



Montenegro
Agency for Prevention of Corruption

II QUARTER REPORT
Report on implementation of the Agency's Work Plan for
2017
(cumulative data – quarter period)

Podgorica, July 2017

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Introduction

Agency for Prevention of Corruption (hereinafter referred to as the Agency) is an independent state institution that began its operations on January 1, 2016 according to the Law of Prevention of Corruption (hereinafter referred to as LPC). The Agency is responsible for implementing a set of anti-corruption laws, i.e.: the Law on Prevention of Corruption, the Law on Financing of Political Entities and Election Campaigns and the Law on Lobbying.

Key areas of the Agency's scope of activities refer to the following: identifying the existence of a conflict of interest in exercising public function and taking measures for its prevention, checking data from the report on income and property of public officials, control of financing of political parties, receiving, processing and monitoring the implementation of integrity plans, receiving and processing the reports of whistleblowers, whistleblowers protection, lobbying control, international cooperation, analysis of regulations, education and public campaigns, general affairs and finances and IT service.

The Agency strategically plans its activities at the level of all organizational units and within two groups of competencies: preventive/educational and control competencies. In this regard, the APC Work Plan for 2017 was adopted at the 40th session of the Council of the Agency for Prevention of Corruption, held as at February 24, 2017. Thirteen key strategic objectives of the Agency for 2017 (two objectives more than for 2016) were represented in the Work Plan, considering primarily the normative framework regulating the work of the Agency. The activities for which the strategic goals were also specified were also presented in details in the Work Plan, and the timeframe for their realization, participants in the realization of activities and the responsible person thereof were determined.

Internal organization of the Agency with the number of executors

The work of the Agency is organized in two sectors: Sector for Prevention of Conflict of Interest and Control of Financing of Political Entities and Election Campaigns and the Sector for Prevention of Corruption, Integrity, Lobbying and Application of International Standards; two departments: Department of International Cooperation and Standards and Department of Information Technologies; and two services: Service of Human Resources and Legal Affairs and Finance Affairs Service.

In order to achieve the most efficient fulfillment of key competences, in 2017, the Agency assessed the need for reorganization of personnel and identified the needs for additional personnel capacities. In this regard, at the 38th session of the Council of the Agency held on January 27, 2017, the new Rulebook on Internal Organization and Job Classification in the Agency was adopted, pursuant

to which the number of employees was increased by 5 (the total number of employees 60)

The most important organizational innovations in the new Rulebook are: within the Sector for Prevention of Conflict of Interest and Control of Financing of Political Parties and Election Campaigns, the **Department for Check of Income and Property of Public Officials and Civil Servants who are prescribed an obligation to submit reports on income and property** has been established, without increasing the number of employees. Within the Sector for Prevention of Corruption, Integrity, Lobbying and the Application of International Standards, **the Department for Education, Research, Campaign and Analytics** has been established. The Department of General Affairs and Finance is divided into the Service of Human Resources and Legal Affairs and the Financial Affairs Service.

The number of vacancies in the Agency is 10. When it comes to the public advertisement that was announced in the I quarter to fill the following vacancies:

- Advisor III in the Department for Prevention of Conflict of Interest of Public Officials, Sector for Prevention of Conflict of Interest and Control of Financing of Political Entities and Election Campaigns;
- Independent Advisor III in the Department for Education, Research, Campaign and Analytics in the Sector for Prevention of Corruption, Integrity, Lobbying and Application of International Standards;
- Advisor III in the Service of Human Resources and Legal Affairs;
- Independent Advisor III in the Financial Affairs Sector,

in the II quarter decisions were made on the selection of candidates who achieved the best results in the testing process and submitted to the Human Resources Directorate for further processing.

Also, in the II quarter a public advertisement for admission to employment was announced for the following vacant jobs:

- Senior state employee - courier/driver in the Human Resources and Legal Affairs Service.

In this procedure, the Decision on the selection of the candidate that achieved the best results in the test procedure was also passed and it was submitted to the Human Resources Directorate for further processing.

In addition, the Agency has issued Decisions on initiating a procedure for filling vacancies by means of a public announcement for the following systematized jobs:

- Advisor III in the Financial Affairs Service;
- Independent Officer (Technical Secretary) in the Human Resources and Legal Affairs Service.

The decision to initiate the procedure was submitted to the Human Resources Directorate for further processing.

Budget of the Agency for 2017

The Budget of the Agency for 2017 is **EUR 1,666,601.63**.

The Budget Plan of the Agency for six months amounts to EUR 833,300.82.

*Total expenditures of the Agency for the II quarter of 2017 amount to **EUR 573,473.97**, out of which:*

- *current expenditures ----- 525,177.41 (91.58% of total expenditures)*
- *capital expenditures ----- 36,663.56 (6.39% of total expenditures)*
- *repayment of debts - court decisions ----- 11,633.00 (2.03% of total expenditures)*

Public Procurement Plan for 2017

In accordance with the Law on Public Procurement ("Official Gazette of Montenegro", No. 42/11, 57/14 and 28/15), as at January 20, 2017, the Agency adopted the Public Procurement Plan for 2017 no. 311. The total value of the public procurement plan is **EUR 583,670.00**, out of which EUR 239,600.00 relates to the procurement of goods and EUR 344,070.00 to the procurement of services.

In the second quarter of 2017, **sixteen** public procurement contracts were concluded, out of which **seven** Contracts after open public procurement procedures conducted for procurement of mobile devices, office supplies, upgrade of software for data exchange with other institutions, and the services of redesign and improvement of the website, computer equipment and peripherals, multimedia and other equipment, infrastructure equipment and maintenance of the application software of the Agency.

In the second quarter of 2017, **shopping public procurement procedures** for the procurement of software for security and monitoring of the database, telephone exchange and telephone network maintenance services, press clipping services, maintenance of fire early detection system and fire-fighting appliances, non-life insurance services, procurement of network professional copying apparatus and air conditioners - professional industrial one for server room, provision of the regulations package and infrastructure maintenance services.

During the second quarter of 2017, **open public procurement procedures** for the procurement of aggregates, mobile telephony services, tourist agency services and the creation of new software modules - the statistical module of the integrity plans application, were announced. Also, **shopping public procurement procedures** were announced: services for official premises security, project of anti-corruption campaign preparation, biotechnical materials, periodicals and printing of brochures, casco insurance services in the implementation procedure.

Three complaints were submitted to the Agency in the procedures of public procurement of hygiene services, procurement of television services and procurement of technical inspection and testing services (vehicle registration).

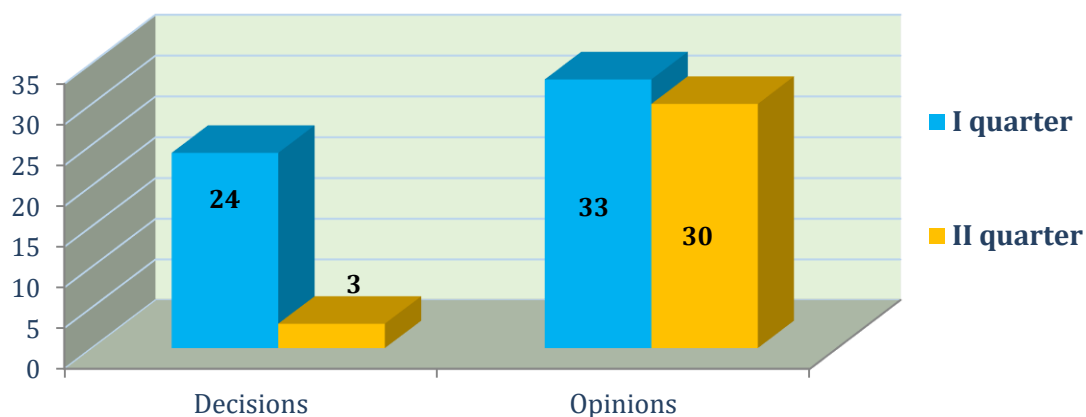
In the first six months of 2017, 20 Public Procurement Contracts were concluded, totaling EUR 251,745.91, while the estimated value determined by the Public Procurement Plan thereof amounted to: EUR 264,800.00, comprising 45.37% of the realized Public Procurement Plan for 2017.

1. Department for Prevention of Conflict of Interest of Public Officials

Activities that characterized the II quarter period in the Department:

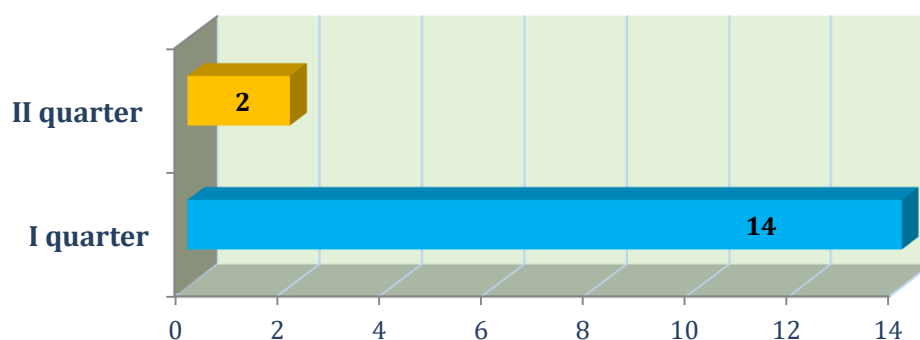
- ✚ As for the field of prevention of conflict of interest, upon the requests of public officials and authorities, the Agency issued **30** Opinions in the second quarter of 2017 on the occurrence of conflicts of interest that are binding on public officials. The opinions issued by the Agency referred to a potential suspicion of conflicts of interest of public officials as well as the authorities in connection with the following: performance of incompatible functions, receiving fees in management bodies, membership in boards of directors, working bodies and commissions, signing the contracts. Since the beginning of 2017, 63 Opinions were issued;
- ✚ Following the conducted procedures, the Agency completed 7 cases and issued **3** decisions. Since the beginning of the year, 31 cases have been completed, 27 decisions have been issued, two Conclusions on rejection and two cases suspended by an official note;

Chart 1: The Agency's decisions and opinions in the field of the conflict of interest



- ✚ In **one** case upon the report of the natural person, after the termination of the procedure before the Agency, it was forwarded to the Council of the Agency for further action, in accordance with Article 87 of the LPC. After the conducted procedure, the Agency has determined that a member of the Council of the Agency, in the election to the function of a member of the Council, did not fulfill the condition regarding the working experience in a certain degree of qualification;
- ✚ Two public officials were found to violate the Law. Since the beginning of the year, 16 public officials have been found to violate the Law. Procedures against 3 public officials are pending before the Agency;
- ✚ Following the adoption of the Decisions and issuance of Opinions regarding the prevention of conflict of interests of public officials, **two** public officials resigned on public functions, based on the given Opinions. Since the beginning of the year, 16 public officials have resigned on public functions;

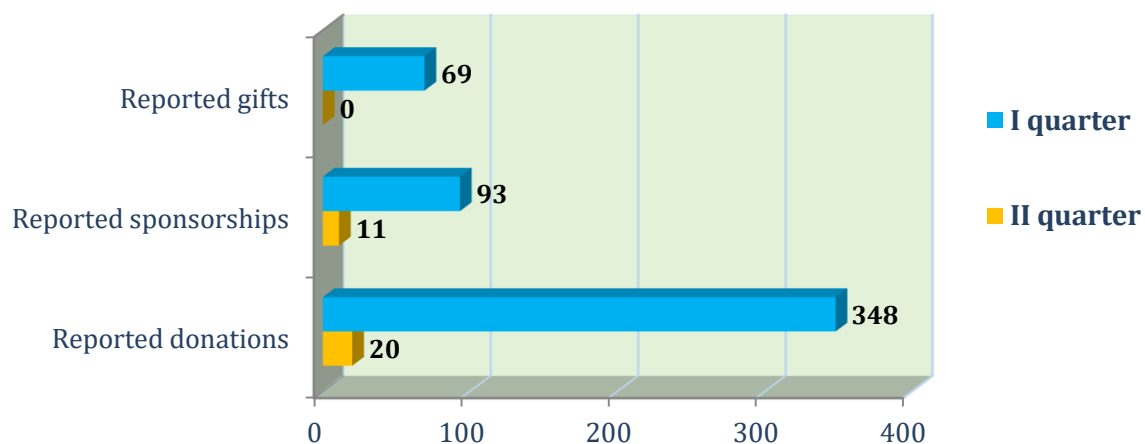
Chart 2: Number of public officials who resigned (I-II quarter)



- ✚ On the basis of decisions made regarding the limitations in the exercise of public function, the authorities acted in **3** cases: for **2** public officials, the authorities issued a conclusion on the warning with a warning measure, in **one** case the authorities submitted a notification that the disciplinary procedure before the competent ministry is in due course.

- In the second quarter, there was no Gift Evidences Certificate, **ten authorities** submitted reports stating that public officials received a total of **20** donations, as well as reports stating that the authorities received a total of **11** sponsorships. In the II quarter, **6** authorities submitted a report that they did not receive any gifts during 2016. The control of the accuracy and completeness of the received Reports/Excerpts and supporting documentation was performed.

Chart 3: Reported gifts, donations and sponsorships



2. Department for checking the income and property of public officials and civil servants having the prescribed obligation to submit reports on income and property

Activities that marked the II quarter period in the Department:

- By the end of the II quarter of 2017, **6094** reports on income and property were checked (**3416** reports in the II quarter). Out of those, **4889** reports of public officials and **1205** civil servants' reports were checked (in the second quarter, **2555** reports of public officials' and **861** of civil servants' reports were checked). All received reports on income and property that passed through the checking process have been verified.

Chart 4: Total number of checked income and property reports

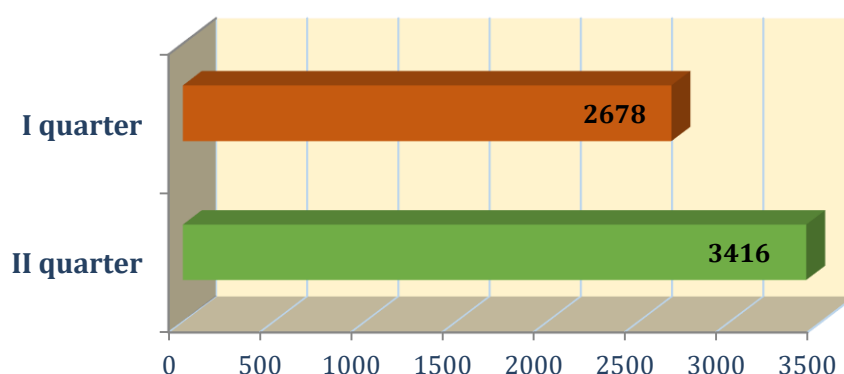
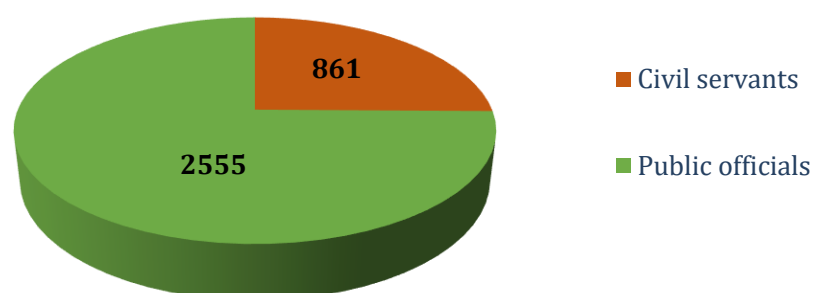


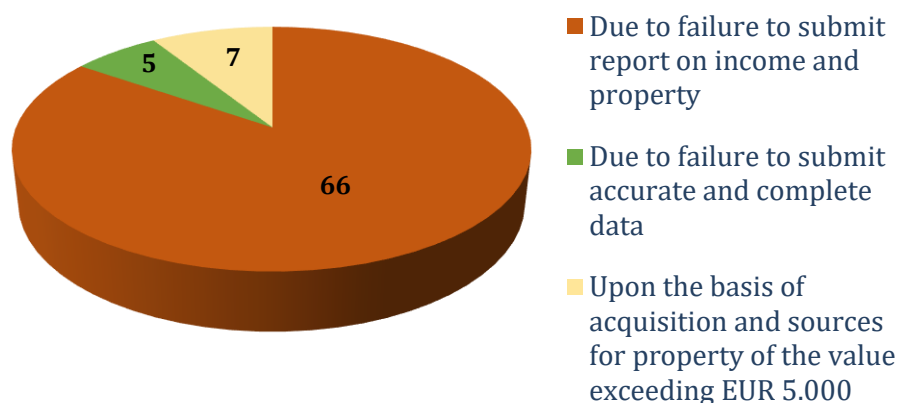
Chart 5: Number of checked reports of public officials and civil servants in the II quarter



- ✚ Currently, data of **210** public officials and civil servants are in the process of a complete check, who are being fully checked through the bases of the Ministry of Interior, the Real Estate Directorate, the Tax Administration and the Securities Commission. Out of that number, all those who have given approval to check bank accounts will be checked through 14 commercial banks in Montenegro. There are currently **47** reports at the stage of checking through the banks;
- ✚ During the complete checking process, irregularities were detected through comparison of data in the reports with the databases of the relevant institutions, as follows: **6** cases relating to incorrect and incomplete data and **12** cases relating to the basis of acquisition of property and income, and those will be processed in accordance with the Law on Prevention of Corruption and in accordance with the rules of general administrative procedure;
- ✚ After the conducted administrative procedures, the Agency completed **78** cases, **66** for failing to submit a report on income and assets (**51** Decision issued in the II quarter), **five** due to failure to provide accurate and

complete data, and **7** on the basis of origination and on the sources for property exceeding EUR 5,000. Another **27** initiated procedures (in this reporting period) are ongoing due to the failure to submit a report on income and property.

Chart 6: Total number of completed cases after the conducted administrative procedures



3. Department for implementation of measures for controlling the financing of political entities and election campaigns

Activities that marked the II quarter period in the Department:

- ✚ Successfully conducted control of the financing of political entities and election campaigns for elections held in the Municipality of Herceg Novi;
- ✚ Owing to the proactivity of the Agency, a total of **41** reports of political entities were submitted during the election campaign for the election of councilors in the Assembly of the Municipality (AoM) of Herceg Novi, out of which **30** were prepared on fifteen-day basis on the contributions of legal and physical entities and **11** reports on the collected and spent funds in the election campaign, while it was established that one report was not submitted, in which case the request for initiating the misdemeanor procedure was forwarded to the competent Department. In the reporting period, **206** reports of the authorities were delivered and published and **247** controls of the submitted reports were executed. Regarding the number of controls on compliance with prohibitions and limitations prescribed by law, a total of **570** controls were carried out in the second quarter, including the controls of political entities and authorities operating in the field, controls of compliance with the prohibition of debt write-off, social benefits and employment in the election campaign, as well as the check of the contributors to the political entities. 4 misdemeanor proceedings have been initiated;

✚ During the reporting period, **14** reports of the authorities of the municipality of AoM of Nikšić (analytical cards one month after the elections) were also submitted and published and **1** report on the collected and spent funds in the election campaign. Controls of submitted reports (**15** controls) were executed;

✚ Regarding the regular work of political entities, **16** Annual Consolidated Financial Statements were submitted to the Agency in the reporting period. Of the total of **51** political entities that are registered in the Register of Political Entities, a total of **46** Annual Consolidated Financial Statements have been submitted since the beginning of the year, therefore, **5** misdemeanor proceedings have been initiated for failure to submit thereof. The Agency received a total of **7** complaints for the regular work of political entities and acted upon all submitted complaints.

✚ In total, 9 misdemeanor procedures were initiated.

Chart 7: *Initiated misdemeanor proceedings for violations of the Law on Financing Political Entities and Election Campaigns (I-II quarter)*

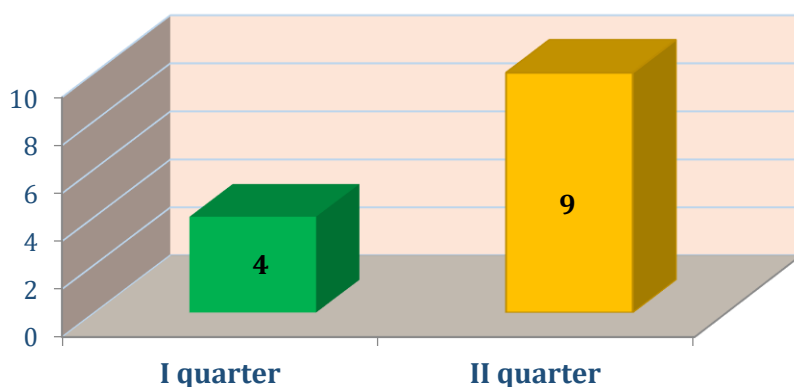
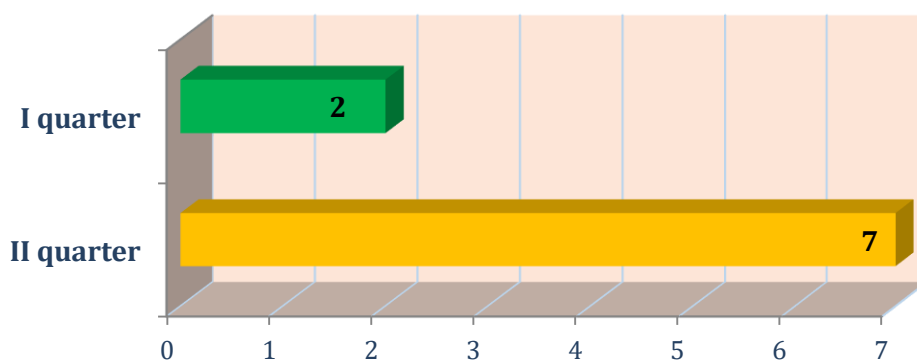


Chart 8: *Number of complaints on the regular work of the political entities (I-II quarter)*



4. Department for initiating misdemeanor procedures and issuing misdemeanor orders

Activities that marked the II quarter period in the Department:

- A total of **261** requests for initiation of misdemeanor proceedings were filed, **252** requests for violation of the provisions of the Law on Prevention of Corruption and **9** requests for violation of the provisions of the Law on Financing of Political Entities and Election Campaigns;

Chart 9: Requests for initiating misdemeanor procedures for violation of the provisions of the Law on Prevention of Corruption

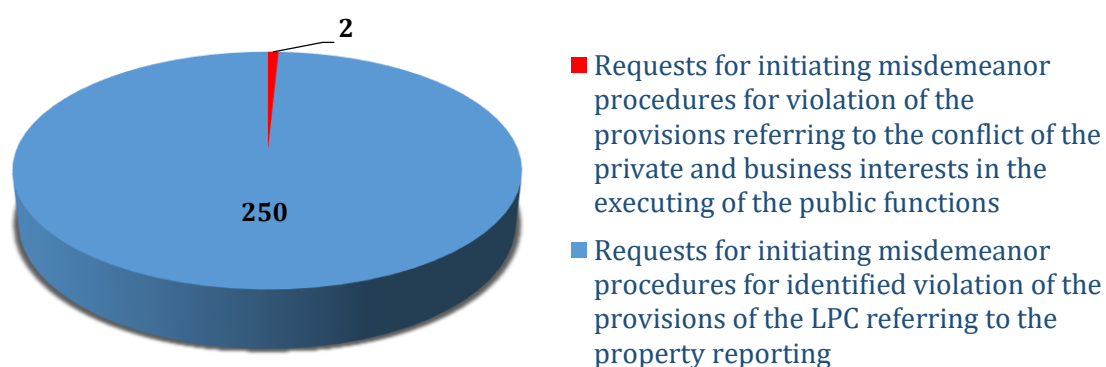
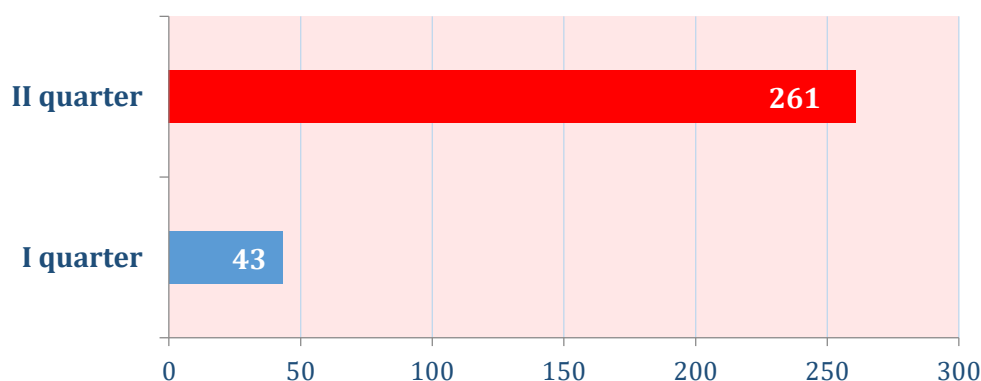
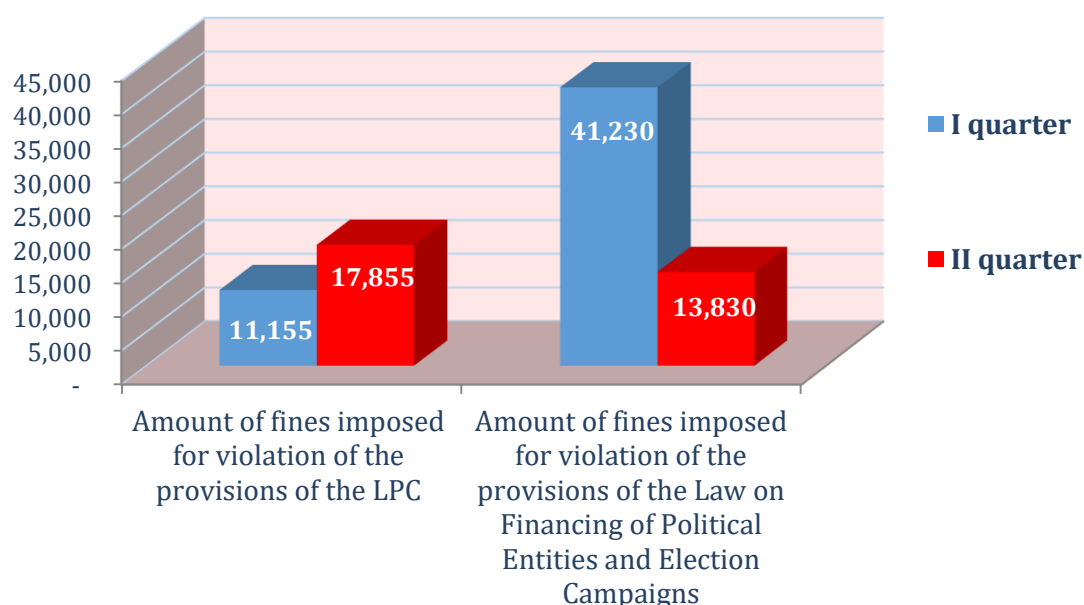


Chart 10: Number of requests for initiating misdemeanor procedures (I - II quarter)



- In total, **106** sanctions were imposed, out of which **33** were warnings and **73** were fines in the total amount of EUR **29,345**. More precisely, in the field of conflict of interest, **five** fines were imposed and the total amount of sanctions was EUR **1,640**, **54** fines were imposed in the area of property and income reports (total amount of sanctions of EUR **13,875**), and in the field of financing political entities and election campaigns **14** fines, with a total amount of sanctions of EUR **13,830**;¹

Chart 11: *Fines imposed for violation of the provisions of the LPC in the area of conflict of interests, property verification, integrity plans and violations of the provisions of the Law on Financing of Political Entities and Election Campaigns (I-II quarter)*



- One decision was issued by which the defendant, in addition to the fine imposed, the PROTECTIVE MEASURE OF SEIZURE OF PROPERTY BENEFITS was also imposed;
- The authorized officers of the Department attended **105** hearings before the competent misdemeanor courts.
- Five** complaints of the Agency on court rulings were adopted.

¹ Due to violation of the provisions of the Law on Prevention of the Corruption referring to the integrity plans in the II quarter of 2017, the fines in the total amount of EUR **2,340** were imposed.

5. Department of Integrity and Lobbying - INTEGRITY

Activities that marked the II quarter period in the Department:

- ✚ The authorities appointed **2** integrity managers. From January 1, 2016, the total number of authorities that appointed the integrity manager is 674;
- ✚ **Two** authorities have adopted an integrity plan. From the beginning of the year, 3 authorities have adopted an integrity plan;
- ✚ The number of bodies that submitted a report on the implementation of the integrity plan in the second quarter is **582** (out of the total number of bodies that adopted Integrity Plans in 2016, i.e. out of 665);

Chart 12: Number of authorities that submitted a report on implementation of integrity plan (I-II quarter)

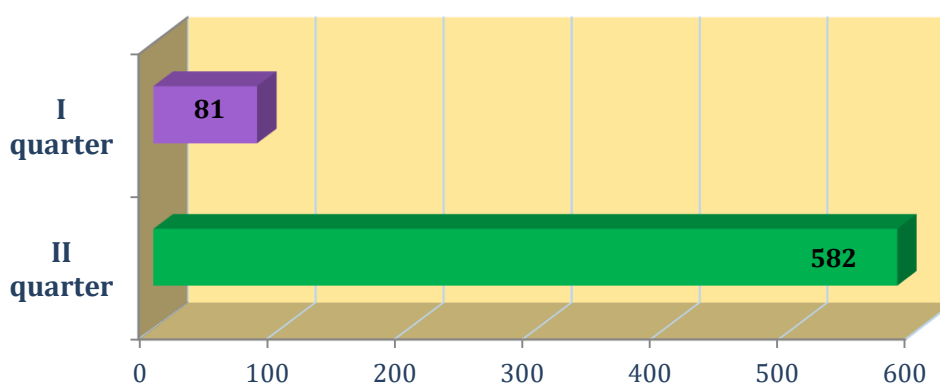
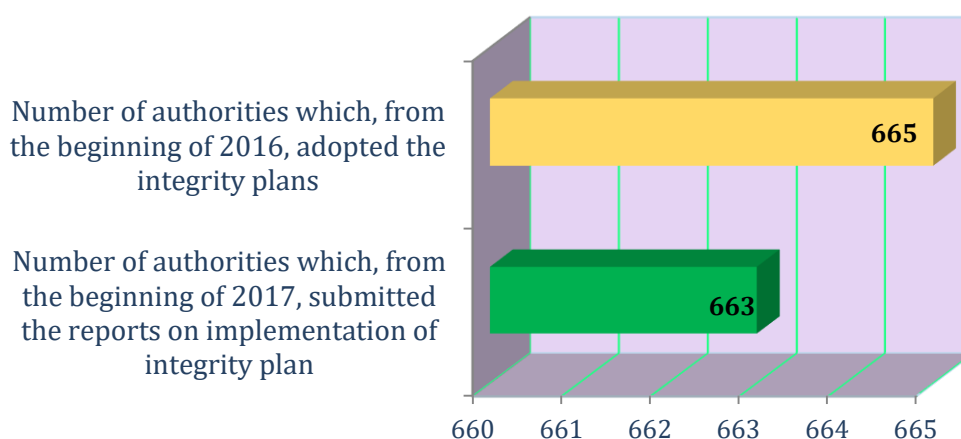
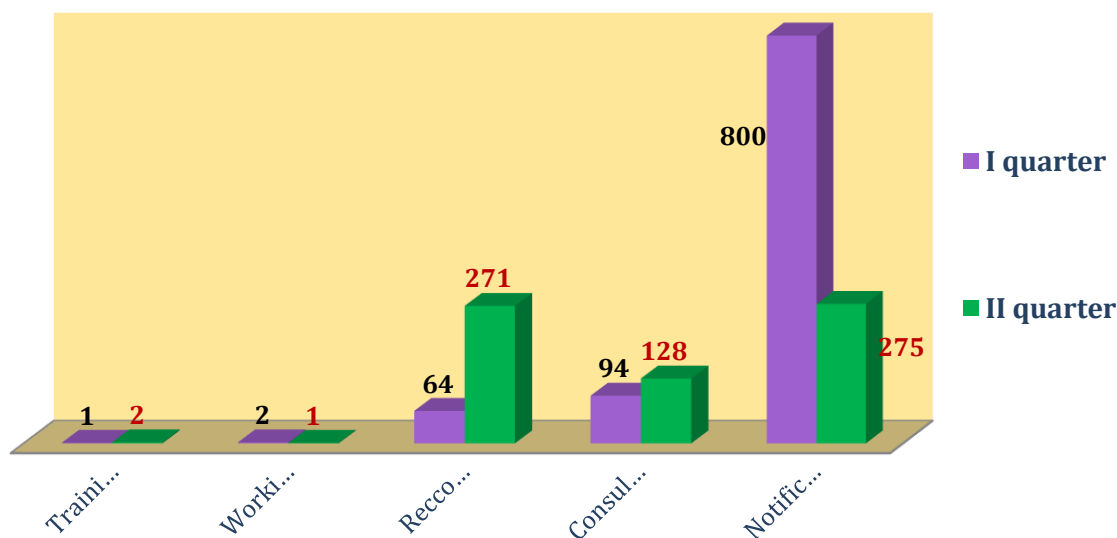


Chart 13: Number of submitted reports on implementation of integrity plan in relation to the total number of adopted integrity plans



- ✚ **271** recommendations were issued for improving the reports on implementation of integrity plan (219 written and 52 oral recommendations);
- ✚ The Department officials conducted **128** consultations, held **one** working meeting, **two** trainings with representatives of the authorities regarding the development of integrity plans and submission of reports, and sent **275** notifications and urgencies.

Chart 14: Trainings, meetings, consultations and given recommendations for improvement of report on implementation of IPs



- ✚ **10** requests for initiation of misdemeanor procedure were filed upon failing to submit the report on implementation of integrity plan;
- ✚ **Three** hearings were held and **3** first-instance decisions were passed. Fines for **3** authorities were imposed in the total amount of **EUR 2,340**.

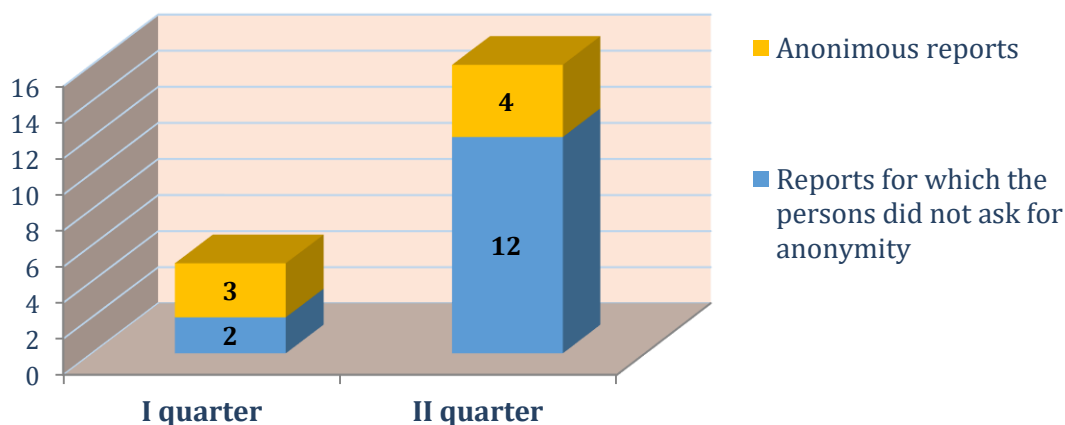
Since the beginning of the year, the total amount of fines imposed was **EUR 3,870**.

6. Department for handling whistleblowers' reports and protection of whistleblowers

Activities that marked the II quarter period in the Department:

- ✚ For the first six months of 2017, **11 cases** were initiated **ex officio**;
- ✚ In the second quarter, the Agency was filed **16** reports on endangering the public interest that pointed to the existence of corruption. In **4** cases, the applicant wanted to remain anonymous. A total of 21 reports have been submitted since the beginning of the year.

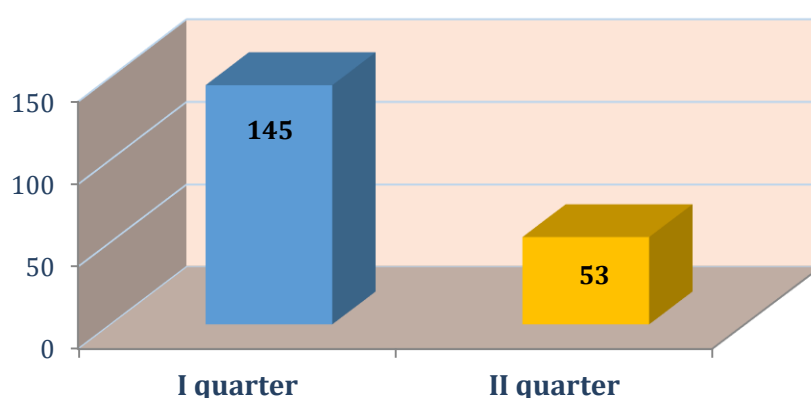
Chart 15: Reports on the public interest endangering that pointed to the existence of corruption (I-II quarter)



- ✚ A total of **3 reports** have been submitted to the competent prosecutor's office since the beginning of the year, of which, according to the latest information from the competent prosecutor's offices, two are in the phase of the reconnaissance. **One** of these **three** reports constitutes a part of the case which was by the APC given to the prosecution, while, in the rest, the Agency acts within its jurisdiction;

- ✚ **One** report was transferred to another competent authority - the Judicial Council;
- ✚ During the reporting period, **1** application for protection of the whistleblowers was submitted and the procedure is in progress. **Two** procedures upon the requests for protection started at the end of 2016, which did not determine the merits of allegations in the report, were also completed;
- ✚ In the reporting period, **one** request was made by a whistleblower to provide professional assistance within the meaning of the Article 66 of the LPC. In this regard, the Agency made a detailed Report at the request of the whistleblower on all actions known to the Agency;
- ✚ In the reporting period, the authorities, companies, other legal entities and entrepreneurs appointed **53** persons for acting on whistleblowers' reports, while a total of **198** persons were appointed from the beginning of the year.

Chart 16: *Number of persons appointed to act on whistleblowers' reports*



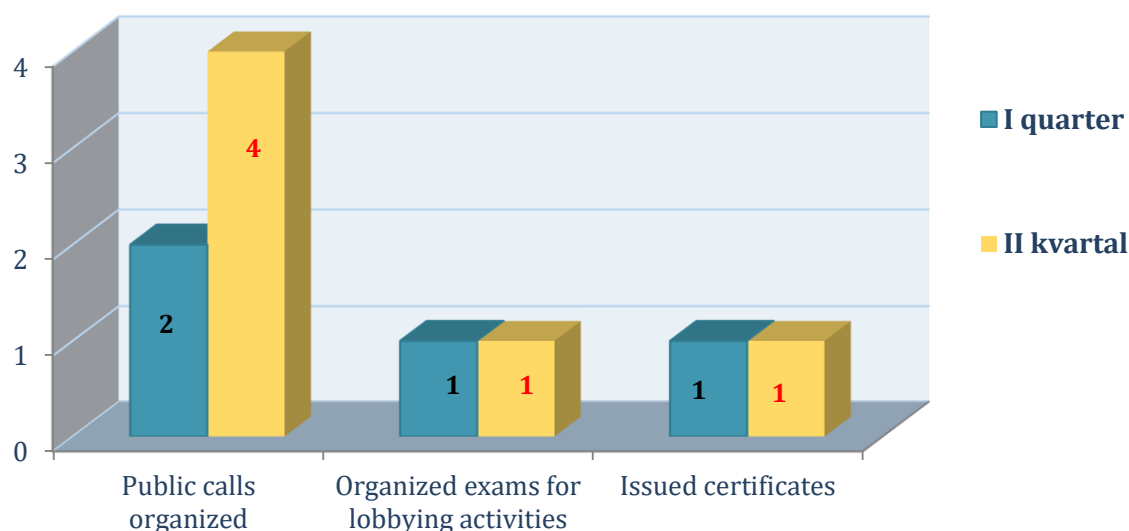
- During the reporting period, **six** trainings, **14** working meetings and **136** consultations were held.

7. Department of Integrity and Lobbying - LOBBYNG

Activities that marked the II quarter period in the Department:

- ✚ **One examination** was organized for conducting lobbying activities. Since the beginning of the year, two exams have been organized;
- ✚ On the website of the Agency, **4 public calls** for applying of the candidates to conduct lobbying exams have been announced. From the beginning of the year, a total of six public calls for applying of the candidates for the exam were announced;
- ✚ **One** candidate passed the exam for performing lobbying activities and received a certificate of the passed exam. Since the beginning of the year, a total of two candidates have received a certificate for performing lobbying activities.

Chart 17: *Number of organized public calls, exams for performing lobbying and certificates issued (I - II quarter)*



8. Department for Prevention of Corruption, Monitoring of Regulations and Issuance of Opinion on Regulations in the Field of Anti-Corruption

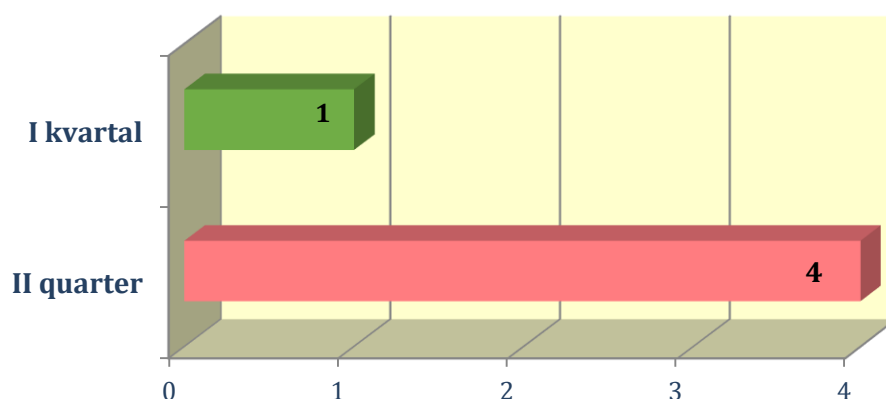
Activities that marked the II quarter period in the Department:

✚ **Four** Opinions on the assessment of susceptibility of regulations to the risks of corruption and compliance with international standards of valid legal texts have been prepared, as follows:

1. Opinion on the Labor Law and the Law on Employment and Realization of Rights from Unemployment Insurance (in the part of the procedures for employment of unemployed persons);
2. Opinion on the Labor Law (in the part of the modality of termination of employment of an employee);
3. Opinion on the Law on Health Care (in the part of the procedures for appointing directors, members of the Board of Directors, as well as the employment of health workers and healthcare associates in health care system institutions);
4. Opinion on the Law on Civil Servants and State Employees (in relation to Articles 69-78 of the aforementioned Law);

✚ **One** Opinion on Draft Laws and Other Regulations and General Acts was prepared, including the Opinion on the General Law on Education (in the part of procedures for appointing directors and employing teaching staff of institutions defined by the aforementioned Law).

Chart 18: *Opinions on the assessment of susceptibility of regulations to the risks of corruption and compliance with international standards of valid legal texts*



9. Department for International Cooperation and Standards

Activities that marked the II quarter period in the Department:

- ✚ In the reporting period, the realization of projects, the beneficiary of which is the Agency, was continued. The first project activity of the IPA 2014 Twinning Project "Support to the Implementation of Integrity Measures" was realized, when, at a ceremony held on June 26 of this year, this project was presented to the general and professional public, as well as to the international community in Montenegro.
- ✚ Within the Horizontal Program SE and EU - Anti-Economic Crime Project, out of 17 measures related to the Agency, three measures have been implemented, and the activities related to the other two measures are ongoing, including the work on the analysis of the legal framework for controlling the financing of political entities and election campaigns, the drafting of the Annual Action Plan for the implementation of the Communication Strategy of the Agency, and the drafting of the Guidelines for the Protection of Whistleblowers for Judges and Prosecutors, as well as the Guidelines for Protection of Whistleblowers for the Police and Civil Servants and State Employees.
- ✚ Within the framework of the RAI Regional Program, dedicated to assessing the susceptibility of legal regulations to corruption, two activities have been completed so far: in addition to the workshop held for preparation of the Methodology for Assessing the *susceptibility of regulations to corruption*, the Department for Monitoring the Legislation and Issuance of Opinions on Anti-Corruption Regulations, the first draft of this methodology was provided, to which the comments were given.
- ✚ Regarding the activities arising from membership in regional and international institutions and organizations in the field of prevention of

corruption, for which the Agency is a contact institution for Montenegro, the Agency officials participated in training for GRECO evaluators within the V evaluation round (prevention of corruption and promotion of integrity) and the Department official is included in the official composition of the GRECO Evaluation Team for Macedonia during this year.

- ✚ Furthermore, at the GRECO session in June this year, it was announced that the Report on Compliance for Montenegro within the IV Round of Evaluation concerning the "Prevention of Corruption in Relation to Members of Parliament, Judges and State Prosecutors" will be discussed and adopted in the session to be held in October.
- ✚ Before the 7th Session of the Group for Assessment of Implementation of the United Nations Convention against Corruption (UNCAC) in June, Montenegro was drawn to be one of the countries evaluating the Republic of Macedonia within the second cycle of the UNCAC evaluation.
- ✚ On the occasion of the Summit of Heads of State and Government in Trieste (Berlin Process), as at July 12, 2017, the Department Officer prepared the Information on the Workshop of Anti-Corruption Bodies, held on the same day of the Summit, to familiarize the Montenegrin delegation to participate in the Summit. The workshop, attended by the heads of the anti-corruption bodies of the Western Balkan countries - participants in the Berlin Process, will be led by the President of the National Anti-Corruption Agency of the Italian Republic, Mr. Cantone.

10. Department for Education, Research, Campaigns and Analytics

Activities that marked the II quarter period in the Department:

- ✚ A quarterly report on the work of APC in 2017 prepared by the APC Council at the 44th session held on May 5, 2017 was prepared;
- ✚ APC, in cooperation with the IPA project team, organized the marking of the start of the implementation of the IPA 2014 Twining Project "Support to the Implementation of Integrity Measures";
- ✚ Preparation of the II quarterly report for 2017 started

Campaigns:

- ✚ 5,500 flyers "Lobbying" were inserted in the daily press
- ✚ The 30-second on the topic "Income and Property Reporting" Prepared and posted on the website;
- ✚ Adopted Communication Strategy of APC for a period of three years, prepared in cooperation with experts hired through the Council of Europe Project;

- ✚ Preparation of the Annual Action Plan for implementation of the Communication Strategy of the APC started.

Trainings in cooperation with domestic institutions, non-governmental organizations and foreign partners

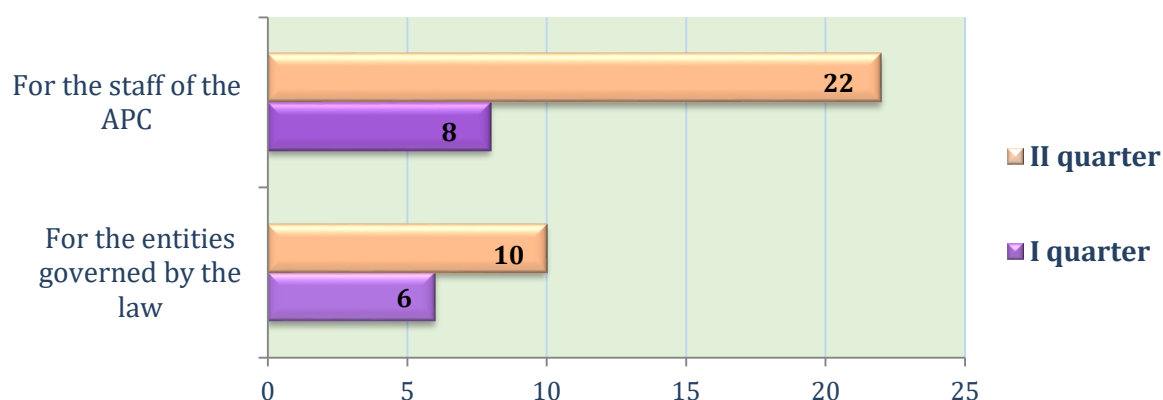
For the staff of the Agency:

- ✚ During the II quarter, the Agency organized 22 trainings for its staff.

For the entities governed by the law:

- ✚ The officials of the Agency held 8 trainings.

Chart 19: *Trainings in cooperation with domestic institutions, non-governmental organizations and foreign partners (I-II quarter)*



Public Relations:

- ✚ The Agency continued its continuous presence in the media;
- ✚ The number of media announcements on the activities of the Agency in the II quarter is 586, out of which:
 - in print media - 288 articles pertaining to the Agency;
 - online media - 265 texts pertaining to the Agency;
 - in TV media - 33 emissions related to the Agency.
- ✚ The number of the Agency's announcements on the website of this body in the I quarter is 35;
- ✚ In the I quarter, two statements of the representatives of the Agency were proactively issued.

Chart 20: *Informing of general and professional public about the activities and results of the Agency*

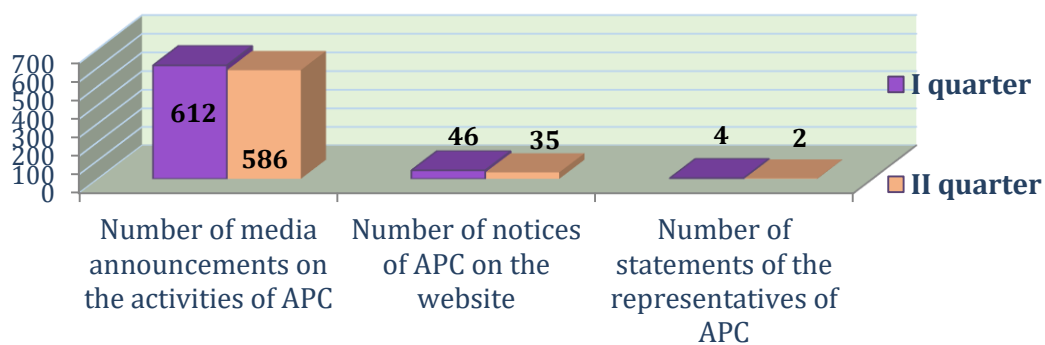
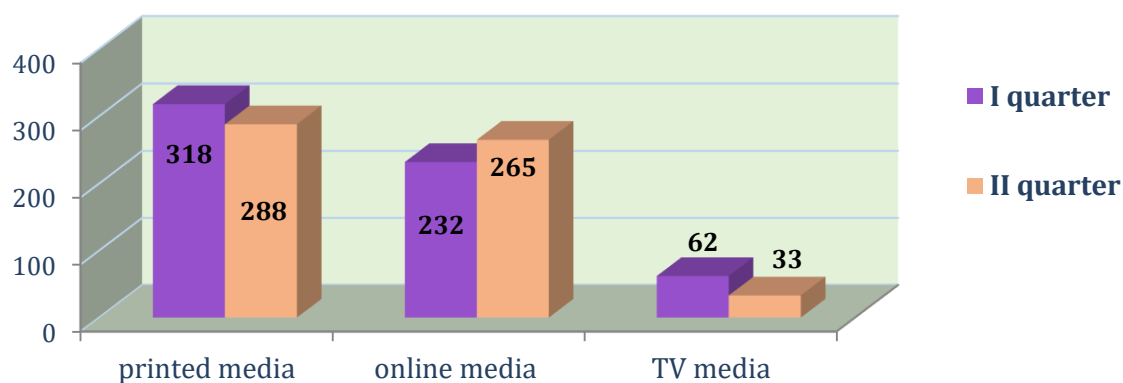


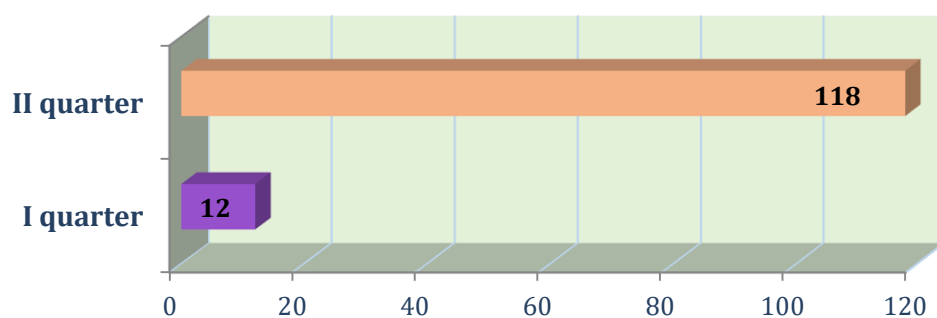
Chart 21: Presence of the Agency in the media (I-II quarter)



FAI:

- ✚ Number of requests for free access to information in the II quarter - 118:
 - Allowed access to information - 6;
 - Partially adopted - 1;
 - Rejected access to information - 101 (100 for lack of possession and 1 due to legal restrictions);
 - Instructions to visit the webpage of APC - 10.

Chart 22: Number of requests for free access to information (I-II quarter)



11. Information Technology Department

Activities that marked the II quarter period in the Department:

- + In line with the recommendations of the APC Council, the NGO sector and the APC's employees, the website has been improved;
- + Terms of Reference task with a functional specification for the development of the module were prepared - integrity plans, while the procurement process is in progress;
- + Changes made to modules Administrative and Misdemeanor Procedure and implementation started thereon;
- + Realized new security tools, as well as equipment that is being installed.

Conclusion

The Second Quarterly Report on the implementation of the Agency's Annual Work Plan for 2017 contains aggregate data on the realized results and activities of the Agency according to all established goals in the annual Work Plan. The realization of the activities fully follows the dynamics of the set goals and indicators of success, the legal deadlines, as well as the strategically defined priorities of the Agency for 2017.

Based on the Annual Work Plan of the Agency for 2017 and the realization of identified activities, the Agency has achieved concrete and measurable results for all strategically defined goals.

This was also demonstrated by the visit of the European Union expert mission, which in the period from June 5 to June 9, 2017 made an insight into the work of the Agency for the Prevention of Corruption in the field. A mission dedicated to assessing the fulfillment of provisional measures relating to the prevention of corruption from chapter 23 was led by Slovenian and Latvian experts, who had a number of meetings with representatives of the Agency for the Prevention of Corruption and the State Audit Institution on that occasion.

These meetings were an opportunity for direct exchange of information on concrete issues concerning the functioning of the legislative and institutional framework in the field of corruption prevention, on the capacity of the Agency for the Prevention of Corruption and the initial results in its work. During the presentation of the preliminary findings, the EU experts praised the so-far progress of the Agency and pointed out the importance of informing the public about the results achieved.

In the part of preventing the conflict of interests of public officials, after the adopted Decisions and given Opinions, 16 public officials have resigned from public functions since the beginning of the year. Currently, there are 210 public officials and civil servants at the full check of data from income and property reports. The number of bodies that submitted the report on the implementation of the integrity plan in the second quarter is 582. 271 recommendations were issued for improving the report on the implementation of the integrity plan.

During the reporting period 11 ex officio cases of public interest endangering were launched. There have been 5 cases in which it has been established that there was a threat to the public interest, and in that regard, APC has made a total of 21 recommendations for improving transparency and eliminating corruption risks in recruitment procedures.

A total of 261 requests for initiation of misdemeanor proceedings were filed, 252 requests due to violation of the provisions of the Law on Prevention of Corruption and 9 requests due to violation of the provisions of the Law on Financing of Political Entities and Election Campaigns. In total, 106 sanctions were imposed, of which 33 were warnings and 73 were fines in the total amount of EUR 29,345.

In June, the Agency officials and the Twinning team implemented the first project activity within the IPA 2014 Twinning Project "Support to the implementation of integrity measures" - the media marking of the start of the implementation of the project. The event took place on June 26 in Podgorica, in the presence of a large number of high-ranking government officials, diplomatic missions in Montenegro, and guests from the public and non-governmental sector.

In June, a workshop was organized and it was intended for preparation of the annual Action Plan for implementation of the Agency Communication Strategy, where the employees of the Agency, in cooperation with experts, defined the annual strategic goals in communication and activities for the realization of the stated goals.

In the second quarter, activities on strengthening staff capacities continued with the filling of remaining vacancies, as well as continuous trainings of staff in cooperation with foreign and domestic partners.

ANNEX 1,2 - CONFLICT OF INTEREST/INCOMPATIBILITY OF FUNCTIONS

Preventing Conflicts of Public and Private Interests in the Exercise of Public Functions /CONFLICT OF INTEREST/INCOMPATIBILITY OF FUNCTIONS							
	Requests for giving Opinion	Opinions of the Agency	Decisions/Acts due to the existence of a conflict of interest upon the initiative	Decisions/Acts due to the existence of a conflict of interest upon the request of the Agency	Decisions of the Exemption on the basis of the Opinion Resignations on the basis of an opinion/decision	Misdemeanor procedures	Sanctions imposed
January - March	33	33	15	9	14		
April	14	14	2	2	/		
May	6	6	/	/	1		
June	10	10	3	/	1		
July							
August							
September							
October							
November							
December							
TOTAL	63	63	20	11	16		

ANNEX 3 – CONTROL OF RECEIVED GIFTS, DONATIONS AND CONCLUDED SPONSORSHIPS

CONTROL OF RECEIVED GIFTS, DONATIONS AND CONCLUDED SPONSORSHIPS							
	Reported gifts	Reported sponsorships	Reported donations	Checked reports	Irregularities detected	Misdemeanor procedures	Sanctions imposed
January - March	69	93	348	/			
April	/	11	20	69			
May	/	/	/	/			
June	/	/	/	/			
July							
August							
September							
October							
November							
December							
TOTAL	69	104	368	Checked all 69	none		

ANNEX 4 – PROPERTY CHECK

EFFECTIVE PROJECT REPORT ON THE PROPERTY AND INCOME OF PUBLIC OFFICIALS								
	Reports of Public and Local Officials	Reports of Civil Servants	Checked reports	Irregularities detected	Misdemeanor procedures due to failure to submit the report	Misdemeanor Procedures - Incorrect Data	Sanctions imposed	Cases transferred to the Prosecutor's Office
January - March	2334	344						/
April -June	2555	861	210 ²					/
August								
September								
October								
November								
December								
TOTAL	4889	1205	210					

² Software and administrative check have been fully executed for all public officials and civil servants who have submitted income and property reports electronically and in writing, and after these verification phases have been implemented, the process of complete control of property and income has begun and is currently in the phase of complete verification of 210 public officials and civil servants.

ANNEX 5 – CONTROLLING THE FINANCING OF POLITICAL PARTIES AND ELECTION CAMPAIGNS

CONTROLLING THE FINANCING OF POLITICAL PARTIES AND ELECTION CAMPAIGNS								
	Number of reports of political entities on regular work	Number of political entities reports during election campaign	Number of reports of authorities and legal entities during election campaign	Number of controls on submitted reports	Number of controls on respecting prohibitions and limitations prescribed by law	Misdemeanor procedures	Sanctions imposed	Cases transferred to the Prosecutor's Office
January - March	89 (Membership fees and reports)	14 (13 fifteen + 1 after elections)	598 (194 rec NK, 17 rec HN, 274 ak, pn, NK i 113 HN)	701 (1+2+3)	53 (kont na ter, dopisi oprtost dugova, soc dav, mjes pot)	4 (for membership fee)		
April	15 (annual report)	18 (17-15-day + 1 after elections in NK)	130 (12-15dnev, 14ak NK, 28 ak HN, 56pn HN, 20 zapoš)	163 (1+2+3)	29 (16-service providers, 13 kontr na terenu)	5 (for annual report)		
May	1 (annual report)	15 (13-15-day+2 after elections in HN)	76 (6-15dnev, 28 AK HN, 28 PN HN, 14 zapoš)	92 (1+2+3)	541 (person from elections-mup mp and regular work)			
June		9	14	23		4 (for persons) and		

		(after elections in HN)	(AK of HN)			1 transferred to the competent department (report on costs)		
July								
August								
September								
October								
November								
December								
TOTAL	105	56	818	979	623	13		

ANNEX 6 – VIOLATIONS

Preventing Conflicts of Public and Private Interests in the Exercise of Public Functions /CONFLICT OF INTEREST/INCOMPATIBILITY OF FUNCTIONS							
	Requests for Opinion issuance	Opinions of the Agency	Decisions on the existence of a conflict of interest on the initiative	Decision on the existence of a conflict of interest at the request of the Agency	Decisions on Exemptions on the basis of Opinions	Misdemeanor procedures	Sanctions imposed
January - March						16	5 sanctions imposed (3 fines imposed in the TOTAL amount of 1.240 €; 2 given warnings)
April-June						2	7 sanctions imposed (5 fines, 2 warnings) in the amount of 1640€
July							
August							
September							
October							
November							

December							
TOTAL						18	12

Efficient checking of reports on property and income of public officials								
	Reports of Public and Local Officials	Reports of Civil Servants	Checked Reports	Irregularities detected	Misdemeanor procedures due to failure to submit a report	Misdemeanor procedures – incorrect data	Sanctions imposed	Cases transferred to the Prosecutor's Office
January - March					20	3	45 sanctions (35 fines imposed in the total amount of 8.385 €; 10 given warnings)	
April - June					249	1	74 sanctions, (54 fines and 20 warnings) in the amount of 13.875€	
July								
August								
September								
October								

November								
December								
TOTAL					269	4	119	

Controlling the financing of political parties and election campaigns								
	Number of reports of political subjects on regular work	Number of political entities reports during election campaign	Number of reports of authorities and legal entities during election campaign	Number of controls of submitted reports	Number of controls on respecting prohibitions and limitations prescribed by law	Misdemeanor procedures	Sanctions imposed	Cases transferred to the Prosecutor's Office
January - March						4	46 sanctions imposed (41 fines imposed in the total amount of 41.230 €; 5 given warnings)	
April - June						9	<u>25 sanctions (14 fines and 11 warnings)</u> in the total amount of	

							13.830€	
							NOTE: The amount of sanctions imposed in the First Quarter Period is increased by the amount of 6.230 €, after the decisions become final.	
July								
August								
September								
October								
November								
December								
TOTAL						13	71	

ANNEX 7 – INTEGRITY

STRENGTHENING OF INTEGRITY IN THE PUBLIC SECTOR BY ADOPTION OF INTEGRITY PLANS BY AUTHORITIES AND THE REPORTING OF THE IMPLEMENTATION THEREOF								
	Number of bodies that appointed integrity managers	Adopted integrity plans	Reports on the implementation of integrity plans	Number of recommendations for improvement of integrity plans	Number of recommendations for improvement of Reports on implementation of IPs	Misdemeanor procedures	Sanctions imposed	Trainings, meetings and consultations held
January	2 (671 in total)	0 (665 in total)	3	0	2 (2 written recommendations)	3 hearings held and 6 first instance decisions issued	One acquittal and sentences for legal and responsible persons for five authorities (for responsible persons: for one authority a fine in the amount of 250€, four warnings and one acquittal; for legal entities: 1*500€; four recommendations, one acquittal; costs of the procedure 5*30€; 900,00 eur in total)	6 consultations
February	0	0 (665 in total)	5	0	7 (5 written and 2	1 hearings held and 2	Penalties for legal and responsible	39 consultations,

					oral recommendations)	first instance decisions passed	persons for two authorities (for the responsible persons: two warnings; for legal entities: two warnings; the costs of the procedure 2*30 €)	660 notifications sent to authorities on obligation of adoption of a report
March	1 (672)	1 (666 in total)	73	1	55 (41 written and 14 oral recommendations)	2 hearings held and 2 first instance decisions passed	Fines for 1 authority and decision to reject the request for initiating misdemeanor proceedings for 1 authority (for the responsible persons: a fine of 50 € for one authority; for legal entities: one decision rejecting the application, and one fine of 500€; the costs of the procedure 20€; EUR 570,00 in total)	49 consultations, 2 working meetings, 1 training, 140 e-mails addressed to the authorities to remind about the obligation to submit the report

April	0	1	510	0	223 (186 written and 37 oral recommendations)	There were no hearings, 2 first instance decisions were issued	One acquittal and sentences for legal and responsible persons for two authorities (for the responsible persons: for one authority a fine in the amount of 50€ and one acquittal; for legal entities: 2*500€; the costs of the procedure 2*30€; EUR 1110,00 in total)	99 consultations 275 e-mails addressed to the authorities to remind about the obligation to submit the report
May	0	0	63	0	44 (30 written and 14 oral)	1 hearing held, no first instance decision issued	/	20 consultations, 1 working meeting, 1 training
June	2	1	9	0	4 (3 written and 1 oral)	2 hearings held, 10 misdemeanor proceedings initiated, one first instance decision (for non-adopting	Fines for 1 authority (for responsible persons fine in the amount of 200€; for a legal entity a fine of 1.000€;	9 consultations, 41 letter, 1 training

						the report),	the costs of the procedure 30€; EUR 1230,00 in total)	
TOTAL	5 (674 from 01/01/2016)	3 (668 from 01/01/2016)	663	1	335 (267 written and 68 oral recommendation s)	9 hearings held and 13 first- instance decision passed	Warnings for 6 authorities, Fines in the total amount of 3.870,00€	Trainings: 3 Consultations : 222 Working meetings: 3 Notifications and urgencies: 1075

ANNEX 8 - WHISTLEBLOWERS

ACTING UPON REPORT ON ENDANGERING OF PUBLIC INTEREST WHICH INDICATES TO CORRUPTION												
Note: 14 procedures started in 2016 and transferred to 2017	Num ber of repor ts	the Agency's Opinion / official note on completi on of procedur e (pos + neg -)	Number of reports transferr ed to the prosecut or's office	Number of reports transferred to the other competent authorities	Number of recommen dations given in procedures where the existence of the EPI has been established	Number of recommend ations by which legally bound entities took the actions	Number of procedures initiated ex officio	Number of initiated misdemean or procedures	Sancti ons impos ed	The number of bodies that assigned a person to act upon the reports	Number of cases in which the APC acts partially, while a part thereof is acted upon by the prosecut ors' office	Number of trainings, working meetings and consultatio ns held
January	0	0	0	0	0	0	0	0	0	10	-	1 working meeting
February	2	3-	1	0	0	0	0	0	0	45	1	1 training 3 working meetings 38 consultatio ns
March	3	1-	0	0	0	0	0	0	0	87	-	1 training 3 working meting 65 consultatio ns

April	9	6-	1	1	0	0	0	0	0	0	-	1 training 2 working meting 17 consultatio ns
May	1	1+ 2-	1	0	1	0	11	0	0	31	-	2 Trainings 2 working meting 9 consultatio ns
June	6	5+	-	-	21	-	-	-	-	17	-	1 training 4 working meting 7 consultatio ns
July												
August												
September												
October												
November												
December												
TOTAL	21	12- 6+	3	1	22	0	11	0	0	190	1	6 held trainings 14 working meetings 136 consult.

ACTING UPON REQUESTS FOR PROTECTION OF PERSONS WHO FILE A REPORT								
Note: 2 requests for protection were initialized in 2016 and transferred to 2017	Number of filed requests for protection	Opinions of the Agency (pos + neg -)	Number of given recommendations for elimination or prevention of damage to a whistleblower	Number of recommendations which the legally bound entities acted upon	Number of cases in which the supervising authority is notified, submitted a special report to the assembly and informed the public	The number of initiated misdemeanor procedures	Sanctions imposed	Number of cases in which Expert assistance was provided to a whistleblower in the procedure of judicial protection
January	0	0	0	0	1	0	0	0
February	0	1-	0	0	0	0	0	0
March	0	1-	0	0	0	0	For a legal entity and a respon. person in a legal entity – acquittal	0
April	0	0	0	0	1	0	0	1
May	1	0	0	0	0	0	0	0
June	0	-	-	-	-	-	-	-
July								
August								
September								
October								
November								
December								

TOTAL	1	2-	0	0	2	0	1	1
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ANNEX 9 – LOBBYING

EFFICIENT IMPLEMENTATION AND SUPERVISION ON THE IMPLEMENTATION OF THE LAW ON LOBBYING										
	Number of published calls for performing the lobbying activities	Number of organized exams for performing the lobbying activities	Number of certificates / approvals issued	Number of registered lobbyists and legal entities and persons performing lobbying activities	Number of submitted official notes on lobbying contact;	Number of submitted written reports on the work of lobbyists and legal entities performing lobbying activities	Number of applications submitted due to unauthorized lobbying	Misdemeanors or procedures	Sanctions imposed	Trainings
January	1	/	/	/	/	/	/	/	/	/
February	1	1	1	/	/	/	/	/	/	/
March	/	/	/	/	/	/	/	/	/	1
April	2	1	1	/	/	/	/	/	/	/
May	1	/	/	/	/	/	/	/	/	1
June	1	/	/	/	/	/	/	/	/	/
TOTAL	6	2	2	/	/	/	/	/	/	2

ANNEX 10: Table (Administrative Procedures)

No.	Public Officials	Basis of Violation	Completed	Actions taken
1.	Rusmin Laličić, MP of the AM of Gusinje and Executive Director of the PHI "Laličić", Gusinje	Incompatibility of functions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of executive director in the Central Registry of Business Entities
2	Šerif Feratović, MP of the AM of Gusinje and Executive Director of the Public Institution Elementary School "Džafer Nikočević " Gusinje	Incompatibility of functions, Articles 12 and 13 of the LPC	Decision on violation published on the website	Did not resign – decision is not final, appeal submitted to the Administrative Court
3	Dženadin Radončić, MP of the AM of Gusinje and Executive Director of "Dženo & Bros " DOO Plav	Incompatibility of functions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of executive director in the Central Registry of Business Entities
4	Slavko Dašić, Director of the Elementary School "Mirko Srzentić" income from the membership in the Council of the Radio-Television Budva	Restrictions, Article 12 paragraph 5 of the LPC	Decision on violation published on the website	Request of Slavko Dašić for suspension of payment of compensation on the basis of engagement in the Council of Radio-Television Budva
5	Radisav Vulević, Member of the Board of Directors of the Pension and Disability Insurance Fund and the MP of the AM of Andrijevica	Incompatibility of functions, Articles 12 and 13 of the LPC	Decision on violation published on the website	Did not resign – the proposal submitted to the acting authority
6	Vojislav Krivokapić, Director of the Public Institution Zahumlje Nikšić, income generated on the basis of the membership in the Board of Directors of "Radio - Broadcasting Center" DOO Podgorica	Restrictions, Articles 12 and 13 of the LPC	Decision on violation published on the website	Request of Vojislav Krivokapić for suspension of payment of compensation on the basis of engagement in the Radio-Broadcasting Center DOO Podgorica, and notice of resignation. Authority pronounced a disciplinary measure - Warning in the form of a conclusion
7	Skender Kalezigi- Acting Director of the PI Public Utilities Ulcinj, authorized representative of the companies "Enicom" and "Agrodrini" DOO Ulcinj	Restrictions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of the authorized representative in the Central Registry of Business Entities

8	Srđan Pavićević, MP of the AM of Gusinje, Executive Director of the company Automoto organization "Gusinje" DOO Plav	Incompatibility of functions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of MP
9	Hasan Ramović, MP of the AM of Bijelo Polje and authorized representative of the company "Put gros" DOO Bijelo Polje	Restrictions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of the authorized representative in the Central Registry of Business Entities
10	Naser Kraja, MP of the AM of Bar and the member of the MB of "Kulturni centar" Bar	Incompatibility of functions, Article 12 of the LPC	Decision on violation published on the website	Resigned to the position of the member of MB of "Culture Center" Bar
11	Pešo Glavanović, MP of the AM of Bar Bar and the member of the Tourist organization of Bar	Incompatibility of functions, Article 12 of the LPC	Decision on violation published on the website	Resigned to the position of the member of the Tourist organization of Bar
12	Branka Kljaić, member of the Board of Directors of the PI "Public Utilities" DOO Danilovgrad, and a responsibility of the authorized representative in the company "In salvo" DOO Podgorica	Restrictions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of the authorized representative in the Central Registry of Business Entities
13	Velizar Vojinović, Director General of the Directorate in the Ministry of Agriculture and the President of the MB of the PI "Vodovod i kanalizacija" DOO Nikšić	Incompatibility of functions, Article 8 and Article 12, paragraph 5 of the LPC	Decision on violation published on the website	Request of Velizar Vojinovića to suspend payments and compensation on the basis of engagement in "Vodovod i kanalizacija" DOO Niksic The authority pronounced a disciplinary measure - Warning in the form of a conclusion, before another authority - the Government of Montenegro is in progress.
14	Danilo Mirotić member of the MB of the Public Enterprise „Regionalni vodovod Crnogorsko primorje“ Budva and authorized representative in the company "Proxima" DOO Podgorica	Restrictions, Articles 11 and 13 of the LPC	Decision on violation published on the website	Resigned to the position of the authorized representative in the Central Registry of Business Entities

15	Dragan Liješević, Director of the Public Enterprise Parking service Budva and Executive Director of the Bodico company DOO Budva	Restrictions, Articles 11 and 13 of the LPC	Decision on violation published on the website	March 27, 2017 dismissed from the public function of the director of the Public Enterprise Parking service Budva
16	Erol Muratović, MP – acting President in the Parliament of the Municipality Petnjica and the member of School Boards in 2 Public Institutions	Incompatibility of functions, Article 12 of the LPC	Decision on violation published on the website	The Proposal to dismiss, suspend or impose a disciplinary measure submitted to the authority

ANNEX 11: Reports of Departments

GOAL 1: PREVENTING CONFLICTS OF PUBLIC AND PRIVATE INTERESTS IN THE EXERCISE OF PUBLIC FUNCTIONS

Performance Indicators:

- *Number of the Agency's opinions on the existence of a conflict of interest*

Upon the requests of public officials and authorities, in the period January-June 2017, ACP issued 63 Opinions on the existence of conflicts of interest that were binding for public officials.

The Agency's opinions referred to a potential suspicion of conflicts of interest of the public officials, as well as the authorities in connection with: performing incompatible functions, receiving fees in management bodies, membership in board of directors, working bodies and commissions, signing contracts

33 requests of parties and bodies and other interested persons were received and answered regarding the rights and obligations of public officials in accordance with the Law on Prevention of Corruption, the Law on General Administrative Procedure, and other.

- *Number of decisions of the Agency on the existence of a conflict of interest*

Decisions based on restrictions in the exercise of public office, which found that public officials violated Articles 11, 12 and 13 of the Law on the Prevention of Corruption in a way that, simultaneously with the public function, they held another function, i.e. the duty of an authorized representative, executive director in a company, by which the public interest was subordinated to the private one and caused a conflict of interest, are shown within the Goal No. 2.

- *Number of decisions of the authorities that have been put out of the effect on the basis of decisions on conflict of interests*

There were no such cases, the authorities were addressing APC with the requests for opinions immediately before making decisions.

Activities:

- *Activities on the development and application of the information system module for the electronic records of public officials based on the established conflict of public and private interest in the exercise of public functions*

In 2017, production began in modules for misdemeanor and administrative procedures. Full digitization has been achieved and all output and input documents in the APC have been digitized since January 1, 2017. Document e-management systems are used: ePisarnica and DMS system. Continuous work will be performed on the implementation of eGovernment in APC.

- *Activities on the education of public officials on provisions pertaining to the conflict of public and private interest in the exercise of public functions*

In cooperation with the Human Resources Directorate, a training plan has been developed and it will start with the implementation from June 2017.

- *Creation of monthly reports on the work of the Agency that are submitted to the Agency Council no later than the 10th of the month for the previous month, according to the previously established methodology;*

Realized – Enclosed Tables (ANNEX 10)

- *Preparation of quarterly Work Reports to be submitted to the Agency Council no later than the 10th of the month for the previous quarter with the following data review:*
 - *the names and surnames of public officials in which the Agency has controlled the existence of a conflict of private and public interest in the exercise of public function, in the sense of Article 39 paragraph 2 of the Law on Prevention of Corruption*

Realized – Enclosed Table (ANNEX 10)

- *brief content of the opinion or decision of the Agency with the final outcome of the procedure - the table view to be published as an Annex to the quarterly reports on the work of the Agency*

Data on the web site of the APC: <http://www.antikorupcija.me/me/sukob-interesa/odluke-akta>

GOAL 2: COMPLIANCE WITH THE RESTRICTIONS IN THE EXERCISE OF PUBLIC FUNCTIONS

Performance indicators

- *Number of decisions of the Agency relating to restrictions in the exercise of public functions / at the request of the party / ex officio*

After the conducted proceedings, APC completed 31 cases and issued 27 decisions, two Conclusions on rejection and two cases were suspended by official note, while in one case after the report of a natural person, after the completion of the procedure before the APC, it was forwarded to the Council of the Agency for further action.

16 public officials were found to violate the Law, while in 14 cases it was established that public officials did not violate the provisions of the Law. Proceedings against 3 public officials are pending before APC.

- *Number of submitted resignations based on decisions on incompatibility of functions*

Following the adoption of the Decisions and issued Opinions regarding the prevention of conflict of interests of public officials, **16** public officials resigned on public functions i.e.: 7 public officials on the basis of the APC's Decisions and 9 on the basis of the issued Opinions.

- *Number of requests / decisions for dismissal, suspension or imposing of disciplinary measures*
- *The number of cases transferred to the competent prosecutor's office*

The APC has submitted notifications to all authorities when it has been established that a public official is in violation of the law - requests for dismissal, suspension or pronouncement of disciplinary measures for public officials for which the valid and final decision has found a violation of the law. **In 2017, on the basis of decisions made regarding the restrictions in the exercise of public office, the authorities acted in 6 cases and pronounced 4 administrative sanctions and initiated 2 disciplinary proceedings before the Commission established by the authorities**, i.e.: 4 given warnings as a disciplinary measure with a warning. APC has also received 2 notifications from the authorities that the proceedings are pending. In cases that are ongoing, the authorities are obliged to notify the APC in accordance with the law within 60 days from the date of receipt of the decision, with a written explanation.

From January 2017, in accordance with Article 42 of the LPC, prior to election/appointment procedure, 6 authorities required Excerpts from the APC record for 27 persons if, in the last four years before the candidacy, holding the capacity of a public official, they were dismissed on public functions due to violation of the provisions of the law.

Other relevant activities

- *Activities on the development and application of the information system module for the electronic records of public officials based on the established violation of the limits in the exercise of public functions*

Decisions establishing that public officials violate the law were published on the APC's website in accordance with Article 39 of the LPC.

- *Activities on the education of public officials on provisions pertaining to restrictions in the exercise of public functions*

In cooperation with the Human Resources Directorate, a Training Plan prepared and launched in June 2017.

GOAL 3: CONTROL OF RECEIVED GIFTS, DONATIONS AND CONCLUDED SPONSORSHIPS

Performance indicators

- *Number of reports of the authorities on received gifts, sponsorships and donations*

Note: Bearing in mind that the legal deadline for submitting the Excerpts/Reports is not later than March 31, + deadline for delivery via post, the data includes the period January/March 2017.

Gifts:

Eight (8) authorities submitted the Excerpts from the records of the gifts that public officials received a total of **69 gifts** (4 appropriate, 65 protocolary and no gifts that can not be refused); 22 authorities submitted reports that they did not receive gifts during 2016.

Donations and Sponsorships:

60 authorities submitted a Report on received donations, stating that public officials received a total of 368 donations; 22 authorities submitted the Report that they receive neither donations nor sponsorships.

Nine authorities submitted a Report on received sponsorship, stating that the authorities received a total of 104 sponsorships.

Within the legal deadline, APC sent 9 requests to the authorities to supplement the Report on received sponsorships or donations.

All reported data starting from January 1 to June 30, 2017 on received gifts, donations and sponsorships for 2016, have been processed and accessible on the website of APC in the application of public registers - a catalogue of gifts, sponsorships and donations.

- *Number of checked reports and number of detected irregularities*

Data on received gifts, sponsorships and donations were processed after the expiration of the legal deadline for the submission of the Excerpts and reports, as well as the accompanying documentation, in accordance with Article 22 of the LPC.

The control of the accuracy and completeness of the received Reports/Excerpts and accompanying documentation was performed. There were no initiated procedures regarding received gifts, sponsorships and donations.

- *Number of decisions of the authorities that have been put out of force based on the Agency's opinion on received sponsorships and donations*

In the period from January 1 to June 30, 2017, no proceedings have been initiated.

- *The number of cases transferred to the competent prosecutor's office*

In the period from January 1 to June 30, 2017, no proceedings have been initiated.

Activities:

- *Activities on the development and application of software for electronic submission of reports on received gifts, sponsorships and donations*

Full application of software for electronic submission of reports on received gifts, sponsorships and donations.

- *Keeping a catalogue of gifts and a register of sponsorships and donations*

Data are available on the website of APC. In the period January - June 2017, all government authorities' reports on received sponsorships and donations in 2016 were announced, with which the complete documentation in accordance with the provisions of the law were enclosed.

All reported data on received gifts for 2016 are available in the gift catalogue <http://portal.antikorupcija.me:9100//acamPublic/poklonSearch.htm>

- *Collecting reports from authorities on received gifts, sponsorships and donations and their publication*

Data are available on the website of APC.

- *Determining the illegal acceptance of gifts, sponsorships and donations*

In the period from January 1 to June 30, 2017, no proceedings have been initiated.

- *Determination of the existence of restrictions in the exercise of public functions "ex officio" and on the basis of external reports*

Since the beginning of the year, 35 procedures have been initiated regarding restrictions in the exercise of public functions, 23 on the basis of external reports filed by legal and natural persons, and 12 "ex officio" - Results shown within the Goal 2.

- *Issuance of misdemeanor orders and filing of requests for the initiation of a misdemeanor procedure with a request for seizure of the material gain that resulted from the commission of the misdemeanor (where possible), for violating the provisions of the Law on Prevention of Corruption pertaining to the restrictions in the exercise of public function, receiving of gifts, sponsorships and donations*

None.

- *Creation of monthly Work Reports of the Agency that are submitted to the Agency Council no later than the 10th of the month for the previous month, according to the previously established methodology*

<http://portal.antikorupcija.me:9100/acamPublic/donacijaSearch.htm>

- *Preparation of quarterly Work Reports to be submitted to the Agency Council no later than 10th in the month for the previous quarter with the following data overview:*
 - *names and surnames of public officials with data on established irregularities in the part of restrictions in the exercise of public functions (incompatibility of functions) with the functions they performed, with regard to the Article 39 paragraph 2 of the Law on Prevention of Corruption;*
 - *short data on the measure imposed by the Agency and the outcome of the measure imposed (whether or not a public official in whose capacity incompatible functions were identified has resigned).*

Realized – Enclosed Table (ANNEX 10)

GOAL 4: CHECK OF REPORTS ON PROPERTY AND INCOME OF PUBLIC OFFICIALS

Performance indicators

- *Checking of the submitted reports on income and property of public officials and civil servants*

The checking of submitted reports involves an administrative check of the authenticity of the electronic and signed version of the income and property report.

By the end of the II quarter of 2017, there were **6094** reports of income and property under various bases of filing. The total number of checked reports is as follows:

- **4917** regular annual reports on revenues and property;
- **437** Reports on income and property within the legal deadline of 30 days after their appointment;
- **121** Report on income and property within the legal deadline of 30 days in case of the increase in property exceeding EUR 5,000;
- **50** reports on income and property at the request of the Agency, in case of initiating an administrative procedure, in accordance with the law;
- **233** annual reports on income and property within the legal deadline of 30 days after the termination of their function;
- **336** annual reports on income and property upon termination of their function.

Out of the total number of checked reports, 4889 reports of public officials and 1205 reports of civil servants were checked

- *Verification of the checked income and property reports that are afterwards transferred to the Agency's website*

Verification of the checked reports involves the process of additional checking of the checked reports, in order to establish the authenticity of the received reports once again, after which they are published on the website of the APC.

By the end of the II quarter of 2017, a total of 6094 income and property reports were checked, that is, all received Income and Property Reports passed through the checking process.

- *The number of data checks carried out from the Report of public officials on income and property*

After the expiration of the legal deadline for submission of the report, and when all the received reports were verified, the property and income of public officials and civil servants who have a prescribed obligation to submit reports in accordance with special laws are checked according to the Annual Plan for the check for 2017.

Software and administrative checks were fully performed for all public officials and civil servants who delivered reports on income and property electronically and in writing, to the APC. Also, after these verification phases have been completed, the process of full control of property and income has begun, and at the moment, it is in full checking process the 210 public officials and civil servants: 170 state public officials and 20 local public officials, as well as 20 civil servants who are obliged to submit reports on income and property.

- *Number of Agency decisions related to reports on property and income of public officials*

In the II quarter of 2017, a total of 51 decisions of the APC were passed, relating to reports on property and income of public officials.

- *The number of cases transferred to the competent prosecutor's office*

In the second quarter of 2017, there were no cases transferred to the competent prosecutor's office.

Activities:

- *Continuous support (help desk) for the use of the web application for electronic submission and entry of reports by employees and public officials*

Support for the use of the web application for electronic submission of reports is performed on a daily basis, in continuity.

- *Adoption of the Annual Plan for verifying reports on property and income of public officials*

The Annual Check Plan for 2017 was passed on November 29, 2016 pursuant to Article 30 paragraph 6 of the Law on Prevention of Corruption.

- *Check of submitted reports in accordance with the annual check plan, via software, as well as comparison with databases of relevant institutes*

In the second quarter of 2017, software and administrative checks and controls were fully performed for all public officials and civil servants who delivered reports on income and property electronically and in writing. After these phases have been realized, the process of complete control of property and income has begun. In this quarter, the procedures for complete verification of 210 public officials and civil servants have been initiated, which are thoroughly checked through the databases of the Ministry of Interior, Real Estate Directorate, Tax Administration and the Securities Commission. Also, out of this number, all those

who gave their consent for checking the bank accounts will be checked through 14 commercial banks in Montenegro.

Full control of the property is done continuously, throughout the whole year, and in accordance with the Annual Check Plan for 2017.

- *Transfer of cases to the competent prosecutor's office*

In the second quarter of 2017, there were no cases transferred to the competent prosecutor's office.

- *Preparation of monthly Work Reports of the Agency that are submitted to the Council of the Agency no later than 10 in the month for the previous month, according to the previously established methodology;*
- *Preparation of quarterly Work Reports to be submitted to the Agency Council no later than 10 in the month for the previous quarter with the following data overview:*
 - *the names and surnames of public officials and civil servants who were checked the income and property report, with regards to the Article 39, paragraph 2 of the Law on Prevention of Corruption;*
 - *a brief review of the data from the Agency's decision with the type of irregularities identified and the measure undertaken by the Agency related to the decision and initiation of the misdemeanor procedure;*
 - *a brief review of the data on the number of procedures for verifying the reports on income and property in which the Agency checked the basis for acquiring the property of public officials and civil servants and requested additional explanations and documentation from public officials, as well as information on the outcome of these procedures;*
 - *the obligation to submit an annual report on the work of the Agency, which shall be submitted to the Agency Council at the latest at the end of February of the current year.*

When it comes to conducting the administrative procedure, after the conducted procedures, the APC ended 78 cases: 66 for failing to submit the report on income and property (51 in this quarter), 5 due to failure to provide accurate and complete data, as well as 7 regarding verification of the basis of acquisition and sources of the property worth over € 5,000, while another 27 procedures initiated (in this reporting period) are ongoing due to failure to submit the income and property reports.

Also, in the process of complete verification, irregularities were detected by comparing the data in the reports with the databases of the relevant institutions, as follows: 6 cases relating to incorrect and incomplete data, and 12 cases relating to the basis of acquisition of property and income, and those will be processed in accordance with the Law on Prevention of Corruption and in accordance with the rules of general administrative procedure.

Data on verification procedures, as well as misdemeanor procedures and sanctions, can be found in Annexes No. 4 and 6.

GOAL 5: CONTROLLING THE FINANCING OF POLITICAL PARTIES AND ELECTION CAMPAIGNS

Performance indicators

- *Number of reports and notifications of political subjects on regular work;*

In the period April-June, 16 Annual Consolidated reports were submitted. Five misdemeanor procedures have been initiated due to the failure to submit Annual Consolidated Report.

- *Number of political entities' reports during the election campaign;*

In the period April-June, a total of 42 reports of political entities were submitted (30 fifteen-day information on the contributions of legal and natural persons and 12 reports on the collected and spent funds in the election campaign, out of which 1 Report related to Niksic elections and 12 elections to Herceg Novi). It was found that one report was not submitted and the request for initiating the misdemeanor procedure was forwarded to the competent Department.

All submitted reports have been published on the website of APC.

- *Number of reports of authorities and legal entities during the election campaign;*

In total, 220 authorities' reports, including election campaign for the election of councilors in the Municipal Assembly of Niksic and Herceg Novi, were delivered and published.

- *Number of reports of authorities and legal entities for regular work;*

APC regularly monitors the financing of regular work of political entities when it comes to monthly costs of regular work, payment of employees in parliamentary clubs, rental expenses and other expenses inherent in regular work.

- *Number of controls of submitted reports;*

APC analyzed and controlled the reports submitted and the implementation of the Law, especially when it comes to employment, budget spending and social benefits in the election campaign; financing of the regular work of political entities, that is, the submitted annual reports of political entities.

A total of 278 submitted reports were checked.

- *Number of controls on compliance with prohibitions and restrictions prescribed by law during the election campaign*

In total, 570 controls were carried out, including controls on political subjects and authorities in the field, control of compliance with the prohibition of debt write-off, social benefits and employment in the election campaign, as well as checking contributors to political entities.

4 misdemeanor proceedings have been initiated.

- *Number of cases transferred to the competent prosecutor's office;*

No cases transferred

Activities:

Based on the experience gained and the implementation of the Law in 2016, an analysis of the legislative framework for this area, including the Law on Financing Political Entities and Electoral Campaigns, as well as the Report on the collected and spent funds in the election campaign, was conducted. The activities were carried out with the support of an engaged expert, ODHIR, the EU Delegation in Podgorica and the project of Horizontal Mechanism of the Council of Europe and the European Union.

- A report on the conducted surveillance after the elections in Niksic was made and published on the website.
- The APC website is continually being developed in order to make all APC data available in an efficient way through the search option.
- APC received a total of 7 complaints for the regular work of political entities in the period April-June. APC has acted upon all complaints filed.
- During the reporting period, 13 press releases were issued; 2 official opinions and interpretations were sent at the request of authorities or political parties.

GOAL 6: INITIALIZING OF MISDEMEANOR PROCEEDINGS

Performance indicators:

- *Number of requests for initiation of misdemeanor proceedings for violation of the provisions of the Law relating to conflict of public and private interest in the exercise of public functions*

Two requests for initiation of a misdemeanor procedure for breaching the provisions relating to conflict of public and private interest in the exercise of public functions were filed.

- *Number of requests for initiation of misdemeanor proceedings due to the established violation of the restrictions in the exercise of public functions*

During the reporting period, no requests for initiation of a misdemeanor procedure were filed due to the established violation of the restrictions in the exercise of public functions.

- *Number of requests for initiation of misdemeanor proceedings due to the established violation of the provisions of the Law relating to the receipt of gifts, sponsorships and donations*

During this period, there were no requests for initiation of misdemeanor proceedings due to the established violation of the provisions related to the receipt of gifts, sponsorships and donations.

- *Number of requests for initiation of misdemeanor proceedings due to the established violation of the provisions of the Law relating to the reporting on property*

250 requests for initiation of the misdemeanor procedure were filed for the violation of the provisions of the Law relating to the reporting of property, 249 due to failure to submit a report and 1 for incorrect data.

- *Number of requests for initiation of misdemeanor proceedings due to the established violation of the provisions of the Law on Financing of Political Entities and Election Campaigns*

9 requests for initiation of misdemeanor proceedings have been filed because of the established violation of the provisions of the Law on Financing of Political Entities and Election Campaigns.

Activities:

In the second quarter, five complaints were received by the APC. In this period, there was also one decision enacted, by which the defendant, in addition to the pronounced fines, was imposed the PROTECTIVE MEASURE OF SEIZURE OF PROPERTY BENEFITS - money obtained by committing the offense under Art. 50

of the Law on Misdemeanors, which was proposed by the request for initiation of a misdemeanor procedure;
The officials of the APC have accessed 105 trials in this period.

GOAL 7: STRENGTHENING THE INTEGRITY IN THE PUBLIC SECTOR BY ADOPTING THE INTEGRITY PLANS BY AUTHORITIES AND REPORTING ON IMPLEMENTATION THEREOF

Performance indicators:

- *Number of authorities that appointed integrity managers;*

2 integrity managers appointed (674 in total).

- *Number of bodies that adopted the integrity plan and the number of bodies that submitted a report on the implementation of the plan;*

2 integrity plans were adopted (668 in total).

582 reports on the implementation of the integrity plan were adopted (663 in total).

- *Number of recommendations of the Agency for improvement of integrity plans and number of recommendations for improvement of reports on the implementation of the integrity plan*

Systemic recommendations were given within the Report on the adoption of Integrity Plans in 2016 that contained an analysis of all integrity plans, classified into 10 systems. There were no individual recommendations for improving the integrity plan.

271 recommendations were given for improving the report on the implementation of the integrity plan (335 in total)

- *Number of consultations, trainings and working meetings with representatives of the authorities regarding the development of integrity plans and submission of reports*

128 consultations

1 working meeting

2 trainings

- *Number of submitted requests for initiating misdemeanor proceedings for violation of the provisions of the Law on Prevention of Corruption related to integrity plans*

Ten requests for initiation of a misdemeanor procedure were filed due to failing to report on the implementation of the integrity plan.

Three hearings were held (2 for cases related to the non-existence of integrity plan and 1 for failing to report on the implementation of the plan) and three first instance decisions were adopted. Fines were imposed in the total amount of 2.340,00 €.

Activities:

- *Creating a web application that will enable users to enter and submit integrity plans and reports on implementation of integrity plans electronically, which will also enable the Agency a statistical and analytical processing of integrity plans*

The first phase of web application development that will serve as an application software system for entering, submitting and monitoring the implementation of integrity plans has been finalized.

It is planned that in the second phase of the application development, the administrative module of the application will be improved, so that the employees of the Department of Integrity and Lobbying will be able to obtain statistical data on the basis of the entered integrity plans and reports on the implementation of plans, in order to produce the best quality analysis of the adopted Integrity plans.

- *Providing support to the authorities, holding working meetings and conducting trainings for the preparation and implementation of integrity plans*

Bearing in mind that the authorities were obliged to adopt and submit the report on the implementation of the integrity plan for 2016 to APC by April 15, 2017, the officers of the Department for Integrity and Lobbying **conducted continuous communication with the authorities** in the second quarter of 2017, **having provided them with support and comments, suggestions and recommendations in the process of drafting reports on the implementation of integrity plans.**

In the second quarter of 2017, the officials of the Department conducted **128 consultations with the authorities** regarding the preparation of the report on the implementation of the integrity plan, as well as the interpretation of the Rules for the preparation and implementation of the integrity plan and the corresponding provisions of the Law on Prevention of Corruption. This number includes one opinion given at the request of the authorities in connection with the conduct of activities in accordance with the principle of integrity, and guidelines and instructions addressed to the authorities that have been granted the conditions for the preparation of an integrity plan this year.

In the second quarter of 2017, the officers of the Department of Integrity and Lobbying held **one working meeting** (at the request of the authority) in order to

make the implementation of the legal obligation to prepare a report on the implementation of the integrity plan as efficient as possible.

In the second quarter of 2017, APC submitted letters to the addresses of 14 newly formed bodies of authorities and authorities which, in the previous year, notified the APC that, due to lack of personnel capacities, they were not able to fulfill the provisions of the Rules for preparation and implementation of integrity plan related to determining integrity managers and forming a working group. The APC reminded these authorities that they were obliged to adopt an integrity plan after filling vacancies and providing the necessary working conditions, and asked for feedback on whether the authorities had in the meantime acquired conditions for fulfilling the legal obligation to prepare and adopt the integrity plan.

In the continuation of education at the local level, training was held in Bijelo Polje on the topic **"Competencies of the APC and obligations of authorities and political entities in the implementation of anti-corruption laws"**. The training was attended by 29 participants, including senior government officials and integrity managers. Among other matters, the participants were pointed to the importance of applying the principles of integrity, as well as to the legal obligation to adopt integrity plans and reports on the implementation of integrity plans.

The Head of the Department for Integrity and Lobbying held **a lecture on the training for officers of the Police Directorate (Border Police Sector) and the Customs Administration**. The participants were introduced, among other matters, with the concept of integrity and pointed out to the importance of applying and implementing integrity measures and complying with the ethics in performing official functions. A legal and strategic framework for the introduction of integrity plans was specially highlighted, as well as the fact that the fulfillment and monitoring of the implementation of individual integrity plans is a key part of the Joint Plan of Measures for Prevention and Repression of Corruption at Border Crossings.

- *Training for the use of web application for electronic submission and entry of integrity plans and reports on the implementation of the integrity plan*

The implementation deadline is not due.

Officials of the Department of Integrity and Lobbying presented the web application for integrity plans and its main functionalities to the participants of the regional conference "Risk Assessment of Corruption and Institutional Integrity" held in Podgorica on May 30 and 31, in the framework of the presentation on APC activities and adoption of integrity plans in Montenegro.

- *Keeping records of integrity managers in authorities*

The Department of Integrity and Lobbying regularly updates the list of responsible persons for preparation and implementation of integrity plan (integrity managers). According to the APC records in the second quarter of 2017, the decision on the appointment of integrity managers was passed by two authorities that did not appoint a manager until that moment. Since the beginning of 2017, the integrity manager was for the first time appointed by five authorities.

In addition, five authorities in this quarter informed APC that, in 2017, they appointed a new person for the integrity manager. Altogether, 11 authorities appointed a new person for integrity manager in 2017 and a decision on appointing the person submitted to APC.

The total number of authorities that determined the integrity manager as of January 1, 2016 was 674.

- *Collection of integrity plans*

From April 1 to June 30, 2017, the two authorities adopted for the first time and submitted to the APC the integrity plan in printed and electronic form. Since the beginning of the year, the integrity plan has been adopted by three bodies that had not previously adopted the anti-corruption document.

Ten authorities updated the plan in this quarter, or adopted a new integrity plan for 2017. Since the beginning of the year, 15 bodies have adopted a new integrity plan.

As of January 1, 2016, a total of **668 integrity plans have been delivered to APC, covering 677 bodies**, as 9 bodies were covered by integrity plans of other authorities. Given that the two institutions in the meantime stopped working (Ministry of Information Society and Administration for Youth and Sports), by adopting a new Decree on the organization and mode of work of the state administration, the number of authorities that at the moment have adopted the integrity plan was actually 666, and the plans included 675 organs.

- *Collecting reports on the implementation of the integrity plan*

All authorities that adopted the integrity plan last year (a total of 665 authorities) were obliged to submit a report on the implementation of the integrity plan in 2016 to the Agency for Prevention of Corruption not later than April 15, 2017.

In the second quarter of 2017, APC received **582 reports on the implementation of the integrity plan**. In the first quarter of the same year, 81 reports were submitted.

The total number of submitted reports on the implementation of the integrity plan is 663. Taking into account the reorganization of the state administration and the termination of several bodies, it can be concluded that, out of the total number of authorities that adopted the integrity plan in 2016, only one body did not submit a report on implementation of integrity plan in the past year.

- *Making recommendations to authorities for improvement of integrity plans;*

In accordance with the obligation laid down in Article 77 of the Law on Prevention of Corruption, the officials of the Department for Integrity and Lobbying drafted in the previous quarter a Report on the adoption of integrity plans in the authorities in 2016, which contains a detailed **analysis of integrity plans by systems and subsystems, with recommendations for further improvement of integrity plans**. The report on adoption of integrity plans is an integral part of the Annual Report on the work of APC for 2016 and includes all integrity plans submitted to APC in 2016.

Report on the adoption of integrity plans in the authorities in 2016 was published on the APC website as a separate document within the section "Integrity". In the second quarter, APC sent out **27 letters** informing certain authorities (central to the system, i.e. a group of bodies) of the adoption of the reports, so that these authorities could inform all other bodies within the system of the integrated analysis of integrity plans and given recommendations.

In the second quarter of 201, the officers of the Department for Integrity and Lobbying did not give individual recommendations for improvement of plans, since the focus in this period was on providing recommendations for improving the report on the implementation of the integrity plans.

In the first quarter of 2017, the department officials made a recommendation for improvement of the integrity plan at the request of one authority, and from the beginning of last year, a total of 65 written and oral recommendations were given on the submitted drafts of the integrity plans.

- *Issuance of recommendations to the authorities for improvement of reports on the implementation of the integrity plan*

In the second quarter of 2017, the officers of the Department for Integrity and Lobbying gave **271 recommendations for improving the reports on the implementation of the integrity plan** (219 written and 52 oral). Recommendations were given to the reports submitted in printed or electronic form, as well as on the submitted draft versions of the reports. In the first quarter of 2017, recommendations for improving 64 reports were given.

In total, 335 recommendations have been given this year to improve the report on the implementation of the integrity plan. Out of that number, 267 written and 68 oral recommendations were given.

- *Preparation of a proposal for a consolidated Report on the adoption and implementation of integrity plans;*

The implementation deadline is not due.

- *Submitting a request for initiation of a misdemeanor procedure for violating the provisions of the Law on Prevention of Corruption related to integrity plans, and representing the Agency before the Misdemeanor Court.*
1. Misdemeanor procedures for failure to adopt the report on the implementation of the integrity plan

In the second quarter of 2017, the Agency submitted to the competent courts **10 requests for initiating misdemeanor proceedings against the authorities that did not fulfill the legal obligation to adopt the report on the implementation of the integrity plan.**

In the second quarter, one hearing was held for the case related to the failure to adopt the report on the implementation of integrity plan, namely, in the Department of the Misdemeanor Court in Herceg Novi. APC was sent a decision on the imposed sanctions (fines) for one responsible person and one legal entity. **The total amount of fines for failure to adopt the report on the implementation of the integrity plan was € 1,230** (€ 1,000 for a legal entity, € 200 for the responsible person and € 30 for the costs of the procedure). This was the first hearing held on the requests for initiating a misdemeanor procedure due to failure to adopt the report on implementation of integrity plan.

2. Misdemeanor procedures for failure to adopt an integrity plan

In 2016, APC submitted to the competent courts 56 requests for initiating misdemeanor proceedings against the authorities that did not fulfill the legal obligation to adopt an integrity plan. During the second quarter of 2017, two hearings were held on the basis of requests submitted last year, both at the Misdemeanor Court Podgorica – the department in Podgorica.

In the second quarter of 2017, the APC was sent a decision on the release of one responsible person, and the ruling on the imposed sanctions (fines) for one responsible person and two legal entities. **The total amount of fines for the second quarter was € 1,110** (€ 1,000 for legal entities, € 50 for responsible persons and € 60 for the costs of the procedure).

Since the beginning of 2017, APC have been issued decisions on the release of 1 legal entity and 2 responsible persons, and decisions on imposed warnings and fines for 10 legal entities and 9 responsible persons (warnings for 6 legal entities and 6 responsible persons; fines for 4 legal entities and 3 responsible persons). **The total amount of fines for the first half of 2017 was € 2,640** (€ 2,000 for legal entities, € 350 for responsible persons and € 290 for the costs of the procedure).

From the beginning of 2016 till June 30, 2017, the APC was submitted the decisions on the release of 3 legal entities and 6 responsible persons, and decisions on pronounced warnings and fines for 41 legal entities and 38 responsible persons (warnings for 20 legal entities and 20 responsible persons, fines for 21 legal entities and 18 responsible persons). **The total amount of**

finances for failure to adopt the integrity plan is € 13,920 (€ 9,910 for legal entities, € 2,800 for responsible persons and € 1,210 for the costs of the procedure).

3. All misdemeanor procedures (sums of points 1 and 2)

From the beginning of 2016 till June 30, 2017, **finances were imposed due to the non-adoption of the integrity plan or failure to adopt a report on the implementation of the integrity plan in the total amount of 15,150 €** (10,910 € for legal entities, 3,000 € for responsible persons and 1,240 € for the costs of the procedure) .

Other activities:

Representatives of the Department for Integrity and Lobbying held a presentation at the regional workshop **"Assessing the Risk of Corruption and Institutional Integrity"**, held in Podgorica on May 30 and 31, organized by the Center for Security Cooperation (RACVIAC), supported by the Regional Anti-Corruption Initiative (RAI) and the Ministry of Defense of Montenegro. The competencies of APC and the results of this state body in all areas of work have been presented, with particular emphasis on the adoption and implementation of integrity plans in the authorities. The participants in the meeting were also presented an analysis of the quality of integrity plans, which was prepared by the APC.

The officers of the Department for Integrity and Lobbying participated in the conference **"Academic Integrity - Achievements and Future Perspectives for Montenegro"**, held in Budva on May 16 and 17, within the Horizontal Mechanism for the Western Balkans and Turkey. Within the panel discussion "Institutional responses to non-academic behavior", they presented the competencies of the APC in the field of integrity and introduced participants to the adoption of integrity plans in educational institutions, the importance of integrity plans in the prevention of corruption, and the legal obligation of educational institutions to deliver APC the reports on implementation of the integrity plans.

Also, the Department officials participated in the workshop **"Preparation of the Annual Action Plan for the Communication Strategy of the APC"**, which was held on June 19-20, 2017 within the Horizontal Program for the Western Balkans and Turkey. The workshop brought together the representatives of all APC sectors and experts from the Council of Europe.

An officer of the Department participated in the National Conference **"Assessment of the Risk of Corruption in the Health System of Montenegro"**, held on July 29, 2017, organized by the Center for Monitoring and Research (CeMI).

GOAL 8: ACTING UPON A REPORT ON ENDANGERING THE PUBLIC INTEREST THAT INDICATES THE EXISTANCE OF CORRUPTION AND PROTECTION OF PERSONS WHO SUBMIT THE RELATED REPORT (WHISTLEBLOWERS)

Performance indicators:

- *Number of reports submitted*

In the second quarter, APC received 16 reports of endangering the public interest that indicated the existence of corruption.

From the beginning of 2017 till July 1, 2017, the total of 21 reports of whistleblowers was received.

Out of the total number of reports in the reporting period, in four cases the whistleblower wanted to remain anonymous. (Total number of anonymous reports since the beginning of the year - 7).

Out of the total number of reports in 2017, 2 were submitted by employees in the institutions against which they submitted the reports.

From the previous year, 14 reports were transferred to 2017 while all procedures started in 2016.

- *Number of prepared opinions/official notes on the existence of endangering the public interest that indicates the existence of corruption;*

From the reporting period, 9 procedures have been completed upon the reports of endangering the public interest that indicated the existence of corruption.

From the beginning of 2017 until July 1, 2017, a total of 13 proceedings have been completed upon reports of endangering the public interest that indicated the existence of corruption.

Out of the total number, in one case has so far found that there was a threat to the public interest in the authorities, while the other procedures are in progress.

- *Number of recommendations for the prevention of public interest endangering that indicates the existence of corruption;*

A recommendation was given in one procedure upon the report, where it has been established that there was a threat to the public interest that indicated the existence of corruption.

- *The number of the Agency's acting ex officio*

From the beginning of the year until July 1, 2017, 11 cases were initiated ex officio.

Out of the total number, 5 cases were concluded where there was a threat to the public interest, and in that sense, APC provided a total of 21 recommendations for improving transparency and eliminating corruption risks in recruitment procedures.

- *Number of actions following the recommendations of the Agency in the procedures upon the report of the whistleblower;*

The deadline for submitting the report upon the given recommendation is still ongoing.

- *Number of cases transferred to the competent prosecutor's office;*

During the reporting period, 2 reports were transferred to the competent prosecutor's office.

A total of 3 reports have been transferred to the competent prosecutor's office from the beginning of the year, out of which, according to the latest information from the competent prosecutor's offices, two are in the phase of the examination. One report of these three forms a part of the case that the APC gave to the prosecution, while in the rest the APC acts within its jurisdiction.

Regarding the reports forwarded to the competent prosecutor's offices in 2016 (10 reports), the status is as follows:

5 - rejected,

1 - imprisonment sentence of 90 days with conditional sentence,
others in the examination stage.

- *The number of cases transferred to another competent authority*

One application was transferred to another competent authority - the Judicial Council.

- *Number of opinions on the existence, or the possibility of damage to the whistleblower due to his/her report;*

1 request for protection was filed in the reporting period. The process is ongoing. Two procedures upon the requests for protection initiated at the end of 2016 have been completed, in which the validity of the allegations from the request has not been identified.

- *Number of recommendations for remedying or preventing the occurrence of damage to whistleblower;*

There were no recommendations given for cases upon the requests for protection of whistleblowers from the reporting and the previous period.

- *Number of actions following the recommendations of the Agency in procedures upon requests for protection of whistleblowers;*
- *Number of cases in which expert assistance was provided to a court official in the court protection procedure*

In the reporting period, one request was made by a whistleblower for provision of professional assistance within the meaning of Article 66 of the LPC.

In that regard, APC has prepared a detailed report upon the request of the whistleblower about all acts known to the APC from the moment of issuing the opinion (August 2016) until the date of submission of this request (April 2017)

- *Number of requests for initiation of misdemeanor proceeding in procedures upon reports and requests for protection of whistleblowers*

There were no misdemeanor procedures initiated in the upon the reports and requests for protection of whistleblowers neither during the reporting period nor in the first half of the year.

- *Number of legally bound entities who have appointed a person to act upon a whistleblower's report*

In the reporting period, the authorities, companies, other legal entities and entrepreneurs appointed 53 persons for acting on whistleblower reports.

Since the beginning of the year, the authorities, companies, other legal entities and entrepreneurs have appointed 198 persons for acting on whistleblower reports.

- *Number of consultations, trainings and working meetings with representatives of the authorities regarding the implementation of the Law on Prevention of Corruption in the part referring to the procedure for whistleblower reports*

Trainings and consultations for legally bound entities:

In the reporting period, more than 30 consultations (in the previous period more than 100) with public and private sector representatives on the legal obligation prescribed by Article 49 of the LPC have been carried out.

In cooperation with the NGO CRNVO within the project "Let your voice be heard" (supported by the Embassy of the Kingdom of the Netherlands), a total of 5 trainings have been held so far for persons who were appointed before the authorities to act upon the whistleblowers' reports, one of which was related to persons in the private sector determined to act on whistleblower report.

As at May 30, 2017, the Head of the Department, in cooperation with the Human Resources Management Department, gave a lecture on the topic: "Action on Corruption Reports and Protection of Whistleblowers".

Other Activities:

A working meeting was held in the Special State Prosecutor's Office in order to establish as efficient cooperation as possible in the part of the procedures for whistleblower reports.

Several working meetings were also held in the framework of the Horizontal Program for the Western Balkans and Turkey for the purpose of developing a Communication Strategy for APC; while a two-day workshop was held in June, where representatives of the Agency gave guidelines for the preparation of the Action Plan on the implementation of the Communication Strategy for APC.

A meeting was held with representatives of the NGO Institute Alternative on the topic: "Draft recommendations for improving the work of APC in 2017" and representatives of the NGO Active zone with the presence of about 20 secondary school students, where the competencies of the APC were presented.

The Head of Department attended a meeting held in April in "Ramada", Podgorica, in order to harmonize the responses and findings of the authorities and independent evaluators gathered through the OECD Questionnaire in January to prepare the Competitiveness Study for 2018.

The Head of the Department prepared an article that was published in the daily newspapers "Pobjeda" and covered the competencies of the APC referring to the procedures upon the reports of whistleblowers and requests for protection of whistleblowers in Montenegro, with complete statistics for the previous and this year, and a special review of the whistleblower's concept itself and education that is continually implemented since the beginning.

The Department officials drafted the Rules of Procedure of the APC on the procedure upon a report on the threat of public interest that indicated to the existence of corruption and the requests for protection of whistleblowers, which were adopted at the 47th Session of the Council of the Agency.

In the period June 5-9, 2017, the Department officials held working meetings with experts for the peer review mission.

A working meeting was held with the expert G. Pirjevac, within the Horizontal Program for the Western Balkans and Turkey – Combatting Economic Crime Project in Montenegro, with the aim of gathering information on mechanisms for protection of whistleblowers in Montenegro and their use, which will be used for Developing Guidelines for protecting the whistleblower for judges and prosecutors, as well as the Guidelines for the Protection of Whistleblowers for the Police and Civil Servants and State Employees.

In the first half of 2017, the Head of the Department attended a session of the Council twice, with the agenda items: acting on anonymous reports and adopting the Rules of Procedure of the APC on acting upon a report on a threat to the public interest that indicates the existence of corruption and the request for protection of a whistleblower.

Training for officers of the Department:

Seminar "International Financial Investigation", organized through the American Embassy and held in Budva on March 13 and 14, 2017.

In the period April 3-7, 2017, the Department was provided with expert support by consultant B. Kečanović, on which occasion recommendations were made regarding the protection of whistleblowers in connection with the Law on Prohibition of Abuse at Work and the Law on Prohibition of Discrimination.

The Ministry of Foreign Affairs of the Kingdom of the Netherlands and the Dutch Helsinki Committee within the framework of the Matra project conducted a training "Integrity of Civil Servants", as at May 9-20, 2017 in Hague.

Conference "Strengthening Integrity and Fighting Corruption in Higher Education", within the framework of the Horizontal Program for the Western Balkans and Turkey, on May 16 and 17, 2017 in Budva.

Activities:

- *Receiving requests for protection of whistleblower;*

In the reporting period, one request for protecting the whistleblower was filed. The examination procedure has been conducted and the collection of the statements accompanied by the supporting documents from the entities that are the subject of this procedure, is in due course.

- *Monitoring the fulfillment of recommendations;*

During the reporting period, a check was carried out in relation to 3 recommendations referring to procedures from the previous period on the request for protection of whistleblowers. The deadline for replying is still open.

From the beginning of 2017, a total of 6 recommendations related to procedures from the previous period were carried out on the request for protection of whistleblowers. One recommendation is fully implemented, the remaining two will be monitored in the upcoming period, while the above three are awaiting response (the deadline is still open).

Due to non-compliance with the recommendations given in the previous period in the cases of protection of whistleblowers, APC notified in two cases the body that supervises the body that did not act according to the given recommendations. In June, the APC was informed by an authority that supervises the authority that has not acted upon recommendations, on the actions taken on the specific case.

GOAL 9: EFFECTIVE IMPLEMENTATION AND SUPERVISION ON THE IMPLEMENTATION OF THE LAW ON LOBBYING

Performance indicators:

- *Number of organized exams for performing lobbying activities;*

1 (2 from the beginning of the year)

- *Number of certificates issued for performing lobbying activities;*

1 (2 from the beginning of the year)

- *Number of approvals issued for performing lobbying activities;*

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- *Number of registered lobbyists and legal entities performing lobbying activities;*

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- *Number of submitted official notes on lobbying contact;*

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- *Number of reports submitted for unauthorized lobbying;*

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- *Number of submitted written reports on the work of lobbyists and legal entities performing lobbying activities.*

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Activities:

- *Preparing a test for taking the exam for performing lobbying activities;*

A test for passing the exam for performing lobbying activities is being prepared continuously.

- *Organizing the exam for performing lobbying activities;*

In the second quarter of 2017, **one exam** was organized for performing lobbying activities. In the first half of 2017, two exams for performing lobbying activities were held.

In the second quarter of 2017, **four public calls** for applying for exams for performing lobbying activities were announced on the APC website (April 5, April 27, May 26 and June 23). On the website, along with the calls, the necessary forms for the application of the candidates were set. From the beginning of the year, a total of six public calls for applying of the candidates for the exam were announced.

One candidate applied for the call announced on February 28. The candidate was allowed the exam taking, and the second exam for performing lobbying activities was held on April 4, 2017.

- *Issue of certificates for conducting lobbying activities after passing the exam;*

In the second quarter of 2017, one candidate passed the exam for conducting lobbying activities and received a certificate of passed exam. Since the beginning of 2017, two candidates have passed the exam and acquired a certificate.

- *Issuance of license for performing the lobbying activities and issuance of decision on the termination of the validity of the approval;*

In the second quarter of 2017, there were no applications for issuance of licenses for performing lobbying activities.

- *Issuance of legitimacy to the lobbyists;*

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- *Keeping a register of lobbyists;*

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- *Receiving and controlling the official notes on lobbying contact;*

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- *Submitting a request for initiation of a misdemeanor procedure due to illegal lobbying*

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Other activities:

In the continuation of education at the local level, training was held in Bijelo Polje on the topic "Competencies of the APC and obligations of authorities and political entities in the implementation of anti-corruption laws". The training was attended by 29 participants. The participants, among other matters, were explained the obligations of the lobbied entities and authorities in accordance with the Law on Lobbying, and in particular the obligations of reporting related to the authorized and unauthorized lobbying, in accordance with the provisions thereunder.

The section of the internet site referring to the field of lobbying is being continuously updated. The APC website is available to download relevant forms and literature for passing exams for performing lobbying activities, as well as the Law on Lobbying and accompanying by-laws.

GOAL 10: MONITORING OF REGULATIONS AND ISSUANCE OF OPINIONS FROM THE FIELD OF ANTI-CORRUPTION

Performance indicators:

- *A number of opinions of amendments to the law, other regulations and general acts, in order to eliminate possible risks for corruption occurrence or harmonization thereof with international standards in the field of anti-corruption*

In the reporting period, 4 opinions were drafted for amending the law, other regulations and general acts.

- *Number of opinions on draft laws and other regulations and general acts in order to eliminate possible risks for corruption or harmonization with international standards in the field of anti-corruption*

In the reporting period, 1 opinion was prepared on draft laws and other regulations and general acts.

Activities:

- *Preparation of the Methodology on the assessment of the susceptibility of legal regulations to corruption;*

After a workshop on the drafting of the national Methodology on the Evaluation of the Legality of Legislation to Corruption, organized by the RAI Secretariat through their Regional Project, the Department submitted the first draft of the related Methodology, to which the comments were given and its finalization is expected by the end of July.

In accordance with the Contract on Consulting Services, the expert Bećir Kećanović was obliged to prepare Recommendations for determining the opinion for the analysis of the risk of corruption in the regulations for the needs of the Department for monitoring the regulations and giving opinion on the regulations in the area of anti-corruption.

- *Making opinions on amendments to laws, other regulations and general acts, in order to eliminate possible risks for corruption occurrence or their harmonization with international standards in the field of anti-corruption;*

In the reporting period, four opinions were made on the assessment of the susceptibility of regulations to the risks of corruption and harmonization with international standards of valid legal texts i.e. as follows:

- 1) Opinion on the Labor Law and the Law on Employment and Realization of the Rights from Unemployment Insurance (in the part of the procedures for employment of unemployed persons)
- 2) Opinion on the Labor Law (in the part of the modality of termination of employment of an employee)

- 3) Opinion on the Law on Health Care (in the part of the procedures for appointing directors, members of the Board of Directors, as well as the employment of health workers and health associates in health care institutions)
- 4) Opinion on the Law on Civil Servants and State Employees (in relation to Articles 69 to 78 of the said Law).

- *giving opinions to draft laws and other regulations and general acts in order to eliminate possible risks of corruption occurrence or their harmonization with international standards in the field of anti-corruption;*

In the reporting period, one opinion was prepared on the draft laws, other regulations and general acts, as follows: Opinion on the General Law on Education (in the part of procedures for appointing directors and employing teaching staff of institutions defined by the aforementioned law).

It is important to note that the abovementioned provisions of the draft of the General Law on Education are analyzed in relation to the applicable legal text and the risks that are left in the draft law and for which recommendations for their removal are given.

- *Co-operation with relevant domestic and international experts, i.e. institutions, organizations, and the civil sector in order to review the best practices in eliminating the risk of corruption and the degree of compliance of domestic legislation with international standards.*

In order to prepare the national Methodology on the Evaluation of Susceptibility of Regulations to Corruption, APC is a participant in the Regional Capacity Building Program for Anti-Corruption Institutions and Civil Society in the fight against corruption and participation in the process of compliance with the UN Convention implemented by the RAI Secretariat. For the 19th and 29th of July, Tilman Hope will be re-enrolled as part of this activity, upon which occasion the Methodology will be finalized and analyzed with the expert the opinions that the Department has prepared so far.

In accordance with the Contract on Consulting Services, the expert Bećir Kećanović was obliged to prepare Recommendations for determining the opinion for the analysis of the risk of corruption in the regulations for the needs of the Department for monitoring the regulations and giving opinion on the regulations in the area of anti-corruption.

During his work, the expert gave comments and suggestions on the draft Opinion on the issues of the Law on Labor and the Employment Law in the part of the procedures that have partially entered the final version of the Opinion and which was completed during this reporting period.

In the continuation of the work, the expert was familiar with the activities that the Department conducts in cooperation with the RAI Secretariat and the engaged expert Tilman Hope on the development of the Methodology for

assessing the regulations from corruption and the basic principles on which the Methodology will be based.

Through his observation, Bećir Kećanović offered his recommendations for the future work of the Department that can be said to be complementary to the Methodology prepared by expert Tilman Hope and which will both be applied in the future, as the Department is being developed. What is certain is that the Methodology that RAI prepares with the expert Tilman Hop, for the current level of equipment and experience of the Department, will have the primacy in his further work, and through the evolution of the work and recommendations of Mr. Kećanovic, it will find its full application, when the procedures of other institutions who participate in lawmaking are at the level that his recommendations expect.

Other relevant activities:

The Head of the Department, as one of the coordinators for the area of **Prevention of corruption in AP 23**, as a contact person in front of the APC, together with colleagues from the MEA, organized an expert mission of the EC (June 5-9) in Podgorica with all the activities that the organization implies: preparation of agenda, coordinating meetings and participating therein, sending requested material and organizing visits to other institutions, as well as other logistical activities. In the context of that activity, the Head took part in the drafting of materials for the meeting with the Minister of European Affairs in order to prepare the said mission, the response to the unofficial document on the situation in the areas 23 and 24, enclosures to the Stabilization and Association Council and enclosures to the session of the Council for the rule of law .

As part of the AP 23 Working Group's responsibilities, the Head of Department coordinated and updated the TAIEX map for 2017 in line with the EC comments received, both for the activities of the Agency and other institutions in the field of Prevention of Corruption from AP 23.

At the end of June, a responses were entered for measures in the area of Prevention of Corruption AP23, with one of the coordinators being the Head of the Department for monitoring the regulations and giving opinions on the regulations in the field of anti-corruption.

In the area of international cooperation, the Head of the Department as an expert from the list of national representatives had participated in the training GRECO for the V evaluation round (which began in 2017) on the topic of prevention of corruption and promotion of integrity in the central authorities (the highest representatives of the executive government) and law enforcement institutions from 3 to 5 of May. In October 2016, GRECO adopted a Questionnaire that will serve to gather relevant information prior to one-site visit (visit to a country that is evaluated) and listed the legal standards on the basis of which the country's assessment will be carried out. Head of the Department is a member of the group that will deal with the evaluation of the top officials at the national

level (president, chairman and members of the Government and other political functions that the perpetrators of the highest state functions as state secretaries, heads and members of the Ministerial Cabinet and other senior political officials). The Head of the Department, as a member of the RESPA Ethics and Integrity Working Group, participated in the meeting of the above-mentioned working group in Brussels on June 16, when the activities of the working group for 2017 were agreed.

Within the Horizontal Program of the SE for the Western Balkans and Turkey (project for combating economic crime), contributions were made through participation in the development of the APC Communication Strategy and the accompanying Action Plan.

In the part of international cooperation regarding the coordination of donor support by the MFA, the Department ran some activities, beyond projects that already serve to increase the capacity of the Department (primarily RAI support and expert assistance of Bećir Kećanović).

Department monitors the activities and the objectives defined by the SEE2020 Strategy RCC, which is coordinated at the national level of MEK, and who, through monitoring of RAI activities in Montenegro expected results of the analysis of regulations and risk analysis, as well as two components that are implemented through the RAI project.

The Head of the Department participated in a meeting with representatives of the OECD and national NGOs that follow the OECD Competitiveness Project, in relation to the Anti-corruption dimension in the project. On this occasion, an active contribution was made in assessing the response to particular questions from the Questionnaire, which served as the basis for the above Study and harmonized the assessments with representatives of the OECD and national NGOs.

The Head of Department participated with colleagues from other Departments at the Regional Workshop on "Assessing the Risk of Corruption and Institutional Integrity", May 30-31, organized by RAI, RACVIAC and the Ministry of Defense of Montenegro, on which occasion he introduced the participants with the activities on the analysis of regulations implemented by the Department.

In the part of cooperation with other institutions, the Head of the Department and independent advisor I are members of the working group for drafting the Agreement on Cooperation with the Public Procurement Directorate, whose preliminary draft has been harmonized.

In the part of participation in other activities of APC, Independent Advisor I of the Department is responsible for regular updating of the Central Personnel records through the KIS application, the same officer is involved in the resolution of claims for the SPI, and during the reporting period was involved in writing the request for criminal proceedings to Public officials who did not report the property and income.

The Department also submitted a report according to the APC integrity plan in the part of the responsibilities under the competence of this Department.

Regarding **preventive and educational activities** of APC: Independent Advisor I attended the national conference "The system of health care and patients' rights in Montenegro - Winning the trust of citizens", organized by CEMI and the Independent Advisor II of the Department participated in the conference "Academic integrity - Achievements and Future Prospects for Montenegro ", held in Budva on May, 16 and 17 within the framework of the Horizontal Mechanism for the Western Balkans and Turkey. The same official participated in the workshop "Evaluation of the legal framework for regulating the field of financing of political entities and election campaigns", which took place on May 26 in the framework of the project.

Independent Advisor II participated in the training organized by UZK "RIA, Impact Analysis" on April 10th.

The Head of Department participated in the Open Days and Availability of Data conference organized by RESPa, June 14-15 in Brussels.

GOAL 11: STRENGTHENING REGIONAL AND INTERNATIONAL COOPERATION IN APPLICATION OF ANTI-CORRUPTION STANDARDS AND GOOD PRACTICES

Performance indicators:

- *Number (percentage) of realized activities envisioned by projects with international partners, the beneficiary of which is APC in relation to set project deadlines;*

1. IPA 2014 Twinning Project "Support to Implementation of Integrity Measures" is in the initial phase of implementation. The implementation started on April 19 of the current year and will last for 18 months. The first project activity was successfully implemented - presentation of the project to the general and professional public, as well as the international community in Montenegro, at the ceremony held on June 26 of the current year.

2. Within the the Horizontal Program of the SE and the EU for Montenegro - Anti-Economic Crime Project (started in November 2016 and to be implemented for 3 years), the beneficiary of which is the APC, out of 17 measures related to the Agency, 3 measures have been implemented, while the activities related to 2 measures are ongoing.

3. Within the RAI Regional Program, dedicated to the assessment of the susceptibility of legal regulations to corruption, two activities have been implemented so far: in addition to the held workshop for the preparation of the Methodology on the assessment of the susceptibility of legal regulations to corruption, the Department for monitoring the regulations and giving opinions

on the regulations in the field of anti-corruption was delivered the first draft of this methodology, to which the comments were given.

- *The number and type of realized activities arising from membership in regional and international institutions and organizations in the field of prevention of corruption, in which the APC is a contact institution for Montenegro;*

8 activities completed. Types of activities:

RAI:

The officials of the APC took part in a regional workshop "Risk Assessment of Corruption and Institutional Integrity", which was held on May 30-31 in Podgorica, organized by RAI, the Center for Security Cooperation (RACVIAC), and the Ministry of Defense of Montenegro.

The Department Officer participated in the work of the 25th RAI Steering Group Meeting held on June 12th in Sofia, Bulgaria.

After receiving a call for the participation of representatives of relevant Montenegrin institutions in this year's RAI Summer School for young anti-corruption practitioners, after communication with HPO, Police Directorate, Supreme Court, and USPNFT, two representatives were selected by RAI for participation, one from the APC and one from the Basic Court in Podgorica. The Summer School RAI 2017 is held in Warsaw, Poland, from July 3 to July 7.

RAI Annual Contribution Payment for 2017 was made.

Council of Europe / GRECO

The officials of the APC participated in the training for GRECO evaluators within the V evaluation round, in the group for evaluation of prevention of corruption and promotion of integrity in relation to the highest representatives of the executive government, in Strasbourg, France, May 3-5, 2017.

After the training was conducted, the participant of the training-officer of the Department was included in the official composition of the GRECO Evaluation Team, which will evaluate the highest representatives of the executive government in Macedonia, from October 1-5, 2018.

OECD:

The data collected (within APC), the responses to the OECD Questionnaire for APC for the development of a thematic study "Assessment of the Implementation and Efficiency of the System for Reporting the Interest and Property of State Officials", prepared and translated, were sent to the OECD ACN.

The APC representatives took part in a meeting organized by OECD and MEK as a national coordinator in order to harmonize the ratings of government institutions with those of independent consultants in connection with the preparation of the Competitiveness Study for 2018. Heads of departments of the APC relevant to the topics of the questionnaire participated, as well as the

officers of this Department (answers to questionnaires, qualitative and quantitative, in the area of conflict of interest, protection of whistleblowers, integrity plans, raising public awareness on corruption were given in January 2017).

- *Number and type of implemented activities to provide support to competent state authorities and organizations in the civil sector in the field of international cooperation in preventing corruption;*

RAI

After receiving a call for the participation of representatives of relevant Montenegrin institutions in this year's RAI Summer School for young anti-corruption practitioners, after communication with HPO, Police Directorate, Supreme Court, and USPNFT, two representatives were selected by RAI for participation, one from the APC and one from the Basic Court in Podgorica. The Summer School RAI 2017 is held in Warsaw, Poland, from July 3 to July 7.

- *Number of conferences, round tables, seminars or other joint educational activities realized in cooperation with regional and international partners*

Number of activities: 3 expert visits and 4 workshops

Activities:

EU expert Bećir Kečanović, engaged in the Agency from April 3-7, in order to provide expert support when passing the Decisions and Opinions of the APC in the area of prevention of conflicts of interest, whistleblowers and protection of whistleblowers and anti-corruption assessment of the law.

The officers of the Department participated in expert mission of the EC on June 5-9, 2017 dedicated to assessing the fulfillment of provisional benchmarks relating to the area of prevention of corruption under the competencies of the APC. The mission was dedicated to the overall analysis of the legislative and institutional framework in the prevention of corruption, as well as the administrative capacities of the Agency, in particular in the area of conflict of interest prevention, control of the Report on income and properties of PO, protection of whistleblowers, control of financing of political entities and election campaigns and lobbying.

On June 29, the officers of the APC took part in a meeting within the expert visit to Montenegro, of Mr. Gregor Prijedorac, organized to collect information on mechanisms for protecting whistleblowers in Montenegro and their use, which will be used to develop Guidelines for the Protection of Whistleblowers for Judges And prosecutors, as well as Guidelines for the Protection of Whistleblowers for Police and Civil Servants and State Employees (Activity 2.5.1, Horizontal Mechanism).

A Workshop was held, at which the study "Assessment of the legal framework for regulating the field of financing of political entities and election campaigns"

(Horizontal Mechanism) was presented, containing an expert analysis of the legal framework for controlling the financing of political entities and electoral campaigns on May 26, as 2.1.3 activity within the project. The workshop was attended by representatives of key institutions involved in the process of controlling the financing of political entities and election campaigns: APC, SAI, MoF, Anti-Corruption Committee, MLSW, MPA and TA.

A workshop dedicated to the preparation of the Annual Action Plan for the Implementation of the Communication Strategy of the APC (Horizontal Mechanism) was held on June 19 and 20, in which the Agency's officials in cooperation with the experts defined the annual strategic goals in communication and activities for the realization of the stated goals (1.1.1 activity);

The officials of the APC took part in the work of the regional workshop "Risk Assessment of Corruption and Institutional Integrity", which was held on May 30-31 in Podgorica, organized by RAI, the Center for Security Cooperation (RACVIAC), and the Ministry of Defense of Montenegro.

The Department Officer participated and presented the results of the APC to the TAIEX Regional Workshop on Good Governance Barriers in the Western Balkans, organized by the EC and the Italian National Anti-Corruption Agency (ANAC), on how to effectively prevent and address corruption in the private sector, in Trieste, June 12 and 13.

- *Number of Identified Reports of International Organizations on Compliance of Montenegrin Anti-Corruption Regulations with International Standards and Recommendations;*

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- *Number and type of activities for reporting on the level of implementation of recommendations from international reports concerning the competence of APC;*

As a continuation of the activities resulting from the membership of Montenegro in GRECO, the sessions of this organization scheduled for October 2017 foresee the adoption of the Compliance Report for Montenegro within the IV round of evaluation, which refers to the "Prevention of Corruption in Relation to Members of Parliament, judges and state prosecutors". On this occasion, a total of 11 recommendations addressed to Montenegro in the Evaluation Report adopted in June 2015 will be analyzed and evaluated by the APC, in cooperation with the competent state authorities. The APC made a report on the implementation of the recommendations and forwarded it to the Secretariat of GRECO on May 1.

- *Number of initiated and signed memoranda on cooperation with related institutions,*

- *Number and type of realized joint activities with related institutions in the region and beyond;*

Activities:

European Union / Council of Europe

- *Implemented activities of IPA 2014 Twinning Project "Support to Implementation of Integrity Measures", related to the area of integrity, whistleblowers protection and lobbying, in line with project deadlines for 2017;*

The implementation of project activities (IPA 2014) began on April 19, with the arrival of a permanent Twinning Advisor (RTA) in Montenegro. Before her arrival, the office space, as well as equipment and office supplies for the RTA and her assistant were provided.

The APC and the twinning team implemented the first project activity - media presentation of the project to a wider professional and international community in Montenegro. The event took place on June 26 in Podgorica, in the presence of a large number of high-ranking government officials, diplomatic missions in Montenegro, and guests from the public and non-governmental sector. The High Representative of the Government and the leaders of the two partner institutions on the project, the National Agency for the Prevention of Corruption (ANAC) and the APC, held the speech on the gathering. On the same occasion, Mr. Rafael Kantone, President of ANAC, addressed the attendees, and the promotional material designed and developed.

The project was registered with the MFA, and a tax certificate was issued, as well as initialized a change in the nomination of the project leader by the APC

- *Implemented activities within the project "Fighting Economic Crimes in Montenegro", within the joint initiative of the Council of Europe and the European Union "Horizontal Support Program for the Western Balkans and Turkey, in order to support the fulfillment of GRECO recommendations from III and IV rounds of evaluation for Montenegro, in accordance with the deadlines set by the project.*

The following activities have been implemented in accordance with the project:

A coordination meeting related to the implementation of the Horizontal Mechanism in Montenegro was held on April 25, 2017, at which the Department official participated and evaluated the activities undertaken so far in the fight against economic crime, which is a key user of the Agency for Prevention of Corruption.

The annual meeting of the Steering Committee of the Horizontal Mechanism in Montenegro, organized by the SE and the EU Delegation in Podgorica, was held on May 10, 2017, with the participation of the Department's official and presenting the results achieved so far within the project.

A Workshop was held where the study "Assessment of the legal framework for regulating the field of financing of political entities and election campaigns" was presented, which included an expert analysis of the legal framework for controlling financing of political entities and electoral campaigns on May 26 as 2.1.3 activity within the project. The workshop was attended by representatives of key institutions involved in the process of controlling the financing of political entities and election campaigns: APC, SAI, MoF, Anti-Corruption Committee, MLSW, MPA and TA.

A Workshop dedicated to the preparation of the Annual Action Plan for the Implementation of the Communication Strategy of the APC on June 19 and 20, in which the APC officials in cooperation with experts, defined the annual strategic goals in communication and activities for the realization of the stated goals (1.1.1 activity);

On June 29, the officers of the APC took part in a meeting within the expert visit to Montenegro, of Mr. Gregor Prijevorac, organized to collect information on mechanisms for protecting whistleblowers in Montenegro and their use, which will be used to develop Guidelines for the Protection of Whistleblowers for Judges And prosecutors, as well as Guidelines for the Protection of Whistleblowers for Police and Civil Servants and State Employees (Activity 2.5.1.).

- *Group of Council of Europe Anti-Corruption Groups (GRECO): prepared the Compliance report on meeting the recommendations of the GRECO IV Evaluation Report of June 2015;*

Regional Anti-Corruption Initiative (RAI)

- *Implemented activities under the Regional Program of the Regional Anti-Corruption Initiative for SEE (RAI), in the area of determining and applying the methodology for anti-corruption assessment of the law, in accordance with the project plan and deadlines for 2017.*

Within the framework of the Regional Program, after the workshop for the preparation of the Methodology on the Evaluation of the Legality of Legislation to Corruption organized by the RAI Secretariat, the Department for Monitoring the Legislation and Opinion on Anti-Corruption Regulations, the first draft of this methodology was provided, to which comments were given and its finalization is expected by the end of July.

UN

- *Completed obligations arising from the work of the Intergovernmental Group for the Evaluation of the Application of UNCAC (IRG), and other UN Working Groups for the Application of the UNCAC Standards;*

Before the 7 Session of the UNCAC Implementation Assessment Group (June 20-24), it was established that Montenegro will be one of the countries evaluating the Republic of Macedonia within the second cycle of the evaluation of the UNCAC application.

Other activities:

At the request of the MFA, a representative of the APC - Department official was appointed to participate in the preparation of the Third National Report within the Universal Periodic Review of the UN Human Rights Council (UPR) for the period 2013-2017, whose final version should be finalized in October 2017. Also, the appointed representative participated in the first meeting within the process of drafting the said report on June 1, 2017, at which the proposal of the contents of the Report, the deadlines for the preparation of the Report, as well as the obligations of institutions participating in its development were discussed.

Bilateral cooperation

- *Implemented project activities in the field of financing political entities and election campaigns, supported by the Embassy of Great Britain in Montenegro;*

Fully implemented project in the previous reporting period.

- *Prepared the project proposals in accordance with the estimated needs for additional strengthening of administrative capacities in all areas of work in the APC in 2017;*

At the request of the MFA, a list of project proposals was submitted to the Ministry for the needs of the APC, which has not been proposed so far for funding with international donors, to be sent to all potential donors (bilateral donors, international organizations, diaspora and interested legal entities and natural persons) in order to provide additional support for the implementation of projects.

Other activities:

Translation of questions and responses aimed at regular reporting to DEU in Montenegro about the work of the APC.

On the occasion of the Summit of Heads of State and Government in Trieste (Berlin Process), on July 12, 2017, the Unit Officer prepared the Information on the Workshop of Anti-Corruption Bodies, held on the same day of the Summit, to introduce the delegation of Montenegro to participate in the Summit. The workshop, attended by the leaders of the anti-corruption bodies of the countries of the Western Balkans - participants in the Berlin Process, will be led by the

President of the National Anti-Corruption Agency of the Republic of Italy, Mr. Kantone.

GOAL 12: RAISING PUBLIC AWARENESS ON THE HARMFULNESS OF CORRUPTION, EDUCATION, RESEARCH, CAMPAIGN AND ANALYTICS

Performance indicators:

- *One campaign on APC competencies;*

Information campaign on the competencies of APC is continued.

- *One anti-corruption campaign;*

Anti-corruption campaign "Not a cent for bribery" is continued.

- *Number of educational activities for different target groups (lectures, round tables, etc.);*

Seven trainings and lectures for different target groups were organized.

- *Number of media announcements about APC activities;*

In the second quarter of 2017, there were 586 announcements on the APC in the media.

- *Number of analytical Reports*

Adopted I quarterly report on the work of APC in 2017;
Adopted communication strategy of the APC.

- *One public opinion poll on the effects of the conducted campaigns*

It will be implemented in December 2017.

- *Conducting campaigns in order to inform the general and professional public about the competencies of the Agency*

5,500 flyers "Lobbying" was inserted in the daily press; APC prepared and published an informative telop of 30 seconds on its website "Report on income and property", containing information on deadlines and reporting methods; Adopted Communication Strategy of APC for a period of three years, prepared in cooperation with experts hired through the Council of Europe Project;

Preparation of the Annual Action Plan for implementation of the Communication Strategy of the APC started.

- *Selection of the agency for design and preparation of complete info materials for the anti-corruption campaign (TV and radio emission, billboards, city lights, posters, flyers, brochures) and constant communication with the agency during the preparation of the campaign;*

There is an ongoing procedure for selecting an agency that will broadcast TV spots from the campaign on TVs with national coverage for the needs of APC, and which will organize the recording, assembling, archiving and publishing of TV announcements by the representatives of APC;

- *Providing broadcasting of videos in electronic media, placing billboards and city lights, distributing posters, flyers and other info materials;*

Broadcasted video on four TV stations with national coverage totaling 16 times;

- *Implementing anti-corruption campaigns in cooperation with other state bodies, the civil sector and the media;*

APC submitted 50 posters to the Ministry of Education with telephone numbers and e-mail addresses of the APC, Police Directorate and SSP to which corruption can be reported. The Ministry distributed this promotional material in cooperation with the Rectorate at higher education institutions.

- *Participating in lectures in the framework of the training program of HRD and other state bodies;*

The APC officials took part in the workshop "Communication Strategy of the APC" within the framework of the project of SE for combating economic crime in Montenegro;

The APC officials participated in the OECD Workshop "Preparing the Competitiveness Study."

The APC officials took part in the seminars of HRD: "What is the RIA, when it should be used, how much should it be comprehensive, which are benefits from the application of the RIA"; "Cyber Security"; "Public procurement"; "Personnel Information System"; "Training of public sector accountants"; "Central Human Resources Records - CHRR" and "Law on Administrative Procedure";

The APC officials were on a study visit to Prague - the Czech Republic, organized by the US Embassy in Podgorica (the Office for Combating Drugs and Enforcement of Laws - INL), which was devoted to investigating and prosecuting corruption in the public sector;

Heads of the Department for International Cooperation and Standards and Department for the Prevention of Corruption, Monitoring of Regulations and Issuance of Opinions on Anti-Corruption Regulations, attended the GRECO Assessment Training in Strasbourg-France;

The Head and officials of the Department for Implementation of Measures for Controlling Financing of Political Entities and Election Campaigns visited the Bureau for the Prevention and Suppression of Corruption of the Republic of Lithuania;

The APC officials took part in the training "Applying Amendments to the Law on Salaries of Public Sector Employees, which came into force on March 31, with a view to calculating the earnings". The organizer of this training was the Ministry of Finance of Montenegro;

The APC officials took part in the workshop "Assessing the Risk of Corruption and Institutional Integrity" organized by RAI, RACVIAC and the Ministry of Defense of Montenegro;

The APC officials took part in the workshop "Creating a PI Application, Changing Property and Income Control, Displaying Reports on the Site". The organizer of the training is Prozone from Novi Sad;

The Head of the Department for International Cooperation and Standards attended a regional TAIEX workshop for the countries of the Western Balkans on "Prevention of Corruption in the Private Sector", held in Trieste - Italy;

The APC officials attended training on "Ethics and Integrity", Brussels-Belgium, organized by RESPA;

The APC official attended the training on the topic "Anti-bribery management system", which was held in Podgorica and organized by the Anti-Corruption Office of the Municipality of Budva and Montenegro - fraud & risk Academy;

The APC official attended the VI School of Public Policy held in Kolasin organized by the NGO Institute Alternative;

Representatives of all APC sectors with Council of Europe experts worked on drafting the Action Plan 2017-2018 for the implementation of the APC Communication Strategy. The workshop was organized in Petrovac within the framework of the SE Project for combating economic crime in Montenegro;

Officials from the Department for handling whistleblowers' reports and protection of whistleblowers had expert support from the Slovenian consultant Bećir Kečanović and during which recommendations were made regarding the court protection of the whistleblowers in relation to the Law on Prohibition of Abuse at Work and the Law on the Prohibition of Discrimination.

- *Organizing the training and lectures, press conferences and round tables on anti-corruption themes;*

The Head of the Department for handling whistleblower reports and protection of whistleblowers was a lecturer at a workshop for employees in the private sector and representatives of local self-government and local government bodies, as well as public institutions designated for handling whistleblower reports. The training was conducted as a part of the NGO CRNVO project entitled "Let your

voice be heard", which referred to promotion, research and education in the field of protection of whistleblowers, supported by the Embassy of the Kingdom of the Netherlands. There were 17 attendees;

The Head of the Department for handling the whistleblower reports and protection of the whistleblowers held a lecture in Kolašin for representatives of local self-government and local government bodies, as well as public institutions designated for handling whistleblower reports. The training was conducted as part of the NGO CRNVO project titled "Let your voice be heard". There were 17 attendees;

Head of the Department for the Prevention of Conflict of Interests of Public Officials, held a lecture on the topic "Fight against corruption and prevention of conflict of interest in public administration" in HRD. There were 20 attendees;

The Head of the Department for handling whistleblowers reports and protection of whistleblowers held a lecture on the topic "The rights and responsibilities of persons reporting corruption in Montenegro, as well as best practices and protection of persons reporting corruption". There were 20 participants;

The Head of the Department for Integrity and Lobbying was a trainer for the officers of the Police Directorate - Border Police Department and Customs Administration officials. The training was held at the "Police Academy" in Danilovgrad, organized by the Police Directorate and the Police Academy, in cooperation with APC, and within the realization of obligations from the Joint Plan of Measures for Prevention and Repression of Corruption at Border Crossings. There were 20 attendees;

The APC in Bijelo Polje conducted training on the topic "Competencies of APC and obligations of authorities and political subjects in the implementation of anti-corruption laws". The training was attended by the heads of government bodies, integrity managers, persons appointed for reception and treatment of whistleblowers, as representatives of several council clubs in AM Bijelo Polje. There were 29 attendees;

The Head of the Department for Education, Research, Campaign and Analytics held a lecture at the Gymnasium "Slobodan Škerović" on the topic "Prevention of Corruption", organized in cooperation with the Ministry of Education. There were 60 students;

APC in co-operation with the IPA project team organized the marking of the start of the implementation of IPA 2014 Twining project "Supporting the Implementation of Integrity Measures".

- *Continuous presence in the media with a view to informing the general and expert public about the activities and results of the anti-corruption plan*

In the second quarter of 2017 there were 586 reports of the APC in the media. Out of that number, there were 210 announcements in April, 143 in May, while 233 were posted in the Agency in June. Since the beginning of the year there were the total number of 1.198 announcements of APC.

- *Providing of as quality information as possible (press releases, statements, answers to questions etc.) at the request of the media and other interested parties*

In the second quarter, the APC published 35 press releases on its website and submitted to the media; Proactively, two statements from Agency representatives were issued and posted on media agencies' websites, therefrom downloaded for broadcasting on TV stations.

- *Regular publication of information on the APC website*

Information is being continuously published on the APC website. In the second quarter, 38 news articles were published. Also, 124 documents issued by APC have been published, i.e. those that have been submitted to this body by legally bound entities under the competence of APC.

- *Regularly update of the anti-corruption campaign site on the social networks*

Regularly updated Facebook page of the campaign "Not a cent for bribery"

- *Preparation and distribution of the bulletin Anti-Corruption in Montenegrin and English language as well as continuous improvement of the content of that publication*

The bulletin will be prepared and distributed in the III quarter of 2017.

- *Marking the International Day of Combating Corruption*

It is celebrated in December 2017.

- *Preparing a monthly analysis of the presence of APC in the media;*

In April, 116 articles related to APC were published in the press. In the same month, 89 articles on APC were published in the online media, while 5 were posted on television; In May, there were 69 articles in the newspaper, 65 in online internet media, and 9 videos on TVs; In June, APC was mentioned 103 times in printed media, 111 times in online media, and 11 times on TV stations.

- *Selection of agencies for press clipping services, creation of anti-corruption campaigns, leasing and placement of billboards and citylight posters, publications printing and information materials and conducting public opinion research;*

Activity was implemented in I quarter of 2017.

- *Preparation of quarterly and annual reports on the work of the APC;*

A quarterly report on the work of APC in 2017 was prepared, and it was adopted by the Council of the APC at the 44th session held on May 5, 2017. The Parliamentary Committee on Anti-Corruption adopted the Report on the work of the APC for 2016 at its session held on April 12, 2017. The Parliament of Montenegro adopted the Report on the work of the APC for 2016 at the Fifth Session of the First Regular (Spring) Session in 2017 held on April 27, 2017.

- *Conducting annual opinion polls showing the effects of campaigns and giving recommendations for future campaigns*

It will be implemented in December 2017.

Other relevant activities:

In the second quarter, the APC received 118 requests for free access to information.

Allowed access to information – 6

Partially adopted – 1

Rejected access to information – 101

Rejected for lack of possession – 100

Rejected due to legal restrictions – 1

Instructed to visit the website of APC - 10

The officials of the APC took part in the training on the topic "Integrity of Civil Servants", held in Hague-Holland, organized by the Ministry of Foreign Affairs of the Kingdom of the Netherlands and the Dutch Helsinki Committee, within MATRA project.

The Head of Department attended a meeting held in April in Podgorica in order to harmonize the responses and findings of the authorities and independent evaluators gathered through the OECD Questionnaire in January to prepare the Competitiveness Study for 2018.

GOAL 13: ESTABLISHMENT OF THE INFORMATION SYSTEM OF THE AGENCY (EXTERNAL AND INTERNAL SYSTEM)

Activities:

- *Website redesign*

Activities to analyze all segments that need to be changed within the redesigned Web site are in due course, in accordance with the dynamics of the Information System Development Plan for 2017.

- *Improvement of the website through the development of new functionalities in accordance with the recommendations of all stakeholders (Council, NGO sector, employees of the Agency)*

This activity is being implemented along with the site redesign, in accordance with the dynamics of the Information System Development Plan for 2017.

- *Additional equipping of the server room of the Agency (procurement of the aggregate and additional redundant air conditioner)*

The purchase of a regular air conditioner was realized and its installation was carried out. The aggregate procurement process is in progress.

- *Implementation of the next phase of the application software of the Agency (Modules for Integrity Plan and Statistics over Integrity Plans, Misdemeanor Procedure, Administrative Procedure);*

Terms of Reference were prepared with a functional specification for creating the module - integrity plans, the procurement procedure in progress. Also, the modification of the Administrative and misdemeanor procedure modules was made and implementation thereof started.

- *Planning the analytics module*

The dynamics did not anticipate that this activity is yet to begin. APC did not receive support when the request for a TAIEX visit was in question, which was necessary to implement in relation to this activity. It is necessary to find another way to enable this visit.

- *Information system audit*

This activity has not come to realization, it is planned for the III and IV quarter.

- *Planning and development of a specialized module for the control of political entities and monitoring of election campaigns in accordance with the Report of the Expert Council of Europe*

A workshop with experts from the Horizontal Program project was scheduled on July 26 and 27 in the APC on this topic.

- *Full implementation of the module for automatic data exchange with the information systems of other state bodies (Tax Administration, MoI, Real Estate Directorate, Securities Commission);*

The realization of these activities is in progress, the implementation dynamics is in line with the plan. It was implemented the connection with the Tax

Administration, MoI (except CSR), Real Estate Administration. It is in due course the connecting with CRBE and CDA (SC), in accordance with the dynamics.

- *Connecting with the Ministry of Justice (Criminal Records Register) for the needs of the Department for the Control of Political Entities and Monitoring of Election Campaigns*

The Ministry of Justice is working on the Draft of the Data Exchange Agreement and we expect to submit the draft of the APC Agreement which shall be signed in order to connect with the Register of Criminal Records as a prerequisite for access to data.

- *Procurement and integration into the existing system of additional hardware equipment*

Purchase of equipment was realized and activities on equipment installation and integration into existing infrastructure are underway.

- *Introduction of new security tools and equipment in order to strengthen information security*

New security tools have been implemented, as well as equipment that is being installed in progress. Based on the request made by the APC to the US Embassy for the grant of the Embassy in 2016, we have been informed that they are in the process of considering this request, which would further improve this segment of work.

- *Improvement of employees in the Department in accordance with the needs of the Agency, especially in the area of information security through participation in trainings and seminars.*

In the past period there have been no activities in this segment, with the exception of participation in the Open Data Conference in Brussels. Also, implementation is required by the end of the year, especially in the part of training for cyber security, data protection, analytical BI software.