increased public participation in the fight against corruption and conflict of interest;
- Efficient coordination of anti-corruption activities, monitoring and evaluation of the implementation.

Even though presented separately, all strategic objectives are inter-related and the desired effects and results can only be achieved by attributing equal importance and relevance to all the objectives. Thus, the implementation of the preventive and repressive objectives depends on the strengthening of the institutional integrity, i.e. independence and capacities of the institutions and legal framework for combating corruption and conflict of interests and its consistent implementation. Gaining public support in the fight against corruption and conflict of interest will have an impact on the efficient realization of the preventive and repressive activities, whereas the implementation of all foreseen strategic objectives will depend on the efficiency of the mechanisms for coordination of anti-corruption activities. Each of the

strategic objectives is addressed through various areas with specific activities proposed to overcome the identified weakness and risks.

6.1 Strategic Objective 1: STRENGTHENED INSTITUTIONAL SYSTEM AND LEGISLATION FOR PREVENTION OF CORRUPTION AND CONFLICT OF INTEREST

Prevention should always come first, ahead of repression and in all areas as it stops harmful consequences from happening, through various activities aimed at identifying the risks and eliminating the possibility for corruption and conflict of interest. Efficient prevention requires strengthened institutional and legal framework for combating corruption and conflict of interest.

6.1.1 Integrity and ethics in institutions at all levels

“Integrity” has become one of the most frequently used terms when evoking good governance as a concept. In that sense, when talking about good governance, it usually means building and nourishing the spirit of integrity both at personal and institutional level, which would encourage and ensure independence, professionalism and accountability when performing the competences prescribed in the national and international legislation.

There is no single methodology or a single model for a systemic application of the concept of integrity; each state applies a model or a combination of methods that were available in a given time period and which are regularly updated in order to address the need to strengthen the national, institutional and personal integrity system .

The recommendations presented in the State Programme 2016-2019 strongly affirm the understanding that national integrity should be embedded in and expanded among all social actors, above all in the systems of the government, independent institutions, local self-government, private sector, civil society and media. The State Programme 2016-2019 also sets the legal framework for further implementation of the integrity concept.

The State Programme 2016-2019 applies an innovative approach to corruption prevention by introducing a social responsibility and integrity system which, in the forthcoming period and among other components, needs to focus more on corruption risk management by conducting corruption risk assessment or, in other words, integrity risk assessment - a system that can be applied both in central and local level institutions, but also in private sector companies.

The integrity system approach contributes to strengthened personal and national integrity of the public sector as a whole and it consists of the following elements:

- Full observance and application of the existing mechanisms in public administration bodies, such as internal audit and control mechanisms, as well as quality management systems.
- Adjustment of the system to the specific needs of various public administration bodies, where each of these bodies need to use it for their own corruption risk management on an annual basis. The purpose is to strengthen and unify the key elements and principles of

corruption risk management through practical advice, guidelines and roadmaps, tools and means that support the promotion of corruption risk management in the public sector. The risk management strategies need to be monitored in order to strengthen the institutional integrity. This process is ongoing, a never-ending cycle and an iterative process of identification, quantification, modelling, management and monitoring.

- Performance standards and procedures implemented in an inclusive manner that partners and staff need to be informed about, where larger structures require larger continuous monitoring systems.
- Developing Codes of Ethics, specific for particular institutions.
- Defining clearly articulated, written anti-corruption policies, visible and accessible to all, concise and reflecting the decisions of the so-called real policy.
- Introducing internal channels to report corruption and illicit behaviour.
- Surely, there is an obvious need to train institutions to improve their knowledge and skills of integrity, its importance and implementation at the institutional level.
- It is advised that the institutions do the necessary updates and submit a report on the implementation of the integrity system and its features to the SCPC at least once per year.

6.1.2 Public procurement, concessions and public- private partnership

Public procurement is one of the ways in which the state government spends public funds. In that sense, public procurement contracts are the drivers of public policy implementation. Hence, preventing corruption in public procurement is a key factor for improved efficiency of these public policies.

Reforms in the fight against public procurement corruption have to involve all stages of public procurement in order to yield more adequate, serious and comprehensive results. From the beginning of the procurement planning as a first phase of the implementation of the overall public procurement process, the main corruption related problem is detected with the drafting of unreal and insufficiently transparent public procurement plans made by the contractual authority, then frequent amendment of these plans and lack of harmonization of these plans with the institution's real needs.

In order to overcome these activities, it is important to limit the possibility for frequent and easy amendments of these annual public procurement plans that the contractual authorities are obliged to publish on their own websites.

In order to identify the real public procurement needs, especially in the Local Self-Government Units (LSGU), it is necessary to adopt the habit of conducting research or surveying, defining special justification procedures for all public procurement which would ensure increased public participation in the drafting of the public procurement plans in each of the municipalities, increased transparency as well as improved alignment of the public procurement plan with the real needs of the institution.

On the other hand, as the Public Procurement Council, which also demonstrated inconsistencies in some of its operations, is the control mechanism in these proceedings, it is

important to impose more stringent criteria for the election of professionals sitting in that body who are directly included in this process and decide whether a particular contractual authority's application should or should not be accepted.

Considering the fact that the penal provisions prescribed in the Public Procurement Law are aimed at a more stringent penal policy for one of the parties (pursuant to this Law, only an official can appear as an offender and no liability is prescribed for the contractual authority), the question that still remains is who the second corrupted party is, knowing that it takes two for corruption. In addition, there is a lack of sanctioning range for these criminal offences or misdemeanours.

The use and spending of public procurement funds by the contractual authorities is to be audited by the State Audit Office which then issues recommendations that are binding on the participants in the proceedings that these recommendations refer to.

The corruption risk in public-private partnership has already been identified in the State Programme 2011-2015. In that sense, an analysis of the Law on Concessions and Public-Private Partnership needs to be conducted in order to review the monitoring and oversight system for the awarding and implementation of concessions and public-private partnerships, but also to strengthen the oversight in the implementation of the concession agreement. These actions would contribute to the prevention and repression of corruption related to the concession agreements and public-private partnerships.

6.1.3 Electoral process, political party and electoral campaign funding

Special contribution to the strengthening of the corruption and conflict of interest prevention system was made by introducing amendments to the Electoral Code and the Law on Political Party Funding. The analysis of the relevant legislation revealed that the amendments to the Electoral Code and the Law on Political Party Funding are a result of the implementation of some of the recommendations issued by the relevant international institutions such as GRECO and OSCE/ODIHR related to political party funding and election campaigns and that certain progress has been made in the increasing of transparency and accountability of the sources, the way the political parties acquire and use the funds, as well as the provision of a more efficient control system that takes more specific measures to sanction the entities that violated the law. Reporting and oversight of finances in this sphere are at a higher level, which shows that the amendments are headed in the right direction but further improvement of this legislation is required, as the practical application revealed a lot of weaknesses and ambiguities.

The SCPC has immediate competences in the oversight of political party and election campaign funding and for this very reason, in the State Programme 2016-2019 it foresees various activities to promote the pertinent legislation, which will improve its quality through strengthened transparency, accountability, responsibility and rule of law.

As for the political parties' transparency, accountability and responsibility, it was established that political parties do not have a proactive role, whether in times of election campaigning or

not. In order to overcome this state, it is essential that the Law on Political Parties be amended by introducing an obligation for the political parties, when registering, to have a website that would be regularly updated with data related to their operation, including data related to their financial operation. It is particularly important that the political parties also publish data related to the seat of the political party's authorized accountant, as well as all relevant data related to elections and manner of acquiring and spending their funding. The introduction of this new obligation sets the right conditions for transparency in the political parties' financial operation, which also relates to the obligation resulting from the Law on Political Party Funding and the Electoral Code for the political parties to publish their financial reports on their websites.

The amendments to the Law on Political Party Funding and the Electoral Code prescribe that political parties and the participants in the election campaign (political parties, coalitions and independent candidates) are required to submit financial reports (register of donations, report on donations, annual financial report and annual balance sheet). The obligation related to the reporting on the political parties' regular operation and their operation during the electoral process is strictly formal, without the necessary insight in the amount of the real funds, their sources and allocation, which has an impact on the efficient sanctioning of violations.

In order to overcome this state of affairs, amendments are foreseen to the existing bylaw on the template, form and manner of keeping the political parties' annual financial report and the bylaw on the template of the financial reports on the election campaign related incomes and expenditures; these amendments refer to the design of a customized template adjusted to the type of incomes per source and the type of expenditures per purpose. At the same time, the drafting of a bylaw to regulate the form and content of the cost specification is foreseen, which is an integral part of the election campaign financial report, pursuant to the Electoral Code amendments from November 2015.

According to the GRECO recommendations from the third evaluation round related to the theme of transparency of party and election campaign funding, with respect to political parties' awareness-raising and prevention of possible violations in the parties' financial operation, training/guidelines need to be provided for the political parties i.e. the people drafting the financial reports to ensure that the forms are properly completed. The drafting of such Guidelines would ensure equal access for all political parties and good quality, accurate and reliable completion of the financial reports.

In order to strengthen the integrity and raise the awareness of the political parties, drafting Guidelines on Political Party Integrity and conducting integrity workshops is of utmost necessity.

In compliance with the Electoral Code, the commitment to cooperation among the institutions that make up the system for control and oversight of the financial operation of the participants in the electoral process is expressed in the Memorandum of Understanding signed among the SCPC, SAO and SEC and is related to the implementation of the provisions on election campaign funding and exchange of information on the observed irregularities in

relation to the submitted financial reports and the measures that have been taken against the entity that has been subject to oversight. However, it is essential for the MoU to become operational by delimitation and fulfilment of the institutions' competences during the electoral process. This particularly concerns the specific measures taken when irregularities and violations of the electoral process are observed in relation to political party funding and the specific measures taken when irregularities are observed following the SAO audit of the financial reports of all the participants in the election campaign.

In order to address these observations pertaining to the implementation of the electoral legislation, conducting research on the application of legislation is essential, as it would result in recommendations for its improvement.

6.1.4 Free access to information of public character

The right of access to information and freedom to receive and impart information is one of the fundamental human rights and one of the main preconditions to democracy. This civil right is also guaranteed in the national Constitution and in numerous conventions that are embedded in our national legislation. The exercise of this guaranteed civil right is ensured with the adoption of the Law on Free Access to Information of Public Character, which provides for the publicity and openness in the operation of information holders and enables natural persons and legal entities to exercise their right to free access to information of public character. The position of this right in our country's legal order only highlights its importance to the overall social life from various aspects, but it also emphasizes the obligation of information holders for a consistent implementation of the legal norms when exercising this right.

In the Republic of Macedonia, a number of activities have been developed to improve the efficiency in the state institutions' operation, the fight against corruption and the provision of high quality public services for its citizens. By joining the Open Government Partnership, the Government of the Republic of Macedonia pledged to continuously improve itself on the foundations of open, transparent, reliable and efficient government institutions that communicate and cooperate with the citizens.

Free access to public information is considered as one of the most efficient modern society anticorruption tools. All steps in favour of increased publicity and transparency in the public institutions' operation narrow the space and possibilities for corruptive behaviour.

The Law on Free Access to Information of Public Character, as a foundation for exercising the right to free access to information, marks nine years of its application. The inconsistent application of the law, along with the institutions' inaccessibility and limited transparency, restricts the information flow. All of this reduces the use of the right of free access to public information as an anticorruption tool.

The analysis of the Law on Free Access to Information of Public Character and the recommendations for its amendment are also the measures that are expected to lead to its successful implementation. Harmonization of the law with the European standards, proactive

transparency by information holders, constant monitoring of the implementation and application of the Law by the Committee for Protection of the Right to Free Access to Information of Public Character, the Committee's competences in encouraging the implementation of the Law by initiating procedures and pronouncing sanctions, as well as provision of protection of information holders from abuse are just some of the recommendations to be considered when amending the Law.

6.1.5 Property status and conflict of interests

For the purpose of increased efficiency in the prevention and repression of corruption, registering and monitoring of property status has to be improved. By establishing and developing a registry of appointed and elected officials and designing the corresponding software, the SCPS and the public will obtain an accurate and complete overview of the elected and appointed officials, there will be a clear distinction of the categories of people who need to declare their property status and a complete and timely overview of the fulfilment of the legal obligation for asset declaration.

In order to increase the efficiency in the registering and monitoring of public office holders' property status, the SCPC has foreseen several activities that primarily involve amendments to the current Law on the Prevention of Corruption.

To that end, the law needs to further define who the remaining close people/family members of the officials are, whose property the official will also have to declare.

In addition, electronic submission of the Property Declaration is also foreseen, which will facilitate the work of the SCPC regarding the data entry from the forms into the electronic data base, reduce the possibility for technical data errors and ensure due publication of the data on the SCPC website. At the same time, it will enable the SCPC staff to focus more on the verification and monitoring of the property status of the elected and appointed officials.

Furthermore, an obligation for an annual declaration of property status and conflict of interests is also foreseen. The introduction of this obligation will increase the efficiency in the monitoring of the property status, and the uncertainties related to the reporting of changes in the property status will be avoided. This obligation will also be valid for one year after the termination of office.

For the purpose of more efficient monitoring of changes in the property status of the elected and appointed officials, it is necessary to increase the competences of the SCPC in that particular area. A software solution will be designed and by linking the institutions' databases, systemic data verification will be made possible, which will reveal whether there has been any increase or decrease in the property status.

In order to increase the transparency in the operation, the final and enforceable court decisions are also to be published on the SCPC website.

The increase in the abuse of public authority by officials for private gains, also known as conflict of interests and its prevalence in the country has resulted in activities and measures that need to be taken to introduce the mechanisms needed to combat this negative social

phenomenon. At the same time, a considerable fraction of the officials reveal lack of understanding of this term and the phenomenon of conflict of interests.

The State Programme 2016-2019 should define the strategy and operational tactic that will ensure decreased conflict of interests that would pose no obstacle to the social, economic and political development of the country and would contribute to citizens' improved trust in the institutions of the system.

The State Programme 2016-2019 is a strategic document that prescribes the specific measures and activities that the bodies, officials and other actors need to take to eliminate the existing forms of conflict of interest and prevent the consequences thereof. To that end, two paths need to be taken: on the one hand, increased education and familiarization of officials is required about what conflict of interest is and how it can be avoided and, on the other, the system for its detection, overcoming and repression needs to be developed.

The main goal can be seen in the development of a policy for prevention of corruption and reduction of conflict of interest, which can be achieved through the implementation of the activities designed to overcome the weaknesses that were established due to lack of application of the existing regulations from the State Programme 2016-2019.

Therefore, the proposed activities are related to amendments, addenda but also adoption of new normative acts aimed at amendments and addenda to the existing relevant laws, such as: defining a list of officials that are obliged to submit a statement of interests and who they need to submit it to, introducing and developing a register of elected and appointed officials, designing a software solution for electronic completion of the statement of interests, systemic verification of data and revealing potential conflict of interests.

Moreover, an annual obligation is foreseen for the officials to submit the template that includes the officials' interest statements, as well as strengthened measures and sanctions against officials who have failed to fulfil this obligation. The amendments to the current legislation will also include definitions of the terms cumulation of functions, cronyism, nepotism and clientelism (as most frequent forms of conflict of interest).

In order to increase the transparency in the operation of the SCPC, the final and enforceable court decisions and the names of the officials who have violated the law will also be published on the SCPC website. Publishing this information will familiarize the public with the work of the SCPC and it will serve as a basis for interpretation of the Law on Prevention of Conflict of Interests, but it will also help the elected and appointed officials to apply this Law in their individual circumstances.

As there is an obvious need for education and training, one of the activities foreseen in the State Programme 2016-2019 is aimed at drafting informational guidelines on conflict of interest, where conflict of interest will be defined as a negative social phenomenon, and nepotism and other common forms of conflict of interest will be defined, too, including the actions that need to be taken in such circumstances, presented through basic principles and examples.

6.1.6 Anti-corruption review of legislation

Anti-corruption review of legislation, or assessment of corruption risks in the laws, is a relatively new discipline and an exceptionally important preventive anti-corruption mechanism that is already being applied by some of the countries in Europe, whereas some countries are taking the initial steps to define the methodological approach for the implementation of this process.

Anti-corruption review of legislation is one of the Priority 1 measures – Rule of Law and Judiciary – Anti-corruption Policies and Legislation, stipulated in the plan of activities of the Government of the Republic of Macedonia, pursuant to the Urgent Reform Priorities List for the Republic of Macedonia, drawn up by the European Commission. Furthermore, the introduction of an anti-corruption review of legislation is an obligation that also stems from the South East Europe 2020 Strategy, in compliance with key measure O – “Anti-corruption”.

When adopting the methodology for anti-corruption review of legislation, the State Commission for Prevention of Corruption looked into the best practices and experiences of other countries in the region and abroad, as well as the ten principles of effective anti-corruption review of legislation contained in the comparative study and methodology drawn up by the Regional Anti-corruption Initiative. The methodology is a follow-up on the implementation of the SCPC competences prescribed in the Law on Prevention of Corruption and the Law on Prevention of Conflict of Interests and it defines the manner of conducting the anti-corruption review of legislation as a process adjusted to the specificities of the country.

The anti-corruption review of legislation includes an analysis and assessment of the form and content of the legal regulations that are being drafted or have been adopted, with respect to their practical application, alignment and improvement, in order to detect, prevent or minimize the risks of corruption and conflict of interests that these laws and their implementation could lead to. The possibility to review and submit opinion on the laws that have already been passed with respect to their practical application and necessary alignment will further increase the efficiency in the implementation of the laws and minimize the risks of corruption and conflict of interests that might result from this legislation. In parallel, the obligatory opinion and anti-corruption review of the SCPC of all the draft laws and law proposals will significantly strengthen and improve this legal competence of the SCPC.

The initial steps in this process are aimed at promoting the acts for the introduction of anti-corruption review of legislation (methodology, Rules of Procedure of the Government of the Republic of Macedonia, internal procedures), assessing the funds needed for efficient implementation of the methodology, but also strengthening the capacities of the SCPC to conduct the anti-corruption review.

For a successful implementation of all stages of this process, the international experiences and good practices related to anti-corruption review of legislation must be implemented.

6.1.7 Lobbying

This problem was identified in the State Programme 2011-2015.

In 2008, the Law on Lobbying was adopted in the Republic of Macedonia, which provided the legal framework for lobbying and legalized lobbying under given rules that have to be observed by anyone who wishes to engage in lobbying and by ensuring public insight in the lobbying process. The legal regulation of lobbying was aimed at dismissing any misconceptions that lobbying is based on secret activities and conducted behind closed doors. In addition to the transparent lobbying procedure, this Law was aimed at preventing any illegal proceedings about obtaining any information by the state and local government bodies that could then be used in illegal procedures, but the possibility of such information being abused was not excluded either.

This step was supposed to somehow encourage the informal lobbyists to register their activity and legalize the “shady” lobbying, but the practice revealed that the Law is not being implemented and there is only one registered lobbyist registered in the registry kept at the Assembly of the Republic of Macedonia.

Due to the extensive lobbying done out of the legal framework, but also because of the conscious avoidance of the obligation for registration of lobbyists and the use of illegal lobbying for the purpose of gaining illegitimate and non-legitimized interests, the risk of corruption still exists.

The measures to be taken in this area include analysis of the Law on Lobbying and recommendations for its amendment which should restore this law and its efficient practical application. The goal is to use the analysis and amendments to the Law to overcome the weaknesses in the existing Law by providing a concise definition of the term “lobbyist” and the people who cannot become lobbyists; clear distinction between the activities that are considered to be lobbying and the ones that are not; identifying the scope of natural persons and legal entities that could perform lobbying activities (at a fee or free of charge); drawing a distinction between lobbying with central government bodies and lobbying with local government bodies and appointing different institutions accordingly; further clarification and simplification of the procedure for registration and deletion from the Registry of Lobbyists; detailed regulation of the procedure for conducting effective supervision of the work of lobbyists.

In parallel, the implementation of the GRECO recommendations from the fourth evaluation round “Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors” will be conducted, those that refer to the introduction of rules on how members of parliament engage with lobbyists and other third parties who seek to influence the legislative process, but also to strengthening of the SCPC financial and human resources in the sphere of lobbying.

6.2 Strategic objective 2: STRENGTHENED REPRESSION OF CORRUPTION

Repression is a particularly important component of the overall anti-corruption commitment and it represents the protective dimension of the fight against corruption and conflict of interest through sanctioning

6.2.1 Judicial bodies and their proceedings

The functioning of the judicial system as a separate and independent branch of power, in addition to the legislative and executive branch of power, is of particular importance to rule of law and it has marked significant progress as a result of the continuous reforms that have been implemented over the last decade. As a result of these reforms, the legal and institutional framework has been set as a foundation for its proper functioning and fight against corruption. However, the practice revealed certain weaknesses in the implementation of the normative and institutional framework and overcoming these weaknesses would improve the overall state of affairs. In particular, it was established that clearly defined criteria for the appointment, election, promotion and dismissal of judges and public prosecutors are still lacking which, on the other hand, leaves room for tampering with the election, promotion and dismissal of judges and public prosecutors. Therefore, the bodies that participate in this process need to abide by clearly defined criteria that will be laid out in their governing acts.

To that end, the professional assessment system needs to be improved using objective quality criteria only, and not to do it on quantitative basis. When it comes to the dismissal of judges, the current disciplinary system also requires improvement as it is a special element that poses greatest threat to the judges' independence.

When setting the criteria for membership to the highest instance judicial bodies, non-measurable criteria related to their professionalism and competence (e.g. eminent jurist) need to be excluded.

The existing training of judges and public prosecutors requires further improvement in order to increase the judges and public prosecutors' efficiency.

More precise criteria are also needed in order to avoid any conflict of interests and criteria for the election of a judge/public prosecutor who would be performing educational activities.

The judges and public prosecutors' codes of conduct also need to be upgraded by clearly defining the term "hospitality", which would also fulfil the GRECO recommendation from the fourth evaluation round.

Shorter deadlines for allocation of cases through the ACMIS system, as well as systematic monitoring of the operation of the system by the Judicial Council of R.M are also required.

6.2.2 Cooperation and coordination of institutions in detecting, proving and processing corruption

For the purpose of successful prevention and fight against corruption, it is of utmost importance that the overall institutional system be synchronized. That means that all law enforcement bodies need to intensify their cooperation. At certain times, higher level of pro-activity is required and establishment of joint teams might be necessary to work together on certain issues.

Generally speaking, the cooperation needs to be improved with regard to reporting and actions taken at all levels. Strengthened regional cooperation is also required for a more successful fight against offences related to corruption and organized crime.

The new legislation on the protection of whistleblowers implies creating the right conditions for its consistent application, primarily with respect to raising citizens' awareness in order to overcome the insecurities related to the reporting of violations and endangering of public interest.

6.3 Strategic objective 3: STRENGTHENING THE INSTITUTIONS' CAPACITIES AND INDEPENDENCE TO IMPLEMENT THE LAWS

Fight against corruption and conflict of interests as an integral part of the implementation and sustainability of rule of law implies the existence of clear and comprehensive rules that would be applied to prevent corruption and conflict of interests, their detection and sanctioning, as well as independent and well-established institutions. These institutions need to have clear tasks, the necessary competences, financial and human capacities, knowledge and skills to fulfil the foreseen objectives, as well as the integrity needed for the implementation of the prescribed rules and procedures.

6.3.1 Law enforcement bodies

Strengthening of the capacities of the law enforcement bodies is equally necessary for an overall and complete prevention and fight against corruption; all this requires great human capacities, as well as funds, especially when it comes to their increased competences resulting from the new anti-corruption legislation.

At the same time, the right conditions also need to be enabled for permanent development of the staff through various types of training.

6.4 Strategic Objective 4: INCREASED PUBLIC PARTICIPATION IN THE FIGHT AGAINST CORRUPTION AND CONFLICT OF INTERESTS

The public sector has the main role to play in the design and implementation of anti-corruption measures, but they cannot be successful enough unless supported by other key social actors, too. Active participation of representatives of other sectors and citizens does not

only add to the democratic legitimacy of the fight against corruption, but it also makes the implementation of anti-corruption activities more sustainable and less dependent on the political will.

6.4.1 Raised awareness of the harmful effects of corruption and conflict of interests

According to the surveys of citizens' perception on corruption conducted by the SCPC, but also according to the civil society organizations, citizens are able to recognize corruption in all its forms but, in general, citizens perceive corruption to be most prevalent in several public administration sectors. Having in mind these data and the comparative analysis, it seems that a systemic approach is needed to inform the public of all forms of corruption and the harmful effect of corruption and conflict of interests.

Strengthening the awareness of citizens and public administration about corruption and conflict of interest is of utmost importance in order to overcome these negative social phenomena, and that requires introduction of a continuous mechanism to educate the public.

6.4.2 Role and importance of media in the fight against corruption

Corruption and conflict of interest are not always adequately treated by media. Considering the role and importance of media in shaping the public awareness, further strengthening of media capacities is needed with respect to investigative journalism, anti-corruption training for journalists but also application of ethical and professional standards in journalism.

State bodies and institutions are among the most frequent advertisers or users of media space. This is done without clear and transparent criteria on either side, which gives room for corruptive use of public funds to tamper with the operation of media and editorial policies.

It is still not clearly defined and no criteria have been set as to what constitutes an announcement or advertising of public interest, broadcasted by the audio and audio-visual service providers at no cost.

6.4.3 Role and importance of the NGO's sector in the fight against corruption

Civil society in the country plays a very significant role in the development of democratic processes. A sustainable civil sector is possible only if, in addition to donors' support, it also receives continuous domestic support. On the other hand, mechanisms for increased transparency, accountability and self-regulation of civil society organizations also need to be strengthened. Potential risks of corruption and conflict of interest in the civil sector might occur in the process of using funds from the state budget, the allocation of funds, reporting on the implemented activities and the appropriateness of the support.

Considering their role in the social system, civil society organizations are becoming an important participant in the processes of monitoring, analysis and prevention of corruption

and conflict of interest. Civil society organizations have a large potential to inform the public and thus influence the raising of public awareness.

Over the past years, a greater number of civil society organizations have been conducting research in various areas and sectors, but also analysis of the general perception of corruption and conflict of interest. In order to encourage cooperation in this sphere, in 2010, the SCPC signed a Memorandum of Understanding with civil society organizations. Furthermore, in December 2014, the civil sector also joined the anti-corruption efforts which resulted in the establishment of the Platform against Corruption, which includes numerous civil society organizations.

6.4.4 Importance of education in the fight against corruption

It is important to improve the informedness of the need and possibilities to promote good governance and integrity as integral parts of the fight against corruption. Therefore, educational content should be designed and introduced in the education system.

Over the past years, in cooperation with the Bureau for Development of Education (BDE) and the Ministry of Education and Science (MES), the SCPC successfully implemented a pilot-activity on anti-corruption education for primary school pupils as an extracurricular activity. The positive effects of the project imply that this educational programme should be further continued and expanded in the primary and secondary education system by introducing anti-corruption content in the curricula.

6.5 Strategic Objective 5: EFFICIENT COORDINATION OF ANTI-CORRUPTION ACTIVITIES, MONITORING AND EVALUATION OF THE IMPLEMENTATION

The efficient coordination, monitoring and evaluation of the implementation of the State Programme is a complex process that implies the need for harmonization of competences, cooperation and communication among key entities.

A comprehensive, inclusive and coordinated approach is needed to engage multiple entities in a broader and joint framework for action in the sphere of combating corruption and conflict of interests.

Monitoring is a continuous activity of systematic collection of data related to the activities, in order to report on the progress made towards achieving the objectives, but also to take measures to overcome any weaknesses and to identify new elements that could be embedded in the existing strategic commitments.

Evaluation is a process that is parallel to monitoring and it represents a systemic and objective assessment of the current state of affairs or of the completion of the anti-corruption strategy.

Considering the fact that the fight against corruption and conflict of interest and the manner of proceeding greatly depend on the amendments to the broad normative, economic and social framework in the country, and knowing that the State Programme is based on its

own experiences from its application and implementation, mechanisms have been foreseen to evaluate and review the implementation of the State Programme and its corresponding Action Plan.

This strategic goal consists of four stages aimed at more efficient and more effective implementation of the State Programme, which are closely related and interdependent and have to be seen as sections of a single and comprehensive process.

6.5.1 Cooperation among the institutions involved in the implementation of the State Programme 2016-2019

The SCPC is the main coordination body that has the competences to adopt the State Programme 2016-2019 and monitor its implementation, encourage the realization of the foreseen anti-corruption measures and initiate activities for their efficient implementation. The SCPC assumes a parallel role of both an institution that is competent to implement certain activities and an institution that is involved in the implementation of those activities.

Pursuant to its legal competences, the SCPC takes care of the consistent application of the State Programme 2016-2019 and implementation of the activities foreseen in the corresponding Action Plan by introducing a platform for coordination, communication, support and cooperation with the institutions covered with the State Programme 2016-2019.

Conducting working meetings with the representatives of the competent/involved institutions and their increased pro-activity and eagerness to adopt special strategic anti-corruption documents in line with the activities foreseen in the State Programme 2016-2019 are of great importance for a successful implementation of the programme activities.

6.5.2 Monitoring of the implementation of the State Programme 2016-2019

The SCPC has a central position in the monitoring of the implementation of the State Programme 2016-2019.

In order to achieve successful implementation of the activities and clear definition of the roles of all stakeholders, the Action Plan clearly defines the competences and obligations of the institutions covered with the State Programme 2016-2019. Therefore, some institutions have been appointed to be the competent institutions in charge of submitting data to the SCPC regarding the implementation status, but there are also the so-called involved institutions which will provide support, cooperation and will make sure that the activities are successfully implemented, as planned.

The competent institutions which will directly implement the activities have an obligation for a timely and good quality realization of the activities and an obligation to report to the SCPC by respecting the already determined dynamics and deadlines. To that end, people will be appointed by all the institutions covered with the State Programme 2016-2019, who will cooperate with the SCPC and who will be in charge of submitting data on the implementation of the activities on behalf of the competent institution. As a result, the SCPC

will have an updated database on all the people appointed by the institutions for the purpose of timely receipt of information and more efficient communication.

Another significant step in the process of monitoring the implementation of the State Programme 2016-2019 is the design of the methodology for collection and processing of data related to the realization of the programme activities. The electronic application for data submission has proven to be an efficient tool to facilitate the overall process of data collection, processing and analysis, but also in terms of drafting reports on the implementation of the State Programme 2016-2019.

Introducing a system for data submission that will provide increased accountability and reporting by the domestic institutions will make it possible for the SCPC to receive data from all the relevant institutions and these data will be clear, concise and fact-based.

6.5.3 Evaluation of the implementation

The purpose of the monitoring and evaluation of the implementation as two parallel processes does not only imply collection of data related to the progress in the implementation of the activities, but also taking specific measures to overcome the gaps and weaknesses and identifying new elements that would be embedded in the existing strategic anti-corruption commitments.

If it is established that certain activity has not been implemented, the SCPC, in cooperation with the other institutions, will look into the reasons and offer recommendations to overcome and resolve the problem, but at the same time, it will also look into the possibility and assess the need to review the activities listed in the State Programme 2016-2019. Knowing that there is a real possibility that the conditions for the implementation of the State Programme 2016-2019 might change or that the programme might need to be upgraded or amended for another reason, the manner of reviewing the text needs to be clearly defined. As the SCPC is in charge of the adoption of the State Programme 2016-2019, it is also in charge of drawing up the drafts for the amendments or addenda to the State Programme 2016-2019 and the corresponding Action Plan.

The monitoring of the implementation and realization of the planned activities and the regular reporting by the competent institutions in charge of the realization of the strategic anti-corruption documents will contribute to an improved evaluation of the implementation of the programme.

6.5.4 Effects of the implementation of the State Programme 2016-2019

The State Programme 2016-2019 and the corresponding Action Plan are adopted in order to achieve the expected results and effects during a particular reform process, which could be hampered if the effects of this process are not assessed over a certain time period. No conclusion can be drawn regarding the success or failure of the anti-corruption activities unless there are precise and relevant data to support that. The expectations to get speedy

effects in a short time period are not adequate and they can cause a decrease in the public support of the anti-corruption measures and activities.

As a result, the SCPC is required to come up with a way to monitor the progress of the implementation of the State Programme 2016-2019 by providing a sustainable and comprehensive mechanism to assess the risks of corruption and the effectiveness of the anti-corruption measures. Therefore, in cooperation with and with the support of the civil society organizations and the international organizations, the SCPC will be conducting research to assess the effects of the activities foreseen in the State Programme 2016-2019. The research and reports on the implementation of these activities, together with the relevant opinions and recommendations, will reveal the areas in which progress has been made.

ACTION PLAN
OF THE STATE PROGRAMME FOR PREVENTION AND
REPRESSION
OF CORRUPTION AND PREVENTION
AND REDUCTION OF CONFLICT OF INTERESTS
2016 - 2019

STRATEGIC OBJECTIVE 1: STRENGTHENED INSTITUTIONAL SYSTEM AND LEGISLATION FOR PREVENTION OF CORRUPTION AND CONFLICT OF INTEREST

1.1. Area: Integrity and Ethics in Institutions at all levels

Justification: There is an obvious need to strengthen the integrity system of institutions and professions, which means strengthening the system of policies, standards and procedures implemented by the institutions, i.e. legal entities, to increase their resilience to corruption and reduce the risk of corruptive behaviour, which would ensure independence, professionalism and ethics when performing the legal competences.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Developing and establishing the integrity concept	SCPC		2016	1. Adopted integrity concept, consisting of: <ol style="list-style-type: none"> 1.1. Code of Ethics, specific for particular institutions 1.2. Performance standards and procedures 1.3. Corruption risk 	

				<p>assessment</p> <p>1.4. Integrity policy</p> <p>1.5. Internal controls</p> <p>1.6. Training</p> <p>1.7. Internal reporting channels</p> <p>1.8. Managing conflict of interest</p> <p>1.9. Reporting</p>	
2. Adoption of Guidelines on the Integrity System	SCPC	MoJ	2017	<p>1. Amended legislation</p> <p>2. Adopted guidelines</p>	
3. Developing the methodology to monitor the integrity system	SCPC	MISA MoF LSGU	2018- Continuously	<p>1. Developed methodology</p> <p>2. Report on the implementation status of the integrity system</p>	

4. Drawing up a review of regulations that contain the grounds for the adoption of discretionary decisions	MISA	State Administration Bodies	2017	1. Drawn-up Review	Yes
5. Analysis of discretionary powers in all segments of the government system	MoJ, SCPC	State Administration Bodies	2017-2019	1. Analysis conducted 2. Recommendations from the analysis implemented	

1.2. Area: Public Procurement, Concessions and Public- Private Partnership

Justification: Continuous promotion of the public procurement system is indispensable, based on the principles of transparency, competitiveness, accountability and consistent application of the public procurement procedures, for the purpose of efficient prevention of corruption and conflict of interests. In addition to the continuous improvements to the Public Procurement Law, integrity in public procurement still needs to be improved.

There is also an obvious need to improve the control mechanisms to monitor the implementation of the signed public procurement contracts by strengthening the SAO capacities, ensuring increased access and inclusion of the public when adopting the public procurement plans and their respective amendments and addenda, but also by strengthening the supervision and monitoring of the implementation of the concession-awarding and public-private partnership procedures.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Amendments to the Public Procurement Law	MoF	PPB; CSOs; SCPC	2016-2017	<ol style="list-style-type: none"> 1. Analysis conducted 2. Professional public debates organized 3. Recommendations of the analysis implemented 4. Competences of the PPB expanded 5. Prescribed obligation for mandatory publishing of the Public Procurement Plans and the Amendments and addenda to the 	Yes, Budget, Donation

				<p>plans on the contractual authorities' websites</p> <p>6. Prescribed limitations for the amendment of Public Procurement Plans</p> <p>7. Prescribed obligation to publish the total amount of the contract (basic contract with Annexes)</p> <p>8. Strengthened criteria for the selection of professionals in the Public</p>	
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				Procurement Council	
2. Alignment of the Public Procurement Plan with the institution's real needs based on the programme of the contractual authority	PPB, MoF	All Contractual Authorities		<ol style="list-style-type: none"> 1. Prior analysis conducted for the purpose of alignment of the Public Procurement Plan with the institution's real needs 2. Research/survey conducted for procurement purposes, especially within the LSGU 3. Audit conducted to verify the success and usefulness of the procurement 	Yes

				4. Adopted procedures to determine the justification of the procurement	
3. Review of the public procurement penal policy and determining the liability of the offenders	MoF	PPB; CSOs; SCPC	2016-2017	<ol style="list-style-type: none"> 1. Analysis conducted 2. Professional debates organized 3. Recommendations of the analysis implemented 	Yes
4. Proceeding upon the recommendations from the public procurement audits	BPP, State Administration Bodies	MoF	Continuously	<ol style="list-style-type: none"> 1. Procedures conducted as a result of the conducted audits 	Yes

5. Analysis of the Law on concession and public private partnership aimed to review the system of monitoring of the procedures for granting concessions and PPP and strengthening of the supervision over the realization of concessions	MoE	CSOs, MoF, SCPC	2016	1. Analysis conducted 2. Recommendations implemented	Yes
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1.3. Area: Electoral Process, Political Party Funding and Electoral Campaigns

Justification: Progress has been made regarding the increased transparency and accountability of the political parties' sources, manner of obtaining and spending funds and the provision of more efficient control system that takes more specific measures to sanction the ones who violate the rules. There is a higher level of reporting and oversight of funds in this sphere and in practice, this proved that the amendments were in the right direction, but further improvement of this legislation is required because of the weaknesses and gaps that appeared in its practical implementation.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Amendments to the Law on Political Parties and the Law on Political Party Funding for the	MoJ	SCPC, SAO, SEC, CSOs	2017 - 2018	1. Law amendments that require that every registered	

<p>purpose of increased transparency, accountability and responsibility of the political parties</p>				<p>political party creates and regularly updates their website with:</p> <ol style="list-style-type: none"> 1.1. Publicly available information related to the political parties' headquarters, founder and authorised accountant 1.2. Clearly defined procedure for making public of the sources and manner of spending of political party funds (through a financial report, register of donations, donations report and annual balance sheet) 	
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2. Alignment of the bylaw for the form of political parties' annual financial report and the form for the financial report on election campaign related incomes and expenditures	MoF		2016	<ol style="list-style-type: none"> 1. Amended bylaws 2. Drafted bylaw of the form and content of cost specification (for the financial report on the incomes and expenditures on the account designated for the election campaign) 	
3. Drafting and adoption of guidelines to educate political parties and persons who prepare the financial reports about accurate completion of the financial reports	MoF		2016	<ol style="list-style-type: none"> 1. Guidelines drafted and adopted 	
4. Strengthening political parties' integrity and raising their awareness	SCPC, SEC, SAO, MoJ	Political Parties, CSOs, Media	Continuously	<ol style="list-style-type: none"> 1. Guidelines on political parties' integrity drafted 2. Integrity workshops conducted 	Yes

<p>5. Monitoring the implementation of electoral legislation with respect to political party funding</p>	<p>SAO, SEC, SCPC, MoJ</p>	<p>CSOs</p>	<p>Continuously</p>	<ol style="list-style-type: none"> 1. Operationalization of the Memorandum of Understanding signed among the SCPC, SAO and SEC for delimitation and fulfilment of the institutions' competences during the electoral process 2. Specific measures taken when irregularities and violations of the electoral process are established 3. Specific measures taken upon the irregularities established with the SAO audit of financial reports of all participants in 	
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				the election campaign 4. Conducted surveys on the implementation of the electoral legislation	
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1.4. Area: Free Access to Information of Public Character

Justification: Free access to public information is considered as one of the most efficient modern society anticorruption tools. All steps in favour of increased publicity and transparency in the public institutions' operation narrow the space and possibilities for corruptive behaviour.

The Law on Free Access to Information of Public Character, as a foundation for exercising the right to free access to information, marks nine years of its application. The inconsistent application of the law, along with the institutions' inaccessibility and limited transparency, restricts the information flow. All of this reduces the use of the right of free access to public information as an anticorruption tool. The analysis of the Law on Free Access to Information of Public Character and the recommendations for its amendment are also the measures that are expected to lead to its successful implementation. Harmonization of the law with the European standards, proactive transparency by information holders, constant monitoring of the implementation and application of the Law by the Committee for Protection of the Right to Free Access to Information of Public Character, the Committee's competences in encouraging the implementation of the Law by initiating procedures and pronouncing sanctions, as well as provision of protection of information holders from abuse are just some of the recommendations to be considered when amending the Law.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
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1. Amendment to the Law on Free Access to Information of Public Character	MoJ, CPRFAPI		2017	1. Analysis of the Law conducted and recommendations for amendments proposed 2. Law amended	
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1.5. Area: Property Status and Conflict of Interests

Justification: In order to achieve increased efficiency in the prevention and repression of corruption and conflict of interests, it is necessary to improve the registering and monitoring of officials' property status and conflict of interests by drafting a single law or prevention of corruption and conflict of interests which will include the following novelties: obligation for an electronic submission of the property status and interest declaration, annual obligation for submitting a property status and interest declaration, definition of the terms official, close person (family member), cumulation of functions, cronyism, nepotism and high value moveable property, as well as strengthened sanctioning system and measures in cases of failure to submit the declarations. Publishing the data from the declaration of property status and conflict of interests on the SCPC website, submission of Property status and interest declaration only to the SCPC, introduction of an obligation to report changes of property status and conflict of interests at least one year after the termination of office and increased competences of the SCPC with respect to the verification and monitoring of officials' property status.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Drawing up a list of officials obliged to submit the asset declaration and the statement of conflict of	MoJ, SCPC		2016	1. Software solution 2. Register of elected and appointed officials	

interests					
2. Amendments to the Law on Prevention of Corruption and Law on Prevention of Conflict of Interests	MoJ	SCPC	2016 - 2017	<ol style="list-style-type: none"> 1. Analysis conducted 2. Recommendations of the analysis implemented 3. Laws amended 	
3. Adopting a unified form of the Property Declaration and the Statement of interests as a single Property status and interest declaration	SCPC		2016	<ol style="list-style-type: none"> 1. Form adopted 	
4. Introducing and developing a Register of elected and appointed officials	SCPC		2016	<ol style="list-style-type: none"> 1. Software solution designed 	
5. Designing a software solution for electronic completion of Property status and interest declaration, systematic data verification and determination of differences	SCPC		2016 - 2019	<ol style="list-style-type: none"> 1. Software solution designed 	Yes

for increasing or decreasing of property status and possible conflict of interests					
6. Drafting Guidelines on Conflict of Interests - definitions of conflict of interests, cronyism, nepotism and clientelism (as most frequent forms of conflict of interest) through basic principles and examples.	SCPC		2017	<ol style="list-style-type: none"> 1. Guidelines drafted 2. Guidelines distributed (In institutions, during training events, published on the SCPC website) 	Yes
7. Increased transparency by publishing final and enforceable court decisions on the SCPC website	SCPC		Continuously 2016-2019	<ol style="list-style-type: none"> 1. Enforceable court decisions published 	

1.6. Area: Anticorruption Assessment of Legislation

Justification: Anti-corruption assessment of legislation, or assessment of corruption risks in the laws, is a relatively new discipline and an exceptionally important preventive anti-corruption mechanism that is already being applied by some of the countries in Europe, whereas some countries are taking the initial steps to define the methodological approach for the implementation of this process.

The anti-corruption review of legislation includes an analysis and assessment of the form and content of the legal regulations that are being drafted or have been adopted, with respect to their practical application, alignment and improvement, in order to detect, prevent or minimize the risk of corruption and conflict of interests that these laws and their implementation could lead to. The possibility to review and submit opinion on the laws that have already been passed with respect to their practical application and necessary alignment will further increase the efficiency in the implementation of the laws and minimize the risk of corruption and conflict of interests that might result from this legislation. In parallel, the obligatory opinion and anti-corruption review of the SCPC of all the draft laws and law proposals will significantly strengthen and improve this legal competence of the SCPC.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Improvement of the acts for the introduction of anti-corruption review of legislation (methodology, Rules of Procedure of the Government of R.M, internal procedures)	SCPC General Secretariat of the Government of R.M	MoJ	2016 - 2017	1. Improved acts 2. Implemented international experiences and good practices related to the process of anti-corruption review of legislation	
2. Enhanced capacities of the SCPC to conduct anti-corruption assessment of	MoF, MoJ, SCPC		2016	1. Identified needs to provide the resources for	Yes

legislation				<p>efficient implementation of the methodology</p> <p>2. Strengthened capacities of the SCPC to conduct an anti-corruption assessment of legislation</p>	
3. Implementation of anti-corruption assessment of legislation pursuant to the relevant methodology	SCPC		2016 - Continuously	1. Annual report on the reviewed laws pursuant to the methodology for anti-corruption assessment of legislation	
4. Drafting a list of priority laws for a compulsory assessment by the SCPC	SCPC		Annually	<p>1. List of priority laws drafted</p> <p>2. Assessment of laws completed</p>	

1.7. Area: Lobbying

Justification: This problem was identified in the State Programme 2011-2015.

In 2008, the Law on Lobbying was adopted in the Republic of Macedonia, which provided the legal framework for lobbying and legalized lobbying under given rules that have to be observed by anyone who wishes to engage in lobbying and by ensuring public insight in the lobbying process.

Due to the extensive lobbying done out of the legal framework, but also because of the conscious avoidance of the obligation for registration of lobbyists and the use of illegal lobbying for the purpose of gaining illegitimate and non-legitimized interests, the risk of corruption still exists. The measures to be taken in this area include analysis of the Law on Lobbying and recommendations for its amendment which should restore this law and its efficient practical application. The goal is to use the analysis and amendments to the Law to overcome the weaknesses in the existing Law by providing a concise definition of the term "lobbyist" and the people who cannot become lobbyists; clear distinction between the activities that are considered to be lobbying and the ones that are not; identifying the scope of natural persons and legal entities that could perform lobbying activities (at a fee or free of charge); drawing a distinction between lobbying with central government bodies and lobbying with local government bodies and appointing different institutions accordingly; further clarification and simplification of the procedure for registration and deletion from the Registry of Lobbyists; detailed regulation of the procedure for conducting effective supervision of the work of lobbyists.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Amendment to the Law on Lobbying	MoJ, SCPC	Assembly of R.M	2016 - 2017	<ol style="list-style-type: none"> 1. Conducted analysis with recommendations for the amendments to the Law 2. Amended Law 	

2. Implementation of the GRECO recommendation on lobbying from the Fourth evaluation round	Assembly of R.M	MoJ, SCPC	2016	1. Introduced rules on how members of the Parliament engage with lobbyists and other third parties who seek to influence the legislative process	
3. Strengthening of the capacities of the SCPC to monitor the law and perform its competence to supervise lobbying	SCPC		2017	1. Strengthened capacities of the SCPC to monitor the implementation of the law	Yes

STRATEGIC OBJECTIVE 2: STRENGTHENED REPRESSION OF CORRUPTION

2.1. Area: Judicial Bodies and their Proceeding

Justification: In this area, the legal and institutional framework for proper functioning of the judicial system and efficient fight against corruption is in place, but the practice reveals that clearly defined criteria for the appointment and promotion of judges and public prosecutors are still lacking, the professional assessment system needs improvement and the disciplinary provisions need to be further defined in order to strengthen the independence of the judiciary and public prosecution, to strengthen the capacities of the Judicial Council of Republic of Macedonia (JCRM) and the Public Prosecution Council of Republic of Macedonia (PPCRM), and improve the efficiency and professionalism and expertise in the work of judges and public prosecutors.

Precise criteria are also needed in order to avoid any possible conflict of interest, as well as clear criteria for the election of judges/public prosecutors who will engage in educational activities.

The Codes of Ethics for judges and public prosecutors need to be amended by defining the term “hospitality” in order to fulfil the GRECO recommendation from the fourth evaluation round.

Weaknesses have been established with regard to the ACMIS system with respect to case allocation and management.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Amending the Law on the Judicial Council of the Republic of Macedonia in order to revise the judges' performance assessment	MoJ	JCRM	2016	1. Amendments adopted	

system by introducing more qualitative and quantitative standards as a basis for all career decisions					
2. The decisions of the Judicial Council of the Republic of Macedonia to promote judges need to be amended to include reasoning for the decision	JCRM		Continuously	1. Decisions with reasoning adopted	
3. Amending the Law on Courts in order to clearly define the violations and to prescribe the procedure for a disciplinary regime	MoJ	JCRM	2016	1. Amendments adopted	
4. Amending the Law on Public Prosecution in order to clearly define the violations and to prescribe the procedure for a disciplinary regime	MoJ	PPC	2016	1. Amendments adopted	
5. Amending the Law on Courts in order to further clarify the criteria on "eminent jurist" when electing members to the JCRM	MoJ	JCRM	2016	1. Amendments to the Law	

6. Adopting an act to define the criteria on judges or public prosecutors who can engage in educational activities at higher education institutions	JCRM, PPRM, PPC		2016	1. Acts adopted	
7. Defining the term "hospitality" in the Codes of Ethics for judges and public prosecutors	Association of Judges of R.M, PPRM		2016	1. Codes of Ethics for judges and prosecutors amended	
8. Developing the capacities of the judiciary and public prosecution in terms of strategic planning, budgeting and financial management, PR and communications	MoJ, JCRM , PPRM	MoF	2016 - 2019	1. Established link with the implementation of the activities of the Strategy for Reform of the Justice System 2016-2020	Yes
9. Amending the existing normative solutions in order to improve the ACMIS system by shortening the deadline to enter the case into the system	MoJ, JCRM		2016 - 2017	1. Recommendations of the JCRM adopted 2. Amended normative solutions	

2.5. Area: Cooperation and Coordination of Institutions in Detecting, Proving and Processing Corruption

Justification: Due to the lack of a whistleblower protection system, the public was insecure in terms of reporting violations to or endangering of public interest.

Improved efficiency of the system for monitoring corruption-related offences per stages and submitting data to the relevant institutions.

Proactive approach when cooperating with the relevant institutions and other law enforcement bodies.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Raising public awareness and encouraging the need to report violations to or endangering of public interest pursuant to the Whistleblowers' Protection Law	SCPC		Continuously	1. Training conducted, especially with respect to training the persons authorized to receive whistleblowers' reports 2. Campaign conducted	Yes
2. Monitoring and submitting data to the SCPC on the initiatives to commence criminal prosecution for violation of whistleblowers' rights	PPRM		2017 - semi-annually	1. Reports submitted	

3. Monitoring and submitting data to the SCPC on the initiated and completed court proceedings on the protection of whistleblowers' rights	JCRM		2017 – semi-annually	1. Reports submitted	
4. Monitoring the track record of corruption-related investigations, charges and judgements	PPRM	MoJ, SCPC, JCRM	2016 annually	1. Reports drafted	Yes
5. Cooperation between the SCPC and public prosecution in cases of grounded suspicious to initiate prosecution for committing a corruption-related criminal offence	SCPC, PPRM		Continuously	1. Cooperation established in compliance with the Protocol for Cooperation for the Prevention of Corruption and Conflict of Interests	
6. Regional cooperation and exchange of data for the purpose of discovering criminal offences related to corruption and organized crime	SCPC, PPRM, MoI, PRO, FPO, FIU		Continuously	1. Bilateral and multi-lateral agreements concluded	Yes

STRATEGIC OBJECTIVE 3: STRENGTHENING CAPACITIES AND INDEPENDENCE OF LAW ENFORCEMENT INSTITUTIONS

3.1. Area: Law Enforcement Bodies

Justification: The increased legal competences, the monitoring of new laws and the efficient implementation of the existing and new laws require improved financial and human capacities for the implementation of the Criminal Procedures Code, the Law on Prevention of Corruption and the Whistleblower Protection Law.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Strengthening the capacities of the judicial institutions and law enforcement bodies	SCPC, PPRM, JCRM, FPO, FIU	MoF	Continuously	1. Capacities strengthened	Yes
2. Providing education and training of staff	SCPC, PPRM, JCRM, FPO, FIU	AJPP	Continuously	1. Training conducted	Yes

STRATEGIC OBJECTIVE 4: INCREASED PUBLIC PARTICIPATION IN THE FIGHT AGAINST CORRUPTION AND CONFLICT OF INTERESTS

4.1. Area: Raised Awareness of the Harmful Effects of Corruption and Conflict of Interests

Justification: According to the latest surveys of citizens' perception on corruption conducted (Corruption Assessment Report: Republic of Macedonia, 2014, MCIC), citizens is the fifth ranked problem that citizens are faced. On the other hand, the surveys conducted by the SCPC and in cooperation with the OSCE reveal that citizens are able to recognize corruption in all its forms but, in general, citizens perceive corruption to be most prevalent in certain public administration sectors. Having in mind these data, but also considering the comparative analysis, it seems that a systemic approach is needed to inform the public of all forms of corruption and the harmful effect of corruption and conflict of interests. Strengthening the awareness of citizens and public

administration about corruption and conflict of interest is of utmost importance in order to overcome these negative social phenomena. Therefore, introduction of a continuous mechanism to educate the public is indispensable.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Corruption-related surveys on perception and victimization	SCPC	Civil Society Organizations	2017-2019	<ol style="list-style-type: none"> 1. Surveys conducted 2. Report with relevant findings and recommendations prepared 3. Report shared with the public 	Yes
2. Public debates on the status of corruption based on reports	SCPC	Civil Society Organizations	2017-2019	<ol style="list-style-type: none"> 1. Debates organized 2. Recommendations for improvement issued 	Yes
3. Designing a campaign to raise the awareness of corruption and conflict of interests	SCPC	CSOs Media	2018	<ol style="list-style-type: none"> 1. Consultations on the preparation of the campaign conducted 2. Plan and contents of the campaign and manner of campaigning 	Yes

4. Conducting a campaign	SCPC CSOs Media		2018-2019	1. Campaign conducted 2. Quantitative report on the implementation of the campaign conducted	Yes
5. Adopting training programmes on corruption and conflict of interest, good governance, integrity and ethics for public administration staff	SCPC MISA AJPP ZELS	Institutions LSGU CSOs	2016 - 2019 continuously	1. Training programmes adopted	Yes
6. Conducting training pursuant to the adopted programmes	SCPC MISA AJPP ZELS	Institutions LSGU	2016 - 2019 continuously	1. Number of trainings conducted (annually) 2. Number of persons trained (annually)	Yes

4.2. Area: Role and Importance of Media in the Fight against Corruption

Justification: State bodies and institutions are among the most frequent advertisers or users of media space. This is done without clear and transparent criteria on either side, which gives room for corruptive use of public funds to tamper with the operation of media and editorial policies. It is still not clearly defined and no criteria have been set as to what constitutes an announcement or advertising of public interest, broadcasted by the audio and audio-visual service providers at no cost.

Corruption and conflict of interest are not always adequately treated by media. Considering the role and importance of media in shaping the public awareness, further strengthening of media capacities is needed with respect to investigative journalism, anti-corruption training for journalists but also application of ethical and professional standards in journalism.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Adopting clear, transparent, precise and measurable criteria that will be used by the state institutions and organizations, municipalities and the City of Skopje, as well as other legal entities authorized to exercise public authority, in order to allocate public funds to printed and electronic media and internet portals for the purpose of informing and familiarizing the public with their services or activities	GRM MISA AAAMS Media-related CSOs CMEM MMA	State-owned and Public Enterprises Municipalities	2016-2017	1. Debates conducted 2. Criteria defined and adopted 3. Criteria applied in practice	

2. Amending the Audio and Audio-Visual Media Services Law in order to determine clear criteria on “announcement or advertising of public interest” which can be broadcasted free of charge by audio and audio-visual media service providers	MISA AAAMS	Media-related CSOs	2016-2017	1. Debates conducted 2. AAAMS Law amended 3. Analysis and surveys conducted in relation to the application of the amended legislation	
3. Harmonizing legal provisions related to the prohibition for media to act as donors to political parties	MoJ	CMEM AAAMS SCPC	2016-2017	1. Debates conducted 2. Recommendations adopted 3. Laws amended	
4. Organizing public debates and exchange of comparative experience in order to design mechanisms to prevent hidden media ownership	MISA AAAMS Media-related CSOs	SCPC Other Financial Operation Institutions	2017	1. Debates conducted 2. Recommendations adopted	
5. Strengthening the role of media in the fight against corruption and conflict of interests	Media-related CSOs Council of Media Ethics in Macedonia (CMEM)	SCPC	2016 - 2019	1. Training on investigative journalism in the sphere of corruption and conflict of interest conducted 2. Mechanism for control of the	

				application and observance of professional standards (self-regulation) introduced 3. Internal Codes of Ethics adopted within media	
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4.3. Area: Role and Importance of the NGO sector in the Fight against Corruption

Justification: Civil society in Macedonia plays a significant role in the development of the democratic processes. The organizations are active in various areas, and frequently its development is conditioned by the ongoing social needs. On the other hand, changes in donors' strategies represent a challenge to the sustainability of the civil sector and its further strengthening. Sustainable civil sector is possible only if domestic support is available (sustainable financing, tax reliefs, delivery of services etc.). Even though the surveys reveal that corruption is not very prevalent in civil society organizations, mechanisms are needed for increased transparency, accountability and self-regulation of the civil society organizations. Potential risk of corruption in the civil sector can be found in the process of using state budget funds, the manner of allocation of such funds, reporting on the implemented activities, the appropriateness of the support etc.

Fight against corruption appeared on the civil society organizations' agenda after 2001, when the first comprehensive research on corruption was published. There were only a small number of organizations that worked on this issue. Progress has been made over the past 5 years as there are numerous civil society organizations that conduct research in various spheres and sectors, but there are also general surveys on the perception of victimization related to corruption and conflict of interest. In order to encourage cooperation, in 2013, the SCPC initiated the signing of a Memorandum of Understanding between the SCPC and the CSOs. Furthermore, in 2014, civil society organizations joined their efforts in combating corruption by establishing the Platform against Corruption that includes 15 civil society organizations. Considering their role in the social system, civil society organizations are becoming an important participant in the processes of monitoring, analysis and prevention of corruption and conflict of interest. Civil society organizations have a large potential to inform the public and thus influence the raising of public awareness.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Improving and extending the cooperation between the SCPC and CSOs	SCPC CSO signatories of the MoU with the SCPC		2016 - 2019	1. Annual working meetings held	
2. Implementing a comprehensive mechanism for centralized monitoring of budget funds allocated to CSOs	General Secretariat of the GRM, Unit for Cooperation with NGOs	All state administration bodies that allocate funds, MoF- PIFC	2017- continuously	1. Electronic platform for centralized monitoring of allocated funds introduced 2. Completed annual reports on allocated funds 3. Reports published	
3. Publishing CSOs' financial reports on the budget funds that they use	CSOs that use funds allocated by public administration bodies General Secretariat of the		2016 – continuously	1. CSO reports submitted to the competent public administration bodies	

	GRM, Unit for Cooperation with NGOs			<ul style="list-style-type: none"> 2. Reports of public administration bodies submitted to the General Secretariat of the GRM, Unit for Cooperation with NGOs 3. Reports published on the website of the General Secretariat of the GRM, Unit for Cooperation with NGOs 	
4. Conducting an analysis on the financial transparency and accountability of CSOs	General Secretariat of the GRM, Unit for Cooperation with NGOs	CSOs	2017	<ul style="list-style-type: none"> 1. Transparency indicators for CSOs defined 2. Analysis on the transparency of CSOs conducted 	

<p>5. Conducting an analysis to assess the needs for self-regulation in civil society for good governance and transparent operation</p>	<p>CSOs</p>	<p>General Secretariat of the Government of RM, Unit for Cooperation with NGOs SCPC</p>	<p>2018</p>	<ol style="list-style-type: none"> 1. Public debate organized to assess the needs for self-regulation in civil society for good governance and transparent operation 2. Comparative analysis on self-regulation in civil society for good governance and transparent operation and needs assessment for the Republic of Macedonia 	
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4.4. Area: Importance of Education in the Fight against Corruption

Justification: It is important to improve the informedness of the need and possibilities to promote good governance and integrity as integral parts of the fight against corruption. Therefore, educational content should be designed and introduced in the education system. Over the past years, in cooperation with the Bureau for Development of Education (BDE) and the Ministry of Education and Science (MES), the SCPC successfully implemented a pilot-activity on anti-corruption education for primary school pupils as an extracurricular activity. The positive effects of the project imply that this educational programme should be further continued and expanded in the primary and secondary education system by introducing anti-corruption content in the curricula

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Introducing anti-corruption contents in regular instruction in primary schools	SCPC MES BDE	CSOs	2016- 2019	1. Revised/amended Civic Education subject curriculum by introducing anti-corruption contents	
2. Introducing a pilot project on anti-corruption education for secondary school pupils as an extracurricular activity	SCPC MES BDE	CSOs	2016-2019	1. Pilot project designed 2. Pilot project implemented in schools 3. Project implemented in all schools	

STRATEGIC OBJECTIVE 5: EFFICIENT COORDINATION OF ANTI-CORRUPTION ACTIVITIES, MONITORING AND EVALUATION OF THE IMPLEMENTATION

5.1. Cooperation among the Institutions Involved in the Implementation of the State Programme

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Introducing a platform for coordination, communication, support and cooperation between the SCPC and the institutions in order to implement the activities of the State Programme	SCPC	Competent institutions /Institutions Involved	Continuously	<ol style="list-style-type: none"> 1. Working meetings held with representatives of the competent institutions/institutions involved 2. Strategic documents adopted in the institutions, in compliance with the activities and guidelines provided in the State Programme 	

5.2. Monitoring of the Implementation of the State Programme

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Appointing representatives of all institutions covered with the State Programme	SCPC	Competent institutions /Institutions Involved	Beginning of 2016	1. SCPC database on appointed representatives established	
2. Regular updates in case of changes of the appointed representatives	Competent institutions/Institutions Involved	SCPC	Continuously	1. Updated database on all appointed representatives 2. Timely submission of data on the status of the implementation of activities	
3. Defining the methodology for data collection and processing and implementation of programme activities	SCPC	Competent institutions /Institutions Involved	2016	1. Methodology for data collection and processing defined 2. Web application for electronic data submission created	Yes

4. Introducing a data submission system that would ensure improved commitment and reporting by the competent institutions	SCPC	Competent institutions /Institutions involved	2016-continuously	<ol style="list-style-type: none"> 1. System introduced 2. Data submitted by all competent institutions 3. Clear and concise fact-based data 	
5. Data collection, processing and analysis	SCPC	Competent institutions /Institutions Involved	Annually	<ol style="list-style-type: none"> 1. Annual reports on the implementation of the State Programme drafted 2. Results presented at an annual conference 3. Annual reports on the implementation of the State Programme published 	

5.3. Evaluation of implementation

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Monitoring the implementation and realization of the activities	SCPC	Competent Institutions /Institutions involved	Annually	<ol style="list-style-type: none"> 1. Review of activities that have not been implemented and detecting the reasons for the lack of implementation 2. Assessment of the need for conducting a review 3. Recommendations for conducting a review and their embedding 	
2. Reporting by the competent institutions on the realization of their strategic anti-corruption documents	Competent institutions /Institutions Involved	SCPC	Annually	<ol style="list-style-type: none"> 1. Submitted report on the realization of activities from separate anti-corruption documents 2. Number of implemented 	

				activities in compliance with the activities of State Programme	
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5.4. Effects of the Implementation of the State Programme

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Conducting surveys to measure the effects of the activities foreseen in the State Programme	SCPC	CSOs, International Organizations	2017 и 2019	<ol style="list-style-type: none"> 1. Drafted report on the surveys conducted including final opinions and recommendations 2. Review of areas in which progress has been made 	

STRATEGIC OBJECTIVE 1: STRENGTHENED INSTITUTIONAL SYSTEM AND LEGISLATION FOR PREVENTION OF CORRUPTION AND CONFLICT OF INTEREST

1.1. Area: Integrity and Ethics in Institutions at all levels

Justification: There is an obvious need to strengthen the integrity system of institutions and professions, which means strengthening the system of policies, standards and procedures implemented by the institutions, i.e. legal entities, to increase their resilience to corruption and reduce the risk of corruptive behaviour, which would ensure independence, professionalism and ethics when performing the legal competences.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Developing and establishing the integrity concept	SCPC		2016	<ul style="list-style-type: none"> Adopted integrity concept, consisting of: Code of Ethics, specific for particular institutions Performance standards and procedures Corruption risk assessment Integrity policy Internal controls Training Internal reporting channels Managing conflict of interest Reporting 	
Adoption of Guidelines on the Integrity System	SCPC	MoJ	2017	<ul style="list-style-type: none"> Amended legislation Adopted guidelines 	
Developing the methodology to monitor the integrity system	SCPC	MISA MoF LSGU	2018- Continuously	<ul style="list-style-type: none"> Developed methodology Report on the implementation status of the integrity 	

				system	
Drawing up a review of regulations that contain the grounds for the adoption of discretionary decisions	MISA	State Administration Bodies	2017	Drawn-up Review	Yes
Analysis of discretionary powers in all segments of the government system	MoJ, SCPC	State Administration Bodies	2017-2019	Analysis conducted Recommendations from the analysis implemented	

1.2. Area: **Public Procurement, Concessions and Public- Private Partnership**

Justification: Continuous promotion of the public procurement system is indispensable, based on the principles of transparency, competitiveness, accountability and consistent application of the public procurement procedures, for the purpose of efficient prevention of corruption and conflict of interests. In addition to the continuous improvements to the Public Procurement Law, integrity in public procurement still needs to be improved.

There is also an obvious need to improve the control mechanisms to monitor the implementation of the signed public procurement contracts by strengthening the SAO capacities, ensuring increased access and inclusion of the public when adopting the public procurement plans and their respective amendments and addenda, but also by strengthening the supervision and monitoring of the implementation of the concession-awarding and public-private partnership procedures.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
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Amendments to the Public Procurement Law	MoF	PPB; CSOs; SCPC	2016-2017	<p>Analysis conducted</p> <p>Professional public debates organized</p> <p>Recommendations of the analysis implemented</p> <p>Competences of the PPB expanded</p> <p>Prescribed obligation for mandatory publishing of the Public Procurement Plans and the Amendments and addenda to the plans on the contractual authorities' websites</p> <p>Prescribed limitations for the amendment of Public Procurement Plans</p> <p>Prescribed obligation to publish the total</p>	Yes, Budget, Donation
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				<p>amount of the contract (basic contract with Annexes)</p> <p>Strengthened criteria for the selection of professionals in the Public Procurement Council</p>	
Alignment of the Public Procurement Plan with the institution's real needs based on the programme of the contractual authority	PPB, MoF	All Contractual Authorities		<p>Prior analysis conducted for the purpose of alignment of the Public Procurement Plan with the institution's real needs</p> <p>Research/survey conducted for procurement purposes, especially within the LSGU</p> <p>Audit conducted to verify the success and usefulness of the procurement</p>	Yes

				Adopted procedures to determine the justification of the procurement	
Review of the public procurement penal policy and determining the liability of the offenders	MoF	PPB; CSOs; SCPC	2016-2017	Analysis conducted Professional debates organized Recommendations of the analysis implemented	Yes
Proceeding upon the recommendations from the public procurement audits	BPP, State Administration Bodies	MoF	Continuously	Procedures conducted as a result of the conducted audits	Yes
5. Analysis of the Law on concession and public private partnership aimed to review the system of monitoring of the procedures for granting concessions and PPP and strengthening of the supervision over the realization of concessions	MoE	CSOs, MoF, SCPC	2016	Analysis conducted Recommendations implemented	Yes

1.3. Area: Electoral Process, Political Party Funding and Electoral Campaigns

Justification: Progress has been made regarding the increased transparency and accountability of the political parties' sources, manner of obtaining and spending funds and the provision of more efficient control system that takes more specific measures to sanction the ones who violate the rules. There is a higher level of reporting and oversight of funds in this sphere and in practice, this proved that the amendments were in the right direction, but further improvement of this legislation is required because of the weaknesses and gaps that appeared in its practical implementation.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Amendments to the Law on Political Parties and the Law on Political Party Funding for the purpose of increased transparency, accountability and responsibility of the political parties	MoJ	SCPC, SAO, SEC, CSOs	2017 - 2018	Law amendments that require that every registered political party creates and regularly updates their website with: Publicly available information related to the political parties' headquarters, founder and authorised accountant Clearly defined procedure for making public of the sources and manner of spending of political party funds (through a financial report, register of donations, donations report and annual balance sheet)	

2. Alignment of the bylaw for the form of political parties' annual financial report and the form for the financial report on election campaign related incomes and expenditures	MoF		2016	Amended bylaws Drafted bylaw of the form and content of cost specification (for the financial report on the incomes and expenditures on the account designated for the election campaign)	
3. Drafting and adoption of guidelines to educate political parties and persons who prepare the financial reports about accurate completion of the financial reports	MoF		2016	Guidelines drafted and adopted	
4. Strengthening political parties' integrity and raising their awareness	SCPC, SEC, SAO, MoJ	Political Parties, CSOs, Media	Continuously	Guidelines on political parties' integrity drafted Integrity workshops conducted	Yes
5. Monitoring the implementation of electoral legislation with respect to political party funding	SAO, SEC, SCPC, MoJ	CSOs	Continuously	Operationalization of the Memorandum of Understanding signed among the SCPC, SAO and SEC for delimitation and fulfilment of the institutions'	

				<p>competences during the electoral process</p> <p>Specific measures taken when irregularities and violations of the electoral process are established</p> <p>Specific measures taken upon the irregularities established with the SAO audit of financial reports of all participants in the election campaign</p> <p>Conducted surveys on the implementation of the electoral legislation</p>	
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1.4. Area: Free Access to Information of Public Character

Justification: Free access to public information is considered as one of the most efficient modern society anticorruption tools. All steps in favour of increased publicity and transparency in the public institutions' operation narrow the space and possibilities for corruptive behaviour.

The Law on Free Access to Information of Public Character, as a foundation for exercising the right to free access to information, marks nine years of its application. The inconsistent application of the law, along with the institutions' inaccessibility and limited transparency, restricts the information flow. All of this reduces the use of the right of free access to public information as an anticorruption tool. The analysis of the Law on Free Access to Information of Public Character and the recommendations for its amendment are also the measures that are expected to lead to its successful implementation. Harmonization of the law with the European standards, proactive transparency by information holders, constant monitoring of the implementation and application of the Law by the Committee for Protection of the Right to Free Access to Information of Public Character, the Committee's competences in encouraging the implementation of the Law by initiating procedures and pronouncing sanctions, as well as provision of protection of information holders from abuse are just some of the recommendations to be considered when amending the Law.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Amendment to the Law on Free Access to Information of Public Character	MoJ, CPRFAPI		2017	Analysis of the Law conducted and recommendations for amendments proposed Law amended	

1.5. Area: Property Status and Conflict of Interests

Justification: In order to achieve increased efficiency in the prevention and repression of corruption and conflict of interests, it is necessary to improve the registering and monitoring of officials' property status and conflict of interests by drafting a single law or prevention of corruption and conflict of interests which will include the following novelties: obligation for an electronic submission of the property status and interest declaration, annual obligation for submitting a property status and interest declaration, definition of the terms official, close person (family member), cumulation of functions, cronyism, nepotism and high value moveable property, as well as strengthened sanctioning system and measures in cases of failure to submit the declarations. Publishing the data from the declaration of property status and conflict of interests on the SCPC website, submission of Property status and interest declaration only to the SCPC, introduction of an obligation to report changes of property status and conflict of interests at least one year after the termination of office and increased competences of the SCPC with respect to the verification and monitoring of officials' property status.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Drawing up a list of officials obliged to submit the asset declaration and the statement of conflict of interests	MoJ, SCPC		2016	Software solution Register of elected and appointed officials	
Amendments to the Law on Prevention of Corruption and Law on Prevention of Conflict of Interests	MoJ	SCPC	2016 - 2017	Analysis conducted Recommendations of the analysis implemented Laws amended	
Adopting a unified form of the Property Declaration and the Statement of interests as a single Property status and interest declaration	SCPC		2016	Form adopted	

Introducing and developing a Register of elected and appointed officials	SCPC		2016	Software solution designed	
Designing a software solution for electronic completion of Property status and interest declaration, systematic data verification and determination of differences for increasing or decreasing of property status and possible conflict of interests	SCPC		2016 - 2019	Software solution designed	Yes
Drafting Guidelines on Conflict of Interests - definitions of conflict of interests, cronyism, nepotism and clientelism (as most frequent forms of conflict of interest) through basic principles and examples.	SCPC		2017	Guidelines drafted Guidelines distributed (In institutions, during training events, published on the SCPC website	Yes
Increased transparency by publishing final and enforceable court decisions on the SCPC website	SCPC		Continuously 2016-2019	Enforceable court decisions published	

1.6. Area: Anticorruption Assessment of Legislation

Justification: Anti-corruption assessment of legislation, or assessment of corruption risks in the laws, is a relatively new discipline and an exceptionally important preventive anti-corruption mechanism that is already being applied by some of the countries in Europe, whereas some countries are taking the initial steps to define the methodological approach for the implementation of this process.

The anti-corruption review of legislation includes an analysis and assessment of the form and content of the legal regulations that are being drafted or have been adopted, with respect to their practical application, alignment and improvement, in order to detect, prevent or minimize the risk of corruption and conflict of interests that these laws and their implementation could lead to. The possibility to review and submit opinion on the laws that have already been passed with respect to their practical application and necessary alignment will further increase the efficiency in the implementation of the laws and minimize the risk of corruption and conflict of interests that might result from this legislation. In parallel, the obligatory opinion and anti-corruption review of the SCPC of all the draft laws and law proposals will significantly strengthen and improve this legal competence of the SCPC.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Improvement of the acts for the introduction of anti-corruption review of legislation (methodology, Rules of Procedure of the Government of R.M, internal procedures)	SCPC General Secretariat of the Government of R.M	MoJ	2016 - 2017	Improved acts Implemented international experiences and good practices related to the process of anti-corruption review of legislation	
Enhanced capacities of the SCPC to conduct anti-corruption assessment of legislation	MoF, MoJ, SCPC		2016	Identified needs to provide the resources for efficient implementation of the methodology Strengthened capacities of the SCPC to conduct an anti-corruption assessment of legislation	Yes

Implementation of anti-corruption assessment of legislation pursuant to the relevant methodology	SCPC		2016 - Continuously	Annual report on the reviewed laws pursuant to the methodology for anti-corruption assessment of legislation	
Drafting a list of priority laws for a compulsory assessment by the SCPC	SCPC		Annually	List of priority laws drafted Assessment of laws completed	

1.7. Area: Lobbying

Justification: This problem was identified in the State Programme 2011-2015.

In 2008, the Law on Lobbying was adopted in the Republic of Macedonia, which provided the legal framework for lobbying and legalized lobbying under given rules that have to be observed by anyone who wishes to engage in lobbying and by ensuring public insight in the lobbying process.

Due to the extensive lobbying done out of the legal framework, but also because of the conscious avoidance of the obligation for registration of lobbyists and the use of illegal lobbying for the purpose of gaining illegitimate and non-legitimized interests, the risk of corruption still exists. The measures to be taken in this area include analysis of the Law on Lobbying and recommendations for its amendment which should restore this law and its efficient practical application. The goal is to use the analysis and amendments to the Law to overcome the weaknesses in the existing Law by providing a concise definition of the term "lobbyist" and the people who cannot become lobbyists; clear distinction between the activities that are considered to be lobbying and the ones that are not; identifying the scope of natural persons and legal entities that could perform lobbying activities (at a fee or free of charge); drawing a distinction between lobbying with central government bodies and lobbying with local government bodies and appointing different institutions accordingly; further clarification and simplification of the procedure for registration and deletion from the Registry of Lobbyists; detailed regulation of the procedure for conducting effective supervision of the work of lobbyists.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Amendment to the Law on Lobbying	MoJ, SCPC	Assembly of R.M	2016 - 2017	Conducted analysis with recommendations for the amendments to the Law Amended Law	
Implementation of the GRECO recommendation on lobbying from the Fourth evaluation round	Assembly of R.M	MoJ, SCPC	2016	Introduced rules on how members of the Parliament engage with lobbyists and other third parties who seek to influence the legislative process	
Strengthening of the capacities of the SCPC to monitor the law and perform its competence to supervise lobbying	SCPC		2017	Strengthened capacities of the SCPC to monitor the implementation of the law	Yes

STRATEGIC OBJECTIVE 2: STRENGTHENED REPRESSION OF CORRUPTION

2.1. Area: Judicial Bodies and their Proceeding

Justification: In this area, the legal and institutional framework for proper functioning of the judicial system and efficient fight against corruption is in place, but the practice reveals that clearly defined criteria for the appointment and promotion of judges and public prosecutors are still lacking, the professional assessment system needs improvement and the disciplinary provisions need to be further defined in order to strengthen the independence of the judiciary and public prosecution, to strengthen the capacities of the Judicial Council of Republic of Macedonia (JCRM) and the Public Prosecution Council of Republic of Macedonia (PPCRM), and improve the efficiency and professionalism and expertise in the work of judges and public prosecutors.

Precise criteria are also needed in order to avoid any possible conflict of interest, as well as clear criteria for the election of judges/public prosecutors who will engage in educational activities.

The Codes of Ethics for judges and public prosecutors need to be amended by defining the term “hospitality” in order to fulfil the GRECO recommendation from the fourth evaluation round.

Weaknesses have been established with regard to the ACMIS system with respect to case allocation and management.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Amending the Law on the Judicial Council of the Republic of Macedonia in order to revise the judges' performance assessment system by introducing more qualitative and quantitative standards as a basis for all career decisions	MoJ	JCRM	2016	Amendments adopted	

The decisions of the Judicial Council of the Republic of Macedonia to promote judges need to be amended to include reasoning for the decision	JCRM		Continuously	Decisions with reasoning adopted	
Amending the Law on Courts in order to clearly define the violations and to prescribe the procedure for a disciplinary regime	MoJ	JCRM	2016	Amendments adopted	
Amending the Law on Public Prosecution in order to clearly define the violations and to prescribe the procedure for a disciplinary regime	MoJ	PPC	2016	Amendments adopted	
Amending the Law on Courts in order to further clarify the criteria on "eminent jurist" when electing members to the JCRM	MoJ	JCRM	2016	Amendments to the Law	
Adopting an act to define the criteria on judges or public prosecutors who can engage in educational activities at higher education institutions	JCRM, PPRM, PPC		2016	Acts adopted	
Defining the term "hospitality" in the Codes of Ethics for judges and public prosecutors	Association of Judges of R.M, PPRM		2016	Codes of Ethics for judges and prosecutors amended	
Developing the capacities of the judiciary and public prosecution in terms of strategic planning, budgeting and financial	MoJ, JCRM, PPRM	MoF	2016 - 2019	Established link with the implementation of the activities of the Strategy for Reform of	Yes

management, PR and communications				the Justice System 2016-2020	
Amending the existing normative solutions in order to improve the ACMIS system by shortening the deadline to enter the case into the system	MoJ, JCRM		2016 - 2017	Recommendations of the JCRM adopted Amended normative solutions	

2.5. Area: Cooperation and Coordination of Institutions in Detecting, Proving and Processing Corruption

Justification: Due to the lack of a whistleblower protection system, the public was insecure in terms of reporting violations to or endangering of public interest.

Improved efficiency of the system for monitoring corruption-related offences per stages and submitting data to the relevant institutions.

Proactive approach when cooperating with the relevant institutions and other law enforcement bodies.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Raising public awareness and encouraging the need to report violations to or endangering of public interest pursuant to the Whistleblowers' Protection Law	SCPC		Continuously	Training conducted, especially with respect to training the persons authorized to receive whistleblowers' reports Campaign conducted	Yes
Monitoring and submitting data to the SCPC on the initiatives to commence criminal prosecution for violation of whistleblowers' rights	PPRM		2017 - semi-annually	Reports submitted	

Monitoring and submitting data to the SCPC on the initiated and completed court proceedings on the protection of whistleblowers' rights	JCRM		2017 – semi-annually	Reports submitted	
Monitoring the track record of corruption-related investigations, charges and judgements	PPRM	MoJ, SCPC, JCRM	2016 annually -	Reports drafted	Yes
Cooperation between the SCPC and public prosecution in cases of grounded suspicious to initiate prosecution for committing a corruption-related criminal offence	SCPC, PPRM		Continuously	Cooperation established in compliance with the Protocol for Cooperation for the Prevention of Corruption and Conflict of Interests	
Regional cooperation and exchange of data for the purpose of discovering criminal offences related to corruption and organized crime	SCPC, PPRM, MoI, PRO, FPO, FIU		Continuously	Bilateral and multi-lateral agreements concluded	Yes

STRATEGIC OBJECTIVE 3: STRENGTHENING CAPACITIES AND INDEPENDENCE OF LAW ENFORCEMENT INSTITUTIONS

3.1. Area: Law Enforcement Bodies

Justification: The increased legal competences, the monitoring of new laws and the efficient implementation of the existing and new laws require improved financial and human capacities for the implementation of the Criminal Procedures Code, the Law on Prevention of Corruption and the Whistleblower Protection Law.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Strengthening the capacities of the judicial institutions and law enforcement bodies	SCPC, PPRM, JCRM, FPO, FIU	MoF	Continuously	Capacities strengthened	Yes
Providing education and training of staff	SCPC, PPRM, JCRM, FPO, FIU	AJPP	Continuously	Training conducted	Yes

STRATEGIC OBJECTIVE 4: INCREASED PUBLIC PARTICIPATION IN THE FIGHT AGAINST CORRUPTION AND CONFLICT OF INTERESTS

4.1. Area: Raised Awareness of the Harmful Effects of Corruption and Conflict of Interests

Justification: According to the latest surveys of citizens' perception on corruption conducted (Corruption Assessment Report: Republic of Macedonia, 2014, MCIC), citizens is the fifth ranked problem that citizens are faced. On the other hand, the surveys conducted by the SCPC and in cooperation with the OSCE reveal that citizens are able to recognize corruption in all its forms but, in general, citizens perceive corruption to be most prevalent in certain public administration sectors. Having in mind these data, but also considering the comparative analysis, it seems that a systemic approach is needed to inform the public of all forms of corruption and the harmful effect of corruption and conflict of interests. Strengthening the awareness of citizens and public administration about corruption and conflict of interest is of utmost importance in order to overcome these negative social phenomena. Therefore, introduction of a continuous mechanism to educate the public is indispensable.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Corruption-related surveys on perception and victimization	SCPC	Civil Society Organizations	2017-2019	Surveys conducted Report with relevant findings and recommendations prepared Report shared with the public	Yes
Public debates on the status of corruption based on reports	SCPC	Civil Society Organizations	2017-2019	Debates organized Recommendations for improvement issued	Yes
Designing a campaign to raise the awareness of corruption and conflict of interests	SCPC	CSOs Media	2018	Consultations on the preparation of the campaign conducted Plan and contents of the campaign and manner of campaigning	Yes
10. Conducting a campaign	SCPC CSOs Media		2018-2019	Campaign conducted Quantitative report on the implementation of the campaign conducted	Yes
Adopting training programmes on corruption and conflict of interest, good governance, integrity and ethics for public administration staff	SCPC MISA AJPP ZELS	Institutions LSGU CSOs	2016 – 2019 continuously	Training programmes adopted	Yes

Conducting training pursuant to the adopted programmes	SCPC MISA AJPP ZELS	Institutions LSGU	2016 – 2019 continuously	Number of trainings conducted (annually) Number of persons trained (annually)	Yes
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4.2. Area: Role and Importance of Media in the Fight against Corruption

Justification: State bodies and institutions are among the most frequent advertisers or users of media space. This is done without clear and transparent criteria on either side, which gives room for corruptive use of public funds to tamper with the operation of media and editorial policies. It is still not clearly defined and no criteria have been set as to what constitutes an announcement or advertising of public interest, broadcasted by the audio and audio-visual service providers at no cost.

Corruption and conflict of interest are not always adequately treated by media. Considering the role and importance of media in shaping the public awareness, further strengthening of media capacities is needed with respect to investigative journalism, anti-corruption training for journalists but also application of ethical and professional standards in journalism.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Adopting clear, transparent, precise and measurable criteria that will be used by the state institutions and organizations, municipalities and the City of Skopje, as well as other legal entities authorized to exercise public authority, in order to allocate	GRM MISA AAAMS Media-related CSOs CMEM MMA	State-owned and Public Enterprises Municipalities	2016-2017	Debates conducted Criteria defined and adopted Criteria applied in practice	

public funds to printed and electronic media and internet portals for the purpose of informing and familiarizing the public with their services or activities					
Amending the Audio and Audio-Visual Media Services Law in order to determine clear criteria on “announcement or advertising of public interest” which can be broadcasted free of charge by audio and audio-visual media service providers	MISA AAAMS	Media-related CSOs	2016-2017	Debates conducted AAAMS Law amended Analysis and surveys conducted in relation to the application of the amended legislation	
Harmonizing legal provisions related to the prohibition for media to act as donors to political parties	MoJ	CMEM AAAMS SCPC	2016-2017	Debates conducted Recommendations adopted Laws amended	
Organizing public debates and exchange of comparative experience in order to design mechanisms to prevent hidden media ownership	MISA AAAMS Media-related CSOs	SCPC Other Financial Operation Institutions	2017	Debates conducted Recommendations adopted	
Strengthening the role of media in the fight against corruption and conflict of interests	Media-related CSOs Council of Media Ethics in Macedonia (CMEM)	SCPC	2016 - 2019	Training on investigative journalism in the sphere of corruption and conflict of interest conducted Mechanism for control of the application and observance of	

				professional standards (self-regulation) introduced Internal Codes of Ethics adopted within media	
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4.3. Area: Role and Importance of the NGO sector in the Fight against Corruption

Justification: Civil society in Macedonia plays a significant role in the development of the democratic processes. The organizations are active in various areas, and frequently its development is conditioned by the ongoing social needs. On the other hand, changes in donors' strategies represent a challenge to the sustainability of the civil sector and its further strengthening. Sustainable civil sector is possible only if domestic support is available (sustainable financing, tax reliefs, delivery of services etc.). Even though the surveys reveal that corruption is not very prevalent in civil society organizations, mechanisms are needed for increased transparency, accountability and self-regulation of the civil society organizations. Potential risk of corruption in the civil sector can be found in the process of using state budget funds, the manner of allocation of such funds, reporting on the implemented activities, the appropriateness of the support etc.

Fight against corruption appeared on the civil society organizations' agenda after 2001, when the first comprehensive research on corruption was published. There were only a small number of organizations that worked on this issue. Progress has been made over the past 5 years as there are numerous civil society organizations that conduct research in various spheres and sectors, but there are also general surveys on the perception of victimization related to corruption and conflict of interest. In order to encourage cooperation, in 2013, the SCPC initiated the signing of a Memorandum of Understanding between the SCPC and the CSOs. Furthermore, in 2014, civil society organizations joined their efforts in combating corruption by establishing the Platform against Corruption that includes 15 civil society organizations. Considering their role in the social system, civil society organizations are becoming an important participant in the processes of monitoring, analysis and prevention of corruption and conflict of interest. Civil society organizations have a large potential to inform the public and thus influence the raising of public awareness.

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Improving and extending the cooperation between the SCPC and CSOs	SCPC CSO signatories of the MoU with the SCPC		2016 - 2019	Annual working meetings held	
Implementing a comprehensive mechanism for centralized monitoring of budget funds allocated to CSOs	General Secretariat of the GRM, Unit for Cooperation with NGOs	All state administration bodies that allocate funds, MoF- PIFC	2017- continuously	Electronic platform for centralized monitoring of allocated funds introduced Completed annual reports on allocated funds Reports published	
Publishing CSOs' financial reports on the budget funds that they use	CSOs that use funds allocated by public administration bodies General Secretariat of the GRM, Unit for Cooperation with NGOs		2016 – continuously	CSO reports submitted to the competent public administration bodies Reports of public administration bodies submitted to the General Secretariat of the GRM, Unit for Cooperation with NGOs Reports published on the website of the	

				General Secretariat of the GRM, Unit for Cooperation with NGOs	
Conducting an analysis on the financial transparency and accountability of CSOs	General Secretariat of the GRM, Unit for Cooperation with NGOs	CSOs	2017	Transparency indicators for CSOs defined Analysis on the transparency of CSOs conducted	
Conducting an analysis to assess the needs for self-regulation in civil society for good governance and transparent operation	CSOs	General Secretariat of the Government of RM, Unit for Cooperation with NGOs SCPC	2018	Public debate organized to assess the needs for self-regulation in civil society for good governance and transparent operation Comparative analysis on self-regulation in civil society for good governance and transparent operation and needs assessment for the Republic of Macedonia	

4.4. Area: Importance of Education in the Fight against Corruption

Justification: It is important to improve the informedness of the need and possibilities to promote good governance and integrity as integral parts of the fight against corruption. Therefore, educational content should be designed and introduced in the education system. Over the past years, in cooperation with the Bureau for Development of Education (BDE) and the Ministry of Education and Science (MES), the SCPC successfully implemented a pilot-activity on anti-corruption education for primary school pupils as an extracurricular activity. The positive effects of the project imply that this educational programme should be further continued and expanded in the primary and secondary education system by introducing anti-corruption content in the curricula

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
Introducing anti-corruption contents in regular instruction in primary schools	SCPC MES BDE	CSOs	2016- 2019	Revised/amended Civic Education subject curriculum by introducing anti-corruption contents	
Introducing a pilot project on anti-corruption education for secondary school pupils as an extracurricular activity	SCPC MES BDE	CSOs	2016-2019	Pilot project designed Pilot project implemented in schools Project implemented in all schools	

STRATEGIC OBJECTIVE 5: EFFICIENT COORDINATION OF ANTI-CORRUPTION ACTIVITIES, MONITORING AND EVALUATION OF THE IMPLEMENTATION

5.1. Cooperation among the Institutions Involved in the Implementation of the State Programme

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Introducing a platform for coordination, communication, support and cooperation between the SCPC and the institutions in order to implement the activities of the State Programme	SCPC	Competent institutions /Institutions Involved	Continuously	Working meetings held with representatives of the competent institutions/institutions involved Strategic documents adopted in the institutions, in compliance with the activities and guidelines provided in the State Programme	

5.2. Monitoring of the Implementation of the State Programme

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Appointing representatives of all institutions covered with the State Programme	SCPC	Competent institutions /Institutions Involved	Beginning of 2016	SCPC database on appointed representatives established	
2. Regular updates in case of changes of the appointed representatives	Competent institutions/Institutions Involved	SCPC	Continuously	Updated database on all appointed representatives	

				Timely submission of data on the status of the implementation of activities	
3. Defining the methodology for data collection and processing and implementation of programme activities	SCPC	Competent institutions /Institutions Involved	2016	Methodology for data collection and processing defined Web application for electronic data submission created	Yes
4. Introducing a data submission system that would ensure improved commitment and reporting by the competent institutions	SCPC	Competent institutions /Institutions involved	2016-continuously	System introduced Data submitted by all competent institutions Clear and concise fact-based data	
5. Data collection, processing and analysis	SCPC	Competent institutions /Institutions Involved	Annually	Annual reports on the implementation of the State Programme drafted Results presented at an annual conference Annual reports on the implementation of the State Programme published	

5.3. Evaluation of implementation

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Monitoring the implementation and realization of the activities	SCPC	Competent Institutions /Institutions involved	Annually	Review of activities that have not been implemented and detecting the reasons for the lack of implementation Assessment of the need for conducting a review Recommendations for conducting a review and their embedding	
2. Reporting by the competent institutions on the realization of their strategic anti-corruption documents	Competent institutions /Institutions Involved	SCPC	Annually	Submitted report on the realization of activities from separate anti-corruption documents Number of implemented activities in compliance with the activities of State Programme	

5.4. Effects of the Implementation of the State Programme

Activity	Competent Institution	Institutions Involved	Time Frame	Activity Indicator	Financial Implications
1. Conducting surveys to measure the effects of the activities foreseen in the State Programme	SCPC	CSOs, International Organizations	2017 и 2019	Drafted report on the surveys conducted including final opinions and recommendations Review of areas in which progress has been made	

7. ACRONIMS

SCPC – State Commission for Prevention of Corruption	MoJ – Ministry of Justice
MoF – Ministry of Finance	MES – Ministry of Education and Science
MoE – Ministry of Economy	MoI – Ministry of Interior
MISA – Ministry for Information and State Administration	PPB – Public Procurement Bureau
CSO – Civil Society Organization	SAO – State Audit Office
SEC – State Election Commission	CPRFAPI – Commission for Protection of the Right to Free Access to Public Information
JCRM – Judiciary Council of Republic of Macedonia	PPCRM – Public Prosecutors Court of Republic of Macedonia
PPRM – Public Prosecution of the Republic of Macedonia	PRO – Public Revenue Office
FPO – Financial police Office	FIU – Financial Investigation Unit
AJPP – Academy for Judges and Public Prosecutors	LSGU - Local Self Government Units
GRM – Government of Republic of Macedonia	AAAMS – Agency for Audio and Audiovisual Media Services
CMEM – Council of Media Ethics in Macedonia	MMA – Macedonian Media Association
BDE – Bureau for Developing of Education	NGO – Non Government Organization
ALSGU- Association of Local Self Government Units	PPP - Public Private Partnership
ACPL Anticorruption Proofing of Legislation	ADIF – Assets Declaration and Interests Form