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On the occasion of the **International Anti-Corruption Day**, NGO MANS traditionally organized **15th National Anti-Corruption Conference**. The focus of this year's conference is on **plans for the reform of the Law on Financing of Political Entities and Election Campaigns and challenges in its application and supervision of the implementation**. With the aim of improving the existing legal solution and harmonizing it with the legal acquis of the European Union, through three working panels, an opportunity was provided for the exchange of opinions and relevant experiences by representatives of political parties, international experts as well as representatives of institutions and the civil sector.

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NGO MANS presented a database on the finances of parliamentary political parties in Montenegro, which was implemented with the help of the **National Endowment for Democracy (NED)**. The database, specific documents that indicate how the parties are financed and spend money can be found on the specialized MANS portal [www.cistakampanja.me](http://www.cistakampanja.me), which is dedicated to the electoral process in Montenegro.

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NGO MANS published a report about financing recently of the recently held local elections which provides a clearer picture of compliance with legal restrictions on the use of public funds in the pre-election period, in order to reduce the possibility of unlawful influence on voters. **This document analyses the spending of state bodies and institutions of the Capital City during the campaign for local elections held in 14 municipalities, also presents data on employment and operations of the largest companies as well as the use of institutional advantage.** A special chapter is devoted to concrete cases and decisions of the Agency for Prevention of Corruption that cause serious issues in practice are presented. Complete report is available at: <https://www.mans.co.me/en/wp-content/uploads/2023/01/Report-on-the-financing-of-2022-local-elections.pdf>

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That some parties do not show accurate data on expenses during the election campaign, which raises the suspicion that they spend much more than the legal limits is shown by the study of the NGO MANS on the example of the **Democratic Party of Socialists (DPS)** during the last parliamentary elections. The data from the research on the finances of political parties show a **tendency that the costs of regular business operations of parties, as well as turnover through regular accounts, increase significantly during the election year compared to the non-election period.** Complete analysis of financing of the parliamentary political parties in Montenegro is available at: <https://www.mans.co.me/en/wp-content/uploads/2022/12/MONEY-IN-POLITICS.pdf>

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NGO MANS called on the MPs in **Parliament to return to the public discussion the Draft Amendments to the Law on Confiscation of Material Benefit**, adopted by the Government, and for which we have been fighting for over a decade. **This law received a negative opinion by the European Commission which points out that it is necessary to significantly improve it and organize public consultations. Not only did those consultations not take place, but the Government hid the document from the public for months, despite the promises of the line minister. The adoption of this Law will certainly not bring results in practice and may greatly jeopardize the confiscation of property that is hidden abroad.**

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In Montenegro, dubious investments from countries that are not democratic have been tolerated for a long time due to short-term interests and filling the budget, CDT's "ACTION" podcast assessed. **The interlocutors of the podcast agree that various foreign influences come to Montenegro, but that the malignant ones are clearly different from the influence of the European Union (EU), and that a good part of the influence is realized through the so-called corrosive capital.** Complete podcast on the topic **"Can Montenegro fight negative foreign influences?"** you can watch at the link: <https://www.youtube.com/watch?v=S4YGWrdm-Hg>

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As a guest in the show **Reflektor** on TV **Vijesti**, the director of the NGO MANS assessed that **the proposal for a law on amendments to the Law on confiscation of property benefits obtained through criminal activity which adopted by the Government, is structurally wrong. Pointing out several flaws in the law, among other that without confirming the indictment of the special prosecution, there is no procedure, meaninglessness of international cooperation, time limit of 10 years, she indicated the reasons why it is necessary to return the text of this regulation to a public debate before it reaches the parliament.** You can watch the entire show at: <https://www.youtube.com/watch?v=6CcxXGxZvDU>

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Savjet Agencije, na osnovu prednje izloženog, smatra da je u ovom postupku nadzora pravilno i potpuno utvrđeno činjenično stanje i pravilno primijenjeno materijalno pravo te da je ASK, kao rukovalac zbirke ličnih podataka, povjerila poslove obrade iz svog djelokruga vezano za uslugu održavanja i nadogradnje aplikativnog informacionog sistema "Prozone" čiji ima sjedište u Republici Srbiji, a na osnovu koje su lični podaci javnih funkcionera i zaposlenih službenika ASK kroz IS putem VPN aplikacije otkriveni i dostupni ovom privredno društvu, bez pisanog ugovora i bez prethodne saglasnosti Agencije kao nadzornog organa, čime je došlo nezakonite obrade ličnih podataka suprotno članu 10 Zakona, kao i nezakonitog povjeravanja poslova i povrede člana 16 i člana 41 Zakona a u vezi članom 2 stav 1 i članom 4a stav 3 Zakona o zaštiti podataka o ličnosti.

**The case of illegal disclosure of personal data of thousands of public officials and persons connected with them outside the borders of Montenegro represents a new compromise of the Agency for the Prevention of Corruption (APC), although they should represent an example of compliance with laws and regulations in society.** The Council of the Agency for the Protection of Personal Data and Free Access to Information (AZLP) recently made a decision that the APC violates the **Law on the Protection of Personal Data, because information about public officials and members of their households was disclosed and processed outside of Montenegro.** The initiative to initiate proceedings before the AZLP was submitted by MANS back in April of this year.

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Representatives of the civil sector continue to point that proposed **changes to the Law on Free Access to Information**, which after the formation of 43. Government, returned from the parliamentary procedure, **envisage a number of good solutions, but that there are also shortcomings.** MANS **emphasize execution as a good solution and the introduction of the institute of controllers, while the key flaw in the proposed text is the reduction of the level of privacy of public officials, treating the institute of tax secrecy, removing proactive publication of information regarding the tenders, as well as a decision on information that is marked with a level of secrecy.**

## December in photos

<p><b>XV NACIONALNA ANTIKORUPCIJSKA KONFERENCIJA   XV NATIONAL ANTI-CORRUPTION CONFERENCE</b> Hotel CUE Podgorica, 9. decembar 2022.   CUE hotel Podgorica, 9th December 2022</p> <p><b>Svečano otvaranje - 10:00h / Official opening - 10:00am</b></p>	<p><b>XV NACIONALNA ANTIKORUPCIJSKA KONFERENCIJA   XV NATIONAL ANTI-CORRUPTION CONFERENCE</b> Hotel CUE Podgorica, 9. decembar 2022.   CUE hotel Podgorica, 9th December 2022</p> <p><b>PANEL I: Dometti i planovi za reformu Zakona o finansiranju političkih subjekata i Izbornih kampanja - 11:00h / Scope of plans for the reform of the Law on Financing of Political Entities and Election Campaigns - 11:00am</b></p>	<p><b>XV NACIONALNA ANTIKORUPCIJSKA KONFERENCIJA   XV NATIONAL ANTI-CORRUPTION CONFERENCE</b> Hotel CUE Podgorica, 9. decembar 2022.   CUE hotel Podgorica, 9th December 2022</p> <p><b>PANEL II: Međunarodna iskustva i preporuke - 13:00h / International experience and recommendations - 13:00am</b></p>	<p><b>XV NACIONALNA ANTIKORUPCIJSKA KONFERENCIJA   XV NATIONAL ANTI-CORRUPTION CONFERENCE</b> Hotel CUE Podgorica, 9. decembar 2022.   CUE hotel Podgorica, 9th December 2022</p> <p><b>PANEL III: Problemi u primjeni Zakona - 14:30h / Challenges in the implementation of the Law - 14:30pm</b></p>
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