



MONITORING OF THE REPUBLIC OF ARMENIA ANTI-CORRUPTION STRATEGY AND ITS IMPLEMENTATION ACTION PLAN FOR 2019-2022

Results

March, 2021

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Note: *The monitoring activities were carried out from January to February 2021, and the report was developed in March of the same year.*

ABBREVIATIONS

ALA	Armenian Lawyers' Association
CoE	Council of Europe
CPC	Corruption Prevention Commission
CSO	Civil society organization
EU	European Union
FGD	Focus group discussion
GRECO	Council of Europe - Group of States Against Corruption
NGO	Non-Governmental Organization
NSS	National Security Service
OECD	Organization for Economic Cooperation and Development
OSCE	Organization for Security and Co-operation in Europe
RA	Republic of Armenia
RA MESCS	RA Ministry of Education, Science, Culture and Sports
RA MoJ	RA Ministry of Justice
RA MTAI	RA Minister of Territorial Administration and infrastructure
RA NA	RA National Assembly
SIS	Special Investigation Service
SRC	State Revenue Committee
UN	United Nations
UNDP	United Nations Development Program
USAID	United States Agency for International Development

INTRODUCTION

Throughout the history of the Third Republic of Armenia, strategies aimed at defining and implementing state policy priorities in specific areas have been adopted many times. Together with the strategies, the Government approves the action plan for its implementation, which is a guideline for the state bodies - a daily work plan.

On 3 October, 2019, the Government of the Republic of Armenia approved the "The Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022" (hereinafter referred to as the Strategy and Action Plan). The main goal of the Anti-Corruption strategy is the consistent implementation of the conceptual postulates and principles proclaimed by the Government of the Republic of Armenia in the field of fight against corruption, including identifying and eliminating the causes of corruption, instilling and spreading the attitude of intolerance among the public and public servants toward corruption, complete and continuous decrease in corruption.

The strategy envisages 48 measures, the term of 2 of which have expired (one was scheduled for 2019, the other for 2020), and the remaining 46 are subject to regular implementation by 2022. The activities are divided into three large groups; in terms of content include the three pillars of the fight against corruption: prevention of corruption, anti-corruption education, investigation of corruption cases (inevitability of punishment). The results of the monitoring showed that although there are actions that are formally assessed as fully implemented, yet they have qualitative problems in terms of content.

Due to the need for an inclusive strategy, the Strategy emphasizes the active involvement of civil society and citizens in the implementation of anti-corruption policy and the need for public oversight. From this point of view, it should be noted that the Strategy envisages monitoring of the implementation of measures by both the state as well as by the non-governmental organizations.

Thus, in pursuance of the action identified in paragraph 48 of the Strategic Action Plan,¹ The Armenian Lawyers' Association and the CSOs Anti-Corruption Coalition of Armenia present the results of the monitoring of activities to be performed in 2019-2020 of the "Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022". The main objective of the monitoring is to assess the current progress of the implementation of the Action Plan of the Strategy.

¹ The action includes: Conducting regular surveys, among the general public, on corruption, public confidence and the impact of anti-corruption measures, publishing the results of surveys.

To implement the monitoring, information requests were sent to the relevant state bodies, the available documents and monitoring reports were studied, as well as two focus group discussions were conducted among the state bodies responsible for implementation of the actions and specialized CSOs and sectoral experts. The monitoring activities were carried out from January to February 2021, and the report was developed in March of the same year.

METHODOLOGY

a. Monitoring objectives

The objectives of the monitoring are: 1) to carry out a study to assess the current state of implementation of the Action Plan by the competent authorities and their content (progress): 2) to assess the actual/expected result of the work done and find out the impact of the changes made: 3) Evaluate the implementation of the Action Plan for the selected target areas in terms of the quantitative aspect of implementation of the action: 4) identify the participation of stakeholders and civil society in the implementation of events, and public discussions.

During the monitoring, the activities carried out in the scope of each event and the expected results and monitoring indicators for that event in 2019-2020 were compared according to the work done. This methodology enabled to assess possible deviations and their causes, the progress made and the implementation status of the event. In the event where the Anti-Corruption Strategy did not provide monitoring indicators for specific measures, the assessment was based on a comparison and analysis of the expected and actual results, which, however, in our estimation, did not fully reflect the progress and results achieved.

Thus, within the framework of this report, two groups of actions defined by the Action Plan have been separated. Actions for 2019-2020. According to the two groups of activities, the monitoring was carried out in two ways: quantitative and qualitative.

The result of the monitoring of the implementation (progress) of the activities defined by the Action Plan is expressed by one of the following rating indicators:

- 1) Completely implemented (all the works envisaged by the action for the observed period have been done).
- 2) Mostly implemented (half or more than half of the works envisaged by the action for the observed period have been done).
- 3) Partially implemented (some work planned for the period under review has been done, but it does not exceed half of the planned work).
- 4) Not implemented (any work envisaged by the event for the period under review has not been implemented).

In general, it is planned to complete 2 actions in 2019-2020, which are included in the field of investigation of corruption cases.

The concluding part of the report summarizes the results of the monitoring and evaluation and presents methodological and content recommendations for solving the identified problems and challenges.

b. Evaluation methods

In order to achieve the research goals, the [comparative method of approach](#) was used, comparing qualitative and quantitative data. Data were collected from primary and secondary sources. Research methods include information inquiry, desk research/document analysis, and focus group discussions with stakeholders (FGDs). The field work was carried out in February-March 2021.

Taking into account the epidemic situation in the country, face-to-face interviews and FGDs were not conducted on the spot, instead, the discussions were conducted online using the "Zoom" platform. Some research methods are presented below:

Desk research research/document analysis and information inquiry. Information on quantitative and procedural indicators of activities to be carried out during 2019 and 2020 was collected through desk research/document analysis and information inquiry: Information on **output level indicators** was collected through these methods

Focus group discussions: Outcome level indicators were evaluated through qualitative research methods, in particular, through FGDs. These indicators include the activities carried out **during 2019-2020**, as it is possible to obtain some estimates of the level of impact only for those completed activities.

The FGDs were conducted with the contact persons involved in the Strategy activities that are planned to be implemented during 2019-2020. The FGDs were conducted with government agencies responsible for these activities, as well as representatives of civil society organizations, lawyers, advocates, and sectoral experts. A total of 2 FGDs were conducted, 1 of which was with representatives of government agencies, and 1 with the representatives of specialized CSO, and sectoral experts.

Table 1. Information on FGDs and in-depth interviews

Method	Quantity	Target group	Number of participants
Focus group discussion	1	RA Ministry of Justice, RA National Security Service, RA Special Investigation Service, RA General Prosecutor's Office, RA Police, RA Investigative Committee, RA State Revenue Committee,	12

Central Bank of Armenia
Staff of the Prime Minister of the
Republic of Armenia.

Focus group discussion	1	Representatives of civil society organizations	12
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All discussions were recorded with the prior consent of the participants.

MONITORING OF
THE REPUBLIC OF ARMENIA
ANTI-CORRUPTION STRATEGY
AND ITS IMPLEMENTATION ACTION PLAN
FOR 2019-2022

RESULTS

SECTOR 1: DEVELOPMENT OF ANTI-CORRUPTION INST SYSTEM

	2019	2020
NUMBER OF PLANNED ACTIONS	5	6
OF WHICH IMPLEMENTED	4	2
OF WHICH MOSTLY IMPLEMENTED	-	2
OF WHICH PARTIALLY IMPLEMENTED	-	1
NOT IMPLEMENTED	1	1

Action 1: Forming the Commission for the Prevention of Corruption and ensuring the regular operation thereof

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
1	Members of the Commission for the Prevention of Corruption have been selected, the Commission has been formed. The Staff of the Commission for the Prevention of Corruption has been formed, which ensures the regular flow of activities of the Commission. The Commission was provided with separate premises, individual budgetary funding, and toolkit necessary for imposing liability	With a view to increasing the effectiveness of the operation of the Commission, a package of recommendations has been elaborated aimed at the expansion of the scope of functions of the Commission.	The Commission for the Prevention of Corruption has been formed,:	<p>The Commission has sufficient premises and material conditions; at least 70% of the staff is ensured, and a separate line is provided in the MTEF budget for the financing of the CPC.</p> <p>The legal basis for submitting the draft budget and the implementation report by the Commission for the Prevention of Corruption to the National Assembly has been provided.</p>	<p>Ministry of Justice of the Republic of Armenia</p> <p>Staff of the Prime Minister of the RA</p> <p>The RA National Assembly (by consent)</p> <p>Commission for the Prevention of Corruption (by consent)</p>	<p>The Draft Law "On Making Amendments and Addenda to the Law on the Corruption Prevention Commission" has been adopted.</p> <p>Other results are presented below.</p>

According to the information provided by the RA Ministry of Justice and the Office of the Prime Minister, the members of CPC (hereinafter referred to as the Commission) were elected in November 2019. One of the members of the Commission resigned, after which the procedure for electing the members of the Commission was changed. It was planned that a new competition would be announced in the fall to fill the vacancy of a member of the Commission, but the competition was postponed due to the war, At the

same time, during the practical implementation of the Law on the Corruption Prevention Commission, it became clear that a problem had arisen with the clarification of the moment of the formation of the Board, which caused the need for legislative regulation. In the context of the above, amendments to the Law on the Corruption Prevention Commission were made on 19 January, 2021 (http://parliament.am/draft_history.php?id=12112), as a result of which a new tender period was provided. In particular, it is stipulated that the NA President announces through the NA staff, the competition to elect a candidate for the vacant position of a member of the CPC on 6 December, 2019, within 60 days after publishing the legal act on approving the individual staff of the Competition Board. By the decision of the Government of the Republic of Armenia, an area was allocated to the Board, which was renovated with the funding of international donor organizations and handed over to the operation of the CPC in order to ensure the normal operation of the Board,

The CPC in the agreement with the Ministry of Justice of the Republic of Armenia, developed a draft decision of the Prime Minister of the Republic of Armenia, which envisages expanding the number of staff of the CPC, and submitted for public discussion (<https://www.e-draft.am/projects/2954/justification>). On 25 March, 2020, the “Law on Making Amendments and Addenda to the Law on the Corruption Prevention Commission” which is aimed at expanding the scope of functions of the CPC, was adopted within the framework of the Draft Package on Making Amendments and Addenda to the Constitutional Law "Judicial Code of the Republic of Armenia",

According to the information provided by the RA Ministry of Justice, the work on the expected result for 2020 has been completely implemented. Regarding the monitoring indicator, it should be noted that the Commission has provided the procedures for submitting the draft budget and the implementation report; the staffing and full provision of the building conditions is in progress.

On 18 February, 2021, ALA organized and carried out the second FGD on the ZOOM online platform. More than a dozen CSO representatives and sector experts participated in the discussion. The position of the participants was that although formally the action is considered fully implemented, but **in terms of content there are serious problems**. In particular, in 2019, amendments and additions were made to the Law on the Corruption Prevention Commission, as a result of which the Independent Competition Board was abolished, and, consequently, the procedure for appointing CSC members by the Board. By virtue of these changes, the CPC was formed by direct nomination of members by the following subjects: The Government of the Republic of Armenia, the three factions of the National Assembly ("My Step", "Prosperous Armenia" and "Bright Armenia") and the Supreme Judicial Council nominated candidates (each of them nominated one candidate). All the nominated candidates were elected.

As a result, the Central Committee was established solely as a result of a political agreement without the provision of institutional independence, while it is a specialized body and its appointments should be exclusively in the professional domain and not political. In

this regard, specialized CSOs have repeatedly stated that the formation of the first staff of the CPC through non-competitive political arrangements is highly vulnerable. CSOs also noted that the legal regulation of having an independent Competition Board was also highly appreciated by the OECD in its report on “Anti-corruption reforms in Armenia - 4th round of monitoring of the Istanbul Anti-Corruption Action Plan’, which was published in October 2018.

In addition, in the Second Compliance Report on Armenia of the Fourth Evaluation Round, adopted on December 6, 2019, inter alia (including the judiciary and the prosecutorial system) GRECO referred to the independence of the CPC, noting that, “*the new law adopted by the National Assembly removes the Competition Board from the process of appointment of members of CPC and introducing a system of direct nomination of candidates. The main concern with such a model is a significant risk of politisation. This is a vital point for the anti-corruption bodies as their insulation from political interference and influence stands as the main principle for ensuring their effectiveness. Civil society organizations are currently not represented in the nomination or selection process. The Government and the ruling parliamentary faction could control the majority in the Commission. GRECO urges the authorities to ensure independence of the Commission for Prevention of Corruption, in particular through a balanced and sustainable composition and transparent procedures.*”

In 2020, the RA National Assembly amended the law and again envisaged the institute of an independent Competition Board, only that it would be applicable in the case of the second staff of the CPC.

Thus, although formally it seems that the action has been **MOSTLY IMPLEMENTED**, but in terms of the content, the CPC **WAS FORMED IN THE CONDITIONS POLITICAL INTERVENTION AND INFLUENCE**, undermining the institutional and professional basis of the newly established structure from the very beginning.

Action 2: Formation of an anti-corruption law enforcement body vested with the functions of revealing and investigating corruption-related crimes and granted with sufficient guarantees of independence - the Anti-Corruption Committee

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
2	A package of recommendations has been elaborated and submitted to	Based on the recommendations, the package of legislative drafts	–	A package of recommendations has been	RA Ministry of Justice, RA General Prosecutor's Office (by	The RA Law on the Anti-Corruption Committee was

	the Staff to the Prime Minister of the Republic of Armenia with a view of formation of the Anti-Corruption Committee.	on the establishment of the Anti-Corruption Committee has been elaborated and submitted to the National Assembly of the Republic of Armenia		elaborated and submitted to the National Assembly.	consent) RA Investigative Committee (by consent) RA Special Investigation Service (by consent) RA Police, RA Ministry of Finance.	adopted in the first reading. Other results are presented below
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“Draft laws on making changes and additions to the RA Law on the Anti-Corruption Committee and related laws” have been submitted to various competent bodies, which have provided their considerations to the RA Ministry of Justice.

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia (hereinafter referred to as the Coalition) organized and carried out the second FGD on the ZOOM online platform. More than a dozen CSO representatives and sector experts participated in the discussion. The position of the participants was that although formally the action is considered **fully implemented, but in terms of content there are serious problems**. Without referring to the separate provisions of the RA Draft Law on the Anti-Corruption Committee”, the main regulations that cause concerns were presented. First of all, it should be noted that the strategy does not define guidelines for the guarantees of independence of the Committee, but we consider it necessary to discuss its guarantees of independence, considering it in the light of the general approaches and goals of the strategy. Accordingly, the draft does not guarantee the de facto independence of the Committee. According to the Draft, the Committee is not one of the independent bodies provided by the Constitution and will be considered as an investigative body established by law, which will be guaranteed independence only at the level of legislative regulations. In addition, the Chairman of the Committee is appointed by the Prime Minister from the list of candidates nominated by the Competition Board. Although at first glance it seems that the appointment will be made by a collegial body, there are still concerns that the appointment is discretionary, the candidate will be chosen by the Prime Minister and will be submitted to the Government for approval, which may have political implications.²

² “The RA Law on the Anti-Corruption Committee” was adopted by the RA National Assembly in March 2021, when the field work for the development of this monitoring was completed.

Thus, although formally it seems that the action is considered **IMPLEMENTED**, in terms of the content the **FORMATION** of the Anti-Corruption Committee **WILL TAKE PLACE IN CONDITIONS OF POLITICAL INTERVENTION AND INFLUENCE**, undermining the professional basis and institutional independence of the newly established structure from the very beginning.

Action 3: Establishment of specialized anti-corruption courts

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
3	The international practice on specialized anti-corruption courts has been studied. A package of recommendations has been elaborated and submitted to the Staff to the Prime Minister of the Republic of Armenia	A package of legislative drafts aimed at the formation of specialized anti-corruption courts has been elaborated and submitted to the National Assembly of the Republic of Armenia: defining the introduction of an institute of judges specializing in anti-corruption cases as a temporary solution. The institute of judges specializing in anti-corruption cases has been introduced	-	The analysis of the experience of the specialized anti-corruption courts with relevant recommendation was presented and discussed in the Anti-Corruption Council. The legislative package was drafted, discussed with the beneficiaries, subjected to international expertise. The legislative	RA Ministry of Justice, RA National Assembly (by consent) Supreme Judicial Council (by consent) Academy of Justice	The package of draft laws has been adopted. Other results are presented below.

				package was sent to the National Assembly.		
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According to the information provided by the RA Ministry of Justice, the RA Law "On Making Amendments and Addenda to the Constitutional Law "Judicial Code of the Republic of Armenia" was adopted in the National Assembly on 03.02.2021 in the second reading and in full. At the same time, changes and additions will be made accordingly in the "Law on Remuneration of Persons Holding State and Public Service Positions", The Constitution Law of the Republic of Armenia "Rules of Procedure of the National Assembly", the "Criminal Procedure Code", the "Civil Procedure Code", the "Law on Confiscation of Property of Illegal Origin" and the "Law on Academy of Justice".

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia organized and carried out the second FGD on the ZOOM online platform. More than a dozen CSO representatives and sector experts participated in the discussion. The position of the participants was that although formally the action is considered fully implemented, but **in terms of content there are serious problems**. Without referring to the separate provisions of the above-mentioned drafts, the criteria set for the candidates for judges of the anti-corruption court, the procedure for involving experts in the process of appointing judges and the criteria set for them were mentioned as problematic regulations.

Thus, although formally it seems that the action is considered **IMPLEMENTED**, in terms of content the **FORMATION** of the Anti-Corruption Judicial System **WILL TAKE PLACE IN CONDITIONS OF POLITICAL INTERVENTION AND INFLUENCE**, disrupting the original and independent structure from the very beginning.

Action 4: Establishment of a department in the General Prosecutor's Office of the Republic of Armenia, carrying out supervision over the investigation of corruption crimes

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

4.	A package of recommendations aimed at the establishment of a department within General Prosecutor's Office of the Republic of Armenia, carrying out supervision over investigation of corruption-related crimes, has been elaborated	Based on the package of recommendations, a legislative package has been elaborated and adopted.	–	A department within General Prosecutor's Office of the Republic of Armenia, carrying out supervision over investigation of corruption-related crimes, has been created	RA Ministry of Justice, RA General Prosecutor's Office (by consent) Academy of Justice	A t Ge
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According to the information received from the Prosecutor General's Office, the Department on Combating Corruption in the Prosecutor General's Office was established by the RA Prosecutor General's Order No. 39, dated 24.09.2019 "On approval of the charter of the Prosecutor's Office of the Republic of Armenia and repealing Order 43 of the Prosecutor General's Office of Armenia dated 29.06.2007".

Relevant information is also included in the RA Government Resolution n 1332 of 3 October, 2019 "On approval of the Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022" within the framework of the progress of measures to be implemented in the first half of 2020. Thus, it should be noted that the study of the results of this action, their nature and the result expected by them and combination with the output indicators, it is noted that the implemented work largely corresponds to the expected result for 2020 and the audit indicator. However, it is noted that the legislative package, according to which the procedure for forming a Department on Combating Corruption in the Prosecutor's Office of the Republic of Armenia and the guarantees of its activity will be in line with the relevant requirements of the Corruption Committee and Anti-Corruption Courts and will proceed from the logic of anti-corruption reforms.

Thus, the action is considered **MOSTLY IMPLEMENTED.**

Action 5: Building capacities of the bodies, non-governmental organizations responsible for drafting of Anti-Corruption Policy

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
5.	-	<p>The capacities of relevant subdivision elaborating the Anti-Corruption Policy of the Ministry of Justice of the Republic of Armenia have been assessed.</p> <p>The capacities of sectoral NGOs have been assessed.</p> <p>As a result of assessment of the capacities, the recommendations aimed at more effective elaboration and implementation of the Anti-Corruption Policy have been submitted.</p>	-	<p>The capacities of the bodies responsible for the development of anti-corruption policy are assessed, the development and implementation of the anti-corruption policy is done more effectively and systematically.</p>	<p>RA Ministry of Justice</p> <p>Staff to the Prime Minister of the RA</p> <p>Human Rights Defender (by consent)</p> <p>Non-governmental organizations (by consent)</p>	<p>The package of proposals was presented to the Prime Minister's Office.</p> <p>Other results are presented below.</p>

According to the information provided by the RA Ministry of Justice and the Office of the Prime Minister, the reports of international organizations were studied in order to find out the directions of capacity development within the framework of the Strategy. It has become clear that the current monitoring institutional structures are not effective. As a result, the Department of Anti-Corruption Programs and Monitoring of the Office of the Prime Minister of the Republic of Armenia was dissolved. The powers of the latter, including the powers related to the implementation of the work of the Secretariat of the Anti-Corruption Policy Council, have been concentrated under one subdivision and reserved to the anti-corruption subdivision of the RA Ministry of Justice, which was reorganized and currently functions as the Department of Anti-Corruption Policy Development and Monitoring (hereinafter referred to as the Department).

The capacities of the relevant subdivision of the RA Ministry of Justice developing the anti-corruption policy were also assessed, as a result of which there was a need to regularly train the employees of the department. Based on international experience, the Department has developed a methodology for monitoring and evaluating anti-corruption strategies.

Having the aim to identify the directions of capacity development of NGOs, in a letter dated 16 June, 2020, the Ministry of Justice of the Republic of Armenia applied to sectoral NGOs, proposing the latter to conduct a self-assessment of their capacity and submit proposals for capacity development based on it. Taking into account the above-mentioned, the RA Ministry of Justice developed a package of proposals and submitted to the RA Prime Minister's Office. At the same time, according to the information provided by the Ministry of Justice of the Republic of Armenia, the implemented work mostly corresponds to the results, but is not fully implemented, as the assessment of the capacity of non-governmental organizations is not completed.

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia organized and carried out the second FGD on the ZOOM online platform. More than a dozen CSO representatives and sector experts participated in the discussion. The participants mentioned that in this regard, they had received only one letter from the RA Ministry of Justice about the needs of NGOs, but after that no discussion was held with those CSOs and, in fact, the final summarization was made without participation of CSOs. Moreover, this summary was not provided to CSOs.

As a result of the capacity assessment, CSOs have made recommendations for the development and implementation of more effective anti-corruption policy. A large number of proposals in this regard were aimed at increasing the effectiveness of the Council of Anti-Corruption Policy with regard to CSOs that are members of the Council.

The position of the participants was that the Council of Anti-Corruption Policy, as such, has not taken tangible measures to implement qualitative changes in its composition, including the involvement of such CSOs, which have a primary mandate in the fight against corruption, and can influence the formation of agenda items and decision-making in the Council. From the official statements circulated so far, it is clear that the NGOs that are included in the Council have no serious impact on the issues on the agenda formed in the Council. The CSOs participating in the FGD attributed this to the fact that high-ranking individuals in the Prime Minister's Office are affiliated with individual sectoral CSOs and are driven by narrow corporate interests, rather than public interests, thus making the Council formal, inefficient and politicized. Moreover, the published journalistic investigation suggests that the call for the inclusion of NGOs in the current Council of Anti-Corruption Policy was conducted with violations, the results of which are unlawful and illegitimate for the three NGOs.³

One of the consequences of the conflict of interests listed above is that the CSOs Anti-Corruption Coalition of Armenia was unjustifiably and illegally removed from the Anti-Corruption Council and was not even notified in advance. Moreover, during 2019-2020, the RA Ministry of Justice has several times developed a draft decision on making changes and additions to the RA Prime Minister's 24 June,

³ <https://iravaban.net/en/232524.html>

2019 N 808 decision, which would allow the Coalition, which, as an informal network that has no state registration but unites 73 CSOs, to be included in the Council of Anti-Corruption Policy on a competitive basis. However, taking into account the above-mentioned circumstance, according to which certain persons holding high positions in the Prime Minister's Office are engaged in lobbying of affiliated NGOs, The draft, authored by the RA Ministry of Justice, was rejected by the Prime Minister's Office to prevent the CSOs Anti-Corruption Coalition from becoming a member of the Anti-Corruption Policy Council through the competition.⁴ Thus, at present, the Anti-Corruption Policy Council not only does not consolidate all the anti-corruption potential and thought of Armenia, which it should have done in the first place; but in addition considering the fact of only three CSOs that are members of the Council, the composition of the Council is neither legal nor illegitimate, in which case the activities of the Council cannot be inclusive, participatory, legal and effective. Moreover, the capacity of the Anti-Corruption Policy Council, the body responsible for developing anti-corruption policy, was not assessed from this perspective.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 6: Ensuring the regular operation of the donor co-ordination mechanism

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020-2022 periodically	2019	2020		
6.	With a view to providing assistance to the process of implementation of the Anti-Corruption Strategy and its implementation actions, the Council of Anti-Corruption Policy has held a donor coordination meeting. The results of the meeting are being published.	Each year, the Council of Anti-Corruption Policy holds one sitting aimed at co-ordination of activities of donors in the anti-corruption field.	At least one donor coordination sitting was held annually, the minutes of the meetings are available, and the press releases are widespread.		Staff to the Prime Minister of the RA	No meeting of the Council of Anti-Corruption Policy dedicated to the coordination of donor activities in the anti-corruption sphere was convened.

⁴ <https://www.e-draft.am/projects/2720/about>

According to the information provided by the Prime Minister's Office, due to the state of emergency and martial law in Armenia, cooperation with international donor organizations is carried out remotely. Both separate meetings and joint discussions are held with international donor organizations to avoid duplication of funding and work. That is, the session as such was not convened, these were separate collegial meetings aimed at discussing a certain range of issues.

In addition to the above, according to Action 6, each year the Council of Anti-Corruption Policy holds **1 (one) session** dedicated to coordinating the work of donors in the anti-corruption sector. As a result of the desk research, it became clear that the Council convened only one meeting in 2020 (3 July), the minutes of which had not been published as of 15 March, 2021. According to the published official statement,⁵ the session was not dedicated to the coordination of donors' work in the anti-corruption sphere. Notably, in 2019, two sessions were held, on 12 July and on 30 August.⁶ The agenda of each of these sessions included two questions on the following:

The agenda of the sitting of 12.07.2019

- ◆ 1. Draft decision of the Government of the Republic of Armenia "On approving "The Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022".
- ◆ 2. The vision of judicial reforms: Conceptual approaches.

The agenda of the sitting of 30.08.2019

- ◆ 1. Presentation of the results of the competition for the involvement of non-governmental organizations in the Council of Anti-Corruption Policy.
- ◆ 2. Presentation of the amended draft decision of the Government of the Republic of Armenia "On approving "The Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022".

Thus, the action is considered **NOT IMPLEMENTED**.

⁵ <https://www.primeminister.am/hy/press-release/item/2020/07/03/Cabinet-meeting/#prettyPhoto>

⁶ <https://anti-corruption.gov.am/am/boardinfo>

SECTOR 2: PREVENTION OF CORRUPTION

	2019	2020
NUMBER OF PLANNED ACTIONS	-	2
OF WHICH IMPLEMENTED	-	-
OF WHICH MOSTLY IMPLEMENTED	-	-
OF WHICH PARTIALLY IMPLEMENTED	-	2
NOT IMPLEMENTED	-	-

Action 7: Identifying corruption risks in local self-government bodies with population of 15,000 and more, developing and implementing plans

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
7.	-	A methodology for conducting risk assessments in local self-government bodies has been elaborated. Based on the methodology, risk assessments have been conducted in local self-government bodies having a population of 15,000 and more.	-	The methodology of risk assessment in self-governing bodies has been approved by the CPC.	RA Ministry of Territorial Administration and Infrastructure. Local self-government bodies (by agreement) RA Ministry of Justice RA General Prosecutor's Office (by consent) Commission for the Prevention of Corruption (by consent) Non-governmental organizations (by consent).	The draft methodology and action plan for conducting risk assessment in RA Local Self-Government Bodies and compiling a program of local anti-corruption measures as a result of the assessment have been developed.

According to the information provided by the RA Local Self-Government Bodies, a draft methodology and action plan for conducting a risk assessment in the local self-government bodies of the Republic of Armenia and drawing up a program of local anti-corruption measures as a result of the assessment has been developed. As a result, proposals were received, based on which the draft was amended and submitted to the RA Ministry of Justice.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 8: Developing and implementing action plans for anti-corruption, including for internal integrity in state bodies based on the results of risk assessments

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
8.	-	A methodology for conducting risk assessments in the bodies of the state administration system. Based on the methodology, risk assessments have been conducted in all bodies of the state administration system, including organizations with state participation.	-	The risk assessment methodology in public administration bodies has been approved by the CPC.	Public administration bodies Commission for the Prevention of Corruption (by consent) Non-governmental organizations (by consent).	The work is in process

According to the information provided by the Ministry of Justice of the Republic of Armenia, in November 2019, the CPC started working with USAID experts, who in February 2020 presented a draft guide to the methodology for assessing corruption risks.

Discussions on the methodology and its launch were held, in particular, with the RA Ministry of Justice, and further with UNDP experts as well. The main problem is that the "self-assessment" version of the anti-corruption risk assessment methodology envisaged by the Anti-Corruption Strategy has been assessed as limitedly effective, and the methodology presented by the experts as extremely in-depth, which is impossible to implement within the set timeframe. Therefore, the Commission, with the help of discussions and other expert assistance, is working on an intermediate hybrid methodology, which will enable the identification of corruption risks, using not only the "self-assessment" methodology, but also other methods of data collection, which will ensure objectivity of information.

In 2020, the Commission conducted two discussions with the participation of the Ministry of Justice of the Republic of Armenia, USAID and UNDP experts, as well as the Transparency International Anti-Corruption Center to supplement and adjust the draft methodology. As a result of the discussion, an agreement was reached to develop a hybrid methodology for assessing corruption risks. At the moment, the works in that direction are in progress.

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia organized and carried out the second FGD on the ZOOM online platform. More than a dozen CSO representatives and sector experts participated in the discussion. CSOs expressed concerns on the fact that the CPC, cooperates with professional CSOs loyal to the Government and the Commission, avoids cooperating with independent professional CSOs and works selectively, with a differentiated approach, non-transparent, non-inclusive and closed to cooperation working style. The methodology was not discussed with any NGO participating in the discussion.

Thus, the action is considered **PARTIALLY IMPLEMENTED.**

SECTOR 2.1: PREVENTION OF CORRUPTION (Integrity)

	2019	2020
NUMBER OF PLANNED ACTIONS	4	7
OF WHICH IMPLEMENTED	2	3
OF WHICH MOSTLY IMPLEMENTED	-	-
OF WHICH PARTIALLY IMPLEMENTED	2	4
NOT IMPLEMENTED	-	-

Action 9: Formation of mechanisms for carrying out oversight over observance of the rules of integrity of persons subject to appointment to state positions, those of judges and judge candidates, prosecutors and candidates for prosecutors, and of investigators

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
9.	The international practice on the observance of the rules of integrity has been studied, and relevant recommendations have been submitted. The draft Law "On making amendments and supplements to the Law 'On Commission for the Prevention of Corruption'" has been elaborated and submitted to the National Assembly of the Republic of Armenia.	<p>The function of conducting studies on observance of the rules of integrity of persons subject to appointment to state positions in the cases and under the procedure prescribed by the Law "On public service" and, thus, rendering relevant advisory opinion on the appropriateness of appointment of the person competent to appoint the given person, has been vested in the Commission for the Prevention of Corruption.</p> <p>The procedure for conducting studies on integrity and rendering advisory opinions upon the results thereof has been elaborated and</p>	-	-	Commission for Prevention of Corruption (by consent), Staff to the Prime Minister of the RA, RA Ministry of Justice, General Prosecutor's Office, RA Investigative Committee (by consent), National Security Service (by consent)	The Law on the Commission for Prevention of Corruption has been amended and supplemented.

According to the information provided by the RA Ministry of Justice and the Office of the Prime Minister, the international experience of observing the rules of ethics has been studied, on the basis of which a package of proposals was submitted to the RA Prime Minister's Office in 2019. Taking into account the fact that both at the meeting of the Council of Anti-Corruption Policy and during

other meetings with the participation of stakeholders, the peculiarities of the providing for the integrity systems were repeatedly discussed, the Government started drafting legislation in 2019. On 25 March, 2020, within the framework of the draft package "On Making Amendments and Addenda to the Republic of Armenia Constitutional Law the RA Judicial Code", the draft law "On Making Amendments and Addenda to the Law on the Corruption Prevention Commission" was adopted, which expanded the functions of the CPC, established the procedure for conducting studies on integrity and rendering advisory opinions based on their results. In addition, with the support of USAID experts, the Council of Europe expert, and the Ministry of Justice of the Republic of Armenia, the Commission has developed and established a methodology for conducting the integrity check of public officials and the integrity questionnaire under the Law on Public Service of the Republic of Armenia. Besides, the RA NA also adopted the package of draft laws on making changes and additions to the Constitutional Law "Judicial Code of the Republic of Armenia" and amendments to the related laws developed by the RA Ministry of Justice, which, among other regulations, establishes the mechanisms for checking the integrity of candidates in the process of filling in the list of candidates for prosecutors, establishing the powers of the CPC for rendering advisory opinions on the integrity check if the candidates for prosecutors.

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia organized and carried out the second FGD on the ZOOM online platform. In the scope of the discussion the participating CSOs mentioned as one of the shortcomings that the advisory opinions of the CPC on the integrity check of high-ranking officials (for example, judges, prosecutors) are not subject to publication, therefore it is difficult to check the level of their influence among decision-makers. :

Thus, the action is considered **IMPLEMENTED**.

Action 10: Assessment of the effectiveness of the enforcement of the Law “On Public Service” and Law “On Civil Service”

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

10.	All secondary legislative acts arising from the Law “On public service” and Law “On civil service” adopted on 23 March 2018 have been adopted.	Trainings have been organized for the purpose of raising awareness about all secondary legislative acts arising from the Law “On public service” and Law “On civil service”	100% of the secondary legislative acts arising from the Law “On public service” and Law “On civil service” are accepted.	–	Bureau of Civil Service of the Staff to the Prime Minister, Commission for Prevention of Corruption (by consent), Non-governmental organizations (by consent).	Civil servants have been trained
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According to the information provided by the Office of the Prime Minister, all secondary legislative acts arising from the Law “On public service” and Law “On civil service” were adopted on 23 March,.

During 2020, the Bureau of Civil Service of the Staff to the Prime Minister organized and conducted trainings to raise awareness of secondary legislative acts arising from the Law “On Public Service” and Law “On Civil Service”. The trainings were conducted on the topics "Organization and implementation of competitions through the information platform" and "Raising the awareness of the candidates for the commission of the interview stage".

The Bureau of Civil Service of the Staff to the Prime Minister has organized remote trainings for the civil servants of the bodies involved in the system and the civil servants - candidates for the commission of interview stage of the competition. 5 (five) trainings were conducted on each topic. Each training group included 10 civil servants. A total of 100 civil servants were trained.

Thus, the action is considered **IMPLEMENTED**.

Action 11: Formation and launch of the institute of ethics commissions and integrity affairs organizers in compliance with the Law "On public service"

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

11.	–	In compliance with the Law "On public service", ethics commissions and integrity affairs organizers have been established under the laws on individual forms of state service and on community service. Guidelines for the activities of ethics commissions and integrity affairs organizers have been elaborated.	–	Integrity affairs organizers have been appointed in all public administration bodies, and at least two guidelines for the activities of ethics committees and Integrity affairs organizers have been developed.	Bureau of Civil Service of the Staff to the Prime Minister, Commission for Prevention of Corruption (by consent),	The passports of the integrity affairs organizers' positions have been approved. Other results are presented below.
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According to the information provided by the Prime Minister's Office, in the state bodies, which have already passed to the system of evaluation and classification of positions according to new criteria, integrity affairs organizers have been appointed (43 state bodies), passports of integrity affairs organizers' positions have been approved, the authorities, responsibilities and functions of the organizers of the ethics issues arising from the Laws on Civil Service and Public Service have been defined, ethics commissions have been established through the non-electronic procedure; the formation of ethics commissions through the electronic platform procedure is underway.

It should be noted that the draft guidelines for the activities of ethics commissions and integrity affairs organizers are still under development, as the legal regulations (standard rules of conduct for public servants) must be defined first, after which it will be possible to fully develop the guidelines for ethics commissions and integrity affairs organizers.

The Civil Service Information Platform was launched on 1 October, 2020, and from 1 October, 2020, the process of including civil servants in the list of candidates for members of the Ethics Committee on the Civil Service Information Platform is being carried out in order to form ethics committee in state bodies electronically.

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia organized and carried out the second FGD on the ZOOM online platform. In the scope of the discussion the participating CSOs mentioned the shortcomings of the integrity affairs

organizers' institute. Accordingly, the work of integrity affairs organizers is not coordinated and managed by any centralized or decentralized body. According to the RA Law on the Commission on Prevention of Corruption, the CPC should provide methodological support and, in fact, perform the function of coordinating purely professional work. It should also be noted that integrity affairs organizers and members of ethics committees are required to undergo mandatory training. However, the results of the training impact assessment are not known. In the sense of the RA Law on Public Service, the integrity affairs organizers is rather an "organizer" than a decision-maker. Therefore, the organizer, not having a professional coordinating and governing body will hardly be able to perform these important functions assigned to him/her on its own, given the fact that organizers in state bodies are appointed persons who have previously held various positions, and who have not been involved in the field of anti-corruption or integrity. The results of the mandatory trainings also need additional qualitative evaluation, which will allow finding out their effectiveness and impact. Therefore, it is important that the integrity affairs organizers be able to carry out their advisory function to the full extent, as a result of which the institute of ethics committees of public servants will also function effectively, as the latter play a role in developing their capacities.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 12: Improvement of the system of remuneration for persons holding state positions and public service positions

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
12.	Main directions of improving the system of remuneration for persons holding state positions and public service positions have been studied.	An action plan for improvement of the system of remuneration for persons holding state positions and public service positions has been elaborated.	The measures developed based on the analysis of the directions and expenditures for the improvement of the remuneration system of public and public service positions were approved within the	–	Bureau of Civil Service of the Staff to the Prime Minister	The events were presented to the Secretariat of the Public Administration Reform Strategy Development Council.

			framework of the Public Administration Reform Strategy in 2019.			
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According to the information provided by the Prime Minister's Office, by the RA Prime Minister's decision N 1246-A of 5 September, 2019, "On establishing a council for organizing processes of elaborating public administration reform strategy and approving its procedure", the Public Administration Reform Strategy Development Council was established and its procedure was approved. Point 2 of the decision instructed the RA Deputy Prime Minister, who coordinates the activities of the Government of the Republic of Armenia in the field of public administration reform, to form by 16 September, 2019, working groups under the Council to implement the work on the development of the Public Administration Reform Strategy. At the same time, 25 December, 2019 was set as the deadline for the submission of the draft Public Administration Reform Strategy. Pursuant to Point 3 of the RA Prime Minister's decision N 1246-A of 5 September, 2019, the Bureau of Civil Service developed and in September 2019 presented to the Office of the RA Deputy Prime Minister Coordinator in the field of Public Administration Reforms, the draft of the "Public Service and Human Resources Management" section of the Public Administration Reform Strategy, subsection "Increasing the attractiveness of the Public Service". It was then submitted to the Secretariat of the Public Administration Reform Strategy Development Council. The process of approving the public administration reform strategy has been suspended due to the state of emergency declared in Armenia due to a new coronavirus disease.

According to the mentioned decision, in order to ensure public discussions and awareness in the process of elaborating the strategy of public administration reforms, the Council for organizing the processes of developing the strategy forms a public platform, involving representatives of the public, expert and scientific-academic community. As a result of the FGD with the CSO representatives organized on 18 February, 2021, it became clear that the public platform had not been created.

Thus, the action is considered **PARTIALLY IMPLEMENTED** (the implementation process is suspended)

Action 13: Prescribing model rules of conduct of public servants, rules of conduct of civil servants provided for by the Law “On public service”

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
13.	-	The international practice has been studied As a result of studies, a package of recommendations has been elaborated and submitted.	-	-	Bureau of Civil Service of the Staff to the Prime Minister, Commission for the Prevention of Corruption (by consent) Public administration bodies.	The package of proposals was presented to the interested parties.

In order to define the model rules of conduct of public servants, rules of conduct of civil servants, the international experience was studied, analyzes were made and the possibility of introducing the best international experience in the domestic legislation was evaluated. Based on this study, a package of recommendations was prepared and submitted to the interested bodies to provide opinions. The opinions have been are presented in part, which are currently being summarized.

Thus, the action is considered **IMPLEMENTED**.

Action 14: Prescribing rules of conduct of the deputy and investigator

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

14.	The international practice has been studied As a result of studies, a package of recommendations has been elaborated and submitted	The rules of conduct of the deputy and investigator have been elaborated.	–	–	Commission for the Prevention of Corruption (by consent), National Assembly (by consent), Investigative bodies (by consent).	Development of the rules of conduct is in process. Other results are presented below.
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According to the information provided by the Investigative Committee, the Investigative Committee studied the international experience, on the basis of which the Draft Order of the Chairman of the Investigative Committee "On defining the rules of conduct of an employee of the RA Investigative Committee" has been developed. The draft was submitted to the CPC on 25 June, 2020 for an opinion, but no response has been received so far.

The National Assembly did not respond to the written inquiry of the ALA. At the same time, we learn from the progress report on the measures to be implemented in the first half of 2020, published by the Government of the Republic of Armenia that Decision No. 1332 N of 3 October, 2019 "On approving the Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022" states that in connection with this action, that a study of international experience was carried out in the National Assembly, on the basis of which negotiations are being held with international partners to define the rules of conduct of a deputy. According to the same document, the SIS is working to establish rules of conduct for SIS officers. In particular, the SIS has been operating the "Code of Conduct for RA Special Investigation Service Officers" since 2014, which has been brought in line with the requirements provided by the Law on Public Service. Further, the RA Investigative Committee studied the international experience, as a result of which the draft order of the Chairman of the RA Investigative Committee "On defining the rules of conduct of the RA Investigative Committee employee" was developed. The mentioned draft order defines the rules of conduct of the RA Investigative Committee employee, which are norms regulating the peculiarities of the Committee employee's behavior and relations, aimed at ensuring the proper conduct of the Committee employee, excluding the conflict of public and private interests, strengthening public trust in the Committee. The draft envisages the principles of conduct of the Committee employee, general rules, and rules of conduct in formal and informal relations. In particular, there are provisions on the moral qualities of the investigator, compliance with the requirements of the law, relations with

colleagues and other persons, behavior when using the official property, etc. The draft was submitted to the CPC by letter No. 01/12 / 30972-20 dated 25.06.2020 in order to obtain a position.

The rules of conduct of the deputies are being developed and have been submitted to the study of international organizations.

Thus, the action is considered **PARTIALLY IMPLEMENTED.**

Action 15: Ensuring a merit-based system in the sector of civil service

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
15.	-	The procedures for formation of competition commissions for holding a competition for civil service position have been revised, nullifying political influence on the process of engagement of civil servants	-	-	Bureau of Civil Service of the Staff to the Prime Minister, Non-governmental organizations (by consent).	An information platform has been introduced.

According to the information provided by the Prime Minister's Office, the second component of the EU-funded "Support to Further Implementation of Civil Service Reform in Armenia" Twinning Project refers to the compliance of enhanced recruitment and selection systems with public administration principles. 4 remote meetings, each lasting one week, were organized within the framework of the project. One of the important points of the above-mentioned component of the project is the implementation of studies on the elimination of political influence on the Competition Board and the submission of proposals.

Work is currently underway. Recommendations were submitted by experts, which are under discussion. In addition, the process of holding tenders through the information platform started on 1 October, 2020. The testing phase of the competition is broadcast live, and the interview phase is videotaped. These processes allow organizing the competitions as transparently as possible, eliminating political influence on the competition processes.

At the same time, it should be noted that the implementation of studies on the elimination of political influence on competition commissions and the submission of proposals is still at an ongoing stage, and accordingly, the procedures for the formation of competition commissions for civil service positions have not been reviewed.

Thus, the action is considered **PARTIALLY IMPLEMENTED.**

SECTOR 2.2: PREVENTION OF CORRUPTION

(Declaration, gifts, impact assessment of regulation, procurement, private sector, real owners, protection of economic competition)

	2019	2020
NUMBER OF PLANNED ACTIONS	4	10
OF WHICH IMPLEMENTED	2	6
OF WHICH MOSTLY IMPLEMENTED	1	3
OF WHICH PARTIALLY IMPLEMENTED	1	1
NOT IMPLEMENTED	-	-

Action 16: Increasing the effectiveness of the system of impact assessment of anti-corruption regulation

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
16.	-	Study of international practice has been conducted. The recommendation on clear criteria and scope of impact of anti-corruption regulation has been submitted to the Staff to the Prime Minister of the Republic of Armenia.	-	-	RA Ministry of Justice, Commission for the Prevention of Corruption (by consent), Non-governmental organizations (by consent).	The package of proposals was sent to the interested parties.

According to the information provided by the RA Ministry of Justice, the international experience has been studied, on the basis of which a package of proposals on clear criteria and scope of the impact of anti-corruption regulation was compiled. The package was sent to the interested bodies, including the RA Prime Minister's Office.

Thus, the action is considered **IMPLEMENTED**.

Action 17: Improving the system of declaration of property, incomes and interests. Introduction of a system of declaration of expenses

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
17.	A study of international practice has been conducted.	The Draft Law of the Republic of Armenia "On making amendments and supplements to the Law of	The study of international experience with	The amended draft law was submitted to	RA Ministry of Justice, Commission for the Prevention of	The amended draft law has been adopted.

	<p>As a result of studies, a package of recommendations has been elaborated and submitted.</p> <p>Based on the study, the draft Law of the Republic of Armenia "On making amendments and supplements to the Law of the Republic of Armenia 'On public service'" has been elaborated and submitted to the Staff to the Prime Minister.</p>	<p>the Republic of Armenia "On public service" has been adopted.</p> <p>The scope of declarants has been expanded, by including in the list of declarants, among other officials, also the members of the Council of Elders and secretaries of staffs of the communities with population of 15 000 and more, persons holding administrative positions in organisations of public significance.</p> <p>The content of declaration has been revised; data subject to publication have been expanded; the value threshold of valuable property subject to declaration has been lowered; the types of loans and income have been clarified; a system for declaration of expenses has been introduced.</p> <p>An obligation to issue by the persons seeking to hold state positions and holding such positions a letter of authorisation to</p>	<p>relevant proposals was presented and discussed in the Anti-Corruption Council.</p>	<p>the National Assembly.</p>	<p>Corruption (by consent), Non-governmental organizations (by consent).</p>	
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		<p>the authorised body for searching and obtaining, on their behalf, information — in any bank and financial organisation in the world, in the territory of any country — on the existence of accounts, the movement and balance thereof from the date of creation, as well as for obtaining, on their behalf, information on the existence of movable, immovable property and securities.</p>				
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According to the information provided by the RA Ministry of Justice, the amended draft law was submitted to the National Assembly, which was adopted on 16.02.2021.

On 18 February, 2021, ALA and the CSO Anti-Corruption Coalition of Armenia organized and carried out the second FGD on the ZOOM online platform. More than a dozen CSO representatives and sector experts participated in the discussion. The position of the participants was that although the planned actions have been implemented, but, given the local context, the following should be noted: the family members of a declaring official are his/her spouse, minor children (including adopted children), persons under the custody of the declaring official and any adult living with the declaring official. As other persons closely related to the official, such as the spouse's parent, child, brother or sister, as well as godparents, are not required to declare property, there is a widespread illegal practice of registering officials' property in their name.

Thus, the action is considered **IMPLEMENTED**.

Action 18: Clarification of incompatibility requirements of persons holding public positions and of public servants

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
18.	-	The international practice has been studied. As a result of studies, a package of recommendations has been elaborated and submitted.	-	The study of international experience with relevant proposals was presented and discussed in the Anti-Corruption Council (2020)	RA Ministry of Justice, Commission for the Prevention of Corruption	The package of proposals was sent to the interested parties.

According to the information provided by the RA Ministry of Justice, the package of proposals was prepared and sent to the interested parties.

Thus, the action is considered **IMPLEMENTED**.

Action 19: Improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants; establishment of a register of gifts

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
19.	The institute of gifts related to the exercise of official duties of persons holding public positions and of public servants has been	Draft legal acts aimed at improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants have been elaborated and	The study of international experience with relevant proposals was presented and discussed in the Anti-Corruption	The amended package of draft legal acts has been approved.	RA Ministry of Justice Commission for the Prevention of Corruption (by consent), Non-governmental organizations (by	The package of proposals has been approved.

	analyzed, the existing problems have been identified, and a package of recommendations for their settlement has been elaborated.	submitted to the Staff to the Prime Minister of the Republic of Armenia. A terms of reference for the register of gifts has been elaborated.	Council		consent).	
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According to the information provided by the RA Ministry of Justice, the draft legal acts aimed at improving the institute of gifts related to the implementation of official responsibilities of public officials and public servants were developed and submitted to the RA Prime Minister's Office, a technical task of the register of gift was developed.

The package of proposals was sent to the interested parties for an opinion. At the same time, we learn from the progress report on the measures to be implemented in the first half of 2020, published by the Government of the Republic of Armenia that Decision No. 1332 N of 3 October, 2019 “On approving the Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022” states that the revised package of recommendations for this action was approved in 2020.

Thus, from the study of the work done in the case of this action, their nature and the result expected by them and the combination with the results, it became clear that the actions taken in 2020 are partially in line with the expected result in 2020, as the drafting of legal acts and technical tasks is still in progress.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 20: Providing for legislative regulation of lobbying; ensuring the transparency of funding of political parties and the mass media

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
20.	The international practice on [legislative] regulation of lobbying and funding of political parties and the mass media has been studied. The problems		-	The analysis of the expediency of legislative regulation of lobbying activities in the Republic of	RA Ministry of Justice, Commission for the Prevention of Corruption (by	The drafts are partially accepted.

	existing in the given field in Armenia and the prospects of introduction thereof have been identified. A relevant package of recommendations has been elaborated and submitted to the Council of Anti-Corruption Policy		Armenia, as well as the analysis of the transparency of the financing of parties and mass media was discussed in the Anti-Corruption Council.	consent), RA National Assembly (by consent), Central Electoral Commission (by consent), Non-governmental organizations (by consent).	
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According to the information provided by the RA Ministry of Justice, the international practice on regulation of lobbying and funding of political parties and the mass media has been studied. Based on the analysis of the RA legislation, the legislative package regulating the activities of the parties, including transparency, was adopted by the RA National Assembly in the second reading and in full. According to the amendments, every year the report on the sources and expenses of financial means, as well as the property will be published on the official website of public notices of the Republic of Armenia, <http://www.azdarar.am>. At the request of the CPC, the party is obliged to submit the information necessary for the verification of the report, documents, including information constituting banking secrecy, information on securities transactions, information constituting insurance secrecy, as well as credit information. Further, a legislative package regulating lobbying activities was developed, the package of proposals on transparency of media financing was sent to the interested bodies for a position, and was submitted to the RA Prime Minister's Office for submission to the Anti-Corruption Policy Council. The issues of transparency of financing of political and media activities and the existing problems were discussed at the sitting of the Anti-Corruption Policy Council.

Thus, the action is considered **MOSTLY IMPLEMENTED**.

Action 21: Clarification of the legal status of organizations of public significance and introduction of a toolkit for reduction of corruption risks therein, including identification of the existing corruption risks and introduction of mechanisms for overcoming them

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

21.	-	<p>The fundamental issues of the legal status of organizations of public significance have been studied</p> <p>The international practice and existing situation regarding the anti-corruption compliance have been studied</p> <p>The results of the study have been discussed with the representatives of the organizations of public significance.</p>	-	<p>The international practice and existing situation regarding the anti-corruption compliance have been studied.</p> <p>The fundamental issues of the legal status of organizations of public significance have been studied</p> <p>The results of the study have been discussed with the representatives of the organizations of public significance.</p>	<p>RA Ministry of Economy, RA Ministry of Justice, Non-governmental organizations (by consent).</p>	<p>Studies have been conducted; the results have been discussed with stakeholders.</p>
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According to the information provided by the Ministry of Economy, The fundamental issues of the legal status of organizations of public significance and the international experience regarding the anti-corruption compliance in the business sphere have been studied. The results of the study have been discussed with the representatives of the organizations of public significance:

Thus, the action is considered **IMPLEMENTED**.

Action 22: Promoting the adoption of anti-corruption compliance requirements in the business sector

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

22.	<p>The international practice on the anti-corruption compliance in the private sector has been studied</p> <p>The findings of the study have been discussed with the representatives of the business sector.</p>	<p>Recommendations on the introduction of anti-corruption compliance requirements in the business sector have been submitted.</p>	–	<p>The study was discussed in Anti-Corruption Council.</p> <p>At least 2 public discussions were held.</p> <p>At least 5 proposals were received from private sector organizations.</p>	<p>RA Ministry of Economy, RA Ministry of Justice, Non-governmental organizations (by consent).</p>	<p>The study has been submitted and discussed in the Anti-Corruption Council</p>
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According to the Ministry of Economy, within the framework of the “Improved Corporate Governance and Financial Accountability Regulation” project funded by the UK Good Governance Fund, with the direct participation of the RA Ministry of Economy, PricewaterhouseCoopers Armenia (PwC) and the Corporate Governance Center, developed and submitted to the Government of the Republic of Armenia the “Draft Corporate Governance Code” (hereinafter referred to as the Draft Code).

At the same time, taking into account the fact that in relation with the development of the Code (including provisions related to compliance programs) the Ministry cooperates with the Center for Corporate Governance, and In addition to the RA Ministry of Economy and the RA Ministry of Justice, NGOs are also responsible for the implementation of the measure envisaged by this clause.

During the presentation of the handbook "Anti-Corruption Compliance as a Component of Corporate Social Responsibility", the principles related to anti-corruption compliance of the Draft Code, as well as recommendations on the implementation ant-corruption compliance were presented.

However, the recommendations on the introduction of compliance requirements were not discussed at the meeting of the Anti-Corruption Council, as no meeting of the Anti-Corruption Council was held.

Thus, the action is considered **MOSTLY IMPLEMENTED.**

Action 23: Improvement of the field of procurement

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
23.	-	<p>With a view of continuously improving the system of state procurement, a study of sectoral problems has been conducted.</p> <p>Based on the study, the package of recommendations aimed at continuous improvement of the system of state procurement has been elaborated and considered at the session of the Council of Anti-Corruption Policy.</p>	-	<p>A study was conducted to identify corruption risks in the procurement process (2nd quarter of 2020). The results of the study were discussed in the Anti-Corruption Policy Council and recommendations for relevant changes were given (3rd quarter of 2020).</p>	RA Ministry of Finance	A number of draft legislative amendments have been submitted.

According to the information provided by the Ministry of Finance, the Ministry developed and on 16.12.2020 submitted to the Prime Minister's Office the RA Draft laws "On Making Amendments and Addenda to the RA Law on Procurement"; "On Making Amendments to the RA Law on Public Administration Bodies"; "On Making Amendments to the RA Law on State Duty" and "On Making Amendments and Addenda to the RA Civil Procedure Code".

On 22 February, 2021, the RA Ministry of Finance submitted the above-mentioned drafts for discussion at the Anti-Corruption Policy Council of the RA Ministry of Justice. It should be noted that the study and the legislative package developed on its basis were not discussed at the meeting of the Anti-Corruption Council, as no meeting of the Anti-Corruption Council was held in the fourth quarter of 2020.

Thus, the action is considered **MOSTLY IMPLEMENTED**.

Action 24: Introduction of the institute of real owners of legal persons

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
24.	-	The international practice has been studied. As a result of studies, a package of recommendations has been elaborated and submitted. The software for the register of real owners has been developed within the framework of the state register.	-	The software for the register of real owners has been developed launched.	RA Ministry of Justice, Public administration bodies, Non-governmental organizations (by consent)	The action is completed. Other results are presented below.

According to the information provided by the RA Ministry of Justice, the international practice has been studied. As a result of studies, a package of recommendations has been elaborated and submitted. The software for the register of real owners has been developed within the framework of the state register. In addition, the software of the register of real owners (beneficiaries) within the framework of the state register is ready for operation; the relevant draft legal acts have already been developed. Moreover, a step forward has been made, as a package of draft laws on amendments and additions to the “Law on State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Individual Entrepreneurs” and related laws has been developed and circulated in parallel with the road map, which imposes an obligation on all legal entities to identify the beneficial owners. In addition, the order of the RA Minister of Justice on approving the form of the declaration on real owners, the order of filling in and submitting the declaration is available.⁷

⁷ <https://www.arlis.am/DocumentView.aspx?DocID=138750>

Thus, the action is considered **IMPLEMENTED**.

Action 25: Improvement of legislation on the field of protection of economic competition

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
25.	-	The legislation on the field of protection of economic competition has been studied. A package of recommendations aimed at settlement of existing problems has been elaborated, including the opportunity of providing the Commission with access to operative data in the process of improvement of mechanisms for conducting inspections and preventing anti-competitive agreements by the Commission.	-	A study to improve the legislation in the field of protection of economic competition was conducted (4th quarter of 2020).	RA Ministry of Justice, RA State Commission for the Protection of Economic Competition (by consent).	The action is completed. Legislative amendments have been adopted.

According to the information submitted by the RA Ministry of Justice, the Draft Law on making Changes in the Law "On Protection of Economic Competition" was adopted in the National Assembly on 03.03.2021 in the second reading and in full. In this regard, it should be noted that the actions envisaged for 2019-2020 have been fully implemented, as well as some work envisaged for 2021. In particular, according to the RA Government Decision N 1332-N of 3 October, 2019, the legislation in the field of protection of economic competition for 2020 has been studied. A package of recommendations to address the existing issues has been developed, which includes the possibility of providing the Commission with access to operational data in the process of improving inspection mechanisms and preventing anti-competitive agreements. Draft legal acts for 2021 have been developed on the basis of a package of proposals, which have been submitted to the Staff of the RA Prime Minister.

In 2020, the "Law on Making Amendments to the Law on Protection of Economic Competition" and related laws (including the "RA Law on Operative-Intelligence Activities" and the "RA Law on Organization and Conduct of Inspections in the Republic of Armenia")

have been developed and adopted by the National Assembly in the second reading and in full. Changes and additions have been made, by which:

- Mechanisms for cooperation with the bodies carrying out operative-investigative activities and providing operative data to the Commission in the cases of anti-competitive agreements, abuse of a dominant position and prevention of coordination of economic activities, and those violations are envisaged.
- The scope of the Commission's authority to conduct inspections has been expanded, and the institute of continuous monitoring has been introduced.
- The proceedings conducted by the Commission have been differentiated, defining their characteristic features.
- The participants of the infringement proceedings were differentiated, the scope of their rights and responsibilities, the reasons for initiating the proceedings, the procedures for joining and separating administrative proceedings, etc. were regulated.

Thus, the action is considered **IMPLEMENTED**.

SECTOR 2.3: PREVENTION OF CORRUPTION

(Introduction of e-governance tools, introduction and improvement of mechanisms for the public participation in the process of state administration, simplification of administration)

	2019	2020
NUMBER OF PLANNED ACTIONS	3	6
OF WHICH IMPLEMENTED	-	-
OF WHICH MOSTLY IMPLEMENTED	-	3
OF WHICH PARTIALLY IMPLEMENTED	3	3
NOT IMPLEMENTED	-	-

Action 26: Introduction of a unified platform for the hotline of applications, complaints, requests of citizens

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
26.	The technical capacity has been studied. A package of recommendations has been elaborated and submitted to the Prime Minister of the Republic of Armenia.		-	-	Staff to the Prime Minister of the RA RA Ministry of Justice, RA Ministry of High-Tech Industry, Non-governmental organizations (by consent).	The work on the creation of the platform has started

According to the information provided by the Staff to the Prime Minister and the Ministry of Justice of the Republic of Armenia, the unified platform of electronic inquiries, which allows sending applications, complaints and inquiries to almost all state bodies, was re-launched in 2020. At the same time, a feedback platform with citizens is currently operated, which will allow assessing the quality of services provided and analyzing the effectiveness of the work of state bodies based on the collected data. The experience gained under the COVID pandemic has shown that joint call centers do not work effectively, as eventually the citizen has to find the answer to his question by calling to the redirected phone numbers. Therefore, the operation of the hotline at the level of each specialized department allows for more operative work.

The technical description of the unified platform for the provision of public services has been developed through the introduction of a toolkit to obtain accessible information on the services provided to the citizens by the state and local self-government bodies; the work on the creation of the platform has started; based on the developed methodology, 101 business processes have been analyzed, a package of optimization and modernization proposals has been developed.:

Thus, the action is considered **PARTIALLY IMPLEMENTED.**

Action 27: Increasing the effectiveness of ensuring public participation in the process of elaborating draft legal acts

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
27.	Activities aimed at modernizing the www.e-draft.am platform have been carried out.	The www.e-draft.am platform is integrated with a series of other electronic platforms. Public awareness-raising measures on www.e-draft.am platform, as well as the rules on availing the reform are being implemented in parallel.		The scope and number of draft acts to be placed on the unified platform for drafting legal acts has increased by 10% (4th quarter of 2020).	RA Ministry of Justice, RA Ministry of High-Tech Industry	The modernization concept is ready.

According to the information provided by the RA Ministry of Justice, the Ministry has developed a concept for modernizing the unified website for publication of legal acts' drafts. At the meeting of the Digitalization Board, the relevance of the website was approved and presented to international donor organizations for funding. Further, the integration of www.e-draft.am platform with a number of other electronic platforms is in progress. However, no public awareness measures on the www.e-draft.am platform, as well as on the rules for using it were carried out.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 28: Introduction of a toolkit for receiving accessible information on the services being provided by state and local self-government bodies to citizens the most, including elaboration of sample forms of filling in applications

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
28.	The scope of services being provided to citizens the most in state bodies has been studied.	Sample forms of filling in applications on the services being provided have been elaborated	The study of the scope of services being provided to citizens the most in state bodies has been conducted.	The study of the scope of services being provided to citizens the most in state bodies has been conducted. The results were discussed at the Anti-Corruption Council.	Staff to the Prime Minister of the RA, E-Governance infrastructure implementation agency (by consent).	Recommendations for improving some of the services have been submitted. Other results are presented below.

According to the information provided by the Prime Minister's Office, "EKENG" CJSC together with the Office of Deputy Prime Minister Tigran Avinyan carried out an inventory of services provided by state and local self-government bodies in a pre-developed format. The consulting company conducted a study of some of the services and provided suggestions for improving their business processes. Work is underway to re-publish the content and functionality of the government's e-gov.am website, as a result of which all the information will be gathered in one place.

According to the information provided by the RA Ministry of Justice, the technical description of the unified platform for providing public services has been developed, the platform has been created, 101 business processes have been analyzed based on the developed methodology, and a package of optimization and modernization proposals has been developed. Moreover, some public administration bodies have already expanded and improved the quality of services provided by the state. However, it should be noted that the proposals were not discussed at the meeting of the Anti-Corruption Council due to the absence of a meeting.

Thus, the action is considered **MOSTLY IMPLEMENTED.**

Action 29: Modernizing the “www.sso.am” unified electronic system of operators and introducing the “www.mygov.am” electronic platform on the basis of the mentioned system

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
29.	-	The sso.am electronic system has been modernized and introduced within the framework of the e-gov.am platform.	-	-	Staff to the Prime Minister of the RA RA, Ministry of Justice, RA Ministry of High-Tech Industry, E-Governance infrastructure implementation agency (by consent).	The development of conceptual design solutions for the unified e-gov.am platform for the provision of services is being carried out.

According to the information provided by the Office of the Prime Minister and the Ministry of Justice of the Republic of Armenia, the technical description of the sso.am electronic platform for joint operators of state services was developed, a tender was announced, and a contractor company was selected. The work on the creation of the platform has started. Currently, the development of conceptual design solutions for the unified e-gov.am service platform is underway. The concept of modernizing the sso.am electronic system of United Operators is currently underway.

An analysis of the system’s works was carried out. Existing deficiencies have been identified and a package of proposals is being developed to address the existing problems in order to ensure more efficient and faster delivery of services online. After the development of the concept of modernization of the sso.am electronic system of the joint operators and the implementation of the software development works of the sso.am electronic system, the introduction of the electronic system in the e-gov.am platform will be considered.

About 25 registers are connected to the interoperability platform of the government. Along with the registers integrated in the Government Interoperability Platform, the scope of activities of the joint offices is increasing, expanding the number of services provided.

Thus, the action is considered **PARTIALLY IMPLEMENTED.**

Action 30: Establishment of a unified platform of proactive publication of information required within the scope of the Law of the Republic of Armenia "On freedom of information"

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
30.	-	The international practice is studied. As a result of studies, a package of recommendations has been elaborated and submitted.	-	The international experience was studied and submitted to the Anti-Corruption Council (3rd quarter of 2020).	Staff to the Prime Minister of the RA, e-Governance infrastructure implementation agency (by consent) RA Ministry of Justice, RA Ministry of High-Tech Industry Non-governmental organizations (by consent).	A preliminary version of the technical task has been developed

According to the information provided by the Prime Minister's Office and the RA Ministry of Justice, the required package of proposals is based on the best international experience.

The reform proposals will be developed on the basis of the study of international experience aimed at creating a common platform for proactive disclosure of information required within the framework of the RA Law on Freedom of Information. The preliminary version of the technical task of the unified platform for proactive disclosure of information has been developed.

In the first quarter of 2021 it is planned to discuss the technical task, international experience with stakeholders and submit the final agreed version of the technical task to the Digitalization Council for consideration.

Thus, the action is considered **MOSTLY IMPLEMENTED**.

Action 31: Continuous improvement of the system of whistle-blowing

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
31.	-	<p>Conducting studies on the operation of the system of whistle-blowing</p> <p>Submission of recommendations aimed at the effectiveness of the system of whistle-blowing on the basis of the studies conducted.</p>	-	<p>The unified statistics of whistle-blowing cases are included in the annual report of the Ministry of Justice of the Republic of Armenia, in the annual report on the implementation of the program of the Government of the Republic of Armenia, in the unified electronic platform for whistle-blowing.</p> <p>A report on monitoring the activities of the Whistle-blowing System for 2019-2020 has been published (2020).</p>	<p>RA Ministry of Justice, RA General Prosecutor's Office (by consent).</p>	<p>A package of recommendations has been compiled</p>

According to the information provided by the RA Ministry of Justice, the package of recommendations on the continuous improvement of the whistle-blowing system was sent to the interested parties.

According to the information provided by the RA Ministry of Justice, monitoring and studies on the operation of the system of whistle-blowing, based on which a package of recommendations for the effectiveness of the whistle-blowing system was developed, which was sent to the interested bodies for discussion, then submitted to the staff of the RA Prime Minister. In addition, the unified statistics of whistle-blowing cases are included in the annual report of the Ministry of Justice of the Republic of Armenia, in the annual report on the implementation of the program of the Government of the Republic of Armenia, in the unified electronic platform for whistle-blowing. Therefore, the work within the framework of this action has been mostly implemented, as no report on monitoring the activities of the Whistle-Blowing System has been published in 2019-2020.

Thus, the action is considered **MOSTLY IMPLEMENTED**.

SECTOR 3: INVESTIGATION OF CORRUPTION-RELATED CASES

	2019	2020
NUMBER OF PLANNED ACTIONS	8	9
OF WHICH IMPLEMENTED	7	8
OF WHICH MOSTLY IMPLEMENTED	-	1
OF WHICH PARTIALLY IMPLEMENTED	1	-
NOT IMPLEMENTED	-	-

Action 32: Clarification of the scope of corruption-related crimes under the Criminal Code of the Republic of Armenia

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
32.	The international practice is studied. As a result of the studies, the draft Law of the Republic of Armenia “On making amendments and supplements to the Criminal Code of the Republic of Armenia” has been elaborated and submitted to the National Assembly of the Republic of Armenia, by prescribing the orienting list of corruption crimes.	-	The definition of the scope of corruption crimes was ensured according to the recommendations of the OECD Anti-Corruption Network, CoE and EU experts.	-	RA Ministry of Justice, Staff of the Prime Minister of the Republic of Armenia, RA General Prosecutor's Office (by consent), RA Special Investigation Service (by consent), RA Investigative Committee (by consent), RA National Security Service, RA Police, RA State Revenue Committee	Is presented below

According to the information provided by the RA Ministry of Justice, the Prime Minister's Office, the Police and the State Revenue Committee, on the basis of the study of international experience on corruption crimes, the RA Law “On Making Amendments and Addenda to the RA Criminal Code” N HO-207-N was developed and adopted by the RA NA on 25 March, 2020. The law defined the list of corruption crimes in the RA Criminal Code with a separate appendix, Appendix 6.

- ◆ For the discussion of the Action 32, ALA and the Coalition organized and implemented a FGD on 16 February, 2021 on the ZOOM online platform, in which the following departments participated:
 - **Police,**

- **Investigative Committee,**
- **SRC**
- **SIS,**
- **RA MOJ,**
- **Staff to the RA Prime Minister.**

During the discussion, the representatives of the Investigative Committee mentioned that the change made is commendable: Defining the list by law is legally correct from a legal point of view, but the real impact of the change can be seen in a year, when statistics will be available.

The views expressed by the Police were that more credible data on the impact of the change will be available in at least a year and added that at the moment, the police statistics suggest that in contrast to 2019, when the list of corruption crimes was not yet defined by law, in 2020 the number of corruption crimes has decreased.

According to the position presented by the SIS: the mentioned clarification will lead to more specialized investigative activities.

The RA Ministry of Justice shares this position, according to which the change will become more visible in parallel with the introduction of a complete anti-corruption institutional system. In addition this change will have practical significance in the activities of specialized anti-corruption investigative, prosecutorial and judicial bodies. Moreover, the definition of the list of corruption crimes has the feature of ensuring legal certainty.

Regarding the action under discussion, the State Revenue Committee drew attention to the fact that the change made a practical impact on the powers of the State Revenue Committee and the spheres of SRC activity. In particular, the new list no longer includes corruption crimes of a customs or tax nature, so the State Revenue Committee ceases to be involved in the investigation of corruption cases.

Representatives of the Staff to the Prime Minister stated that they did not participate in the implementation of the legislative change to be discussed; therefore they do not have additional information.

- ◆ For the discussion of the Action 32, ALA and the Coalition organized and implemented the second FGD on 18 February, 2021 on the ZOOM online platform. Representatives of more than a dozen NGOs participated in the discussion. The common position of CSOs was that the state often did not respond to inquiries and requests within the timeframe and in accordance with the law, and did not consult with civil society in cases prescribed by law. As a result, the voice of civil society is not always heard. The

context of this is that proposals on legislative changes made by CSOs are not taken into account, regardless of the availability of public discussion tools.

As for the change to be discussed, the common view was that it would be necessary to wait for some time after which it would be possible to assess the impact of the change, but in general, the clarification brings positive results.

Thus, the action is considered **IMPLEMENTED**.

Action 33: Studying the compliance of the elements of corruption-related crimes enshrined by the Criminal Code of the Republic of Armenia with international standards, submitting, where necessary, recommendations on bringing the corruption-related crimes in line with international standards

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
33.	-	The international practice is studied As a result of studies; a package of recommendations has been elaborated and submitted to the Staff to the Prime Minister of the Republic of Armenia.	-	The study of international experience has been carried out (2020)	RA Ministry of Justice, RA General Prosecutor's Office (by consent), RA Special Investigation Service (by consent), RA Investigative Committee (by consent), RA National Security Service, RA Police	The amended Code was adopted in the first reading.

According to the information provided by the RA Ministry of Justice, on the basis of the study of the relevant international experience, amendments were envisaged in the Criminal Code, which was adopted in the National Assembly on 09.12.2020 in the first reading.

Thus, the action is considered **IMPLEMENTED**.

Action 34: Developing a methodology for investigation of individual corruption-related crimes, including illicit enrichment, conducting training of criminal prosecution bodies based on the methodology developed

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
34.	The methodology for investigation of individual corruption-related crimes, including illicit enrichment, has been developed.		–	–	RA General Prosecutor's Office (by consent), Human Rights Defender (by consent), RA National Security Service, Academy of Justice, Non-governmental organizations (by agreement).	The information was received from the RA General Prosecutor's Office. The methodology has been developed.

We learn from the progress report on the measures to be implemented in the first half of 2020, published by the RA Ministry of Justice of the Republic of Armenia that Decision No. 1332 N of 3 October, 2019 “On approving the Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022” states that there was a working group in the Prosecutor General's Office for this action, which was engaged in the study and application of international experience. According to the information provided by the General Prosecutor's Office of the Republic of Armenia, the relevant subdivision of the General Prosecutor's Office has developed a methodological guide entitled "Peculiarities of Investigation of Certain Corruption Crimes, Including Illicit Enrichment".

Thus, the action is considered **IMPLEMENTED**.

Action 35: Complementing the statistics on corruption-related crimes

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
35.	The procedures for maintaining statistics on the sources of information concerning corruption-related crimes and on the property confiscated and levied in execution as a result of investigation thereof are developed.		-	-	RA General Prosecutor's Office (by consent), RA Police.	Statistics management procedures have been developed.

According to the information provided by the Police, the procedure for obtaining information on corruption crimes, statistics on confiscated and ceased property as a result of their investigation should be based on the provisions of the new Joint Crime Registration Procedure, the drafting of which has already been carried out in the Information Center of the RA Police and it will be possible to finalize it only after the adoption of the new RA Criminal Procedure Code.

In accordance with the list of corruption crimes received from the RA Prosecutor General's Office, the program components of corruption crimes and reports of the persons who committed them were developed in the Information Center of the RA Police, as a result of which reports are received and provided to interested services.

The reports are also provided to the Statistical Committee of the RA every six months and they are published on the official website of the Committee.

According to the information provided by the Prosecutor General's Office, in order to supplement the statistics on corruption crimes, appropriate changes have been made in the sample templates of statistical reports.

Thus, the action is considered **IMPLEMENTED**.

Action 36: Ensuring the access of criminal prosecution bodies to the electronic databases of state bodies through electronic enquiry

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
36.	-	Software is developed and the software is introduced	-	-	Staff to the Prime Minister of the RA, e-Governance infrastructure implementation agency (by consent), RA Ministry of Justice, RA Ministry of High Tech Industry, RA General Prosecutor's Office (by consent), RA National Security Service.	Software is developed and introduced

According to the information provided by the Prime Minister's Office, the RA Ministry of Justice and "EKENG" CJSC (e-Governance infrastructure implementation agency), a unified interoperability platform is developed, launched and its accessibility is ensured.

Currently, the RA Police, the Investigative Committee, the SIS, the Prosecutor's Office and the NSS are connected to the interoperability platform. The mentioned bodies receive data from the State Register of Population of the RA Police Passport and Visa Department, the Traffic Police, the Police Information Center, the Cadastre Committee, the State Revenue Committee, the State Register of Legal Entities Agency and the Civil Status Acts Registration Agency of the RA Ministry of Justice, as well as the RA Ministry of Labor and Social Affairs, etc.

Thus, the action is considered **IMPLEMENTED**.

Action 37: Establishing a centralized register of bank accounts

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
37.	<p>The international practice has been studied.</p> <p>As a result of studies, a package of recommendations has been elaborated and submitted to the Staff to the Prime Minister of the Republic of Armenia.</p>	<p>Based on the recommendations of the study centralized register of bank accounts has been established.</p>	<p>International experience on centralized register of bank accounts studied and discussed at Anti-Corruption Policy Council</p>	<p>The Central Register of Bank Accounts has been established and is operational (2nd half of 2020).</p>	<p>Central Bank of the RA (by consent).</p>	<p>Presented below</p>

- ◆ For the discussion of the Action 37, ALA and the Coalition organized and implemented the second FGD on 16 February, 2021 on the ZOOM online platform. Representative of the **Financial Monitoring Center of the Central Bank** participated in the discussion.

According to the Bank, in 2020 the Central Bank initiated the process of creating a centralized register of bank accounts, within the framework of which first the relevant international experience was studied, then legal regulations were developed and technical software was provided. As a result, a draft law on amendments and additions to the RA Law on the Central Bank was drafted and sent to all stakeholders for discussion and opinion. The draft is currently being discussed in the Government. According to the Central Bank, in parallel with the legal work, huge progress has been registered in the technical and software support of the system. In particular, it is ready for operation.

- ◆ For the discussion of the Action 37, ALA and the Coalition organized and implemented the second FGD on 18 February, 2021 on the ZOOM online platform. Representatives of more than a dozen NGOs participated in the discussion. According to them, the Registry can cause problems in the processes of banking secrecy, customer protection and finding those responsible in case of violation of rights.

It turns out that the Registry is actually created, the hardware and software is already ready and can be launched, and the draft regulating the legal relations for the operation of the Registry has been submitted to the RA Government for discussion.

Thus, the action is considered **MOSTLY IMPLEMENTED**.

Action 38: Strengthening international cooperation in investigating and disclosing corruption-related crimes

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
38.	The mechanisms for international co-operation in corruption cases, and the hindrances existing therein have been studied.		–	A study of the mechanisms for international co-operation in corruption cases, and the hindrances existing therein have been conducted (2nd quarter of 2020).	RA Ministry of Justice, RA General Prosecutor's Office (by consent), RA National Security Service.	The RA draft law "On Legal Aid in Criminal Cases" has been drafted. Other results are presented below.

According to the information provided by the RA Ministry of Justice, a study of the mechanisms for international co-operation in corruption cases, and the hindrances existing therein have been conducted, as a result of which the RA Draft Law "On Legal Aid in Criminal Cases" has been developed, which was put up for public discussion and submitted to the interested bodies.

According to the information provided by the RA Prosecutor General's Office, on 24-28 November, 2019, the Deputy Head of the Department for Combating Corruption Crimes of the RA Prosecutor General's Office participated in an anti-corruption study visit to the city of Kiev, Ukraine. The visit was aimed to study the experience of the Ukrainian anti-corruption bodies in the fight against corruption, to meet with state anti-corruption bodies and non-governmental organizations operating in this field.

Thus, the action is considered **IMPLEMENTED**.

Action 39: Establishing mechanisms aimed at confiscation of property of illicit origin

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
39.	<p>The regulations of the legislation of the Republic of Armenia on levying execution on and recovering the property of illicit origin, as well as the compliance thereof with the requirements of the UN Convention Against Corruption have been studied.</p> <p>Based on the results of the studies, the “Draft Law on Levying the Property of Illicit Origin” has been elaborated.</p>	<p>The “Draft Law on Levying the Property of Illicit Origin” has been submitted to the National Assembly of the Republic of Armenia.</p>	<p>The study on levying execution on and recovering the property of illicit origin was conducted and the recommendations were discussed.</p>	<p>“Draft Law on Levying the Property of Illicit Origin” was presented to the National Assembly (1st quarter of 2020).</p>	<p>RA Ministry of Justice, RA General Prosecutor's Office (by consent), Central Bank of Armenia (by consent), RA National Security Service</p>	<p>The law has been adopted. Other results are presented below.</p>

The law has been adopted.

According to the information provided by the RA Ministry of Justice, the required law was adopted on 16 April, 2020.

As a result of the desk review, it became clear that the post of the RA Prosecutor General has been created in the RA General Prosecutor's Office, which coordinates the field of confiscation of property of illegal origin, and the department of confiscation of property of illegal origin has been established. Open tenders were held to fill the lists of candidates for the confiscation of property of illegal origin and the Deputy Prosecutor General to coordinate the field. The competitions were conducted by the Qualification Commission under the Prosecutor General of the Republic of Armenia, in which two of the experts were appointed by the Prosecutor General of the Republic of Armenia on a voluntary basis. One of the experts was Arkady Sahakyan, former Chairman of the Governing Board of the CSOs Anti-Corruption Coalition in Armenia. It should be noted that two candidates submitted applications to participate in

the competition for the position of Deputy Prosecutor General. One of the candidates did not participate in the competition, and in fact the latter was elected and appointed in the absence of an alternative candidate.

Thus, the action is considered **IMPLEMENTED**.

Action 40: Introduction of an institute to subject legal persons to criminal liability for corruption-related offences

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
40.	The international practice on criminal liability of legal persons for corruption-related offences has been studied.		-	The draft laws "On Making Amendments and Addenda to the Criminal Code" and "On Making Amendments and Addenda to the Criminal Procedure Code" were submitted to the Office of the Prime Minister of the Republic of Armenia (2nd quarter of 2020)	RA Ministry of Justice, RA General Prosecutor's Office (by consent).	The amended Code was adopted in the first reading.

A step forward has been made from the results expected by the monitoring indicator for 2020: the drafts of the "RA Criminal Code" and the "RA Criminal Procedure Code" have been submitted to the RA National Assembly. On 21 May, 2020, the "Draft Criminal Code of the Republic of Armenia" was approved by the Government of the Republic of Armenia, which was adopted in the first reading on 9 December, 2020. The issue of criminal liability of legal persons for corruption-related offences has also been regulated within the framework of this draft.

Thus, the action is considered **IMPLEMENTED**.

Action 41: Creating pre-conditions for bringing the legal regulations prescribed by Article 30 of the Law "On operational intelligence activity" in compliance with the law enforcement practice

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
41.	A relevant study has been conducted A recommendation on existing legislative incompliances and existing possibilities of their elimination has been submitted.		-	-	RA Ministry of Justice, RA General Prosecutor's Office (by consent), RA Special Investigation Service (by consent), RA Investigative Committee (by consent), RA Police, RA National Security Service.	The package of proposals is being finalized. Other recommendations are presented below.

According to the information provided by the RA Police, and the RA Ministry of Justice, the package of proposals "On Making Amendments to Article 30 of the RA Law on Operative-Investigative Activities" was developed and sent to all the beneficiaries for the opinion, as well as to the Staff to the Prime Minister of the RA. Currently a draft based on the received proposals is being developed. The package of proposals provided for the implementation of the enforcement of operative-investigative measures of the practice on imitation of receiving or giving a bribe under Article 30 of the "RA Law on Operative-Investigative Activities". In particular, the package of proposals revealed the legal position expressed by the RA Court of Cassation on the scope of implementation of the mentioned operative-investigative measure and its legality and the observations made by the ECHR. Combining the mentioned with the changes conditioned by the continuous development of the criminal procedure legislation, the issue of expanding the scope of operative-investigative measure of receiving or giving bribes was raised. It was suggested that the possibility of carrying out an operative investigative measure "imitation of receiving or giving a bribe" should not be connected with "receiving a bribe" or "giving a bribe", but with revealing specific crimes envisaged by a special part of the RA Criminal Code. It was suggested to directly list all the crimes where carrying out the operative investigative measure would be considered lawful in order to reveal those crimes.

Thus, the action is considered **IMPLEMENTED**.

SECTOR 4: PUBLIC AWARENESS AND ANTI-CORRUPTION EDUCATION

	2019	2020
NUMBER OF PLANNED ACTIONS	5	7
OF WHICH IMPLEMENTED	1	3
OF WHICH MOSTLY IMPLEMENTED	-	-
OF WHICH PARTIALLY IMPLEMENTED	4	4
NOT IMPLEMENTED	-	-

Action 42: Elaboration, approval and implementation of a programme of an annual public awareness campaign

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
42.	The Communication Strategy and the relevant Action Plan have been elaborated and submitted to the Staff to the Prime Minister of the Republic of Armenia.	The measures provided for by the Action Plan are being implemented. Semi-annual reports have been submitted through the procedure prescribed.	–	The Communication Strategy and the relevant Action Plan have been approved by the decision of the RA Prime Minister. Semi-annual reports on Communication have been submitted through the procedure prescribed to the Anti-Corruption Policy Council and published on the websites of the Council and the RA Ministry of Justice.	RA Ministry of Justice, Staff to the Prime Minister of the RA, Public administration bodies, Non-governmental organizations (by consent), Mass media (by consent).	The work is in process.

According to the information provided by the RA Ministry of Justice and Staff to the Prime Minister of the RA, based on the study of international experience and cooperation with the UNDP, the RA Ministry of Justice has developed a draft decision of the RA Government “On approving the 2021-2022 Communication Action Plan within the framework of the fight against corruption”, which is under discussion in the Ministry of Justice.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 43: Inclusion of the subject “Fundamentals of the anti-corruption policy” in the instruction modules of all higher education institutions

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		

43.	Instruction plans for the subject “Fundamentals of the anti-corruption policy” have been developed.	The subject “Fundamentals of the anti-corruption policy” is taught in higher education institutions.	–	Instruction plans for the subject “Fundamentals of the anti-corruption policy” are developed (2nd quarter of 2020). The subject “Fundamentals of the anti-corruption policy” is taught in higher education institutions (3rd quarter of 2020).	RA Ministry of Education, Science, Culture and Sport, Universities, Secondary vocational education institutions	The work is in process.
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According to the information provided by the MESCS, aimed at implementation of the action on the issue of "Inclusion of the subject" Fundamentals of Anti-Corruption Policy" in the teaching modules of all higher education and secondary vocational education institutions", the issue was submitted to the universities for discussion in accordance with the relevant letter of the RA Ministry of Education and Science, based on the requirement of Article 6, Part 2, Clause 3 of the RA Law on Higher and Postgraduate Professional Education. The Article provides that “elaboration and approval of the curricula and syllabuses for professions and specializations of higher and postgraduate professional education, as well as publishing study materials and training and methodological manuals,” is the competence of the higher education institutions. As a result of discussions on the possibility of including a separate subject "Fundamentals of Anti-Corruption Policy" in the curricula of universities, the universities submitted information to the Ministry, according to which lectures on corruption risks and prevention of corruption are already held in universities. Moreover, the formation of anti-corruption knowledge and values among university students is promoted by the establishment of basic principles in the internal rules and procedures of higher education institutions; in particular, the provisions of the anti-corruption policy are enshrined in anti-corruption programs, student assessment systems, current exam and appeal procedures, final attestation procedures, codes of ethics, and academic integrity policy.

At the same time, the universities expressed readiness to include the subject "Fundamentals of Anti-Corruption Policy" in their curricula for a certain amount of hours, after developing a program for teaching the subject and defining the educational outcomes.

Referring to the process of action related to the field of primary (vocational) and secondary vocational education, that is, "... inclusion of the subject "Fundamentals of Anti-Corruption Policy” in the teaching modules of secondary vocational education institutions", according to the semi-annual reports submitted by MESCS this is considered as implemented.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 44: Providing anti-corruption education in high school

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
44.	A study on the sections related to corruption of the subject "Social Studies" taught in high school has been conducted. A relevant package of recommendations has been submitted.	The content of the sections related to corruption in the textbooks of the subject "Social Science" has been changed.	–	The study on the sections related to corruption of the subject "Social Studies" taught in high school was conducted. A relevant package of recommendations was submitted (2nd quarter of 2020). Teaching is carried out using the sections related to corruption in the textbooks of the subject "Social Science" (3rd quarter of 2020).	RA Ministry of Education, Science, Culture and Sport, Universities	The work is in process.

According to the information provided by the RA Ministry of Education, Science, Culture and Sport, in the framework of the review of the state standard of general education and subject standards and programs, the following anti-corruption topics were addressed in the subject outcomes of the social sciences and in the scope of the program:

1. Types, causes and consequences of corruption (9th grade)
2. Economic competition, elections (election violations), civic participation and forms of control (10th grade)
3. Anti-corruption methods and their effectiveness (11th grade).

In order to fix the mentioned changes, the draft decision of the Government of the Republic of Armenia "On making changes in the decision N 439-N of the Government of the Republic of Armenia of 8 April, 2010" was developed, which defines the procedure of formation and approval of the state standard of general education and the provisions of the state standard of general education. The mentioned draft was developed, circulated, put for public discussion and submitted to the Staff to the Prime Minister of the RA, in accordance with the established procedure. The draft was returned for discussion after the end of martial law.

At the same time, by the order N 1196-A / 2 of the Minister of Education and Science of the Republic of Armenia of 10 September, 2020, the textbook of the subject "Social Science" created for the 11th grade with the support of the "Konrad Adenauer" Foundation

was approved and provided to secondary schools, and the methodological manual developed on the basis of the mentioned textbook for the teachers of the secondary school. The mentioned textbook includes sections related to corruption.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

Action 45: Public awareness-raising on the reforms being implemented in the system of civil service, conducting trainings, including the topics of prevention of corruption, integrity, and human rights

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
45.	Guidelines for awareness-raising and training programs have been elaborated.	Regular trainings, seminars, events aimed at awareness-raising have been conducted.		Civil Servants Training Programs include Corruption Prevention and Human Rights Courses (4th quarter of 2020). 50 civil servants were trained.	Bureau of Civil Service of the Staff to the Prime Minister, RA Ministry of Justice Human Rights Defender (by consent), Non-governmental organizations (by agreement).	The action is implemented. Implementation of some additional actions is suspended.

According to the information provided by the Bureau of Civil Service of the Staff to the Prime Minister and the Ministry of Justice of the Republic of Armenia, during the second half of 2020 the Bureau of Civil Service of the Staff to the Prime Minister organized and conducted 25 trainings on integrity (including sections on human rights and prevention of corruption). The trainings were organized from 14 September to 24 December 24 inclusive, each lasting two working weeks. The trainings were conducted remotely, with the participation of 390 civil servants.

The seminars for the media, the professional community and NGOs have been postponed due to the decision to declare a state of emergency in Armenia on 16 March, 2020 and the decision to declare martial law on 27 September, 2020.

The production and dissemination of awareness-raising videos has been delayed due to the postponement of the EU-funded "Support to Further Implementation of Civil Service Reform in Armenia" Twinning Project.

Posting informative infographics on the social network aimed at raising public awareness about the civil service system has been postponed, as they were envisaged within the framework of the "Public Administration Reform Strategy until 2030" developed by the office of the Deputy Prime Minister Tigran Avinyan. The work related to the latter has been postponed due to the decision to declare a state of emergency in Armenia on 16 March, 2020 and the decision to declare martial law on 27 September, 2020.

Thus, the action is considered **IMPLEMENTED**.

Action 46: Elaboration of distance learning modules for civil servants

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
46.	-	Distance learning modules have been elaborated.	-	Distance learning modules have been developed in the civil service system (2nd quarter of 2020).	Bureau of Civil Service of the Staff to the Prime Minister.	Learning modules are elaborated.

According to the information provided by the Prime Minister's Office, distance learning modules on Civil Rights have been developed for Civil Servants:

1. Children's rights,
2. Fight against discrimination,
3. Overview of the course on women's rights and gender equality.

In addition, distance learning modules on integrity, human rights, and on corruption prevention have been developed. These topics were included in the training programs for civil servants.

Trainings on integrity topic (including sections on human rights and prevention of corruption) were conducted with the participation of 390 civil servants of 39 state bodies.

At the end of each training session, civil servants underwent a testing phase to assess the effectiveness of the training.

Thus, the action is considered **IMPLEMENTED**.

Action 47: On-line broadcast of the stage of testing of competitions for filling vacant positions

No.	Expected outcome		Monitoring indicator		Responsible body	Monitoring result
	2019	2020	2019	2020		
47.	-	The technical conditions for broadcasting the stage of testing of competitions for filling vacant positions have been elaborated	-	-	Bureau of Civil Service of the Staff to the Prime Minister.	The system has been put into operation.

According to the information provided by the Staff to the Prime Minister, the civil service information platform has been launched since 1 October, 2020, and from 1 October, 2020, the competitions for filling vacancies in state bodies are held through the civil service information platform. Following the integration of the online broadcasting and civil service information systems of the vacancy testing phase, on 21 December, 2020, the Ministry of Health conducted the first competition testing through the Civil Service Information Platform, which was broadcast live on the official website of the Bureau of Civil Service of the Staff to the Prime Minister. An online broadcast of the vacancy testing phase of the competition has been implemented as well.

Thus, the action is considered **IMPLEMENTED**.

Action 48: Conducting regular surveys, among the general public, on corruption, public confidence and the impact of anti-corruption measures, publishing the results of surveys

No.	Expected outcome	Monitoring indicator	Responsible body	Monitoring result
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	2019	2020-2022	2019	2020		
48.	A methodology for conducting regular surveys on corruption, level of public confidence and impact of anti-corruption measures has been elaborated.	Through conducting a survey among the general public, including in Yerevan and the marzes of the Republic of Armenia, at least once a year, the most corrupted sectors according to the public opinion, existing corruption risks have been revealed, the public opinion on the effectiveness of anti-corruption measures implemented by the Government has been presented, and steps have been taken aimed at reducing corruption risks.	-	-	Staff to the Prime Minister, RA Ministry of Justice, Public administration bodies, Commission for the Prevention of Corruption (by consent), Non-governmental organizations (by consent)	Results are presented below.

As a result of cooperation between the RA Ministry of Justice and IRI International Organization:

- According to a survey conducted by IRI International Organization in Yerevan and the regions of Armenia in 2019, the public opinion indicators of corruption in the public sector were presented, the reasons for which were identified according to public perception.
- In the framework of regular public opinion surveys regularly conducted by IRI, since 2019, questions related to the fight against corruption are asked.

It should be noted that work on conducting only separate anti-corruption surveys are currently underway. In this regard, the RA Ministry of Justice is already cooperating with the CoE Yerevan Office; a corresponding methodology is being developed.

In addition, within the framework of the "Human Rights and Women in the Armed Forces of Armenia" program of the CoE Yerevan Office, a study was conducted and a report entitled "RA Legislation on the Protection of Advertisers and its Applicability in the Armed Forces: Parallels with International Standards and Best Practice" was published. In this report in international and local experts identified issues that hinder the reporting on human rights violation and corruption in the armed forces. In order to identify the obstacles to the effectiveness of whistleblowing systems, within the framework of the mentioned program, a sociological survey was

conducted in the military units subordinated to the 1st and 2nd Army Corps of the RA Ministry of Defense to understand the readiness of servicemen to report violations or other abuses, including corruption. :

Due to the situation created in the country, it was not possible to sum up the results of work in 2020 and it was postponed to 2021.

During the second half of 2020, discussions in remote mode took place between the representatives of the RA Police, the RA Ministry of Justice, the OSCE, the EU and the UN. Thus, a unified methodology for conducting surveys has not been approved yet, after which it will be possible to conduct surveys in Yerevan and the regions of Armenia.

It was also decided to conduct a public inquiry on confidence towards the police with the direct support of the OSCE. The jointly developed survey questionnaire included, among other issues, issues related to corruption and the level of public trust in the Police. The survey is planned to be conducted by IMR in 2021.

Thus, the action is considered **PARTIALLY IMPLEMENTED**.

METHODOLOGICAL RECOMMENDATIONS

1. The indicators to be monitored for the activities envisaged by the Anti-Corruption Strategy Action Plan mainly include output level indicators. These indicators mainly refer to whether this or that action envisaged by the Anti-Corruption Strategy Action Plan has been implemented or not, while the indicators on the relationship between the action and the expected result are mostly absent. This assumes that the impact assessment of the performed actions is not performed and it is not assessed whether the performance of the action led to the desired result/results. For example, the analyzes and assessments of the actions 1, 2, 3, 11 presented in this report allow to conclude that these indicators do not fully allow to assess the qualitative aspects of the actions performed. For this reason, we propose to include impact level indicators, as indicators for measuring the effectiveness of the implementation of Anti-Corruption Strategy Action Plans, which it will enable to assess whether the actions taken have led to the desired results and what impact they have had in the in the long term perspective.
2. Some of the actions envisaged by the Anti-Corruption Strategy Action Plan do not have monitoring indicators, which does not allow finding out the real scope and real impact of the actions carried out in a specific period. We suggest reviewing and envisaging such measures for all the events for which there are no audit indicators. We propose to review and provide for such measures for all events for which there are no monitoring indicators.
3. In order to assess and monitor the performance of the anti-corruption strategy and its implementation measures, some monitoring indicators are based on assessments and indicators provided from one source, and comparisons are not made with the results and information provided by other reliable sources. We suggest combining information provided from several sources for verifying the monitoring indicators to effectively evaluate the performance of actions.

CONTENT RECOMMENDATIONS

1. Adopt the draft law on amendments to the RA Law on the Corruption Prevention Commission and other related laws and envisage the CPC as the central body that will coordinate and supervise the activities of the integrity affairs organizers, including the organization of trainings for them.
2. Adopt the draft law on making amendments to the RA Law on the Corruption Prevention Commission and other related laws, making available to the public the results of the integrity check of public servants carried out by the CPC, preserving personal data in accordance with the RA Law on Protection of Personal Data.
3. Carry out a real assessment of the formation and capacity of the Anti-Corruption Policy Council, identify the illegal grounds for membership of NGOs involved in violation of the requirements of the RA legislation, as well as illegal grounds for artificial barriers to membership to the Council of the CSOs Anti-Corruption Coalition of Armenia and make appropriate legal decisions.
4. Adopt model rules of conduct of public servants and rules of conduct of civil servants, members of parliament and investigators.
5. Expand the scope of the term "family" of declaring officials, including persons closely related to the official, such as a spouse/parent, child, brother or sister, as well as persons in a godfather-godson relationship.
6. Train the representatives of the main stakeholders (policy makers, civil society organizations, scientific institutions, media, government clients, businesses) on anti-corruption and integrity topics, contributing to strengthening their capacity building.
7. Review the Anti-Corruption Strategy and Action Plan in the light of the methodological and contextual proposals presented in this report, as well as in the light of the situation in Armenia as a result of the Artsakh 2020 war and the challenges encountered.