



Montenegro
The Government of Montenegro
Ministry of Internal Affairs and Public Administration

**INNOVATED ACTION PLAN
FOR
IMPLEMENTATION OF
THE PROGRAMME OF FIGHT AGAINST CORRUPTION AND ORGANIZED CRIME
- 2008 - 2009 -**

Podgorica, May 2008

Legal framework	The Government of the Republic of Montenegro adopted at its session held on 28 th July 2005 the Program of the fight against corruption and organized crime , and on session held on 24 August 2006 the Government adopted Action Plan for implementation of the Program of fight against corruption and organized crime . National Commission for monitoring of implementation of Action Plan for implementation of the Program of fight against corruption and organized crime was established by the Decision of the Government of the Republic of Montenegro on 15 February 2007. National Commission adopted the First Report on realization of measures from the AP on 10 July 2007 (for period September 2006-May 2007) , and the Second Report for the period September 2006-December 2007 . Proposal for innovation of the Action Plan ensued from the work of the National Commission . By Decision passed by the Minister of the Internal Affairs and Public Administration, no 01 – 541/1, dating from 14 February 2008, the Working Group for preparation of the amendments of the Action Plan for implementation of the Program of fight against corruption and organized crime was established . All of the measures realized until now shall be separately gathered and put in the Annex of the innovated Action Plan, and the implementation period of the Innovated Action Plan is prolonged until the end of 2009 .
Document description	The Innovated Action Plan renders operational the priorities established in the Program of the fight against corruption and organized crime , recommendations of the National Commission , recommendations of the international organizations and institutions , and recommendations of the involved institutions of Montenegro which have as an element continuous monitoring in fight against corruption and organized crime, or represent still not realized measures from the Action Plan from 2006, in such a way that concrete measures and activities of line ministries, administration bodies and institutions competent for the prevention and suppression of corruption and organized crime are determined, and which did not exist until now. The Action plan determines goals, measures, bearers and deadlines, i.e. dynamics of obligation discharge, indicators for measuring success and possible risk factors.
Implementation period	2008-2009 Having in mind that the Government of the Republic of Montenegro adopted the Program of fight against corruption and organized crime in July 2005, and that in meantime Montenegro became independent and internationally recognized state, member of the UN and of the Council of Europe, and having in mind that Montenegro signed the Stabilization and Association Agreement on 15 October 2007 with the EU, and in May 2008 prepared National Program for Integration of Montenegro into the EU for period 2008-12, the general opinion is that it is necessary to adopt the innovated AP until June 2008, whose implementation would be monitored for the period 2008-2009, and it is necessary to prepare, until the end of 2009, completely new proposal of the Program of fight against corruption and organized crime , and in accordance with that, to adopt the Action Plan for implementation of the new Program for period 2010-2012 .
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Beneficiaries	Minister of Internal Affairs and Public Administration Members of the National Commission The Government of Montenegro

INNOVATED ACTION PLAN (MATRIX) FOR IMPLEMENTATION OF THE PROGRAM OF FIGHT AGAINST CORRUPTION AND ORGANIZED CRIME

NO	GOAL	MEASURE	COMPETENT INSTITUTION	DEADLINE (FOLLOWING THE ADOPTION OF THE AP)	INDICATORS OF THE SUCCESS	RISK FACTORS	SOURCE OF FINANCING	
							BUDGET	
POLITICAL AND INTERNATIONAL OBLIGATION TO ACT								
1	Building of horizontal and vertical networks and associations with the objective of joint action of political parties and leaders, agencies, public and civil society and other non-state actors	Monitoring implementation of the Resolution on the fight against corruption and organized crime through: 1. Amendments of the Rulebook on work aiming to widen competencies of the Committee 2. Adoption of the opinions and suggestions of the Committee	MNE Parliamentary Committee for political system, judiciary, and administration, Committee for economy, finances, and budget	Two times per year, following the report of the National Commission	- Amendments of the Rulebook on work aiming to widen competencies of the Committee - number of the invited NGOs at the thematic, extended Committee's sessions - Number of the adopted opinions and suggestions given by the Committee		Yes	-
		1. Delivering of the periodic reports based on the innovated Instruction on preparation of the reports on implementation of the Action Plan, and delivering of other analysis and reports relating the corruption and organized crime 2. Regular updating of the sub-web site of the National Commission at the Government's web site	1. All competent bodies involved in implementation of the AP 3. Anti-Corruption Initiative Directorate (ACID)	1), 2) Continuously	1. Prepared Instruction, number of delivered reports in relation to the number of the competent bodies obliged to report 2. Number of the reports published at the web site in six-months period	No risk	-	-
2	Intensification of already initiated realization of general reforms of legal and financial system	Preparation of the proposal of the Criminal Code (especially in domain of introducing the institute of expanded seizure and confiscation of the proceeds of crime, defining of a crime committed in organized manner as a general institute of the criminal material law)	Ministry of Justice	2009	Defined proposal of the Criminal Code following the public hearing and collected comments given by the international organizations, the Code in line with the European standards and international conventions, the Code envisages introducing of the institute of expanded seizure and confiscation of the proceeds of crime, defined crime committed in an organized manner as a general institute of the criminal material law	No risk	-	-
		Adoption of the Criminal Code	MNE Parliament	2009	Adoption of the Code	No risk	-	-
		Preparation of the proposal of the Criminal Procedure Code (introducing the institute of inverted proving burden)	Ministry of Justice	2008	Defined proposal of the Criminal Procedure Code following the public hearing and collected comments given by the international organizations, the Code in line with the European standards and international conventions, the Code envisages introducing of the institute of inverted proving burden	No risk	-	-
		Adoption of the Criminal Procedure Code	MNE Parliament	2008	Adoption of the Code	No risk	-	-

	Adoption of the Law on Amendments of the Law on State Prosecutor	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Adoption of the proposal of the amendments of the Law on Identity Card, in regard to providing the police to use biometric data	Mol&PA	2008	Adoption of the proposal	No risk	-	-
	Adoption of the amendments of the Law on Identity Card	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Genetic Privacy	Ministry of Health	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Genetic Privacy	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Obtaining of Biologic Material	Ministry of Health	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Obtaining of Biologic Material	Ministry of Health	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on National DNA Register	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on National DNA Register	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Preventing Conflict of Interest in performing public functions, in accordance with the international standards and recommendations	Mol&PA in cooperation with the Commission for Determining Conflict of Interest	2008	Defined proposal Law, following the public hearing and collected comments given by the Council of Europe, European Commission, and civil society, the law in line with the European standards and international recommendations, underlining: 1. Harmonized definition of the public official with the provisions of the UN Convention against Corruption (Art 2 of the Convention) 2. Introduced efficient and proportional penalty regime, 3. Defined and prescribed sanctions for delivering incorrect data on property, and 4. Defined obligation of the Commission to, when necessary, check and determine whether the data on reported incomes and proper are true or not.	No risk	-	-

	Adoption of the Law on Preventing Conflict of Interest in performing public functions	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Protection of the persons reporting the corruption (whistleblowers)	Mol&PA, Anti-Corruption Initiative Directorate (ACID)	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Protection of the persons reporting the corruption (whistleblowers)	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Integrity in Public Sector (which will contain prevention of corruption, preparation of the integrity plans, rules on lobbying, conflict of interest, protection of whistleblowers)	Ministry of Finance in cooperation with the ACID	2009	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Integrity in Public Sector	MNE Parliament	2009	Adoption of the Law	No risk	-	-
	Adoption of the Law on Financing Political Parties	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Adoption of the Law on Financing Election Campaign for President of Montenegro, mayors, and presidents of municipalities	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Electronic Communication, aiming to: 1. introduce obligation for telecommunication services providers to register all buyers of the telecommunication services /120/ 2. ensure direct links and connection with the databases of the telecommunication services providers; condition: adoption of the Law on Personal Data Protection /125-6/	Ministry of maritime, transport, and telecommunication	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Amendments of the Law on Electronic Communication	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on internal financial control in public sector	Ministry of Finance	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-

	Adoption of the Law on internal financial control in public sector	MNE Parliament	2008	Adoption of the Law	No risk	-	
	Preparation of the proposal Law on Personal Data Protection	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Personal Data Protection	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on taking care of temporarily and permanently ceased property	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk		
	Adoption of the Law on taking care of temporarily and permanently ceased property	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on property relations	Ministry of Finance	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on property relations	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Determining competencies for preparation, and preparation of the proposal Law on State Election Commission	MNE Parliament in cooperation with the Secretariat for Legislation	2008	Determined competency for preparation of the Law, defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on State Election Commission	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on obligatory relations	Ministry of Justice	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on obligatory relations	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Aliens	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Aliens	MNE Parliament	2008	Adoption of the Law	No risk	-	-

3	Implementation of international instruments and standards in field of fight against corruption and organized crime	Analyze degree of harmonization of the legislation with international standards in field of fight against corruption and organized crime	Anti-Corruption Initiative Directorate, Mol&PA, Ministry of Justice	Continuous	Reports on the level of harmonization of the legislation: number of the analyzed laws, and number and names of the conventions in relation to which the analysis was prepared, for every law individually, number of defined amended laws and number of the adopted amended laws	Lack of Human Resource Capacities	Yes	Yes
		Continue with the harmonization of legislation with the UN Conventions against corruption (Palermo, UNTOC Convention), and other conventions in field of fight against organized crime	Mol&PA, Ministry of Justice	2008, Continuous	Full harmonization of the legislative framework with the conventions in field of organized crime; number of the analyzed laws, and number and names of the conventions in relation to which the analysis was prepared, for every law individually, number of defined amended laws and number of the adopted amended laws	No risk		
		To ratify Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no198)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
		To ratify Convention on Prevention of (CETS no196)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
		To ratify Convention on Combating of Terrorism (CETS no 190)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
		To ratify Convention on Fight against Trafficking in Human Beings (CETS no 97)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
		To ratify the Convention on Cyber Crime, with supplementing Protocols (ETS189)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
		Publishing of the ratified international agreements and conventions at the web site of the Government, the Parliament, and in Official Journal	The Government /MFA MNE Parliament MNE Official Journal	Continuous	Published ratified agreements	No risk	Da	Da
4.	Cooperation and Exchange of information between the states, aiming to organize joint operations in fight against organized crime	Preparation of the Annual plans for signing of bilateral agreements	Police Directorate, Customs Administration, Directorate for preventing money laundering and financing of terrorism	Until the end of III quarter of 2008, until the end of I quarter of 2009	Prepared Annual plans for signing of bilateral agreements: <ul style="list-style-type: none"> with the neighboring countries with the EU countries with international organizations 	No risk	-	-
		Signing of bilateral agreements: <ul style="list-style-type: none"> with the neighboring countries with the EU countries with international organizations 	Police Directorate, Customs Administration, Directorate for preventing money	Continuous	Number of signed bilateral agreements: <ul style="list-style-type: none"> with the neighboring countries with the EU countries with international organizations 	Non-harmonized legislation in countries in the region	-	-

			laundering and financing of terrorism					
		Reporting on the results of international cooperation in fight against corruption and organized crime	The Supreme Court, Supreme State Prosecutor's Office, Police Directorate, Customs Administration, Directorate for preventing money laundering and financing of terrorism	Continuous	Indicators of the criminal prosecution: number of criminal claims, investigations, charges, and sentences in force, which resulted from international cooperation	No risk	-	-
5.	Active participation in realization of measures and activities of Regional Anti-corruption Initiative (RAI)	Implementation of Declaration on ten joint measures for fight against corruption in South Eastern Europe	ACID (on basis of collected individual reports from the competent bodies)	Continuous	Assessment of the realized progress by RAI	Lack of human resources, Lack of budgetary and/or external resources	Yes	Yes
6	Realization of the obligations deriving from the membership in the Council of Europe (GRECO)	Fulfillment of obligatory recommendations from GRECO Report on assessment of anti-corruption measures and activities in Montenegro	ACID (on basis of collected individual reports from the competent bodies)	Continuous	GRECO Report on Fulfillment of obligations and recommendations deriving from the GRECO Report on assessment of anti-corruption measures and activities in Montenegro, number of measures assessed by GRECO as implemented and realized, and number of measures that are not realized	No risk	Yes	Yes
7.	Improvement of material conditions for the functioning of competent bodies	Defining priorities in field of fight against corruption and organized crime, drafting projects and candidate them for Budget financing, and by means of international organizations and institutions	ACID, Customs Administration, Tax Administration, Commission for determining conflict of interest, Commission for controlling public procurement procedure, Supreme State Prosecutor's Office, Supreme Court, Police Academy, Directorate for preventing money laundering and financing of terrorism, Human Resources Management Agency	Continuous	Defined priorities, project proposals based on defined priorities	No risk	-	-

		Ensuring financial support from the Budget for the competent bodies for realization of candidate projects	ACID, Police Directorate, Customs Administration, Tax Administration, Commission for determining conflict of interest, Commission for controlling public procurement procedure, Supreme State Prosecutor's Office, Supreme Court, Police Academy, Directorate for preventing money laundering and financing of terrorism, Human Resources Management Agency	Continuous	Number of projects financed from the Budget relating to fight against corruption and organized crime, and total amount of ensured and provided means	Lack of budgetary means	Yes	-
		Ensuring financial support from the international organizations for the competent bodies for realization of candidate projects	ACID, Police Directorate, Customs Administration, Tax Administration, Commission for determining conflict of interest, Commission for controlling public procurement procedure, Supreme State Prosecutor's Office, Supreme Court, Police Academy, Directorate for preventing money laundering and financing of terrorism, Human Resources Management Agency	Continuous	Number of projects delivered to the foreign donors relating to fight against corruption and organized crime, and total amount of ensured and provided means by the foreign donors	Not accepting projects by foreign donors	-	Yes

GENERAL OBJECTIVES

A. EFFICIENT CRIMINAL PROSECUTION AIMING TO COMBAT CORRUPTION AND ORGANIZED CRIME

1.	Raising the level of knowledge and specialization of police, prosecutors and judges	Needs assessment for training of prosecutors, police, and judges	Police Directorate, Police Academy, Supreme State Prosecutor's Office, Supreme Court	2008	Identified need for training of prosecutors, judges, and police officers	Lack of budgetary and/or external means, quality of training project	Yes	Yes
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		Organizing of joint seminars for representatives of police, prosecutor's office and courts, in relation to new provisions and solutions stipulated in Criminal Procedure Code	Center for education of bearers of judicial functions in cooperation with the Police Academy	2008-2009	Number of held seminars, number of participants from the police, prosecutor's office, courts	No risk	Yes	Yes
2.	Prevention of abuse in application of secret surveillance measures (SSM)	Court and prosecution control Parliamentary control (in accordance with the provisions of the Law on) Internal Police Control	Judicial Council, Supreme State Prosecutor's Office, Police Directorate	Continuous	Number of carried out controls, number of discovered eventual abuses	No risk	Yes	Yes
3	Efficient care of temporary and permanently confiscated property, as well as of the distribution of profit gained from the confiscated property (to judiciary, prosecution, police)	To establish separate independent body for confiscated property management	Ministry of Finance	2008	Established body; Prepared and delivered reports on status and level of condition and degree of preservation of the value of the property (confiscated, guarded, and returned); Relation in value between temporarily confiscated, permanently confiscated and returned property	No risk	-	-
4.	Assessment of the criminality state of play in field of criminal acts with elements of corruption and organized crime	1. preparation of the six-months analysis on statistical indicators in relation to number of cases in field of corruption and organized crime being processed before the courts or the ones with effective rulings, with special attention to the structure of perpetrators of such acts and sphere of society in which these acts 2. to prepare instructions for harmonization of methods of presenting statistical data by the police, prosecution, and courts, for publishing of these data at the web sites of the mentioned institutions	1. Supreme Court, Police Directorate, Supreme State Prosecutor's Office (Three-Party Commission) 2. Supreme Court, Police Directorate, Supreme State Prosecutor's Office (Three-Party Commission)	1. 2008, Continuous 2. 2008. 3. 2008. 4. 2009.	1. prepared periodical statistical indicators and analysis, delivered to the National Commission 2. harmonized methods of presenting statistical data by the police, prosecution, and courts, comparable statistical data, and also published at the web sites of the respective institutions 3. number of identified, characteristic emerging problems in relation to implementation in purpose of providing evidences and proving in pre-trial procedure, investigation, and main hearing, and which have impact on efficient criminal prosecution and effective rulings	No risk	-	-
5.	Strengthening of state bodies' capacities in fight against trafficking in human beings	Implementation of the Action Plan for fight against trafficking in human beings	Office of the national Coordinator for fight against trafficking in human beings, Police Directorate	2009 Continuous	Quarterly informing on realization of measures from the Action Plan Statistical data on number of investigations carried out, criminal claims submitted, and effective court rulings, convicting and acquitting, in field of trafficking in human beings	No risk	-	-

B. PREVENTION AND EDUCATION								
1.	Improvement of working conditions and general standard of judges, prosecutors, and the police	To provide special premises for acceptance of injured parties and witnesses, protecting and preserving integrity of court proceeding, and safety and privacy of injured parties and witnesses	Judicial Council, Ministry of Finance, Courts	I quarter of 2009	Provided and special premises for acceptance of injured parties and witnesses	Lack of budgetary and/or external means	Yes	Yes
2.	Increase of the integrity of judges and prosecutors	Implementation of the Code of Ethics of judges and the Code of Ethics of prosecutors	Judicial Council, Prosecutor's Council	Continuous	Efficient implementation and initiation of disciplinary proceedings due to the violation of the Code of Ethics (number of disciplinary proceedings, number of decisions, number of dismissed judges/prosecutors)	No risk	-	-
		Efficient work of Office for reporting the corruption within the judiciary	Supreme Court	Continuous	Number of disciplinary and criminal proceedings initiated against the judges due to reports delivered to the Office	No risk	Yes	-
3.	Increase of the integrity of the police	Application of the Police Code of Ethics: 1) Efficient work of Committee on Ethics 2) Preparation of six-month analysis on application of Code of Ethics 3) Organizing of periodical trainings on application of Code of Ethics	1, 2 Police Directorate (Committee on Ethics) 3 Police Academy	Continuous	Six-month analysis prepared by the Committee on Ethics on application of Code of Ethics Number of disciplinary proceedings initiated due to violation of the Police Code of Ethics, number of trainings and number of employees participating in trainings	No risk	-	-
		Preparation of the Instructions on reporting the cases of corruption to police (manner of reporting and protection of whistle blowers), and its efficient implementation	Police Directorate	2008	Prepared Instructions, number of reported cases of corruption before and after promotion of the Instructions	No risk	Yes	Yes
		Training of police officers and employees for implementation of the Instructions on reporting corruption to the police	Police Directorate, Police Academy, ACID	2008, Continuous	Number of trainings and number of employees participating in trainings	Lack of budgetary and/or external means	Yes	Yes
		Promoting the Instructions on reporting corruption to the police	Police Directorate, ACID, NGO	2008, Continuous	Prepared plan of promotion of the Instructions, report on implementation of the plan, number of the realized activities in relation to the planed ones	No risk	Yes	Yes
		Six-months reporting on work of organizational unit for surveillance of Police Directorate work	Mol&PA	Continuous	Six-months reports	No risk	-	-
4.	Improvement of methods, manner of	Promotion of the Code of Ethics of public servants and state employees	Human Resources Management Agency	Continuous	Respecting the Code of Ethics	No risk	-	-
		Fulfilling the obligation for public office	Commission for	Continuous	Percentage of submitted reports on incomes and	Disregard of	-	-

	functioning and conducting of the legislative, executive and judicial authorities, as well as state prosecutors	holders to submit reports on their incomes and property conditions	Determining the Conflict of Interest		property	the law and the procedure		
		Monitoring the giving and receiving gifts by the officials and employees	Commission for Determining the Conflict of Interest	Continuous	Number and value of reported gifts		-	-
		Updating and monitoring of the public register aimed at ensuring the transparency of financial and property conditions of public office holders	Commission for Determining the Conflict of Interest	Continuous	Updated public register		-	-
5.	Narrowing down the area for potential corruption in public sector	Preparation of the Action Plan for fight against corruption in field of health care and social protection	Ministry of health, labor and social welfare, ACID, in cooperation with the NGO	I quarter of 2009	Prepared Action Plan	No risk	-	-
		Preparation of the Action Plan for fight against corruption in field of education	Ministry of Education and Science, ACID, in cooperation with the NGO	I quarter of 2009	Prepared Action Plan	No risk	-	-
		Preparation of the Action Plan for fight against corruption in field of spatial planning	Ministry for Economic Development, ACID, in cooperation with the NGO	I quarter of 2009	Prepared Action Plan	No risk	-	-
6.	Efficient implementation of the Law on Financing Political Parties and the Law on election of the President of Montenegro, mayors, and presidents of municipalities	Organizing of the seminars for authorized persons from political parties and employees who have direct contact with finances	State Election Commission and NGO	Continuous	Total number of seminars per institutions and fields, number of participants	Lack of budgetary and/or external means	Yes	Yes
		Organizing of advising with the authorized persons in political parties aiming to share knowledge acquired at the international seminars	State Election Commission	Continuous	Total number of organized advisories, number of participants	No risk	Yes	Yes
		Education of the citizens and NGOs on implementation of the Law on Financing Political Parties and the Law on election of the President of Montenegro, mayors, and presidents of municipalities	NGOs	Continuous	Number of NGOs that carry out education, prepared manual for citizens	Lack of budgetary and/or external means	Yes	Yes
		Preparation of the Manual for members of State and Municipal election commissions and for authorized persons of political parties and employees who have direct contact with finances	State Election Commission and NGO	2008 – 2009	Prepared manual, number of distributed manuals	Lack of budgetary and/or external means	Yes	Yes
		Preparation of database on financial reports submitted by political parties, available at the web site of the State Election Commission	State Election Commission	2008, Continuous	Established database, number of published information and submitted reports at the web site	No risk	Yes	-

		Preparation of database with the reports on spent means by the State Election Commission, available at the web site of the State Election Commission	State Election Commission	2008, Continuous	Established database, published report	No risk	Yes	-
7.	Efficient implementation of the Law on Free Access to Information	Training of the state employees and civil servants on implementation of the Law	Human Resources Management Agency	Continuous	Number of seminars and participants	Lack of budgetary and/or external means	Yes	Yes
		Education of the citizens and NGOs on implementation of the Law on Free Access to Information	NGOs	Continuous	Number of NGOs that carry out education	Lack of budgetary and/or external means	Yes	Yes
		Preparation of the Manual for state employees	Ministry of Culture and media, NGOs	2008	Prepared manual	Lack of budgetary and/or external means	Yes	Yes
		To enable free access to information, in accordance with the Law	All state bodies (obligatory enforcers of the Action Plan)	Continuous	Number of solved cases in relation to number of submitted request, number of decisions repealed in second instance and court proceeding	Lack of budgetary and/or external means	Yes	Yes
C. PUBLIC, CIVIL SOCIETY (INCLUDING PRIVATE SECTOR) AND MEDIA								
1.	Joint propaganda-preventive action of the governmental and non-governmental sector and civil society with the aim of raising the level of public awareness on negative consequences of organized crime and corruption	Design and realize intensive public campaign with the aim of more efficient participation of citizens in the fight against corruption and organized crime	ACID (in cooperation with the Customs Administration, Tax Administration, Police Directorate, Directorate for preventing money laundering, Directorate for public Procurement, Commission for determining conflict of interest, Privatization Council, State Audit Institution, NGO sector, Media)	Continuous	Preparation of quarter reports on implementation of public campaign; number of prepared flyers, brochures, guidebooks, number of published procedures for submitting of complaints, number of fields covered by the informative material	Lack of budgetary and/or external means	Yes	Yes
2.	Introduction and education in training institutions on general notions and appearances of	Periodical lectures in high schools and faculties on corruption and organized crime	Ministry of Education and Science, ACID, NGOs	Continuous	Total number of lectures held, number of visited education institutions, number of participants	No risk	Yes	-

	corruption and organized crime							
3.	Professional informing on corruption and organized crime	Education of media on corruption and organized crime, and investigative journalism	NGOs from the area of media	Continuous	Number of seminars, number of participants	Indifference of media	-	Yes
4.	Transparent insight into media ownership structure and prevention of their monopolization	Preparation of the proposal Law on illegal printed media concentration	Ministry of Culture and Media	III quarter of 2008	Prepared proposal Law	No risk	Yes	-
		Adoption of the Law on illegal printed media concentration	MNE Parliament	IV quarter of 2008	Adoption of the law	No risk	-	-
5.	Improvement of transparency of business operations	In cooperation with private sector, initiate and carry out activities in the plan of improvement of fair and competitive operations and investment through: 1) preparation of the activity plan 2) preparation of six-month reports on realization of activity plan and its publishing at the web site of the respective institution	Ministry for Economic development, in cooperation with private sector	1. III quarter of 2008 2. Continuous	1. Prepared activity plan, number of realized activities in relation to plan of envisaged activities, 2. published reports on realization	No risk	Yes	Yes
		In cooperation with the Central register of the Commercial Court and other competent institutions, initiate the project of compiling and publishing «black» list of companies, convicted for criminal acts with the elements of corruption	Commercial court, Ministry of Justice	III quarter of 2008	Compiling, publishing and promoting the “black” list	No risk	Yes	Yes
D. LOCAL SELF-GOVERNMENT								
1.	Enhancing the fight against corruption at local level	Drafting and adoption of: 1. Model of Program of fight against corruption and organized crime in local self-government 2. Action Plan of measures for preventing and combating corruption at the local level	Mol&PA in cooperation with the MNE Communities' Association and MNE municipalities	II quarter of 2008	Adopted model of Program of fight against corruption and organized crime in local self-government Adopted Action Plan			
		Drafting and adoption of the local anti-corruption action plans relating to competencies of local self-government, and are not encompassed by the Program of Fight against corruption and organized crime and by the Action Plan for its implementation	Local self-government bodies, NGOs	III quarter of 2008	Number of drafted action plans in relation to the number of municipalities, number of adopted action plans, information on realization of local action plans	Insufficiently built capacities of local self-governments	Yes	Yes

SPECIFIC MEASURES AGAINST CORRUPTION AND ORGANIZED CRIME

A. EFFICIENT CRIMINAL PROSECUTION AND TRIAL

A.1. PROSECUTOR'S OFFICE

1.	Capacity building for prosecutors	Increasing the number of prosecutors in accordance with the new Criminal Procedure Code, and the law on State Prosecutor	Supreme State Prosecutor, Prosecutors' Council	2008-2009	Number of new employees in relation to necessary number of prosecutors	Lack of budgetary and/or external means	Yes	-
		Increasing budget for prosecutor's office in accordance with the new Criminal Procedure Code and the law on State Prosecutor, in line with recognized needs to increase following: 1) Number of new prosecutors and administrative staff 2) Premises and technical capacities 3) Staff training 4) Improvement of material conditions of the prosecutors in accordance with the new competencies and authorizations 5) Improvement of material conditions of the employees and servants in accordance with the new competencies and authorizations	Ministry of Finance, Prosecutors' Council	2009	Percentage of prosecution's budget increase in accordance with the increase of number of employees, premises and technical capacities, trainings; Number of organized trainings, fields for which the trainings were held, number of prosecutors participating to every training, indicators of improvement of material conditions of prosecutors, employees, and servants (incomes, beneficiaries, housing)	Lack of budgetary and/or external means	Yes	Yes
		Analyze number and structure of cases in field of corruption, organized crime, in relation to existing staff	Prosecutor's Council	III quarter of 2008	Carried out analysis of number and structure of cases in field of corruption, organized crime, in relation to existing staff	No risk	-	-
		Analyze existing situation regarding the manner and criteria for solving the housing issues and needs of state officials in part referring to bearers of judicial functions	Judicial Council Prosecutor's Council, Ministry of Finance	2009	Carried out analysis, report delivered to the national Commission with proposed solutions	Lack of budgetary means	Yes	-
		Implementation of further training of prosecutors 1) Informing the prosecutors on comparative practice of neighboring countries in field of fight against corruption and organized crime 2) Drafting and implementation of the program of education	Supreme State Prosecutor, Judicial Training Center and State Prosecutors' Association	Until 01.06.2008, Continuously	Drafted program, number of trainings, number of involved fields, total number of participants and number of participants per field	Lack of budgetary and/or external means	Yes	Yes

		<p>prosecutors in regard to crime cases with elements of corruption and organized crime, especially in regard to new forms of criminality (CC and CPC)</p> <p>3) Drafting and implementation of the program of education for criminal acts described in Chapter XXIII of CC and Chapter XXVIII of CC</p> <p>4) Drafting program and implementation of training on application of SSM (in accordance with the comparative practices of the neighboring countries)</p>						
		To define needs and to provide adequate equipment for Department for combating organized crime, for proper proceeding in cases of organized crime, corruption, terrorism, and war crimes	Prosecutor's Council, Ministry of Finance	2008-2009	Defined needs, Report on value of acquired equipment in relation to the needed one	Lack of budgetary and/or external means	Yes	Yes
		<p>Establishing of the Judicial IT system and database and training of prosecutors</p> <p>1) Collecting, preparation, and analysis of statistical data regarding the perpetrators and the structure of criminal acts</p>	Supreme State Prosecutor	Following adoption of the amended Action Plan, 1. Continuous (quarterly)	Number of prosecutor's offices connected by the IT system, total number of the cases per institution, in relation to the total number of cases in database, number of trainings and participants per prosecutor's office 1. Periodical statistical reports	Lack of budgetary and/or external means	Yes	Yes
	1) Capacity building in the Department for the fight against organized crime	Specializing prosecutors for prosecuting of following criminal acts: 1 with elements of corruption 2 organized crime 3 War crimes 4 Terrorism	Supreme State Prosecutor, Judicial Training Center	2008-2009	Total number of trainings, number of trainings per field, total number of participants, number of participants per field	Lack of budgetary and/or external means	Yes	Yes
		Reorganization of existing Department for the fight against organized crime through amendments of the Rulebook on organization and systematization of job positions	Supreme State Prosecutor	2008	Reorganized existing Department, adopted new Rulebook	No risk	-	-
		Increase number of deputies of Special prosecutor for combating organized crime including terrorism, corruption, and war crimes	Supreme State Prosecutor	2008	Number of appointed deputies in relation to number of systematized job positions for deputies	Lack of budgetary means, lack of necessary staff	Yes	-
		Increase number of expert associates in Department for fight against	Supreme State Prosecutor	2008	Number of employed staff in relation to number of systematized job positions	Lack of budgetary	Yes	-

	organized crime				means, lack of necessary staff		
	Signing of international agreements on cooperation	Supreme State Prosecutor	Continuous	Number of signed agreements	Indifference of the prosecutor's offices of other countries for signing of agreements	-	-
	To determine if is necessary to provide personal protection for the prosecutors proceeding in cases of organized crime, corruption, terrorism, and war crimes	Supreme State Prosecutor, Police Directorate	IV quarter of 2008, Continuous	Adopted plan of protection, number of protected prosecutors	No risk	-	-
A.2. POLICE							
	Amending of the Rulebook on internal organization and systematization of the Police Directorate	Police Directorate	2008-2009	Adopted Rulebook	No risk	-	-
	Adoption of the legal act which stipulates that officers of Crime Police Sector are provided with additional payment on basic wage due to complex, specific, and risk tasks they perform within their competencies 1. to ensure increase of wages and additional payments for the police officers dealing with cases of organized crime and corruption	MNE Government, Ministry of Finance, Police Directorate, Mol&PA	2008	Adopted act, introduced special additional payment	Lack of budgetary means	Yes	
	Adoption of the Instructions on police proceeding and conduct in issuing, conducting, and extradition of persons searched for by international warrants	Police Directorate	2008	Adopted Instructions	No risk	-	-
	Adoption of the Instructions on protection of whistleblowers	Police Directorate	2008	Adopted Instructions	No risk	-	
	To adopt and implement plan of protection of police officers involved in fight against corruption and organized crime	Police Directorate	III quarter of 2008, continuous	Adopted plan of protection, number of persons under protection	No risk	Yes	-
	To determine needs for training, and implement trainings and strengthen human resource capacities of the Department for Internal Control within the Police Directorate	Police Directorate, Police Academy	continuous	Determined needs, implemented trainings and improved capacities, number of realized trainings in relation to envisaged, number of officers from the internal control who participated in every training individually, comparing to needs	Lack of budgetary and/or external means	Yes	Yes
	To determine needs and to acquire necessary equipment for work of	Police Directorate	2008.	Determined needs for equipment, Value of acquired equipment in regard to needs	Lack of budgetary and/or external	Yes	Yes

	Internal Control Department				means		
	Six-month reporting on work of organizational unit for monitoring the Police Directorate work	Mol&PA	continuous	Six-month reports	No risk	-	-
	To adopt Instructions on application of secret surveillance measures	Police Directorate	III quarter of 2008	Adopted Instructions	No risk	-	-
	To provide links and connection with the computer networks and databases of respective institutions (ex: Customs Administration, Tax Administration, Directorate for preventing money laundering and financing of terrorism, Real Estate Agency, Central Depository Agency, Republic Construction Inspection), in order to collect data and in accordance with the police competencies envisaged by the CPC and the Law on Police	Police Directorate, Customs Administration, Tax Administration, Directorate for preventing money laundering and financing of terrorism, Ministry for Economic Development, Central Depository Agency	2008	Signed agreements on cooperation with the protocols explaining procedures for establishing links and the manner of, established links, number of established links in relation to number of envisaged institutions with which the links are established	No risk	Yes	-
1) Capacity building of the police in the fight against organized crime	Reorganization of the existing Department for the fight against organized crime, in the sense of defining the organizational level, as well as the scope of action 1.1. Increase number of officers within the organizational unit dealing with suppression of corruption from existing two to four officers 1.2. Defining official positions within district units that will deal with fight against corruption and organized crime (two officers per each district unit assigned for this problem)	Police Administration	2008	Reorganized Department 1.1. Number of officers increased at defined level 1.2. two official positions defined per district units	No risk	-	-
	Securing functional working space for the existing Department for the prevention and fight against organized crime	Police Administration	2008-2009	Secured adequate working space	No risk	Yes	-
	Training needs assessment and organizing trainings 1. Providing continuous trainings for officers in the field of fight against organized crime and corruption	Police Administration, Police Academy in cooperation with the Supreme State Prosecution	Ongoing	Training needs assessed and determined: trainings provided; No. of trainings; Level of qualified staff; No. of organized compared to planed;	Lack of budgetary and/or external funding	Yes	Yes
	Purchase of technical and communication equipment: 1. Creating formal and technical conditions in order to use data	Police Administration	II quarter of 2008	Equipment purchased and operating 1. Infrastructure for data base usage established	Lack of budgetary and/or external	Yes	Yes

	base of the Ministry of Internal Affairs and Public Administration (citizens, vehicles, arms, travel papers, quests) with the aim of efficient carrying out investigations in the field of organized crime and corruption				funding		
2) Capacity building of the police in the fight against industrial crime	Providing functional working space for the needs of existing Department for the fight against industrial crime	Police Administration	2008	Functional working space provided	No risk	Yes	-
	Training needs assessment and organizing trainings: a) Basic trainings for fight against industrial crime b) Specialized trainings for fight against industrial crime	Police Administration Police Academy in cooperation with the Supreme State Prosecution	2008-2009, Ongoing	Training needs assessed No. of trainings compared to planned; Total No. of organized trainings; No. of trainings per fields covered; No. of participants; No. of participants per training	Lack of budgetary and/or external funding	Yes	Yes
	Making requirement needs plan for the Department 1. Purchase of technical and communication equipment	Police Administration	2008-2009	Requirement needs plan made; 1. Equipment purchased and operating; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
3) Capacity building of the police with regard to criminal-intelligence affairs and the use of secret surveillance measures (SSM)	Reorganization of the existing Department for special control through introduction of new activities: 1. Establishment of the DESK activities at central and regional level 2. Introduction of criminal-intelligence affairs within the district police units 3. Adopting manual on criminal-intelligence work	Police Administration	2009	1. DESK activities established at central and regional level (pilot regions) 2. Organizational units for Criminal-intelligence affairs established within district police units 3. Manual on criminal-intelligence work adopted harmonized with European standards	Delays in the adoption of the changes and amendments of the Rulebook on internal organization and systematization	Yes	Yes
	Providing functional working space for the needs of Department for special control	Police Administration	2008.	Functional working space provided	No risk	Yes	-
	Recruitment of necessary staff	Police Administration	2008, Ongoing	Recruitment model developed; staff fulfillment accomplished; % of fulfillment compared to systematization	Delays in the adoption of the changes and amendments of the Rulebook on internal organization and systematization	-	-
	Implementation of: 1) Basic trainings 2) Specialized trainings	Police Administration	2008-2009, Ongoing	1) No. of implemented basic training; No. of participants per training 2) No. of implemented specialized training; Fields covered by training; No. of participants per training	Lack of budgetary and/or external funding Lack of staff determined for	Yes	Yes

					specialized trainings		
	Requirement needs assessment and purchase of technical equipment for the use of SSM	Police Administration	2008-2009, Ongoing	Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Establishment of unified database of operational intelligence data	Police Administration	2008-2009	Unified database established	No risk	Yes	-
	Securing links and connections with computer networks and databases in telecommunication service providers, in accordance with the police authorization, envisaged in the Criminal Procedure Code	Police Administration	2008	Links established and police access to the computer networks and databases in telecommunication service providers enabled	Lack of readiness of the mentioned institutions to allow the police to use their databases, lack of funds for implementation	Yes	-
	Signing of the agreement with the Central Bank in order to secure the funds for the implementation of SSM, making reports on its implementation	Police Administration, Central Bank of Montenegro	2008	Agreement with the Central Bank signed; periodical reports on its implementation made	No risk	Yes	-
4) Capacity building of the police in the fight against trafficking in human beings	Monitoring implementation of the memorandum on cooperation between responsible ministries and NGO's in the field of fight against trafficking in human beings	National Coordinator Office for fight against trafficking in human beings, Police Administration	2009 Ongoing	Making periodical information on accomplished cooperation	No risk	-	-
5) Capacity building of the police in the fight against smuggling of drugs	Adoption of the National strategy for the fight against drugs and prevention of drug use, with annual action plans	Government of MNE (working group)	2008	National strategy for the fight against drugs and prevention of drug use adopted	No risk	-	-
	Training needs assessment and organizing trainings for officers of the Center for fight against drugs and smuggling	Police Administration Police Academy	Ongoing	Training needs assessed No. of trainings compared to planed; No. of organized specialized trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Training needs assessment and organizing trainings for police officers on fight against smuggling of drugs procedure	Police Administration Police Academy	Ongoing	Training needs assessed No. of trainings compared to planed; No. of organized trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Requirement needs assessment and purchasing equipment for the needs of Center for fight against drugs and smuggling	Police Administration	2008-2009	Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Provision of adequate working space	Police Administration	2008.	Adequate working space provided	No risk	Yes	-

		for the needs of Center for fight against drugs and smuggling						
6) Capacity building of the police in the field of witness protection		Training needs assessment and organizing trainings for officers of the witness protection Unit	Police Administration	Ongoing	Training needs assessed No. of trainings compared to planed; No. of organized trainings for officers of the witness protection Unit; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
		Requirement needs assessment and purchasing of specialized equipment for the witness protection Unit	Police Administration	2008.-2009	Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
		Signing bilateral agreements with adequate departments in other countries in order to exchange protected witnesses	Police Administration	2008, Ongoing	No. of signed agreements	No risk	Yes	Yes
7) Capacity building of the police in the use of forensic and other criminal investigation techniques		<ol style="list-style-type: none"> 1) Needs assesment and Technical equipping of the Center for criminal technique 2) Reorganization of forensic unit 3) Training needs assessment and organizing trainings 4) Requirement needs assessment and purchasing of modern laboratory and other equipment 5) Implementing standards ISO 17025 	Police Administration	<ol style="list-style-type: none"> 1. 2008, Ongoing 2. 2008 3. Ongoing 4. 2008-2009 5. 2009 	<ol style="list-style-type: none"> 1) Needs assesed; Currency of purchased compared to required equipment 2) Reorganized unit 3) Training needs assessed No. of trainings compared to planed; No. of organized trainings; No. of participants 4) Needs assesed; Currency of purchased compared to required equipment 5) Standards ISO 17025 implemented 	Lack of budgetary and/or external funding	Yes	Yes
8) Capacity building of the police in the fight against terrorism		Development of the Strategy for fight against terrorism	Ministry of Internal Affairs and Public Administration in cooperation with Police Administration, Agency for National Security, Ministry of Justice, NGO	2008-2009	Strategy developed	No risk	-	-
		1. Training needs assessment and organizing trainings for officers in the field of fight against terrorism Specialized training: <ol style="list-style-type: none"> 1) for IED operations (elimination of danger from improvised explosive devices) 2) for PAS (protection against sabotage) 3) for negotiations with hijackers (terrorists) 	Police Administration Police Academy	Ongoing	1. Training needs assessed 2. No. of trainings compared to planed; No. of organized trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
		Requirement needs assessment and purchasing equipment for the needs of	Police Administration	2008.-2009	Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary	Yes	Yes

	criminality police Sector dealing with suppression of terrorism				and/or external funding		
	Capacity building of the existing Special Anti-terrorist unit (SAU) 1) Training plan making 2) Implementation of continuous training 3) Requirement needs assessment and Purchase of modern equipment and arms	Police Administration	1) III quarter 2008, 2,3) Ongoing	1) Training plan made 2) No. of carried trainings compared to planed; No. of trained staff 3) Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
9) Capacity building of the police in the fight against cross-border crime	Training needs analysis and organization of continuous training for the officers in the border police Sector	Police Administration Police Academy	Ongoing	Training needs assessed and number of organized trainings compared to planed; No. of carried trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Requirement needs assessment for purchasing equipment for surveillance and securing the state border. 1.) Purchase of equipment for surveillance and securing the state border and discovery of cross-border crime	Police Administration	2008.-2009	Requirement needs plan determined 1. Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Better quality cooperation at bilateral and regional level (consulting meetings, planning and conduction of mutual activities etc.) and making reports on cooperation with recommendations submitted to the National Commission	Police Administration (border police Sector) and border polices of neighbor countries	Ongoing	No. of implemented joint actions; No. meetings organized; No. of reports made; No. of recommendations given; No. of recommendations implemented; No. of reports submitted to the National Commission	Insufficient interest of countries in region for more qualitative cooperation	-	-
10) Capacity building of the police through international police cooperation	Reorganizing actual NCB Interpol and forming organizational unit for international police cooperation within whose scope there will be: 1) Interpol NCB 2) Europol NCB	Police Administration	2008-2009	Organizational unit for international police cooperation formed within whose scope are systemized: 1) NCB Interpol 2) NCB Europol	No risk	-	-
10.1. International police cooperation trough Interpol	Direct connection with the communication system I-24/7 in order to establish communication with Interpol	Police Administration (NCB Interpol) in cooperation with Interpol General Secretariat	Ongoing	Use of I-24/7 system in the exchange of police data	No risk	Yes	
	Training needs assessment and training of officers who will perform duties regarding international police cooperation trough Interpol 1) Training for the use of Interpol systems	Police Administration	Ongoing	Training needs assessed and number of carried trainings compared to planed; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Participation of the Interpol NCB	Police Administration	Ongoing	No. of working groups and bodies where the	Lack of	Yes	Yes

		officers in the Interpol's working bodies, groups and projects, with the aim of fight against international organized crime in region			Interpol NCB officers participated compared to total number of working bodies and groups treating problems of fight against organized crime in region (to whom Montenegro belongs too)	budgetary and/or external funding		
		Requirement needs assessment and working equipment acquisition in accordance with recognized Interpol trends in development hardware and software communication equipment	Police Administration	2008-2009	New hardware and software solutions identified; requirement needs assessed, currency of acquired compared to required equipment; Acquired equipment; equipment operating	Lack of budgetary and/or external funding	Yes	Yes
		Extension Interpol' services at border crossings with the purpose of performing direct searching in the Interpol's database and certifying persons, travel papers and vehicles at BCP's	Police Administration	2008-2009	No. of BCP networked with the Interpol compared to total number of BCP	Lack of budgetary and/or external funding, providing adequate infrastructure at the BCP's in order to install Interpol's Communication systems	Yes	Yes
10.2. International police cooperation trough Europol		Signing strategic agreement with Europol in order to provide data exchange between Europol and Police Administration	Police Administration	2008	Strategic agreement signed; No. of cases when data have been exchanged	Europol's decision on the term of signing the Agreement with Montenegro	-	-
		Forming the Europol National Central Bureau	Police Administration	2008-2009	Europol NCB formed	No risk	-	-
		Recruiting required staff within the Europol NCB	Police Administration	2008-2009	Europol NCB fulfilled; % of hired personnel	No risk	-	-
		Establishment of secure communicational system for data exchange with Europol	Police Administration in cooperation with Europol	2009	Secure communicational system for data exchange with Europol established	Delay in signing strategic and operational agreement, which is a condition for system establishment	Yes	Yes
		Training needs assessment and carrying out trainings for officers of Europol NCB in order to use Europol's analytic-intelligence programs in information processing	Police Administration in cooperation with Europol	2008, Ongoing	Training needs assessed and number of carried trainings compared to planed; No. of trainings; No. of participants; Educated staff for using modern analytic-intelligence programs	Lack of budgetary and/or external funding	Yes	Yes
A.3. JUDICIARY								
3.	Capacity building of courts	Apply consistently the principle of random allocation of cases through the	Court President	Ongoing	No. of courts with electronic allocation of cases	No risk	-	-

	introduction of electronic case coding and allocation (using as much as possible the information technologies) 1) Regular and ongoing supervision of court administration by the Ministry of Justice pursuant to the Law on Courts 2) Strict application of the provisions on disciplinary responsibility of judges and the dismissal procedure pursuant to the Law on Courts	1) Ministry of Justice 2) Judicial Council		1) Acting upon reports of authorized officers of the Ministry of Justice 2) Number of proceedings compared to reported cases of disciplinary responsibility of judges			
	Strengthen the independence of the judiciary powers through making requirement plan for increasing financial resources in the budget allocation 1. Provide accumulation of salaries and special allowances to judges proceeding in cases with elements of corruption and organized crime	Judicial Council, Ministry of Finance	2008-2009	Accumulation plan made of determined financial resources in the budgetary allocation of MNE and level of resources accumulation per year	Lack of budgetary funding	Yes	-
	Establishing a Special Department for fight against organized crime, corruption, terrorism and war crimes within the High courts in Podgorica and Bijelo Polje	Judicial Council	III quarter of 2008	Department established; % of hired personnel for judges and associates; No. of cases in process; Total No. of sentences; No. of acquittal/conviction and revoked sentences	No risk	Yes	-
	Determine required number of judges within the Special Department for fight against organized crime, corruption, terrorism and war crimes within the High courts in Podgorica and Bijelo Polje	Judicial Council	III quarter of 2008	Required number of judges determined	No risk	Yes	-
	Dispose/ hire required personnel within courts, in accordance with determined needs	Judicial Council	IV quarter of 2008	Required personnel disposed/hired in courts compared to determined needs and % of hired personnel compared to required	No risk	Yes	-
	Establishment of the Judicial Informational System with integrated database and training of judges 1. Acquisition, development and analysis of statistic data related to perpetrators and felonies structure	Judicial Council	2009	Judicial Informational System established; No. Of courts connected with the Informational system; Periodical statistic reports; Training needs assessed and number of trainings compared to planed; No. of trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Determine requirements and provide protection of judges proceeding in cases with elements of corruption,	Judicial Council, Police Administration	IV quarter of 2008, Ongoing	Requirements for personal protection of judges determined; No. of judges to whom personal protection is provided	No risk	Yes	-

		organized crime, terrorism and war crimes						
		Develop separate annual and periodical training programs for judges proceeding in cases with elements of corruption and organized crime	Centre for Education of the Bearers of Judicial Function	IV quarter of 2008, Ongoing	Report of the Centre for Education of the Bearers of Judicial Function in developed annual and periodical training program	No risk		
		Carrying out trainings according to separate determined program	Centre for Education of the Bearers of Judicial Function	Ongoing	No. of judges passed through the training program; report of the Centre on training program realization; No. of carried compared to No. of planned trainings; Number and areas of trainings and number of participants per training	Lack of budgetary and/or external funding	Yes	Yes
		Determining Rules of Procedure of the Judicial Council with the purpose of establishing criteria and procedures for election of judges procedure	Judicial Council	II quarter of 2008	Rules of Procedure adopted and criteria and procedures established for election of judges procedure	No risk	-	-
B. EXTERNAL AUDIT OF THE BUDGET								
1.	Supervision of budgetary revenues and expenditures	External audit of the final budgetary account by State Auditors Institution	State Auditors Institution	Once a year (by the end of the second quarter) Ongoing	External budgetary audit report; No. of non-conformities and No. of recommendations; No. of corrective measures compared to total No. of non-conformities; No. of criminal charges after the audit	No risk	Yes	-
2	Supervision of regularity, effectiveness and efficiency of the operation of budgetary beneficiaries at the level of Montenegro and municipalities	Audit of budgetary spending	State Auditors Institution	Ongoing	Budget audit report; No. of implemented audits and submitted reports in spending units, accounts of settlement of municipalities and other subjects; No. of recommendations and % of accepted recommendations out of individual audits by audit subject; % of adopted recommendations by the Parliament out of the annual report of the State Auditors Institution; No. of specific reports; No. of non-conformities and No. of recommendations No. of corrective measures compared to total No. of non-conformities; No. of criminal charges for irregularities in budget management and allocation	No risk	Yes	-
		Strengthening administrative and technical capacities of the State Auditors Institution through: 1. Further technical equipment and introduction of Intranet into the State Auditors Institution 2. Electronically connecting with the Ministry of Finance and all consumer units – audited entities 3. Innovation of Methodological Instruction of Audit Performance of public sector auditing	State Auditors Institution	2009	Increased level of IT support in the State Auditors Institution; IT trainings for employees done; No. of trainings; No. of electronic connections with the consumer units – audited entities; Methodological manual innovated on the basis of acquisitions and experiences and EU audit standards for public sector	Lack of human resources for public sector audit	Yes	

3	Prevention of abuses in budgetary execution	Training plan making and trainings of persons in charge of budget management and allocation	State Auditors Institution and Human Resources Administration in cooperation with NGO	Ongoing	Training plan made; No. of new employed; No. of trainings; No. of participants	No risk	Yes	Yes
		Raising public awareness regarding the supervision of budgetary spending through the development and dissemination of a guide and a media campaign	State Auditors Institution, in cooperation with media and NGO	Ongoing	Guide book prepared; No. and kind of educational activities	No risk	Yes	Yes
		Preparation of public relations Strategy with the aim of timely information provided to the public on budgetary spending and the implementation of planned audits pursuant to the Law on State Auditors Institution	State Auditors Institution in cooperation with media and NGO	Ongoing	Strategy prepared; annual and periodical reports of the State Auditors Institution	No risk	-	-
C. INTERNAL AUDIT								
1	Supervision of the legality of operation of budgetary beneficiaries	Internal audit of budgetary spending by budgetary beneficiaries	Ministry of Finance– Department for Internal Audit	Ongoing	Budgetary audit report; No. of non-conformities and No. of recommendations, No. of corrective measures compared to total No. of non-conformities; No. of criminal charges after the audit	No risk	Yes	-
2.	Strengthening administrative capacities of new Sector for public internal financial control (PIFC)	Determining bylaws in accordance with new Law, reorganization of sector, recruitment, training	Ministry of Finance	2009.	No. of determined bylaws; Rulebook on internal organization and systematization of the Ministry of Finance changed; sector reorganized; No. of new employees; No. of trainings; No. of established units for internal audit of budgetary beneficiaries; Guide book for internal auditing determined	No risk	Yes	-
D. INSTITUTIONAL CAPACITY BUILDING FOR ANTICORRUPTION POLICY IMPLEMENTATION IN PRIVATISATION PROCESS								
1	Establish efficient privatization process control by Parliament	1. Establishment the Commission for monitoring transparency in privatization process 2. Development Rules of procedure of Commission 3. Efficient work of the Commission and cooperation with institutions involved in privatization	1. Parliament 2. 3. Commission for monitoring transparency in privatization process	1. Immediately after adoption AP 2. 30 days after adoption AP 3. Ongoing	1. Commission established 2. Rules of procedure adopted 3. No. of meetings of Commission; No. of inquiries submitted to institutions involved in privatization and No. of acquired responses; No. of consultative hearings and recommendations and level of recommendation accomplishment	No risk	-	-

2.	Capacity building of external (state) audit in privatization process control	Auditing legality and efficiency of management the state assets and obligations, budgets and all financial affairs of subjects whose financial resources are public or issued by using state assets	State Auditors Institution	Ongoing	No. of included new kinds of audit into the annual audit plans (preliminary, control, intersection audit, efficiency audit of subject's operations); No. of performed audits and submitted reports; No. of recommendations given and % of accepted recommendations by audit subject out of individual audits; periodical reporting to the National Commission	No risk	-	
3	Observe the principle of transparency in privatization	Organizing public discussions on privatization plans and strategies for entities of strategic significance, particularly in the area of energetic, traffic, tourism and public companies privatization	Ministry for Economic Development, Ministry of Transport, Maritime Affairs and Telecommunications, Ministry of Agriculture, Ministry of Tourism and Environmental Protection	Ongoing	Reports on number of organized public discussions; No. of participants, No. of comments; No. of accepted compared to No. of rejected comments; Manner of submitting feedbacks on accepting/rejecting comments to the public discussion participants	No risk	Yes	-
		Establish a system to control investments in privatized companies	Privatization Council Montenegrin Agency for Economic Restructuring and Foreign Investments	Ongoing	System established; No. of companies included in system; No. of violations of privatization contracts; No. of terminated contracts due to non-compliance with contractual obligations	No risk	-	-
		Making reports on published public tenders for election legal and financial advisers in privatization	Privatization Council	Ongoing	No. of published tenders and other related information in reporting period		-	
		Informing the public and the employees of their rights to participate in decision-making and monitoring of the privatization process	Privatization Council, Montenegrin Agency for Economic Restructuring and Foreign Investments	Ongoing	No. of submitted inquiries and questions in written form, directly to Privatization Council and Montenegrin Agency or to the News-paper "Pobjeda"; No. of responses sent to citizens and employees	No risk	-	
		Providing access to all information related to privatization on the basis of Law on free access to information	Montenegrin Agency for Economic Restructuring and Foreign Investments	Ongoing	No. of positive/negative replies compared to No. of requests received; No. of decisions revoked by court	No risk	-	-
		Posting all the documents significant for privatization process transparency at the Agency web site (tenders and other materials related to privatization under the competency of Privatization Council and Montenegrin Agency for Economic Restructuring and Foreign Investments)	Montenegrin Agency for Economic Restructuring and Foreign Investments	Ongoing	No. of posted tenders and other documents at the web site of the Agency in the reporting period	No risk	-	-
4	Integrity development of officers involved in privatization process	1. Implementing procedures for reporting non-compliances and corruption in privatization	1. 2. Commission for examining comments, complaints, prepositions	Ongoing	1. 2. – Report on work of the Commission; total number of reports, anonymous reports; institutions whom reports were submitted;	No risk	-	-

		2. Implementing procedures for reporting conflict of interest in privatization	and suggestions of citizens and other subjects on privatization process		feedbacks form competent institutions			
		Developing Booklet for reporting instances of corruption in privatization process	Anticorruption Initiative Administration, in cooperation with Commission for examining comments, complaints, prepositions and suggestions of citizens and other subjects on privatization process	2008	Booklet developed	No risk	-	-
E. ADMINISTRATION FOR PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING								
1	Harmonization of the operation of the Administration for Prevention of Money Laundering and Terrorism Financing with the new legislative framework	Capacity building of the Administration for Prevention of Money Laundering and Terrorism Financing trough: 1. Changing and adoption of the new Regulations on Internal Organization and Systematization in accordance with the Law on Prevention of Money Laundering and Terrorism Financing 2. Establishment of the Department for the Supervision of reporting entities 3. Recruiting personnel as per the new Regulations on Internal Organization and Systematization and new staff training	Administration for Prevention of Money Laundering and Terrorism Financing, Ministry of Finance, Government of MNE	1, 2 III quarter of 2008. 3. 2008	1. Regulations adopted 2. Department established 3. Increased No. of new employees within the Administration; no. of new employed; Total No. of trainings; No. of trainees	1,2,No risk 3. Lack of human and financial capacities	Yes	-
		Determining risk analysis directives	Administration for Prevention of Money Laundering and Terrorism Financing and other in line bodies out of the article 86 of the Law on Prevention of Money Laundering and Terrorism Financing (except physical persons)	2008.	Directives determined by Administration for Prevention of Money Laundering and Terrorism Financing, Central Bank of MNE, Agency for insurance Supervision, Administration for games of chance, Commission for valuable papers, Prevention of Money Laundering and Terrorism Financing Strategy	No risk	-	

2	Training of the employees of the Administration for Prevention of Money Laundering and Terrorism Financing	Participation to seminars organized by international institutions	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	No. of attendees; No. of seminars whereon the representatives of the Administration participated	Lack of budgetary and/or external funding	Yes	Yes
		Participation of the representatives of the Administration in the working groups of the Egmont Group	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	No. of meetings of EGMONT whereon the representatives of the Administration participated	Lack of budgetary resources	Yes	-
3	Updating /amending list of indicators of suspicious transactions related to new methods of money laundering and terrorism financing	Current status analysis and, accordingly needs assessment for defining amended list of indicators (in accordance with the article 46 of the Law, list of indicators is being determined by Ministry of Finance on the basis of professional ground prepared by the Administration for Prevention of Money Laundering and Terrorism Financing in cooperation with other in line bodies)	Ministry of Finance, Administration for Prevention of Money Laundering and Terrorism Financing, Central Bank of MNE, in cooperation with other in line bodies out of the article 86 of the Law on Prevention of Money Laundering and Terrorism Financing (except physical persons)	Ongoing	Total number of new indicators; Potentially, amended list of indicators of suspicious transactions determined	No risk	-	-
4	Training of authorized persons and employees of reporting entities	Making training plan for the purpose of organizing seminars for authorized persons of reporting entities and the employees having direct contact with clients	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	Training plan made; Total number of seminars and conferences as per institutions and areas	Lack of budgetary and/or external funding	Yes	Yes
5	Enhancing regional cooperation	Agreement implementation analysis on cooperation with financial intelligence units within the region, and needs assessment for signing new agreements	Administration for Prevention of Money Laundering and Terrorism Financing	2008, Ongoing	Needs assessment analysis made on signing bilateral on exchange financial-intelligence data, information and documentation with authorized bodies of other countries, as well as international organizations; No. of submitted reports on suspicious transactions to prosecution/police, as a result of international cooperation	No risk	-	-
		Innovate current or signing new cooperation agreements with FIU from the region on the basis of conducted analysis	Administration for Prevention of Money Laundering and Terrorism Financing	2008, Ongoing	Total number of agreements compared to assessed needs for signing new or innovating current agreements	No risk	-	-
		Maintaining regional meetings with the FIU from the neighboring countries	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	No. of regional meetings	Lack of budgetary and/or external funding	Yes	Yes
6	Enhancing internal cooperation	Agreement implementation analysis on cooperation with other authorized state bodies and organizations	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	Analysis made; No. of submitted reports on suspicious transactions to prosecution/police as a result of inter institutional cooperation	No risk	-	-

			and other bodies (Police Administration, Tax Administration, Customs Administration, Commission for valuable papers, Central Bank of MNE), and in line ministries					
		Innovate individual cooperation agreements with other authorized state bodies and organizations and signing new agreements in accordance with conducted analysis	Administration for Prevention of Money Laundering and Terrorism Financing and other bodies (Police Administration, Tax Administration, Customs Administration, Commission for valuable papers, Central Bank of MNE), and in line ministries	Ongoing	Total number of new agreements as well as No. of innovated agreements	No risk	-	-
7	Preparation of particular Program for fight against money laundering and terrorism financing	In accordance with the need to prepare new Program for fight against corruption and organized crime, it is necessary to prepare and develop its significant segment – Program for fight money laundering and terrorism financing for period 2010 – 2012	Administration for Prevention of Money Laundering and Terrorism Financing in cooperation with: Ministry of Justice, Ministry of Internal Affairs and Public Administration, Agency for National Security, Police Administration, Tax Administration, Customs Administration, Supreme State Prosecutor, courts, Anticorruption Initiative Administration, Commission for valuable papers, State Auditors Institution, Central Bank of MNE Agency for insurance Supervision,	2009	Analytical background prepared for Program making; Program for fight money laundering and terrorism financing for period 2010 – 2012 prepared Action plan for its implementation prepared	No risk	-	-

			Administration for games of chance, Bank Association, NGO					
F. PUBLIC PROCUREMENT								
1	Capacity building for implementation of Law	Needs assessment and recruiting new staff	Public Procurement Directorate, Commission for the Control of Public Procurement Procedure	Ongoing	No. of recruited staff compared to No. of capacity needs	Lack of budgetary resources	Yes	-
		Making training needs plan and conducting trainings for implementation of Law on Public Procurement (Public Procurement Directorate, public procurement officers and bidders)	Public Procurement Directorate, Human Resources Agency	Ongoing	Training needs plan made; No. of trainings compared to no. of needed; No. of trained staff	No risk	Yes	Yes
		IT Training for public procurement officers and bidders	Public Procurement Directorate in cooperation with Secretariat for Development	2008.	No. of trainings, No. of trained staff	Lack of budgetary and/or external funding	Yes	Yes
2	Provision for efficient implementation of the Law on Public Procurement in fight against corruption	Develop Public Procurement Manual	Public Procurement Directorate, in cooperation with Commission for the Control of Public Procurement Procedure	III quarter of 2008.	Public Procurement Manual developed	No risk	Yes	Yes
		Provisions of conditions for the implementation of the Public Procurement Law regarding the electronic public procurement system	Public Procurement Directorate in cooperation with Secretariat for Development	2008-09	The electronic public procurement system established	Lack of budgetary resources	-	Yes
		Creation of the electronic register book	Public Procurement Directorate	2008-09.	Electronic register book established	Lack of budgetary and/or external funding	Yes	Yes
		Develop comparative analysis on the protection of the rights of bidders in the Western Balkan countries	Public Procurement Directorate	2008. Ongoing	Comparative analysis done	No risk	Yes	Yes
		Report irregularities with the elements of corruption in the public procurement procedures 1. Creating precise directives on corruption reporting procedure in public procurement and manner of handling reports of	Commission for the Control of Public Procurement Procedure	1. III quarter of 2008. 2, 3,4 Ongoing	1. Precise directives created and published 2. No. of reported cases; No. of non proceeded reported cases; No. of cases submitted to prosecution/police; No. of tenders canceled due to reported cases; No. of criminal charges 3. No. of submitted information to the Police Administration compared to determined	No risk	-	-

		citizens 2. Operating of a phone line to report corruption 3. Informing the prosecution and police on determined irregularities with the elements of corruption in the public procurement procedures 4. Making six-month reports on work of a phone line to report corruption and posting reports at the website			irregularities; No. of criminal charges submitted to prosecution/police based on irregularities observed by the Commission for the Control of Public Procurement Procedure 4. Reports on work of a phone line made and posted at the web site			
		Making and submitting reports on procurement plans monitoring compared to envisaged and accomplished shopping methods (regarding to legal limitation to announce the shopping method not more than twice a year for services, goods and pursuits) and canceling procedures in the cases of legal offences	Commission for the Control of Public Procurement Procedure	III quarter of 2008, Ongoing	No. of reports made; No. of enforcers of the Law whose public procurement plans are monitored; No. of tenders canceled due to announcing more than two shopping methods; No. of charges submitted to prosecution/police based on received information	No risk	-	-
		Making and posting six-month reports on state of affairs of the public procurement, observed irregularities and proposed measures to improve the system	Public Procurement Directorate	III quarter of 2008, Ongoing	No. of posted reports; No. of proposed measures; No. of accomplished proposed measures	No risk	Yes	Yes
3	Provision of better transparency and efficiency in the public procurement procedure and protection of the rights of bidders	Posting complaints and issuing of complaints at the particular part of the Commission for the Control of Public Procurement Procedure web site	Commission for the Control of Public Procurement Procedure	III quarter of 2008, Ongoing	No. of submitted compared to No. of posted complaints; No. of positive/negative issuing of complaints; No. of charges submitted to prosecution/police based on irregularities determined during the complaint procedure	No risk	-	-
		Posting at the web site procurement plans of all enforcers of the Law in a time limit envisaged by Law	Public Procurement Directorate	III quarter of 2008, Ongoing	No. of posted procurement plans compared to No. of enforcers	No risk	-	-
G. COMMISSION FOR ESTABLISHING CONFLICT OF INTEREST								
1	Efficient control of the accuracy of submitted data	Application of the obligation to submit information to the State prosecutor on false declaration off assets	Commission for Establishing the Conflict of Interests	Ongoing	No. of submitted pieces of information compared to the no of irregularities determined	No risk	-	-
		Making needs analysis for capacity building of Commission for	Commission for Establishing the Conflict	2008	Analysis made	No risk	-	-

		Establishing the Conflict of Interests due to new competencies envisaged by new Law on Prevention of Conflict of Interest in carrying out public function 1. In accordance with determined needs, modify the Rulebook on internal organization and systematization of working positions 2. Accordingly to modified Rulebook, enhance human resources	of Interests		1. Rulebook modified 2. New staff recruited due to modified Rulebook			
2	Training for all those involved in the implementation of Law on Prevention of Conflict of Interest in carrying out public function	Training for public officials (local officials), NGO representatives, Media representatives	Commission for Establishing the Conflict of Interests, in cooperation with NGOs and the media	Ongoing	No. of trainings; no of persons who have undergone training	Lack of budgetary and/or external funding	Yes	Yes
H. STATE ELECTION COMMISSION								
1	Continue with the harmonization of functioning with legislation framework and capacity building of the State Election Commission	Adopting new Rulebook on internal organization and systematization of the State Election Commission	State Election Commission	2008.	Rulebook adopted	No risk	-	-
		Establishing Department for monitoring transparency of political parties and candidates financing, in accordance with the Law on State Election Commission	State Election Commission	2008.	Department for monitoring transparency of political parties and candidates financing established	Adoption of the Law on State Election Commission	Yes	-
		Establishing the Unit within the State Election Commission for submitting and processing reports on instances of misuses and pressures put on electors during the election process	State Election Commission	2008	No. of reports of citizens; No. of reports submitted to the Police Administration; No. of submitted misdemeanor or criminal charges; No. of sentences	Adoption of the Law on State Election Commission	-	-
		Enhance human resources according to new Rulebook on internal organization and systematization	State Election Commission	2008.	No. of new staff	Lack of human and financial capacities	Yes	Yes
		Training plan making and education of employees and members of both the State Election Commission and election commissions in the municipalities	NGO, State Election Commission	2008, Ongoing	Training plan made; No. of trainings compared to planned; No. of participants	Lack of human and financial capacities	Yes	Yes

2	Integrity development of the State and Municipality Election Commissions	Development of a Code of Ethics for public servants within the State Election Commission and election commissions in the municipalities	State Election Commission	2008.	Code of Ethics developed	No risk	-	-
		Establishing Ethical Board	State Election Commission	2008.	Ethical Board established	No risk	-	-
		Making annual analysis on implementation of the Code of Ethics	Ethical Board of the State Election Commission	2008	Annual analysis on implementation of the Code of Ethics made; No. of disciplinary initiatives for non observance of the Code of ethics	No risk	-	-
		Organizing periodical trainings on implementation of the Code of Ethics	Ethical Board and NGO	2008	No. of trainings held; No. of State and Municipal members of election commissions participated at trainings	Lack of budgetary and/or external funding	Yes	Yes
		Building technical capacities via embedding needs and required equipment acquisition	State Election Commission	2008	Required equipment acquired in accordance with identified needs.	Lack of budgetary and/or external funding	Yes	Yes
3	Enhancing financial transparency in work of the State Election Commission	Making detailed financial annual report for elections carried out by State Election Commission and election commissions in the municipalities and posting reports at the website	State Election Commission and election commissions in the municipalities	Ongoing	No. of posted reports	No risk	-	-

I. TAX ADMINISTRATION

1	Prevention of corruption within the Tax Administration	Making six-month reports on work of a phone line to report corruption and posting reports at the website	Tax Administration	Ongoing	No. of reported instances of corruption; No of filed complaints to the in line bodies compared to No. of reported cases; reports posted at the website of Tax Administration	No risk	Yes	Yes
		Strengthening the Internal Control Department of the Tax Administration 1) Training of staff of the Internal Control Department 2) Making six-month reports on performed internal controls	Tax Administration	1; 2; Ongoing	1) No. of trainings undertaken and no of persons who have undergone training 2) Reports made: No. of irregularities identified; No. of disciplinary initiatives compared to no. of irregularities identified; No. of denunciation/information submitted to the prosecution/police	No risk	Yes	-
		Strengthening external control through: Six-month reporting on supervision and their posting on the websites of the Ministry of Finance and the Tax Administration	Ministry of Finance	III quarter of 2008 Ongoing	Reports made and posted at the websites; No. of irregularities identified; No. of denunciation compared to no. of irregularities identified	No risk	-	-

		Monitoring the observance of the Code of ethics of public servants within the Tax Administration	Tax Administration	Ongoing	Number of servants disciplinary sentenced for non observance of the Code of ethics	No risk	-	-
2	Automation of the taxing procedure	IT training of staff	Tax Administration	Ongoing	No. of trainings; No. of trainees	No risk	Yes	-
3	Enhanced cooperation with the police and prosecutors	Making reports on realization of the signed agreements on cooperation	Tax Administration	Ongoing (quarterly)	Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to signed agreements	No risk	-	-
		Enable the police to have direct access to Tax Administration databases	Tax Administration, Police Administration	II quarter of 2008, Ongoing	Direct access to Tax Administration databases enabled due to signed agreements	No risk	-	-
J. CUSTOMS ADMINISTRATION								
1	Prevention of corruption in customs services	Enhance the system of communication with the public 1) Create a campaign whereby the public will be informed that on a current phone line for reporting instances of smuggling, instances of corruption in the Customs Administration can be reported as well 2.) Establish an orderly operating centre for informing the public on customs procedures 3.) Making six-month reports on reporting instances of corruption 4) Development of Guidelines for the public	Customs Administration	1. 2008 2. 2008 3. Ongoing 4. III quarter of 2008	1. Campaign created and conducted 2. Orderly Operating Centre established 3. Six-month reports made: number of reported instances of corruption, no of complaints filed with competent bodies compared to the number of instances, reports posted at the Customs Administration website and submitted to the National Commission 4. Guidelines developed	No risk	Yes	Yes
		Revision of the Action Plan on integrity development in customs service	Customs Administration	2008.	Action Plan revised, in accordance with the Arusha Declaration	No risk	-	-
		Strengthening the Internal Control Department of the Customs Administration : 1) Training of staff of the Internal Control Department 2) Development of Rules of Operation for the Internal Control Department 3) Making six-month reports on performed internal controls 4) Establishing a data base of the Internal Control Department	Customs Administration	1. Ongoing 2. III quarter of 2008 3. Ongoing 4. 2008	1) No. of trainings undertaken and No. of persons who have undergone training 2) Rules of Operation made, 3) Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to irregularities identified in the customs officers performance 4) Database established	No risk	Yes	-

		Strengthening external control through making six-month reports supervision and their posting on the websites of the Ministry of Finance and the Customs Administration	Ministry of Finance	I quarter of 2008.	Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to irregularities identified	No risk	-	-
		Development of a Code of Ethics for public servants within the Customs Administration	Customs Administration	III quarter of 2008.	Code of Ethics made	No risk	-	-
		Monitoring the observance of the Code of ethics of public servants within the Customs Administration	Customs Administration	Ongoing	Number of servants disciplinary sentenced for non observance of the Code of ethics	No risk	-	-
2	Automation of customs procedure	IT training of staff	Customs Administration	Ongoing	No of trainings, no of trainees	No risk	Yes	-
		Strengthening technical capacities in terms of acquisition of modern technical equipment at the border crossing points for identification of goods illegally transported over border crossings	Customs Administration	2008, Ongoing	Equipment purchased for scanning vehicles at border crossings for finding hidden goods	Lack of budgetary and/or external funding	Yes	Yes
3	Enhanced cooperation with the police and prosecutors	Sign agreements on cooperation	Customs Administration, Police Administration, Supreme State Prosecution	II quarter of 2008.	Agreements signed	No risk	-	-
		Making reports on realization of the signed agreements on cooperation	Customs Administration	Ongoing (quarterly)	Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to signed agreements	No risk	-	-
		Enable the police to have direct access to Customs Administration databases	Customs Administration, Police Administration	I quarter of 2008. Ongoing	Direct access to Customs Administration databases enabled due to signed agreements	No risk	-	-
K. ANTI-CORRUPTION INITIATIVE DIRECTORATE								
1	Capacity building of the Administration for Anti-corruption Initiative	Enhance human and financial resources of the Administration for Anti-corruption Initiative for carrying out new competencies, according to the Changes and amendments of the Regulation through: 1. Systematization of new working positions in the Department for promotion preventive performance (7 new working positions) 2. Providing adequate working premises 3. Acquisition of required computer and office equipment	Administration for Anti-corruption Initiative	Ongoing 1. 2008 2. 2009 3. 2008	1. New Systematization adopted, open competition announced, new staff employed, number of trainings 2. Adequate working premises provided 3. Equipment purchased	Lack of human and financial capacities	Yes	-

2	Raising the level awareness and encourage the public to report instances of corruption	Development and distribution of surveys on the existing forms, causes and methods of the appearance of corruption	Administration for Anti-corruption Initiative, NGO, Media	Ongoing	Number and scope of conducted researches, number of fields covered by researches, reports published at the website	Lack of budgetary fund, survey methods	Yes	Yes
		Development and dissemination of information and promotion materials	Administration for Anti-corruption Initiative	Ongoing	Information and promotion materials developed and disseminated	Lack of budgetary fund	Yes	Yes
3	Proposals for introduction and application of European and other international anticorruption standards and instruments	Coordinate the activities on promotion and implementation of the Council of Europe's Civil and Legal Convention on Corruption	Administration for Anti-corruption Initiative in cooperation with competent bodies	Ongoing	Report on realized activities	Financial and human capacities, cooperation with competent bodies	Yes	Yes
		Coordinate activities regarding full implementation of the UN Convention against Corruption 1) Preparation of current legislation amendment proposals in accordance with the Analysis results on level of harmonization with the UN Convention against Corruption and undertaking specific measures towards full implementation of the UN Convention against Corruption	Ministry of Internal affairs and Public Administration, Ministry of Finance, Administration for Anti-corruption Initiative	2008-2009	Prepared proposals on law changes	No risk	Yes	-
4	Compliance with the obligations undertaken under RAI (Regional Anticorruption Initiative) and GRECO (Council of Europe's Group of States against Corruption)	Coordinate activities undertaken within the RAI (Regional Anticorruption Initiative) and GRECO	Administration for Anti-corruption Initiative	Ongoing	Report on realized activities	Institutional, human and financial resources	Yes	Yes

ABBREVIATIONS

AP	Action plan
MAfERaFI	Montenegrin Agency for Economic Restructuring and Foreign Investments
CCCR	Commercial Court Central Register (in Podgorica)
PPD	Public Procurement Directorate
DNA	Deoxyribonucleic acid
SAI	State Audit institution
EAR	European Agency for Reconstruction
EU	European Union
FIU	Financial Intelligence Unit
GRECO	Group of Countries of South East Europe for fight against Corruption
IED	Improvised Explosive Devices
IT	Informational technologies
SEE	South East Europe
CC	Criminal Code
MFA	Ministry of Foreign Affairs
SSM	Secret Surveillance Measures
Mol&PA	Ministry of Internal Affairs and Public Administration
NCB	National Central Bureau
NGO	Non-Governmental Organizations
PACO	Program Against Corruption and Organized Crime in u South East Europe
PIFC	Public Internal Financial Control
CDP	Counter-Diversion Protection
RAI	Regional Anti-corruption Initiative
RMNE	Republic of Montenegro
SAT	Special Anti Terrorist Unit
CE	Council of Europe
SEI	Secretariat for European Integrations
ACI	Administration for Anti-corruption Initiative
UN	United Nations
UNTOC	United Nations Convention against Trans national Organized Crime
HRA	Human Resources Agency
APMLTF	Administration for Prevention of Money Laundering and Terrorism Financing
CPC	Criminal Procedure Code
SSP	Supreme State Prosecution

Commission in charge of drafting the changes and amendments of the Action Plan for Fight against Corruption and Organised Crime	
President	Dejan Đurović , NCB Interpol, Police Administration
Members	Petko Spasojević , Head of the Department for Combating Commercial Crime, Police Administration
	Petar Stojanović , Supreme Court
	Veselin Vučković , Supreme State Prosecution
	Željko Tomović , Advisor to the Minister, Ministry of Justice
	Nada Vukanić , Ministry of Internal Affairs and Public administration
	Rajko Malović , Head of the Department for Fight against Organized Crime, Police Administration
	Vanja Čalović , Coordinator, Network for Promotion of Non-governmental Sector
	Zlatko Vujović , NGO Centre for Monitoring (CEMI),
	Svetlana Rajković , Advisor Cabinet of Deputy Prime Minister for EU Integration
Secretary	Dimitrija Šaranović , Senior Advisor, Administration for Anti-corruption Initiative

ANNEX

REALIZED MEASURES FROM THE ACTION PLAN FOR PERIOD SEPTEMBER 2006 – DECEMBER 2007

I POLITICAL AND INTERNATIONAL OBLIGATION TO ACT

- Adopted Resolution on fight against corruption and organized crime -
- Established National Commission for monitoring implementation of the Program and Action Plan – Adopted Rules of Procedure of the National Commission, defined model of monthly reporting with monitoring plan, defined list of institutions obliged to submit reports, regularly delivered periodical reports,
- **Adopted laws directly relevant for fight against corruption and organized crime:**
- Law on liability of legal entities for criminal acts; Law on international legal assistance in criminal matters; Law on Amendments of the Law on preventing the money laundering and financing of terrorism; Law on wages of the judicial function bearers; Law on Public Procurement;
- Law on banks; Law on Amendments of the Customs Law; Data Secrecy Law; Law on liability of legal entities for criminal acts;
- **Drafted and adopted laws in domain of general legislative reform, the most important among them:**
- Law on Asylum; Law on Competition Protection; Law on Amendments of the Law on Financing of local self-government; Proposal Law on Aliens;
- **Ratified** CoE Civic-legal Convention on Corruption with supplementing Protocol on corruption;
- **Continuous analyzing of approximation of legislation** with international standards in field of fight against corruption and organized crime, and continuous approximation of legislation with the UN Convention (Palermo, UNTOC Convention), and other conventions in field of fight against organized crime;
- Continuous increasing of number of signed bilateral agreements on cooperation, especially in the region, gradual implementation of Declaration on ten common measures for fight against corruption in SEE, implementation of obligatory GRECO recommendations on assessment of anti-corruption measures and activities within Montenegro
- Continuous strengthening of technical and financial support for competent bodies through the MNE Budget; defining of priorities, drafting of project proposals and candidate them in international organization and institutions;
- European Commission and Council of Europe organized a number of missions and regularly reported on realized progress and defined relevant recommendations;

II GENERAL OBJECTIVES

A. EFFICIENT CRIMINAL PROSECUTION IN COMBATING CORRUPTION AND ORGANIZED CRIME

- Needs assessment for training of prosecutors, judges, and police is underway; continuous carrying out of the trainings and seminars;
- **Three-party Commission was established** (representatives of the Supreme Court, Supreme State Prosecutor's Office, and Police Directorate), which prepares quarter reports and evaluation of the number of cases; this Commission started to work on systematization of statistical indicators and preparation of the analysis of proving procedures and acts in pre-trial and investigation proceedings, and preparation of recommendations for future work
- **Statistic of cases-** Defined work methodology and unique statistic indicators on reported and processed cases in 2007 and 2006;
- Continuous reporting on activities undertaken in preventing abuse of application of secret surveillance measures (court control, parliamentary control, and police internal control)

B. PREVENTION AND EDUCATION

- **Continuous activities on improvement of working conditions and general standard of the judges and prosecutors:** technical equipping, providing of functional working premises, increase of wages of judges and prosecutors, prepared Code of Ethics of the prosecutors; established Office for reporting corruption in judiciary;
- **Police capacity strengthening** - continuous application of the Police Code of Ethics and strengthening of Ethical Committee; reorganized Internal Control Department in the Police Directorate; objectified criteria for selection of the police staff;
- **Strengthening of capacities of state employees and civil servants** – promoting of Code of Ethics of state employees and civil servants; significantly increased number of fulfilled obligation of public officials to regularly report on incomes and property; initiated registration of the gifts that officials receive through internal control system and reporting to the Commission; continuous updating and monitoring of the public register, which ensures transparency of the financial and property status of public officials;
- **Trainings** – Continuous training of state employees and civil servants, and education of the citizens and NGOs on implementation of the Law on Free Access to Information; prepared guidelines and manuals for access to information owned by the state bodies;

C. PUBLIC, CIVIL SOCIETY (INCLUDING PRIVATE SECTOR) AND MEDIA

- Continuous creating and implementing of various **public campaigns** aimed for more efficient participation of the citizens in fight against corruption and organized crime; prepared large number of informative material on corruption issues and manners to combat it; a number of institutions initiated preparing of the Integrity Plans; carrying out of first surveys on forms, causes, and mechanisms of corruption emergence;
- Amending of the Decree on organization and manner of work of the public administration strengthened competencies of the **Anti-Corruption Initiative Directorate**, which will enable carrying out of survey and preparation of the studies on status and fields of corruption within Montenegro, together with the recommendations for upgrading of activities in field of fight against corruption.
- Directorate carries out periodical **lectures** in high schools and faculties on corruption and organized crime;
- Continuous carrying out of the **media education** on corruption and organized crime, and on investigative journalism;
- In cooperation with the private sector, activities in field of enhancing the **fair and competitive business and investing** have been initiated and carried out;

D. LOCAL SELF-GOVERNMENT

- Ministry of Internal Affairs and Public Administration prepared the draft model for preparation of the local anti-corruption action plans relating to the competencies of the local self-government, on basis of which every local self-government should adopt own action plan in period to come;

III SPECIFIC MEASURES AGAINST CORRUPTION AND ORGANIZED CRIME

A. EFFICIENT CRIMINAL PROSECUTION AND TRIAL

A.1. PROSECUTOR'S OFFICE

- Increased number of prosecutors and partly ensured increase of wages and improvement of working conditions in the reporting period
- **Further implementation of the training of prosecutors** – continuous activities: informing prosecutors on international standards in field of fight against corruption and organized crime, implementation of the program, education of prosecutors in regard to crime cases with elements of corruption and organized crime (CC and CPC); implementation of the education program for criminal acts described in Chapter XXIII of CC, and Chapter XXVIII of CC, training on new forms of crime, on application of SSM;
- Acquisition of the equipment and expert literature for Department for combating organized crime is underway; specialization of prosecutors for prosecuting criminal acts with elements of corruption and organized crime, and strengthening of material and human resource capacities of this Department;
- Deputy Special Prosecutor for combating organized crime was appointed;
- A number of multilateral and bilateral agreements on cooperation was signed;
- Rules of Procedure on Internal Work of the State Prosecutor was adopted;

A.2. POLICE

- Rulebook on Internal Organization and Systematization of the Police Directorate was adopted, so as the Rulebook on application of police authorizations;
- Informant networks were created and rules for engagement of informants were defined;
- Organizational unit dealing with investigations of the criminal acts of corruption was established;
- Existing **Department for fight against organized crime** was reorganized, and organizational units in field of classical-general organized crime and financial organized crime were established (in framework of the last one, organizational unit for money laundering issues was established as well);
- Continuous carrying out of trainings for officers dealing with corruption and organized crime;
- Activities on establishment of operative database in field of organized crime have been initiated;
- Reorganization of the existing **Department for combating economic crime** in sense of defining organizational level and scope of work; established organizational unit in framework of Department for combating economic crime, which will deal with money laundering issues and financial investigations;
- Continuous trainings of the employed persons in **Department for fight against organized crime and corruption** in field of investigating corruption and financial investigations;
- **Special Verification Unit** was reorganized and organizational level was defined; functionality has been increased through establishment of units for: application of SSM and Operative analytics; necessary staff was partly engaged and educated;
- **Reorganization of the special team for fight against trafficking in human beings in sense of defining legal framework of work, organizational level, and scope of work – established teams for fight against trafficking in human beings** within all territorial organizational units; establishing of the database in order to collect and centralize data; continuous carrying out of

necessary specialized trainings, especially trainings and education of the police officers in regard to identification of the victims of the human trafficking (criminal prosecution, victims protection, and prevention);

- A number of memorandums on cooperation between line ministries and NGOs were signed in field of fight against trafficking in human trafficking;
- Reorganized **Center for fight against illicit drugs**; continuous specialized trainings for members of this Center, and trainings and education of the police members on procedure of fighting illicit drugs;
- Reorganized **Witness Protection Unit**; partly carried out trainings of the Witness Protection Unit members; specialized equipment acquired; signing of bilateral agreements with respective services of other countries is underway, aiming to exchange protected witnesses; provided adequate premises for functioning of Witness Protection Unit;
- **Crime Technique Department** – technical equipment of the Crime Technique Center (reorganized forensic unit, continuous trainings of the staff, equipment of the modern laboratory and other equipment);
- Reorganized existing **Working line for fight against terrorism** (established specialized units for collecting and processing of data, mine protection unit, organizational units in regional security centers); continuous specialized trainings for: IED operations (elimination of danger from improvised explosive devices), for CDP (counter-diversion protection), and negotiations with hijackers (terrorists); upgraded and improved horizontal and vertical linkage of all working lines;
- **Special ant-terrorist unit (SAT)** – continuous trainings and acquisition of modern equipment and weapons
- Reorganized **State Border and Border Matters Department** – organizing of continuous trainings for the members of this department; partly acquired surveillance equipment and equipment for securing the state border and discovering of cross-border crime; signing of bilateral and regional agreements on cooperation is underway, organizing of consultative meetings, planning and carrying out of joint activities;
- **NCB Interpol in Podgorica** has been opened; established direct connection with the communication system I-24/7 for global communication; continuous trainings for strengthening international police cooperation: trainings for using Police Directorate system, trainings for using of information system I-24/7, trainings for using analytical program I-2, specialized Interpol courses; partly acquired equipment necessary for work;

A.3. JUDICIARY

Partly introduced initial training and specialization, in accordance with the Law on Education in Judiciary; carrying out of regular and continuous monitoring of judicial administration by the Ministry of Justice, in accordance with the Law on Courts; strengthening of intern-institutional cooperation between the courts and other competent bodies (Prosecutor's Office, Police Directorate, Anti-Corruption Initiative Directorate).

B. EXTERNAL AND INTERNAL AUDIT OF THE BUDGET

Continuous realization of the external audit of final **budgetary account** by the State Audit Institution, and internal audit of budgetary spending of budgetary beneficiaries; continuous education of the persons responsible for budget management and allocation of the budgetary means;

C. PRIVATIZATION COUNCIL

Defined and established procedures for reporting conflict of interest in privatization and National Commission is being regularly reported about it; established sub-web site of the Privatization Council; defined procedures for realization of publicity and transparency when electing the advisors – esteemed consultancy agencies; continuous implementation of the Law on Free Access to Information; defined procedures for reporting irregularities and corruption in privatization, and also the phone line was opened for reporting the corruption in Agency for restructuring of the economy and foreign investments; established Commission for examination of the complaints, objections, proposals and suggestions of the citizens on privatization process;

D. DIRECTORATE FOR PREVENTING MONEY LAUNDERING

Adopted new Rulebook on internal organization and systematization; Directorate regularly participates in Working groups of Egromont Group; prepared expanded and amended list of indicators of suspicious transactions and it was delivered to reporting entities; continuous organization of seminars for authorized persons of the reporting entities and employees who are in direct contact with the clients; partly innovated single agreements on cooperation with FIU from the region, so as a number of single agreements on cooperation with other competent state bodies and organizations of other countries; continuous strengthening of inter-institutional cooperation of the competent bodies in field of implementation of the Law on Preventing Money Laundering and Financing Terrorism;

E. PUBLIC PROCUREMENT COMMISSION

Established Directorate for Public Procurement, strengthened capacities of it; continuous education of the staff for implementation of the new Law (Public Procurement Commission, officers for public procurement and bidders); drafted and adopted bylaws; opened phone line for reporting irregularities in public procurement procedures (with elements of corruption);

F. COMMISSION FOR DETERMINING CONFLICT OF INTEREST

Increased number of delivered annual reports by the public officials on incomes and property; continuous delivering of information to the State Prosecutor on false reporting of property; partly realized educations for: public officials (local officials), NGO representatives and journalists;

G. TAX ADMINISTRATION

- Established phone line for reporting corruption within Tax Administration, National Commission has been periodically reported on it; partly carrying out of the annual surveys on existing conditions, forms, causes and methods of the corruption emergence within tax administration; **strengthened Department for Internal Control of Tax Administration; adopted Rules of Procedure of Internal Control Department**, which continuously prepares six-month reports; initiated trainings of the Internal Control Department members; strengthened external control through: appointment of the authorized officer for surveillance over the Tax Administration work and fractional rotation of the employees within the Tax Administration (Financial Police);
- Adopted Code of Ethics for employees and servants of the Tax Administration; introduced information system with the unique database; continuous IT trainings; signed relevant agreements on cooperation, including the drafting of the Agreement on cooperation with the Police Directorate for providing Police Directorate direct access and using of Tax Administration's database;

H. CUSTOMS ADMINISTRATION

- **Enhanced system of communication with the citizens through** establishing the phone line for reporting the corruption within the Customs Administration, and preparation of the six-month reports that are being delivered to the National Commission; strengthened Internal Control Department of the Customs Administration through: trainings of employees, preparation of the Rules of Procedures of the Internal Control Department and preparation of the six-month reports on realized internal control; strengthened external control through: appointment of the authorized officer for surveillance over the Customs Administration work;
- Drafted proposal of the Code of Ethics for employees and servants of the Customs Administration; realization of the model of rotation of the employees within the Customs Administration; introduced information system with the unique database; ; continuous IT trainings; a number of agreements on cooperation signed with the customs services of other countries;

I. ANTI-CORRUPTION INITIATIVE DIRECTORATE

- Staff and financial strengthening of the Anti-Corruption Initiative Directorate; adopted new Rulebook on internal organization and systematization of the ACID; establishing of the Department for Citizens' Complaints is underway; prepared and distributed information-advertising material;
- Coordination of the analyzing activities of the current legislation, and harmonization of legislation and full implementation of CoE Civic Legal Convention on corruption, and implementation of the UN Convention against corruption; coordination of the activities in relation to fulfillment of obligatory recommendations from the CoE Report (GRECO); coordination of the activities that are being implemented in framework of Anti-Corruption Initiative of the Stability Pact (SPAI); finalized activities being carried out on framework of CoE PACO Impact project;