



MONITORING OF THE ACTIONS OF
THE REPUBLIC OF ARMENIA
ANTI-CORRUPTION STRATEGY
AND ITS IMPLEMENTATION ACTION PLAN
FOR 2019-2022
TO BE PERFORMED IN THE FIRST HALF OF 2021

Results

December, 2021

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ABBREVIATIONS

ACC	Anti-Corruption Committee
ALA	Armenian Lawyers' Association
CB	Central Bank
CoE	Council of Europe
CPC	Corruption Prevention Commission
CSO	Civil Society Organization
EKENG	e-Governance infrastructure implementation agency
EU	European Union
FGD	Focus group discussion
GRECO	Council of Europe - Group of States Against Corruption
HEE	Higher Educational Establishment
IC	Investigative Committee
LG	Local Government Bodies
MoD	Ministry of Defense
MESCS	Ministry of Education, Science, Culture and Sports
MFA	Ministry of Foreign Affairs
MHTI	Ministry of High-Tech Industry
Moj	Ministry of Justice
MM	Mass Media
NA	RA National Assembly
NGO	Non-Governmental Organization
OIM	Operative-investigative measure
RA	Republic of Armenia
RP	Road Police
SCPEC	State Commission for the Protection of the Economic Competition
SIS	Special Investigation Service
SJC	Supreme Judicial Council
SRC	State Revenue Committee
UN	United Nations
USAID	United States Agency for International Development

INTRODUCTION

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. In this regard, 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 Plan¹ the Armenian Lawyers' Association and the CSOs Anti-Corruption Coalition of Armenia, in the scope of this report, present **the results of the monitoring of activities of the "Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022" to be performed in the first half of 2021**. The main objective of the monitoring is to assess the current progress of the implementation of the Action Plan of the Strategy. The main objective of the monitoring is to assess the current progress of the implementation of the Action Plan of the Strategy. To implement the monitoring, the available documents, official information and monitoring reports were studied, as well as a focus group discussion was conducted among the specialized CSOs and sectoral experts. The monitoring activities were performed in October-November 2021, and the report was developed in December of the same year.

It should be noted that this report is the second report on the monitoring of the Anti-Corruption Strategy and its action plan. The first was the report on 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", which the Armenian Lawyers' Association and the CSOs Anti-Corruption Coalition of Armenia published in March 2021 (hereinafter referred to as the

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.

monitoring results report for 2019-2020).² This public monitoring tool ensures continuous public control and monitoring.

² Report on 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 Armenian Lawyers' Association and the CSOs Anti-Corruption Coalition of Armenia published in March 2021, is available here: <https://armla.am/en/6889.html>

MONITORING OBJECTIVES

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 performed in the scope of each event and the expected results and monitoring indicators for that event in 2021 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. And in the case when the deadlines for specific measures under the Anti-Corruption Strategy are envisaged not in the first but in the second half of the current year, the assessment was carried out on the basis of comparison and analysis of the expected result and the work done in the reporting period. In order to understand what these measures are, the second column of each action indicates the specific half-year or quarter of the action to be implemented in 2021. There are actions that must be implemented in 2021 without a specific deadline.

Thus, within the framework of this report, the actions defined by the Action Plan for 2021 have been separated and the progress of the implementation of those actions in the first half of the year has been assessed.

The monitoring was performed 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) 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).

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, including reports submitted by the bodies responsible for the implementation of the Anti-Corruption Strategy

and focus group discussions with stakeholders. This report also analyzed and included the observations and recommendations submitted to the draft report by the competent state bodies. The field work was performed in October-November 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/document analysis: Information on quantitative and procedural indicators of activities to be performed in 2021 was collected through desk research/document analysis, including analysis of the report submitted by the state bodies on the implementation of the measures to be implemented in the first half of 2021 under the "Republic of Armenia Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022" (hereinafter referred to as the Report)³ The report also includes the observations and recommendations submitted by the competent state bodies on the draft report. Information on **output level indicators** was collected through these methods.

Table 1. Competent bodies involved in the development of the report and the nature of the cooperation

Method	Target Competent Authorities/Bodies	Bodies presented observations and recommendations / Number	Bodies that did not have observations and recommendations	Bodies that did not respond	Number of observations and recommendations
Collection of observations and recommendations on the draft report	Involved in the implementation of the actions of Anti-Corruption Strategy 2021	RA MoJ, RA Ministry of Economy CPC, Prosecutor General's Office, EKENG CJSC, SCPEC, Civil Service Office, Investigative Committee, RA Police	ACC, Academy of Justice, RA MHTI, RA MESCS RA Ministry of Finance, SJC CEC	NA, Office of the Prime Minister, HRD, RA NSS, RA CB, RA SIS,	58
Total	22	9	7	6	58

Focus group discussions: **Outcome level indicators** were evaluated through qualitative research methods, in particular, through FGDs. These indicators include the activities performed **in the first half of 2021**, as it is possible to obtain some estimates of the level of impact only for those completed activities.

Taking into account the fact that within the framework of the report, the competent state bodies presented in detail the actions taken to implement the measures, therefore the FGD was organized with the representatives of specialized CSOs, lawyers and sectoral experts. In total of 1 FGD was conducted. At the same time, the draft of this report was sent to all the competent state bodies included in the list of bodies responsible for actions to be implemented in the Anti-Corruption Strategy during 2021 and it was suggested to submit observations and recommendations on the

³ See the report on the process of implementation of actions to be implemented in the first half of 2021 provided by the Decision No 1332-N of the Government of the Republic of Armenia dated October 3, 2019 on "Approving the Anti-Corruption Strategy of the Republic of Armenia and its Implementation Action Plan for 2019-2022". Available at:

https://moj.am/storage/files/pages/pg_2607683989861_Hashvetvutyun_2021_final.pdf

draft in writing. The submitted observations and recommendations were summarized and included in the report.

Table 2. Information on conducted FGD

Method	Quantity	Target group	Number of participants
Focus group discussion	1	Representatives of civil society organization, lawyers, sectoral experts	17

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RESULTS

SECTOR 1: DEVELOPMENT OF ANTI-CORRUPTION INSTITUTIONAL SYSTEM

	2021
NUMBER OF PLANNED ACTIONS	6
OF WHICH IMPLEMENTED	1 ⁴
OF WHICH MOSTLY IMPLEMENTED	-
OF WHICH PARTIALLY IMPLEMENTED	4 ⁵
NOT IMPLEMENTED	1

⁴ Evaluation of the action is made with reservation

⁵ Evaluation of 2 actions is made with reservation

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
1	The legislative package on expanding the scope of the Commission's functions has been submitted to the National Assembly. The number of staff has increased.	A separate line provided for the financing of the Commission is envisaged in the RA state budget. Legislative package improving the efficiency of the powers of the CPC has been submitted to the National Assembly (2021)	Ministry of Justice of the Republic of Armenia Staff of the Prime Minister of the RA The RA National Assembly (by consent) Commission for the Prevention of Corruption (by consent)	The scope of the Commission's functions has been expanded. The number of staff has increased from 40 to 53. Other results are presented below.

On 19 January, 2021, the RA National Assembly adopted the Law "On Making Amendments and Addenda to the Law on Public Service" and the package of related laws. The package also amended the "Law on the CPC" and revised the scope of the CPC's powers. In particular, in order to find out the fact that the declarant possesses the actual property, as well as the fact that the declarant is a real owner (beneficial owner), the SPC has the right to apply to the operative-investigative bodies and receive the necessary information. The CPC was also empowered to request a situational declaration of assets and income within two years of the applicant's termination of office, in the event of a significant change in his or her assets. In the framework of the integrity study, the authority given to the CPC to study the possibility of belonging to a criminal subculture was clarified. In the context of the above, the CPC is entitled to apply to the bodies implementing the OIM (Operative-investigative measures) and receive information. In addition to the above, on 29 December, 2020, the draft law "On Making Amendments and Addenda to the Constitutional Law on Parties" was adopted and entered into force on 20 January, 2021, by which the members of the party's permanent governing body and in the case of other governing bodies, the members of that body are obliged to submit a declaration of their property and income to the CPC. Other changes are also envisaged by the amendments made. At the same time, it should be noted that some articles of this law, including the above, will enter into force on 1 January, 2022.

During the reporting period, changes were made to the staff list of the CPC and the number of staff increased by 13 new positions from 40 to 53.

According to the Report, during the elaboration of the above-mentioned legal acts, consultations were held with the representatives of the interested state bodies and NGOs. From this point of view, it should be noted that it is another matter when drafts are submitted for public discussion, and quite another when the competent authorities do not take into account the recommendation and observations submitted by CSOs as a result of those discussions.

On 23 November, 2021, on the ZOOM online platform, the ALA and the CSO Anti-Corruption Coalition of Armenia organized a FGD (Focus Group Discussion) with the participation of more than a dozen CSO representatives, lawyers, and sectoral experts. The participants, despite the above-mentioned changes, expressed concerns about the incomplete legislative regulations and the problems arising thereof. Thus, as we mentioned, the CPC has the right to conduct an integrity check of officials. Among other things, that conclusion also contributes to the decision-making process when appointments are made. The first problem here is that they are secret and are not published. Under this strict privacy regime, it is impossible to assess the effectiveness of this function, to exercise effective public control, and analyze how many of the findings (whether positive or negative) were taken into account in the decision-making process and how well they contained complete information about the integrity of the candidate.

Second: The conclusion of the integrity checking is not provided to the evaluated candidate. In particular, in accordance with Article 26.1 (9) of the Law “On Commission for the Prevention of Corruption”, the Commission, as a result of reviewing and summarizing the information, prepares and submits to the **competent body** an advisory opinion on the conduct of the person. The consequence of such regulation is, that the person under evaluation is not familiar with the conclusion concerning him/her, and there may be information that needs to be further clarified by the candidate after getting acquainted with it. Moreover, this does not refer to the regulation of requesting clarifications by the CPC, as the CPC requires clarification only on issues that raise doubts of the Commission. This issue, for example, arose when, during the discussion of the conclusion of the integrity checking at the National Assembly, the candidate informed about the incorrect information contained in the conclusion.

Thus, although formally the action is considered as **IMPLEMENTED (with reservation)**, but there are serious problems in terms of content.

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 and ensuring normal functioning

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
2	The Anti-Corruption Committee has been formed. It has been provided with a separate budget financing, and tools needed to perform the functions.	<p>The central body of the ACC is provided with the necessary premises and material resources, at least 50% of the staff has been replenished (2021).</p> <p>40% of the specialized units of the staff were trained in 2021, 70% in 2022.</p> <p>MTEF</p> <p>A separate line of ACC financing for 2021-2022 is envisaged in the state budget and</p>	<p>RA Ministry of Justice, RA General Prosecutor's Office (by consent) RA Investigative Committee (by consent) RA Special Investigation Service (by consent) RA Police, RA Ministry of Finance.</p>	<p>Necessary measures have been taken to form a Competition Board for the election of candidates for the Chairman of the Anti-Corruption Committee and to organize the process of electing the Chairman of the Committee.</p> <p>Other results are presented</p>

		the MTEF.		below.
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On 24 March, 2021, the National Assembly adopted the Law Anti-Corruption Committee. The law regulates the powers, system and structure of the ACC, the procedure and conditions of formation, activity, and holding position in the AAC, the rights, duties and responsibilities of employees, and other relations related to the position. The main competence of the AAC is the organization and implementation of pre-trial criminal proceedings on alleged corruption crimes under its jurisdiction under the RA Criminal Procedure Code. At the same time, in order to resolve the issue of initiating criminal proceedings, the AAC will conduct operative-investigative measure (OIM) in the manner prescribed by the “Law on Operational Intelligence Activity”. Appointments to the AAC, including to management, are made through an open competition, the mandatory stage of which will be the stage of integrity checking of the candidates by the CPC. (Problematic points related to the integrity checking tool are presented in Action 1 of this report).

In addition, on 3 June, 2021, the Government of the Republic of Armenia adopted the Decision N 895-N "On Defining the List of Documents Necessary for Participation in the Competition for the Election of Candidates for the Chairman of the Anti-Corruption Committee", and " On Defining the Procedure for Involvement of International Experts in the Competition Board for the Election of Candidates for the Chairman of the Anti-Corruption Committee” Decisions N 896-N. And on 17 June, 2021, the Decision N 989-N "On defining the procedure and the required level of language proficiency testing of the candidate to the member of the Anti-Corruption Committee". Other necessary measures have been taken to form a Competition Board for the election of ACC chairperson candidates and to organize the process of electing ACC Chairman.

According to the Report, the above legal acts were discussed with interested bodies and CSOs. The Law on the ACC and the package of related laws were presented on Unified Website for Publication of Legal Acts’ Drafts (www.e-draft.am) for public discussion, and public discussions were organized on the drafts. However, it should be noted that it is another matter that the drafts are submitted for public discussion, and quite another when the competent authorities do not take into account the recommendations and observations made by CSOs as a result of those discussions.

It should also be noted that the ACC was not formed during the reporting period.

Thus, the action, which is scheduled for implementation in 2021, is considered as **PARTIALLY IMPLEMENTED (with reservation)**.

Action 3: Establishment of specialized anti-corruption courts

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
3	Specialized anti-corruption courts have been established. Sufficient human, administrative and material resources are provided to	The court was formed: the SJC procedural decisions were made (4th quarter of 2021). Training programs for judges with anti-	RA Ministry of Justice, RA National Assembly (by consent)	Legal acts have been adopted, which envisage the establishment of a specialized

	support the functioning of specialized courts.	corruption specialization developed and approved (4th quarter of 2021). At least 30% of the Judges has been appointed and passed corresponding training (4th quarter of 2021).	Supreme Judicial Council (by consent) Academy of Justice	anti-corruption court. Other results are presented below.
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On 14 April, 2021, the RA National Assembly adopted the Law on Making Amendments and Addenda to the Constitutional Law "Judicial Code of the Republic of Armenia" and the Laws on Making Amendments and Addenda to the Related Laws, which envisage the establishment of a Specialized Anti-Corruption Court. The court will have at least 15 judges, of which at least 10 must be judges specializing in corruption cases and at least 5 judges specializing in anti-corruption civil cases. The number of courts of appeal and cassation will be increased accordingly.

The law also establishes the procedure, requirements and restrictions for the appointment of judges with anti-corruption specialization, and at the same time provides for higher remuneration than other judges as a guarantee of independence and impartiality of the most risky, and vulnerable sector from the point of view of external influence. The mentioned legal acts define the peculiarities of the selection of candidates for judges with anti-corruption specialization; envisage a requirement to integrity checking of candidates for anti-corruption judges.

In order to ensure a specialized court hearing on cases of confiscation of property of illegal origin, by the decision of the RA SJC of 1 April, 2021, No. SJC-19-N-7, 4 specialized judges of the Court of General Jurisdiction of Yerevan, were provided the power to hear cases of confiscation of property of illicit origin.

During the FGD on the ZOOM online platform, which was attended by more than a dozen CSO representatives, lawyers and sectoral experts, 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 their selection and other issues were defined as problematic regulations. In addition, it is not clear what specific procedures the SJC has used to select four judges who are considered to have anti-corruption specializations and will hear civil cases related to the confiscation of property of illicit origin. The process of integrity checking of judges is also concerning. (Problematic points related to the integrity checking tool are presented in Action 1 of this report).

According to the Report, the circumstance delaying the implementation of the event is the submission of the package of laws by the RA President to the Constitutional Court.

Thus, the action, which is scheduled for implementation in the 4th quarter of 2021, during the reporting period is formally considered as **PARTIALLY IMPLEMENTED**.

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(ies)	Monitoring result
	2021	2021		
4	A department carrying out supervision over the investigation of corruption related crimes has been established in the General Prosecutor’s Office of the Republic of Armenia,	A department specializing in corruption related cases has been established in the General Prosecutor’s Office. At least 60% of prosecutors have been appointed and passed corresponding training (4th quarter of 2021) The specialization of the department employees has been increased.	RA Ministry of Justice, RA General Prosecutor's Office (by consent) Academy of Justice	The Department Specializing in Corruption related Crimes of the General Prosecutor's Office of the Republic of Armenia has been established Other results are presented below.

The Department Specializing in Corruption related Crimes of the General Prosecutor’s Office of the Republic of Armenia was established and operates by the Order No. 39 of 24 September, 2019 of the Prosecutor General of the Republic of Armenia "On Approval of the Charter of the General Prosecutor’s Office and repealing Order N 43 of 29 June, 2007 of the Prosecutor General of the Republic of Armenia".

On 14 April, 2021, the RA National Assembly adopted the Law on Making Amendments and Addenda to the Law on the Prosecutor's Office, which envisages the establishment of a Department overseeing the legality of pre-trial criminal proceedings conducted by the ACC. Persons who have passed Integrity checking in accordance with the law may be appointed to the position of prosecutors in this department. (Problematic points related to the integrity checking tool are presented in Action 1 of this report). It should be noted that as of the first half of 2021, the department has not been established.

According to the Report, the circumstance delaying the implementation of the event is the submission of the package of laws by the RA President to the Constitutional Court.

Thus, the action, the implementation of which is planned for 2021, in the reporting period is considered **PARTIALLY IMPLEMENTED (with reservation)**.

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
5	<p>The employees of the relevant subdivision elaborating the Anti-Corruption Policy of the Ministry of Justice of the Republic of Armenia, the representatives of the non-governmental organizations are regularly trained.</p> <p>The functions of the competent subdivisions are clearly separated.</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>At least 40% of the employees of the relevant subdivision developing the anti-corruption policy of the RA Ministry of Justice have passed training.</p> <p>At least one training per year was provided for NGO representatives.</p>	<p>Staff to the Prime Minister of the RA</p> <p>RA Ministry of Justice</p> <p>Human Rights Defender (by consent)</p> <p>Non-governmental organizations (by consent)</p>	<p>The capacities of the anti-corruption policy development and monitoring department of the RA Ministry of Justice were assessed.</p> <p>The employees of the department participated in 8 events on different topics.</p> <p>Other results are presented below.</p>

According to the Report, the capacities of the Department of Anti-Corruption Policy Development and Monitoring of the RA Ministry of Justice were assessed. In order to develop their capacities, the employees of the department participated in 8 events on different topics. It is also planned to involve a national expert from the UN, who will assist the RA Ministry of Justice in strengthening and improving its capacity in the field of anti-corruption monitoring and evaluation.

According to the same source, in the first half of 2021, the programs of the NGOs involved in the anti-corruption policy processes aimed at anti-corruption education were studied, surveys among the people studying and teaching within the framework of those educational programs were conducted. The defining and implementation of capacity building measures for NGOs is planned to be implemented during the second half of the year.

The last action taken by the Ministry of Justice of the Republic of Armenia, which was aimed at identifying the directions of capacity development of NGOs, was on 16 June, 2020, when the Ministry of Justice of the Republic of Armenia addressed the NGOs, offering them to carry out self-assessment of their capacity and based on the results submit proposals on their capacity development to the RA Ministry of Justice. According to the information previously provided by the Ministry of Justice, the Ministry of Justice has developed and submitted a package of proposals to the RA Prime Minister's Office.

Back in the framework of the report on monitoring results for 2019-2020, it was found out that CSOs had received only one letter from the RA Ministry of Justice asking about the needs of NGOs. Not any discussion was held with those CSOs after that, and, in fact, the final summary was made without the participation of CSOs. This summary has not been submitted to CSOs as it was then.

On 23 November 2021, during the FGD meeting on the ZOOM online platform, with more than a dozen CSOs, lawyers, and sectoral experts participants highlighted as a problem the ineffectiveness of the Anti-Corruption Policy Council. In particular, the Anti-Corruption Policy Council, as such, has not taken any tangible actions, including qualitative changes in its composition, including the involvement of CSOs with a primary mandate on the fight against corruption and which can influence the council's agenda-planning and decision-making. On the contrary, the three illegally elected NGOs (Transparency International Anti-Corruption Center NGO, “Informed Citizens Union” Consulting NGO, and “Freedom of Information Center” NGO)⁶ remain in the Council and continue taking decisions which legitimacy is not guaranteed by the latter’s vote. It is clear from the official reports so far that the NGOs involved in the Council have no serious influence on the issues on the agenda formed in the Council.

Thus, at present, the Anti-Corruption Policy Council not only does not consolidate all the anti-corruption potential and idea in Armenia, which it should have done primarily, but also for at least three CSOs on the Board, the composition of the Council is neither lawful nor legitimate, in which case the activities of the Council cannot be inclusive, participatory, legitimate and effective. Moreover, the capacity of the Anti-Corruption Policy Council, which is an advisory body responsible for developing anti-corruption policy, was not assessed from this point of view.

According to the Report, there were no circumstances hindering the implementation of the event.

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(ies)	Monitoring result
	2021	2021		
6	Each year, the Anti-Corruption Policy Council 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 spread. The involvement of donors in the process of implementing the anti-corruption strategy and actions for its implementation is	Staff to the Prime Minister of the RA	The action is not performed.

⁶ See: Who and How failed the Anti-Corruption Institutional System in Armenia? Available at: <https://iravaban.net/en/337078.html>

		proportionally distributed and coordinated.		
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As a result of desk research, it became clear that in the first half of 2021, the Anti-Corruption Policy Council convened only one session (on 16 February), the scant minutes of which were published on 9 April, 2021.⁷ According to the published official protocol⁸, the session was not dedicated to the coordination of donors' work in the anti-corruption sphere, but included other issues. According to the information provided by the RA Ministry of Justice, in terms of content, donor coordination activities are regularly carried out by the RA Ministry of Justice.

Thus, a session was not convened as such, they were separate and collegial meetings aimed at discussing a certain range of issues.

The Anti-Corruption Monitoring Platform, which was supposed to be a unified and information platform for anti-corruption activities in Armenia, is not working effectively. In particular, the platform has not been updated, the last that have been posted in the Anti-Corruption Policy Sessions Minutes section are the minutes of the meeting held as of 30 August, 2019.⁹ Other sections of the platform are not updated either, and the site is not user-friendly.¹⁰ There are no dates in the news to find out when this or that event took place, additional research is needed to find the dates.¹¹ According to the information provided by the RA Ministry of Justice, work is underway to develop a new platform, and it will be ready soon. The platform will allow to get acquainted with anti-corruption strategies, reports, etc., as well as allow users to leave their observations.

According to the information published by the RA Prime Minister's Office and the Ministry of Justice, no coordination session has taken place.

According to the Report, the full implementation of the event was delayed due to the state of emergency in the Republic of Armenia.

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

⁷ <https://anti-corruption.gov.am/am/news?content.pid=3>

⁸ See the protocol of 16 February, 2021. Available at: https://anti-corruption.gov.am/am/news_page?content.cid=130:

⁹ Last accessed on 22 November, 2021, <https://anti-corruption.gov.am/am/boardinfo>:

¹⁰ See, for example, the chronological order in which news is posted and archived: <https://anti-corruption.gov.am/am/news>:

¹¹ See at: https://anti-corruption.gov.am/am/news_page?content.cid=124, last accessed on 22 November, 2021.

SECTOR 2: PREVENTION OF CORRUPTION

	2021
NUMBER OF PLANNED ACTIONS	2
OF WHICH IMPLEMENTED	-
OF WHICH MOSTLY IMPLEMENTED	-
OF WHICH PARTIALLY IMPLEMENTED	-
NOT IMPLEMENTED	2

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(ies)	Monitoring result
	2021	2021		
7	Based on the results of risk assessments, as necessary, Anti-corruption programs have been developed for local self-government bodies having a population of 15,000 and more.	Evaluation was carried out in 8 communities (2021) Anti-corruption programs have been developed and implemented in 8 communities.	The RA Ministry of Territorial Administration and Infrastructure, Local self-government bodies (by consent) 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 action is not performed.

According to the Report, the CPC, with the assistance of international experts, particularly USAID experts, developed and prepared a comprehensive methodology for assessing corruption risks in local self-government bodies by the end of March 2020. The following areas were selected for assessment as the most risky areas.

- Appointment to post, promotion, performance assessment: Regulations for recruitment of staff, promotion, transfer and performance assessment.
- State budget management. Study of corruption risks related to the management of financial resources, including operating expenses, travel expenses, benefits and program costs.
- Public procurement: Procurement management in all infrastructures, from initiation to completion

According to the same source, corruption risks were identified, programs were developed, in Aragatsotn, Armavir, and Gegharkunik marzes, which contributed to a more transparent organization of works. It is also mentioned that the event was attended by representatives of the RA Ministry of

Territorial Administration and Infrastructure, local self-governments, CSOs, RA Ministry of Justice, Transparency International Anti-Corruption Center, as well as USAID experts. **It should be noted that the participation of specialized civil society was not ensured in the implementation of these actions. It is also not clear based on what criteria only one structure is selected. This is especially worrying in conditions when NGOs are also responsible for the implementation of this event.**

On 23 November, 2021, during the FGD on the ZOOM online platform, which was attended by more than a dozen CSO representatives, lawyers and sectoral experts, the participants expressed concern that the MoJ and the CPC work selectively with professional CSOs, showing a differentiated and non-inclusive approach. The methodology was not discussed with any NGO participating in the FGD.

At the same time, it should be noted that the above-mentioned actions were performed last year, therefore, in the first half of 2021; no work in this direction was performed to implement this action.

According to the Report, the processes of identifying corruption risks, developing and implementing programs in a number of local self-government bodies with a population of 15,000 and more have been delayed due to the new type of coronavirus epidemic in the Republic.

Thus, the action, the implementation of which is planned for 2021, is considered **NOT IMPLEMENTED** during the reporting period.

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(ies)	Monitoring result
	2021	2021		
8	Based on the results of the risk assessments, sectoral anti-corruption measures have been developed, including internal integrity action plans, including actions that have been identified but not yet implemented under previously adopted action plans.	Based on the reports, anti-corruption action plans in state bodies including internal integrity action plans, have been approved by at least 13 bodies (Ministries, Prime Minister's Office, President's Office, NA Staff, SRC, Cadaster, Police).	Prime Minister's Office, Public administration bodies Commission for the Prevention of Corruption (by consent) Non-governmental organizations (by consent).	The action is not performed.

The CPC, with the support of international experts, particularly USAID experts, developed and in late March 2020 drafted a comprehensive methodology for assessing corruption risks in public administration system. The following areas have been identified for the assessment as the most risky:

- Appointment to post, promotion, performance assessment: Regulations for recruitment of staff, promotion, transfer and performance assessment.
- State budget management. Study of corruption risks related to the management of financial resources, including operating expenses, travel expenses, benefits and program costs.
- Public procurement: Procurement management in all infrastructures, from initiation to completion.

According to the Report, the amended version of the draft program for the prevention of corruption in the RA Ministry of Defense was circulated in the RA Ministry of Defense, proposals were received from those responsible, and they were included in the draft and submitted to the RA Minister of Defense. The program of measures provided by the amended draft was discussed with the RA Deputy Minister of Defense and representatives of structural subdivisions.

On 23 November, 2021, during the FGD on the ZOOM online platform, which was attended by more than a dozen CSO representatives, lawyers and sectoral experts, participants expressed the same concern as described in Action 7.

At the same time, it should be noted that the above-mentioned actions were performed last year, therefore, in the first half of 2021; no work in this direction was performed to implement this action.

According to the Report, the reason for the delay in the implementation of the event was the inconsistency of the Anti-Corruption Strategy and the methodology developed by the experts.

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

SECTOR 2.1: PREVENTION OF CORRUPTION (Integrity)

	2021
NUMBER OF PLANNED ACTIONS	7
OF WHICH IMPLEMENTED	2 ¹²
OF WHICH MOSTLY IMPLEMENTED	-
OF WHICH PARTIALLY IMPLEMENTED	5
NOT IMPLEMENTED	1

¹² Evaluation of 1 action is made with reservation.

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(ies)	Monitoring result
	2021	2021		
9	<p>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> <p>The Draft Law provides the Commission for the Prevention of Corruption the authority to carry out studies on the observance of the integrity rules of judges and candidates for judges in the cases and in the manner prescribed by the Constitutional Law of the RA "Judicial Code of the Republic of Armenia"; as well as the authority to carry out studies and observance of the integrity rules of prosecutors and candidates to prosecutors, investigators in the cases and in the manner prescribed by the “Law on the Prosecutor's Office” and authority to issue advisory opinions to relevant persons on their basis.</p>	<p>The Commission for the Prevention of Corruption has submitted at least 20 conclusions on the observance of the integrity rules for candidates for public office in the Republic of Armenia in 2021, and 40 conclusions in 2022.</p>	<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 Special Investigation Service (by consent), (RA Investigative Committee (by consent), National Security Service (by consent)</p>	<p>Legal acts on providing advisory conclusions have been adopted.</p>

On 25 March, 2020, within the framework of the package of draft laws "On Making Amendments and Addenda to the Constitutional Law of the Republic of Armenia", the Draft Law "On Making Amendments and Addenda to the Law on Central Committee" was adopted, which expanded the functions of the CPC, established the procedure for conducting integrity checking, and procedure for providing advisory conclusions based on their results. The scope of expanded functions also includes mechanisms for checking the integrity of candidates for judges, judges of the Constitutional Court, candidates for members of the SJC, persons to be appointed to public office, as well as other persons defined by law. The integrity checking survey includes

verification of credibility of data provided in the questionnaire on integrity rules; the fact of not being previously subjected to criminal, administrative or disciplinary liability, including involvement in corrupt transactions, compliance with the rules of conduct, conflict of interest, incompatibility requirements, checking of the circumstances of the violation of other restrictions; study of information about a person published in the media, as well as on social networks; compliance of the property status of the person with the actual income received; as well as a review of previously submitted declarations; examination of information on a person's work activities; study of the possibility of affiliation of a person to criminal subculture. On 19 January, 2021, the Law on Making Addenda and Amendments to the Law on CPC clarified the toolkit for studying the possibility of adherence of a person to a criminal subculture during the integrity checking phase.

On 24 March, 2021, the National Assembly adopted the Law on the CPC and the laws on making changes and additions to the related laws (see Action 2), which established the rules for integrity checking of CPC management and investigators.

On 14 April, 2021, the National Assembly adopted the package of laws "On Making Amendments and Addenda to the Constitutional Law of the RA Judicial Code" and "On Making Amendments and Addenda to the Related Laws" (See Action 3), which, among other regulations, envisages mechanisms for checking the integrity of candidates at the stage of filling in the list of candidates for prosecutors, defining the authority of the CPC to provide an advisory opinion on the integrity checking of candidates to prosecutors. According to the regulations established by law, integrity checking is carried out during the selection of the prosecutors included in the promotion lists, the Prosecutor General and his/her deputies included in the promotional lists. (Problem points related to the integrity study tool are presented in Action 1 of this report).

According to the information provided by the CPC, 15 integrity checking conclusions were issued in the first half of 2021, of which only 1 was negative, and no decision was made related to one due to the ratio of votes of the CPC.¹³

Thus, the action is formally considered as **IMPLEMENTED (with reservation)**, but in terms of content, there are serious problems due to the existing legislative shortcomings in the process of integrity study.

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(ies)	Monitoring result
	2021	2021		
10	Assessments to determine the process of implementation of the “Law on Public Service” and the “Law on Civil Service” were carried out.	Evaluation of the implementation of the legislation was carried out in the bodies of the civil service system.	Bureau of Civil Service of the Staff to the Prime Minister, Commission for	After the classification of the civil service positions, an evaluation of the legal acts certifying the scope of

¹³ See the summary report of the CPC for the first half of 2021, page 4, Available at the following link: <http://cpcarmenia.am/files/legislation/544.pdf>

	Based on the assessments, a package of proposals was presented to the RA Prime Minister. The results were discussed at the meeting of the Anti-Corruption Policy Council.		Prevention of Corruption (by consent), Non-governmental organizations (by consent).	professional knowledge and sources of the positions filled through the competition was carried out.
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Pursuant to Article 38, Part 3, Clauses 2 and 3 of the “Law on Civil Service”, the Bureau of Civil Service of the Staff to the Prime Minister conducted studies on the practice of applying public service legislation and other issues arising from civil service processes in the relevant bodies during the first half of 2021. Evaluated the legal acts certifying the scope of professional knowledge and sources of positions filled through the competition after the classification of civil service positions.

According to the Report, no public discussion was organized, NGOs did not participate in this process. **This is especially worrying in conditions when NGOs are also responsible for the implementation of this action.**

Thus, although the action is considered **IMPLEMENTED**, yet it was performed without the participation of the public sector.

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(ies)	Monitoring result
	2021	2021		
11	The issue of providing the necessary tools for ethics commissions and integrity affairs organizers to carry out their functions was analyzed and evaluated. Training programs have been developed for the members of the Ethics Commission and integrity affairs organizers, training courses have been organized.	The Commissions and organizers have the appropriate tools to ensure their activities (2021).	Bureau of Civil Service of the Staff to the Prime Minister, Commission for Prevention of Corruption (by consent).	Integrity affairs organizers have been appointed in 43 state bodies. 63 civil servants were re-trained. Other results are presented below.

Integrity affairs organizers have been appointed in 43 state bodies, passports for the positions of Integrity affairs organizers have been approved, the functions, rights and responsibilities of Integrity affairs organizers have been defined.

The Civil Service Information Platform has been launched since 1 October. According to the information provided by the Bureau of Civil Service of the Staff to the Prime Minister of the Republic of Armenia, before the launch of the Civil Service Information Platform, a list of candidates for the formation of ethics commissions was submitted to the Bureau of Civil Service by 61 state bodies; and after the launch of the Civil Service Information Platform after 1 October, 2020, the authorities were to include that information in the Civil Service Information Platform. And according to the data uploaded in the Civil Service Information Platform, 35 state bodies included data on the candidates. In addition, information on the number of positions of Integrity affairs organizers evaluated and classified according to new criteria, as well as on the functions, rights and responsibilities stipulated in them, which derive from the provisions of Article 36 of the Civil Service Law was provided. The process of including in the list of candidates for a member of the Ethics Committee during the reporting period continues.

Pursuant to Parts 4 and 5 of Article 28 of the Law on Public Service, the standard rules of conduct based on the principles of conduct of public servants are established by the CPC; and the rules of conduct based on the principles of conduct of civil servants - the Deputy Prime Minister who coordinates the civil service. According to Point 13 of the Anti-Corruption Strategy, the deadline for the **adoption** of standard rules of conduct of public servants, rules of conduct of civil servants is 2022, and the deadline for **development** is 2021. Point 13 of the appendix N 2 to the decision N 756-N of the Prime Minister of 11 June, 2018 is defined that the draft decision of the Deputy Prime Minister on defining the rules of conduct of civil servants based on the principles of conduct established by the Law on Public Service shall be submitted to the Government one month after the establishment of the standard rules of conduct based on the principles of conduct.

According to the Report, in view of the above circumstances, the draft guidelines necessary for the practical implementation of the functions of the ethics commissions and Integrity affairs organizers are still under development. In this regard, it should be noted that the strategy sets the deadline for the adoption of rules of conduct as 2022, and the deadline for their development is 2021. **Therefore, it turns out that the action was not performed during the reporting period.** According to the monitoring of the Bureau of Civil Service, the draft guidelines are still under discussion and elaboration, therefore this action could not have been performed without the model guidelines developed by the CPC. According to the information provided by the CPC, the standard rules of conduct of the Public Servant have been developed and the draft has been sent to the Council of Europe for an advisory opinion.

As for the trainings, in March 2021, the Bureau of Civil Service of the Staff to the Prime Minister organized and conducted 6 (six) 2 days trainings on anti-corruption issues and integrity for the Integrity affairs organizers. The trainings were organized in person with the participation of 63 civil servants.

Thus, the action, the implementation of which is planned for 2021, in the reporting period 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(ies)	Monitoring result
	2021	2021		

12	Measures aimed at the reform of the remuneration system of government officials and civil servants are being implemented.	There is no monitoring indicator identified for 2021	Bureau of Civil Service of the Staff to the Prime Minister, Commission for Prevention of Corruption (by consent),	Work aimed at reform the system of performance evaluation of public servants (civil servants) has been carried out.
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Measures to improve the remuneration system for persons holding state positions and public service positions are envisaged in the draft Public Administration Reform Strategy of the Republic of Armenia, which, according to the Report, is in discussion stage. 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 Council for the Development of the Public Administration Reform Strategy was established and its procedure was approved. Paragraph 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 working groups under the Council to implement the work of developing the Public Administration Reform Strategy by 16 September, 2019. At the same time, the deadline for the submission of the draft Public Administration Reform Strategy was set 25 December, 2019. The Civil Service Office developed and in September 2019 submitted to the Office of the RA Deputy Prime Minister Coordinating in the field of Public Administration Reforms the draft sub-section "Increasing the Attractiveness of Public Service" in the "Public Service and Human Resources Management" section of the Public Administration Reform Strategy. It was then submitted to the Secretariat of the Council for the Development of Public Administration Reform Strategies.

On 1 March, 2021, the European Union Twinning Project "Support to Further Implementation of Civil Service Reform in Armenia" resumed its work which was stopped due to the Covid-19 epidemic and the war unleashed by Azerbaijan on 27 September, 2020. Within the framework of the program, works aimed at the reform of the system of performance evaluation of persons holding state (public service) positions are being carried out.

It should also be noted that the above-mentioned action covers a wide range of public administration systems and works are gradually being performed in various areas to improve the remuneration system. As an example, the RA Ministry of Justice mentions the introduction of high salaries in the bodies that are an integral part of the anti-corruption institutional system.

Thus, although there is no monitoring indicator for assessing performance for 2021, comparing the expected outcome with the actions taken, we can conclude that the action is partially implemented.

According to the Report, the circumstances delaying the implementation of the event were due to the state of emergency and martial law.

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

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(ies)	Monitoring result
	2021	2021		
13	The modal rules of conduct of a public servant, the rules of conduct of a civil servant have been developed.	At least 2 trainings per year have been conducted (2021).	Bureau of Civil Service of the Staff to the Prime Minister Corruption Prevention Commission (by consent)	No training was provided during the reporting period.

According to the monitoring indicator, at least 2 trainings have been planned to be carried out in 2021. It is supposed that at least 1 should have been implemented in the first half of the year. No training was provided during the reporting period.

According to the Bureau of Civil Service, the expected result of the action was the model rules of conduct of the public servant and the rules of conduct of the civil servant, and conducting of trainings was set as monitoring indicator. A prerequisite for conducting trainings by the Bureau of Civil Service should have been the existence of model rules of conduct for public servants and rules of conduct for civil servants, so this action could not have been provided without those rules.

According to the information provided by the CPC, the model rules of conduct of the Public Servant have been developed and the draft has been sent to the Council of Europe for an advisory opinion.

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

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
14	The rules of conduct of the deputy and the investigator have been adopted and are in force.	The rules of conduct of the deputy, investigator, developed on the basis of international practice, have been approved (1st quarter of 2021). The Ethics Commission has conducted at	Commission for the Prevention of Corruption (by consent), National Assembly (by	The rules of conduct of the RA NA deputies have not been developed. The draft order of the Chairman of the RA

		least 2 trainings per year (2021, 2022).	consent), Investigative bodies (by consent).	Investigative Committee on defining the rules of conduct of the employee of the RA Investigative Committee has been developed. The revised Code of Conduct for RA SIS officers is in force.
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The rules of conduct of the deputies of the National Assembly of the Republic of Armenia are currently being developed, and the work done has been submitted to international organizations for an opinion. GRECO, in its interim compliance report of the fourth evaluation round, published on 22 September 2021, which addresses the prevention of corruption among members of parliament, judges and prosecutors, gave a harsh assessment of non-compliance. In particular, GRECO mentioned in points 77 and 79 of the report:

“77. ... With respect to members of parliament, transparency of the legislative process remains to be prioritized, placing the emphasis on the involvement of the public in the law-making process and the use of “urgent procedures”. A draft code of ethics for MPs and draft amendments to the National Assembly’s Rules of Procedure intended to establish a mechanism to monitor members’ compliance with ethical norms have been developed but have not yet been presented to GRECO for scrutiny.”

“79. ... concerning members of parliament, judges and prosecutors, enhanced provisions on gifts are noted but it has not been confirmed whether a procedure for registering permissible gifts is in place.”

The international experience was studied in the RA Investigative Committee, 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 draft of the mentioned order defines the rules of conduct of the RA Investigative Committee officer, which are norms regulating the peculiarities of the behavior and relations of the Investigative Committee officer, aimed at ensuring the proper behavior of the servant; to exclude the conflict of public and private interests, to strengthen the public trust in the Investigative Committee. At the same time, it should be noted that according to the information provided by the RA Investigative Committee, the legal act defining the rules of conduct of the investigator and developed in the first quarter of 2020 was not adopted, as it was submitted to the opinion of the CPC, but as of 29 November, 2021, no response or opinion was submitted.

The Code of Conduct of RA SIS Officers has been brought in line with the requirements of the Law on Public Service, adopted and is in force.

According to the Report, the circumstances delaying the implementation of the event were due to the state of emergency and martial law.

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(ies)	Monitoring result
	2021	2021		
15	Clear criteria for the formation of Competition Commissions have been set.	The legal acts on approving the procedure and criteria regulating the relations for the formation of Competition Commissions (2021) have been adopted.	Bureau of Civil Service of the Staff to the Prime Minister Non-governmental organizations (by consent).	Two remote meetings were organized, each lasting a week. A package of proposals was presented by experts.

The second component of the European Union Twinning Project "Support to Further Implementation of Civil Service Reform in Armenia" addresses the compliance of enhanced staffing and selection systems with public administration principles. Within the framework of the program, 2 remote meetings were organized in 2021, each lasting one week. A package of proposals has been presented by experts, the works are under active discussion.

No public discussion was organized during the implementation of the action, although NGOs are also among the responsible structures.

According to the Report, the circumstances delaying the implementation of the event were due to the state of emergency and martial law, due to which the work with the Twinning project experts was suspended for four months.

Thus, the action, the implementation of which is planned for 2021, in the reporting period 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)

	2021
NUMBER OF PLANNED ACTIONS	10
OF WHICH IMPLEMENTED	3
OF WHICH MOSTLY IMPLEMENTED	1
OF WHICH PARTIALLY IMPLEMENTED	4
NOT IMPLEMENTED	2

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
16	Clear criteria and scope for the impact of anti-corruption regulation have been established.	A relevant legal act on the impact of anti-corruption regulation has been adopted, including clear criteria and scope for impact assessment (2021)	RA Ministry of Justice Commission for the Prevention of Corruption (by consent) Non-governmental organizations (by consent)	The action is not performed.

In 2020, the RA Ministry of Justice developed a package of proposals “On Increasing the efficiency of the anti-corruption regulation impact assessment system.” The specialization and training of the body conducting the assessment was highlighted. The package of proposals was summarized taking into account the opinions of the interested bodies and presented to the Office of the Prime Minister of the Republic of Armenia in December 2020. It should be noted that the above-mentioned actions were performed last year; therefore in the first half of 2021 no work was done to implement this action.

According to the RA Ministry of Justice, the non-implementation of this measure in due time is conditioned by the fact that within the framework of cooperation with international partner organizations experts have been involved in the implementation of the work, which will enable the development of regulatory impact assessment structures in line with international best practices and standards.

Thus, the action, the implementation of which is planned for 2021, in the reporting period is considered **NOT 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(ies)	Monitoring result
	2021	2021		
17	Ensure continuous implementation of the adopted regulations.	The content of the declarations has been revised. The institute of declaration of expenses has	RA Ministry of Justice Commission for the Prevention of Corruption	The scope of declaring officials has been expanded. The institute of declaration of

		been introduced.	(by consent) Non-governmental organizations (by consent)	expenses has been introduced. Other results are presented below.
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On 19 January, 2021, the RA National Assembly adopted the Law "On Making Amendments and Addenda to the Law on Public Service" and the package of related laws, which amended the existing declaration system. The law expands the scope of declaring officials. The duty of declaration is also envisaged for the secretaries of the staff of the municipality, the members of the council of elders of the communities with a population of 15,000 and more, the Secretary of the Staff of the Yerevan Municipality, the members of the Council of Elders of the Yerevan community, as well as for persons holding the highest positions of the head of the tax and customs services, the state service employees in the staff of the National Assembly and the service of judicial bailiffs. The law introduced a new institute of declaration of expenses and defined the types of expenditures to be declared, the information presented when submitting the declaration, etc. The law revised the content of property declarations. The monetary threshold of expensive property has been revised. It has been determined that any property worth four million AMD or a higher value is expensive property. A property declaration requirement has been introduced to declare the property actually owned, acquired on behalf of the declarant, for the benefit or account of the property owned by a third party on ownership right, as well as the property from which the declarant actually benefits or manages.

By the decision N 858-N of 27 May, 2021, the Government of the Republic of Armenia established the model form of declarations of declarants' property, income, expenses and interests. The draft decision of the Government of the Republic of Armenia "On Making Amendments to the Decision N 306-N of 12 March, 2020" was submitted to the Office of the Prime Minister of the Republic of Armenia. This draft envisages reviewing the scope of data to be published included in the declarations of declaring officials, including information on total expenses and annual expenses incurred as of the date of termination of official duties.

On 23 November, 2021, on the ZOOM online platform, the ALA and the CSO Anti-Corruption Coalition of Armenia organized a FGD with the participation of more than a dozen CSO representatives, lawyers, and sectoral experts. Despite the above-mentioned changes, the participants, expressed concerns about the incomplete legislative regulations and the problems arising thereof. Thus, the following should be noted: the family members of the declaring official are his/her spouse, minor child (including adopted), person under the guardianship or trusteeship of a declaring official and any adult co-living with the declaring official. An adult child who does not live together with an official is left out of this circle. Taking into account the local context and the vicious practice of registering the official's property in the name of another person, CSOs have long suggested that these individuals be included in the list of the persons submitting declaration.

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(ies)	Monitoring result
	2021	2021		
18	Based on the study, the RA Draft Law "On Making Amendments and Addenda to the RA Law on Public Service" was developed and submitted to the RA National Assembly.	The incompatibility requirements of public officials and civil servants have been clarified.	RA Ministry of Justice, Commission for the Prevention of Corruption	A package of proposals has been developed. Other results are presented below.

In 2020, the RA Ministry of Justice developed a package of proposals "On clarifying the incompatibility requirements of public officials and public servants", which on 18 December, 2020 was submitted to the interested state bodies for an opinion and amended based on the observations received, it was submitted to the Prime Minister's Office. The package was not submitted to the RA National Assembly during the reporting period.

Thus, the action is considered **PARTIALLY 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(ies)	Monitoring result
	2021	2021		
19	The register of gifts has been developed and is operational.	A unified register of gifts has been introduced.	RA Ministry of Justice Commission for the Prevention of Corruption (by consent).	A package of proposals has been developed. Other results are presented below.

In 2020, the RA Ministry of Justice developed a package of proposals "On the creation of a Register of Gifts related to the Performance of Official Duties of Public Officials and Public Servants", which was submitted to the interested state bodies and the Council of Europe for an opinion, as well as to the Office of the Prime Minister. The summarizing of the received proposals is currently in process.

Thus, the study of the work done in the case of this action, their nature and the result expected by them and the comparison with the results of expected outcomes, it became clear that the actions taken in the first half of 2021 partially correspond to the expected result of 2021, as the register of gifts was not developed during the reporting period, and thus was not introduced.

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(ies)	Monitoring result
	2021	2021		
20	Based on the proposals, a package of draft legal acts was developed and submitted to the RA National Assembly.	The analysis of the expediency of legislative regulation of lobbying activities in the Republic of Armenia, as well as the analysis of the transparency of the financing of parties and mass media has been discussed in the Anti-Corruption Council. (4th quarter of 2020).	RA Ministry of Justice, Commission for the Prevention of Corruption (by consent), RA National Assembly (by consent), Central Electoral Commission (by consent), Non-governmental organizations (by consent).	The package of draft laws "On Making Amendments and Addenda to the RA Constitutional Law "On Parties" and related laws." Other results are presented below.

On 29 December, 2020, the RA NA adopted the package of Draft Laws "On Making Amendments and Addenda to the RA Constitutional Law "On Parties" and related laws." Based on the study of international experience, a package of Draft Laws "On Lobbying", "On Amendments to the RA Code on Administrative Offenses" and "On Amendments to the RA Law on State Duties" has been developed, the aim of which is to form a lobbying institute, which will strengthen the connection between the government and the citizens and will give an opportunity to represent the interests of the citizens and organizations through a special body. The package of the above-mentioned drafts is currently under discussion. 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.

The RA Ministry of Justice has studied the international experience of financial transparency of the media, the regulations defined by the RA legislation. Based on the mentioned study, the package of proposals was compiled and submitted to the study of the interested bodies and the Staff of the RA Prime Minister.

According to the Report, a number of state institutions and NGOs participated in the preparation process of the draft.¹⁴ Examining the list of NGOs, it becomes clear again **that the participation of specialized civil society and diversity of opinions in the implementation of these activities was not ensured. It is also not clear on what criteria several structures which are generally interrelated with both each other and the government are selected, and therefore, they cannot provide diversity of opinion, and then it is presented that CSOs participated in the implementation of the action. This is especially concerning in conditions when NGOs are also structures responsible for the implementation of this action.**

Thus, the action is considered **PARTIALLY 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(ies)	Monitoring result
	2021	2021		
21	The status of organizations of public significance has been clarified and an effective toolkit for reducing corruption risks has been introduced.	The practice of introducing anti-corruption compliance in organizations of public significance has expanded.	RA Ministry of Economy, RA Ministry of Justice, Non-governmental organizations (by consent).	In order to clarify the legal status of organizations of public significance, a study of legislative field was conducted. Other results are presented below.

In order to clarify the legal status of organizations of public significance, the legislative field has been studied and the existing problems have been identified. The consulting company examines the business processes of providing services "as it is" and makes recommendations "as it should be". It is envisaged that the "as it should be" proposals will be circulated among the authorized bodies for the purpose of submitting observations.

Thus, from the study of the work done in the case of this action, their nature and the result expected by them and the comparison with the results, it became clear that the actions taken in the first half of 2021 correspond to the minimum with the expected result of 2021. In addition, it is not clear to what extent the above-mentioned "as it should be" proposals correspond to the anti-corruption compliance programs in terms of content and quality

¹⁴ See the report on the process of implementation of actions to be implemented in the first half of 2021 provided by the Decision No 1332-N of the Government of the Republic of Armenia dated October 3, 2019 on "Approving the Anti-Corruption Strategy of the Republic of Armenia and its Implementation Action Plan for 2019-2022" Action 20, page 54.

and In addition, it is not clear to what extent the above-mentioned "how the proposals should be" are relevant in terms of content and quality to anti-corruption compliance programs and how they may affect the expansion of compliance program implementation practices.

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

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
22	Anti-corruption compliance requirements in the private sector are provided in relevant legislation.	The monitoring indicator is not set for 2021, at least 5 proposals were received from private sector organizations (3rd quarter of 2020).	RA Ministry of Economy, RA Ministry of Justice, Non-governmental organizations (by consent).	The action is not performed.

Study of the submitted report, shows that no new actions were taken to implement this measure during the reporting period. As a result, anti-corruption compliance requirements in the private sector are not provided in relevant legal acts.

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

Action 23: Improvement of the field of procurement

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
23	Based on the study, a package of drafts was developed and adopted aimed to simplify the procurement process, to ensure the certainty of the procurement process.	A study to identify corruption risks in the procurement process was conducted (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).	RA Ministry of Finance	The package of draft laws "On Making Amendments and Addenda to the Law on Procurement" and related laws have been developed.

In December 2020, 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" were submitted to the Government for discussion. The Drafts are currently in the finalizing stage.

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

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
24	According to the roadmap, a constant demand to identify the real owners in different areas is being introduced.	The roadmap for the introduction of the institute of real owners of legal entities was discussed and adopted (2nd quarter of 2021).	RA Ministry of Justice, Public administration bodies, Non-governmental organizations (by consent)	Draft laws have been adopted, which envisage the creation of an open and accessible register of real owners of legal entities. Other results are presented below.

In 2020, the RA Prime Minister's decision N 30-A "On approving the Roadmap for the Introduction of the Institute of Real Owners of Legal Entities" was developed and approved on 18 January, 2021, which outlined the priority areas for identifying real owners (beneficiaries) and the relevant deadlines.

In 2021, the electronic system for submitting information on real owners (beneficiaries) of legal entities was launched. The declarations of real owners are submitted under the above system from 2021.

The "Law on Making Addenda and Amendments to the RA Law on Registration of the Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Individual Entrepreneurs" and related laws" was developed in 2020, and adopted by the National Assembly of the Republic of Armenia on 3 June, 2021. They envisage the creation of an open and accessible register of real owners (beneficiaries) of legal entities, it is envisaged to extend the mandatory requirement of identification of owners (beneficiaries) to all legal entities operating in Armenia, step by step.

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(ies)	Monitoring result
	2021	2021		
25	Based on the package of proposals, draft legal acts were developed and submitted to the Office of the Prime Minister of the Republic of Armenia.	The results of the study were discussed in the Anti-Corruption Policy Council and recommendations for relevant changes were given (3rd quarter of 2021).	RA Ministry of Justice, RA State Commission for the Protection of Economic Competition (by consent).	Legal acts have been developed, which have been adopted by the National Assembly. Other results are presented below.

“The RA Law on Protection of Economic Competition” and the package of draft laws on making amendments and additions to the related laws were approved by the Government Decision N 2117-A of 17 December, 2020 and submitted to the National Assembly immediately. The package of the above-mentioned drafts, including the Law on Making Amendments to the Law on Protection of Economic Competition” approved by the Government, was adopted by the National Assembly on 3 March, 2021. According to the information provided by Competition Protection Commission (former name SCPEC), within the framework of legal reforms in the field, the adoption of by-laws deriving from the above-mentioned law has been implemented.

At the same time, it should be noted that the minutes of the meeting of the Anti-Corruption Policy Council held on 16 February, 2021, show that the drafts were not discussed at the council meeting before their adoption, thus the action is not implemented completely.

Thus, the action, the implementation of which is planned for 2021, in the reporting period is considered **MOSTLY IMPLEMENTED**.

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)

	2021
NUMBER OF PLANNED ACTIONS	6
OF WHICH IMPLEMENTED	1¹⁵
OF WHICH MOSTLY IMPLEMENTED	-
OF WHICH PARTIALLY IMPLEMENTED	3
NOT IMPLEMENTED	2

¹⁵ Evaluation of the action is made with reservation.

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
26	The introduction of flexible statistical tools ensures transparency and accountability of the bodies of executive branch.	The unified platform of the executive power hotline is launched, as a result of which at least 50 complaints and inquiries have been received, at least 50% of which have been resolved.	Staff to the Prime Minister of the RA RA Ministry of Justice, RA Ministry of High-Tech Industry, Non-governmental organizations (by consent).	The action is not performed.

The technical possibilities of the platform to be established in order to implement it in the bodies of the public administration system and/or to interconnect it with the existing electronic systems were studied. The ToR of the unified hotline platform of the citizens' applications, complaints, and inquiries is under development. The proposal package will be prepared after the approval of the ToR.

According to EKENG, there is an operating e-request.am platform, through which citizens have sent more than 50 complaints during 2021. In the first half of 2021, the number of bodies accessible through the platform doubled and reached to 140.

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

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
27	The opportunity for the public at large to participate in the state law-making process is provided. At the same time, public awareness events are being held on the www.e-draft.am platform, as well as the rules for using it.	At least 2 public awareness measures were implemented (1st quarter of 2021).	Staff to the Prime Minister of the RA RA Ministry of Justice, RA Ministry of High-Tech Industry, Human Rights Defender (by consent) Non-governmental	The action is not performed.

			organizations (by consent).	
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According to the Report, the ToR for modernizing the www.e-draft.am platform was developed and presented to donor organizations. The modernization of the platform also envisages the connection with Arlis.am website. However, it should be noted that the Arlis.am website is also in the process of modernization, after the completion of which it will be connected with the www.e-draft.am platform. It should be noted that this work was performed last year,¹⁶ and according to the information provided by the Ministry of Justice of the Republic of Armenia during the reporting period, the USAID Armenia Business Environment Improvement Program organized a roundtable discussion on “Advantages and Challenges of e-draft.am Online Platform” on 26 May, 2021. In the framework of which the representatives of the civil society submitted comments and recommendations on the www.e-draft.am platform, which will be considered within the framework of the modernization draft of ToR.

According to the report, the work was suspended due to the state of emergency and martial law.

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(ies)	Monitoring result
	2021	2021		
28	Measures to introduce a toolkit to obtain available information on the services provided have been taken.	Model application forms for services provided have been developed and published on the websites of at least 3 state bodies (2nd quarter of 2021).	Staff to the Prime Minister of the RA, E-Governance infrastructure implementation agency (by consent).	Unified Offices for Public Service have been launched in Yerevan and Gyumri, providing 97 and 110 services, respectively. Other results are presented below.

In order to improve the quality of public services, the bodies of the public administration system have carried out a number of works.

¹⁶ See Monitoring Results Report 2019-2020, Action 27.

- On 22 July, 2020, the Ministry of Justice of the Republic of Armenia launched the "Unified Office for Public Services", where citizens can use all the public services of the Ministry of Justice (97 services), and in addition also have access to the services of other departments. A similar Unified Office for Public Services was launched in Gyumri on 23 June of this year (110 services).
- On 18 January, 2021, the National Assembly of the Republic of Armenia adopted in the second reading and in full two new laws and amendments to eight laws, which aim to ensure digitalization of public services; simplification of administration; reduction of terms; increase of quality of services; reduction of corruption risks; ensure user friendly services provided to the citizens.
- A new section has been created on the website of the Ministry of Foreign Affairs of the Republic of Armenia - "Changes in the procedure of the entry to the Republic of Armenia due to the COVID-19 epidemic", which allows RA citizens to receive up-to-date information on entry and exit restrictions and quarantine measures applied by many countries. A new section "Visa Requirement for RA Citizens" has been created in the "Consular Service" section of the RA MFA, RA Embassies and Consular Institutions websites, through which RA citizens can find out whether an entry visa is required to travel to a specific foreign country or not, and if so, where to apply.
- On 25 June, 2020, the Government of the Republic of Armenia adopted Resolution No. 1065-A, by which an area in the building located at 3 Zakiyan Street, Yerevan, under the direction of the Ministry of Justice, was attached to the RA Police to carry out the functions of providing passport services in the Unified Office for Public Services. Renovation works are currently being in process.
- On 20 February, 2021, the work of the Unified Office for Public Services established in Ijevan started, where the Ijevan Passport Service of the Passport and Visa Department of the RA Police was transferred and operates. A Unified office has also been established in Gyumri, but taking into account the building conditions and location of the Mush and Kumayri passport services of the RA Police Passport and Visa Department, with the possibility of providing services to citizens using the "one window" principle, a new service consisting of 3 employees (Gyumri Passport Group of Gyumri Police Passport and Visa Department) was created to organize the RA Passport and Visa Department services. As a result, there are two passport offices and one passport group in Gyumri, which in turn contributes to more efficient organization of work, reduction of queues and improvement of the quality of services.
- On 25 June, 2020, the Government of the Republic of Armenia adopted Decision No. 1052-N "On Making Amendments and Addenda to the Decision 1231 of the Government of the Republic of Armenia of 14 July, 2005 ", which approved the forms of electronically received references and applications: the forms were approved by the order of the RA Chief of Police. As a result, submitting an application is faster and simpler, as it is done electronically.
- Work is currently underway to provide individuals with an online public service number and personal registration certificates. In particular, the ways of identifying persons are being studied, after which it will be possible to continue further work.

- The Passport and Visa Department of the RA Police has been provided with the opportunity to use the unified information system by the Civil Acts Registration Office, as a result of which the digitalized act registrations of the citizen are checked through the mentioned system and no additional inquiries are made. This contributes to faster service delivery and improved quality of citizen service.
- In 2021, in order to respond quickly to the committed traffic violations and to listen to the citizens' complaints, a hotline has been introduced in the Traffic Police units of the RA Police, which operates uninterruptedly.
- A system of online e-appointment (which operates uninterruptedly) for early registration in order to avoid crowding as well as to regulate and exclude queues that cause dissatisfaction among citizens, to alleviate participation in theoretical and practical examinations for obtaining a driver's license, registration of vehicles, has been established in the territorial traffic registration-examination subdivisions of the Traffic Police, which operates uninterruptedly.
- A program has been developed for citizens to enter into online vehicle sales and state registration contracts and is ready to be launched as soon as the government decision enters into force.
- Model forms for electronic applications for using wild animal species for social purposes, such as amateur hunting and hunting of animal species of non-hunting objects, amateur fishing, are posted on the website of the Ministry of Environment env.am.

On 23 November 2021, during the FGD meeting on the ZOOM online platform, with more than a dozen CSOs, lawyers, and sectoral experts participants it became clear that there are problems for the citizens in relations with the RA Police Patrol Service.

First, it was a great difficulty for the citizens to contact the RA Police Patrol Service. In order to receive information, the citizens have to physically approach the patrol service and get the necessary information with the help of the duty officers. Citizens do not have the opportunity and means to communicate with the patrol service officers. There is no one to answer the phone number of the service. As one of the participants mentioned, *"Even if you have a small question, you have to approach the service on the outskirts of Yerevan and ask the duty officers to help you and contact this or that employee to get information."* These difficulties exist in conditions of epidemic, when physical presence and communication should be minimized, and this issue can be solved by setting up a simple telephone service or hotline. According to the information provided by the RA Police, the difficulties for the citizens to contact the RA Police Patrol Service are connected with the overload of the telephone, as well as some technical problems. However, citizens can apply with their concerns to the RA Police Operative Management Center or the RA Police Hotline, where the citizens' problems will be solved through a similar procedure.

Second, the patrol service does not provide/send the protocol and decision on administrative liability to the person subject to administrative responsibility within the timeframe established by law, in case the person does not agree with that decision and does not sign it.

Third, there are many cases when the drawn up administrative acts are written in illegible handwriting, or the patrols do not mention the board number of the car of the service on duty, their full name and surname, which will allow identifying the person who has exercised administrative responsibility.

According to the information provided by the RA Police, all the administrative protocols drawn up by the patrol officer at least mention the position, title, initials and surname of the officer, as well as the number of the badge, which are sufficient to identify the officer.

Fourth, despite the system of online e-appointment is installed in the territorial registration-examination subdivisions of the traffic police, every day, at different times of the day, the queues of citizens reach more than one hundred. These queues are more concerning in the conditions of the epidemic. The de facto installed system has not yet solved the existing problems. In addition, when trying to register online for a driver (license) or vehicle registration, or registration-related activity, the system does not register, indicating: *“Due to the workload of the unit you have chosen, we apologize and suggest choosing another registration-examination unit”*. It turns out that a person living in the city of Yerevan, who urgently needs to register a vehicle, must reach units located outside Yerevan. In fact, it turns out that a person living in the city of Yerevan, who urgently needs to register a vehicle, must reach units located outside Yerevan. According to the RA Police, the above mentioned is done in order to avoid the accumulation of queues in the registration-examination subdivisions.

Thus, the action, though evaluated as technically implemented, is considered **IMPLEMENTED (with reservation)**, but there are serious problems in terms of content.

Action 29: Modernizing the “www.sso.am” unified electronic system of operators and introducing electronic platform within the framework of “e-gov.am”

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
29	A unified database of public and community services, an opportunity for electronic evaluation of services provided, as well as a unified system of statistics on services provided have been introduced.	The sso.am electronic system has been modernized The sso.am electronic tool has been modernized, about which there are publications by the Government (4th quarter of 2021).	Staff to the Prime Minister of the RA RA, Ministry of Justice, RA Ministry of High-Tech Industry, E-Governance infrastructure implementation agency (by	A unified platform for the provision of state and community services has been launched experimentally. The process of registering a sole proprietor is ready and available in a testing environment.

			consent).	
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The unified platform for the provision of state and community services has been launched experimentally. The process of registering a sole proprietor is ready and available in a testing environment. The launch of the platform will ensure the possibility of receiving services online through a single unified platform. The platform will allow individuals and legal entities to apply online for services, follow the process, receive the results of services.

At the same time, please note that according to the information provided by EKENG, the sso.am platform is intended only for internal use, for the operators of unified offices providing public services, therefore it is not possible to find out the work done on the platform through desk research.

Thus, the action, the implementation of which is planned for 2021, in the reporting period 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(ies)	Monitoring result
	2021	2021		
30	The ToR of the unified platform for proactive publication of information has been developed.	The ToR has been developed (4th quarter of 2021).	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).	The action is not performed

According to the Report, the study of the international experience aimed at creating a unified platform for proactive publication of information required within the framework of the RA Law on Freedom of Information was carried out. It is planned to present information on the services provided by state bodies on e-gov.am platform.

Within the framework of the monitoring results report for 2019-2020, the Office of the Prime Minister of the Republic of Armenia informed that in the first quarter of 2021 it is planned to discuss the ToR, international experience and submit the final agreed version of ToR to the discussion of Digitalization Council. However, it became clear from the report that such a discussion had not taken place; in any case no information about it was published. In addition, the above-mentioned actions were performed last year, therefore in the first half of 2021 no work was performed to implement this action.

Thus, the action, the implementation of which is planned in the 4th quarter of 2021, in the reporting period is considered **NOT IMPLEMENTED**.

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
31	Submission of recommendations aimed at the effectiveness of the system of whistle-blowing on the basis of the conducted studies and discussion at the meeting of the Anti-Corruption Policy Council.	The package formed on the basis of the monitoring recommendations is presented to the Office of the Prime Minister of the Republic of Armenia (1st quarter of 2021).	RA Ministry of Justice, RA General Prosecutor's Office (by consent).	The action is not performed

The package of draft laws on “Making Amendments and Addenda to the RA Law on the Whistle-Blowing System” and related laws” is under development. The draft envisages reviewing the types of whistle-blowing, in addition to corruption crimes, also providing an opportunity to report other cases of corruption through the electronic platform, at the same time providing the CPC access to the relevant part of the platform. It should be noted

that the above actions were performed last year; therefore in the first half of 2021 no work was done to implement this action.¹⁷ In addition, the proposals were not submitted and discussed in the Anti-Corruption Policy Council.¹⁸

According to the Report, there were no obstacles in the implementation of the event.

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

¹⁷ See Monitoring Results Report 2019-2020, Action 31:

¹⁸ See the performance of the 6th action within the framework of this report, where the agenda and minutes of the 16 February, 2021 sitting of the Anti-Corruption Policy Council are presented.

SECTOR 3: INVESTIGATION OF CORRUPTION-RELATED CASES

	2021
NUMBER OF PLANNED ACTIONS	8
OF WHICH IMPLEMENTED	7¹⁹
OF WHICH MOSTLY IMPLEMENTED	-
OF WHICH PARTIALLY IMPLEMENTED	-
NOT IMPLEMENTED	1

¹⁹ This table does not include the result of action 37, as the action did not have any event planned for 2021. See action 37 for details.

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(ies)	Monitoring result
	2021	2021		
33	In case of submission and acceptance of a proposal on the need to bring the corpus delicti of corruption crimes, as well as the statute of limitation periods in line with international standards, a package of relevant legal acts has been developed.	According to the results, the proposals are included in the draft Criminal Code of the Republic of Armenia (2021).	ՀՀ 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 draft of the new RA Criminal Code was adopted, which revised some crimes of a corrupt nature, bringing it in line with international standards.

Based on the study of international experience, as a result of cooperation with various international organizations, including the Group of States against Corruption (GRECO), the draft of the new RA Criminal Code, which revised some corrupt crimes to bring them in line with international standards, was developed in the second reading and fully adopted by the RA NA on 5 May, 2021. There are no incentive norms for these crimes.

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(ies)	Monitoring result
	2021	2021		
34	The methodology of investigating individual corruption crimes, including illicit enrichment, is included in the training programs of	A methodology for investigating individual corruption crimes, including illicit enrichment is in place.	RA General Prosecutor's Office (by consent), Human Rights Defender	The methodological guideline on "Approving the methodological guideline on

	criminal prosecution bodies.		Office (by consent), RA National Security Service, Academy of Justice Non-Governmental organizations (by consent)	investigating individual corruption crimes, including illicit enrichment” has been developed and approved.
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By the order N 35 of 22 March, 2021, the Prosecutor General of the Republic of Armenia approved the methodological guideline "On "Approving the methodological guideline on investigating individual corruption crimes, including illicit enrichment". The guide analyzes the essence of corruption crimes and the legal bases for their prevention, the legal-organizational bases for the fight against corruption, the criminal and forensic characteristics of corruption crimes. A separate chapter presents the essence, legal bases and features of illicit enrichment. The circumstances to be clarified in corruption cases, the criminal and forensic characteristics of the investigation of corruption crimes, as well as the peculiarities of separate investigative actions in corruption cases are also presented.

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

Action 35: Complementing the statistics on corruption-related crimes

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
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. Criminal statistics on corruption crimes were supplemented with information on sources of information and property confiscated and levied as a result of the investigation.	Statistics on corruption crimes have been updated.	RA General Prosecutor's Office (by consent), RA Police	Procedures for keeping statistics have been developed. Criminal statistics on corruption crimes have been updated.

By the relevant orders of the Prosecutor General of the Republic of Armenia of 27 December, 2019 and 2 July, 2020, the statistical information on corruption crimes was supplemented with data on sources of information on corruption crimes and property confiscated and levied as a result of investigation of corruption crimes.

In accordance with the list of corruption crimes received from the Prosecutor General's Office of the Republic of Armenia, the program components of corruption crimes and reports of the persons who committed them were developed in the Information Center of the Police, as a result of which reports were received and provided to interested services. The reports are also provided to the RA Statistical Committee every six months and they are published on the official website of the Committee.

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(ies)	Monitoring result
	2021	2021		
36	Law enforcement agencies have access to the databases of government agencies needed to effectively investigate corruption and other economic crimes through electronic inquiries.	Software for accessing government databases through electronic inquiries by law enforcement is embedded and fully operational with other (3rd quarter of 2021).	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.	Law enforcement agencies have access to the databases of state bodies through electronic inquiries.

Through the Government Interoperability Platform, it is possible to make inquiries from state databases (Population Register, Cadaster Committee, Traffic Police, State Revenue Committee, Civil Registry Office, State Register of Legal Entities, etc.). The scope and formats of information received from state databases are constantly expanding.

Thus, the SIS has access to the databases of the Police Passport and Visa Department, the Information Center, the Traffic Police, the Financial Monitoring Center, the Unified Information Platform, the Register of Legal Entities, the Real Estate Cadaster, and the Central Depository.

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

Action 37: Establishing a centralized register of bank accounts

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
37	Based on the package of proposals, a central register of bank accounts was created. ²⁰	The Central Register of Bank Accounts has been established and is operational (2nd half of 2020).	Central Bank of the RA (by consent).	The Draft Law of the Republic of Armenia "On Making an Addendum to the Law of the Republic of Armenia" on the Central Bank of the RA has been adopted.

Based on the results of the large-scale study of the international experience carried out by the Central Bank of the Republic of Armenia in 2020 and the analysis of the responses to inquiries sent based on it, The Draft Law of the Republic of Armenia "On Making an Addendum to the Law of the Republic of Armenia" on the Central Bank of the RA has been developed, which was adopted by the RA NA on 30 June, 2021. On the basis of the current version of the draft, the draft decision of the Board of the Central Bank of the Republic of Armenia on the operation of the Register was also developed.

Thus, the action is considered **IMPLEMENTED** (This assessment is not included in the Sector Assessment Indicator (p. 65) as it is not planned for 2021).

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		

²⁰ No event is planned for 2021 within the framework of this action in the Anti-Corruption Strategy. However, having in mind that in the reporting period the RA NA adopted the relevant legal act, therefore the performed works are presented within the framework of this report.

38	Proposals for overcoming the existing obstacles to the implementation of international cooperation in corruption cases were presented to the Office of the Prime Minister of the Republic of Armenia.	At least 2 discussions with the involvement of relevant stakeholders were organized (1st quarter of 2021).	RA Ministry of Justice, RA General Prosecutor's Office (by consent), RA National Security Service.	The action is not performed
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As a result of the study of the mechanisms of implementation of international cooperation and the existing obstacles in them, the Draft Law "On Legal Aid in Criminal Cases" was developed, circulated and submitted to the RA Prime Minister's Office on 3 August, 2020. Further, opinions were received from international experts and stakeholders, after summarizing them the draft will be resubmitted to the Prime Minister's Office. It should be noted that the above actions were performed last year; therefore in the first half of 2021 no work was done to implement this action.²¹

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

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
39	Structures aimed at confiscation of property of illegal origin, property management, and international cooperation have been established and are in operation.	Structures for confiscation of property of illegal origin.	RA Ministry of Justice, RA General Prosecutor's Office (by consent), Central Bank of Armenia (by consent), RA National Security Service	A responsible subdivision has been established within the RA General Prosecutor's Office. 4 specialized judges have been reserved the power to hear cases of confiscation of property of illegal origin. Other results are presented below.

On 16 April, 2020, the National Assembly adopted the laws "On Making Amendments to the Law on Confiscation of Property of Illicit Origin" and related laws. To ensure enforcement law, on 3 September, 2020, the Department for Confiscation of Property of Illicit Origin was established within the

²¹ See last year's monitoring, action 38

General Prosecutor's Office of the Republic of Armenia. The Department consists of four prosecutors, two senior prosecutors, a deputy head of department and a head of department, as well as five economists and a unit supporting the Department.

In the period from 3 September to 31 December, 2020, the department received data from other subdivisions of the General Prosecutor's Office of the Republic of Armenia in order to check the grounds for initiating an investigation into the possible property of illicit origin and to make relevant decisions based on the inspection results. In 2020 in particular, 214 decisions were made to initiate investigation based on the materials received, and in the case of 216 persons, 83 decisions were made not to initiate investigation. In the period of 1 January to 1 June, 2021, 25 decisions were made to initiate investigation, as well as 11 decisions not to initiate investigation.

Currently, 239 investigations are being conducted by the prosecutors of the department, in the framework of which the necessary evidence is being obtained in order to submit relevant lawsuits to the court.

At the same time, in order to ensure a specialized court hearing on cases of confiscation of property of illicit origin, by the decision of the RA SJC No. BDKH-19-N-7 of 1 April, 2021, 4 specialized judges of the Court of General Jurisdiction of Yerevan were reserved jurisdiction to examine cases on confiscation of property of illicit origin.

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(ies)	Monitoring result
	2021	2021		
40	The Draft Laws "On Making Amendments and Addenda to the Criminal Code" and "On Making Amendments and Addenda to the Criminal Procedure Code" were developed and submitted to the RA National Assembly.	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 RA National Assembly. (3rd quarter of 2020)	RA Ministry of Justice, RA General Prosecutor's Office (by consent).	The institute of liability of legal persons and the corresponding structures have been introduced.

On 5 May, 2021, the RA National Assembly adopted the Draft of the new RA Criminal Code, which introduced the institute of responsibility of legal persons. The draft does not define the exhaustive scope of crimes, the subject of which may also be a legal person. In addition, criminal liability of a natural person does not preclude criminal liability of a legal person for the same crime. Release of a natural person from criminal liability is not a basis for release of a legal person from criminal liability.

The draft of the new RA Criminal Procedure Code was also developed, which was adopted by the RA NA on 30 June, 2021. The draft also defines the structures of the institute of liability of a legal person. Concerns about the appointment process of judges are presented in Action 3 of this report.

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(ies)	Monitoring result
	2021	2021		
41	A legislative package aimed at using the imitation of taking or giving bribes to carry out operative-investigative measures in cases of giving or receiving illegal remuneration, using real or supposed influence, giving illegal remuneration for using real or supposed influence as well, was developed and submitted the National Assembly.	There is no monitoring indicator identified for 2021	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 possibility of "imitation of taking or giving bribes" to carry out the OIM measure has been defined, linking it with the detection of specific crimes envisaged by a special part of the RA Criminal Code. Other results are presented below.

In 2020, the Ministry of Justice of the Republic of Armenia developed a package of proposals on making changes in Article 30 of the RA Law on Operative-Investigative Activities, which allows to carry out the law enforcement practice of the operative-investigative activity of imitation of taking or giving bribes provided in in Article 30 of the RA Law on Operative-Investigative Activities,

It should be noted that on 4 May, 2021, the RA Criminal Code was adopted by the National Assembly, which also reviewed the scope of corruption crimes. On 30 June, 2021, the National Assembly the RA adopted the Criminal Procedure Code. Article 251 of the mentioned Code defines the secret investigative action "imitation of taking or giving a bribe". Taking into account the package of proposals and the opinions received by the law enforcement bodies within its the framework, it has been established that the terms "'take a bribe" and "give a bribe" are used in this Code in the sense defined by Articles 218-220, 258, 272-276, 435-440, 477, 496-497 of the RA Criminal Code." Taking into account the fact that the Criminal Procedure Code adopted on 30 June, 2021 has already defined the concept of "imitation of taking or giving a bribe" secret investigative action, according to it, relevant amendments will be made to the RA Law on Operative-Investigative Activity.

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

SECTOR 4: PUBLIC AWARENESS AND ANTI-CORRUPTION EDUCATION

	2021
NUMBER OF PLANNED ACTIONS	6
OF WHICH IMPLEMENTED	2
OF WHICH MOSTLY IMPLEMENTED	2
OF WHICH PARTIALLY IMPLEMENTED	1
NOT IMPLEMENTED	1

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
42	Based on the public awareness campaigns, individuals are regularly informed about their rights in the implementation of anti-corruption measures by the state, reforms in the service sector, whistleblowing and appeal mechanisms, and their interaction with the state body.	The semi-annual reports on communication were submitted to the Anti-Corruption Policy Council in accordance with the established format and published on the websites of the Council and the RA Ministry of Justice. (2020, 2021, 2022).	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 action is not performed.

The draft decision of the Government of the Republic of Armenia "On approving the communication action plan for 2021-2022 within the framework of the fight against corruption" has been developed by the Ministry of Justice, which is currently being finalized. It should be noted that the above measure was performed last year; therefore in the first half of 2021 no work was done to implement this action.

According to the Report, a public awareness campaign was launched in the first half of 2021. In particular, the RA Ministry of Justice continued to publish information materials on the implementation of the Anti-Corruption Strategy on the official website of the RA Ministry of Justice, on social networks, through the media. However, as a result of the desk research and FGD organized on 23 November, it became clear that the information published on the website of the RA Ministry of Justice is mainly press releases on the work done, and not public campaigns, which will inform the citizens in popularly about the implementation of measures, reforms in the field of service provision, whistleblowing and appeal mechanisms, their rights in relations with the state body. It is noticed that the Ministry of Justice does not attach enough importance to this issue, does not have a clear strategy or vision and has not set itself the primary goal of changing the public consciousness.

Take, for example, the billboards that do not say anything to the ordinary citizen about the whistleblowing system, do not affect in change of consciousness, are made and placed in a non-popular way.

According to the observations of the RA Ministry of Justice, the Ministry, attaching great importance to corruption as a phenomenon, its various manifestations, as well as the introduction of effective public awareness structures on anti-corruption measures, amends the draft decision of the Government of the Republic of Armenia "On approving the 2021-2022 Communication Action Plan in the framework of the fight against corruption" taking into account the proposals of international donors, thus aiming to ensure the adoption of an effective and efficient action plan, which will also be implemented in practice, serving the goals it objectives.

According to the Report, there were no circumstances hindering the implementation of the event.

Thus, the action, the implementation of which is planned in 2021, in the reporting period is considered **NOT 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(ies)	Monitoring result
	2021	2021		
43	The subject “Fundamentals of the anti-corruption policy” is taught in higher and vocational education institutions.	The subject “Fundamentals of the anti-corruption policy” is taught according to the Instruction plans. (3rd quarter of 2020).	RA Ministry of Education, Science, Culture and Sports, Universities, Secondary vocational education institutions	The subject “Fundamentals of the anti-corruption policy” is taught in 5 higher education institutions and in primary and secondary vocational education institutions Other results are presented below.

The subject “Fundamentals of the anti-corruption policy” is taught in higher and vocational education institutions. According to the 2021 semi-annual reports of the program received from the universities, the universities, in particular Gavar State University, Goris State University, Armenian State Pedagogical University after Kh. Abovyan, Yerevan State Medical University after M. Heratsi and V. Brusov State University in their curricula for a certain period of time included the subject "Fundamentals of Anti-Corruption Policy", which will be taught from the 2021-2022 academic year.

According to the letter of the RA Deputy Minister of Education, Science, Culture and Sports, a compulsory curriculum on "Fundamentals of Anti-Corruption Policy" has been developed in primary and secondary vocational educational institutions within the framework of the subject "Fundamentals of Law".

428 thematic subject programs have been developed and are being implemented in the 2nd, 3rd, and 4th years of the educational institutions implementing secondary professional educational programs, which include the topics: "Legal Characteristics of Corruption", "Anti-Corruption Policy", "The Concept of Anti-Corruption Phenomenon", "Fight against Corruption in the Republic of Armenia", "Causes and Consequences of Corruption", "International Commitments and Assessments of the Republic of Armenia", "Objectives of the Anti-Corruption Strategy", "Anti-corruption strategic directions" and other topics. The number of students of the mentioned institutions is 7127.

244 thematic subject programs have been developed and are being implemented in the 1st, 2nd and 3rd years of educational institutions implementing preliminary professional (vocational) educational programs. The topics include: “Manifestations and Levels of Corruption”, “Causes and Consequences of Corruption”, “The Concept of Criminal Procedure Law - Issues and Subjects”, “Stages of Judicial Trial/Proceedings in Courts of Appeal and Cassation”, “International Law”, “Concept and Essence” and other. The number of students of the mentioned institutions is 2009.

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

Action 44: Providing anti-corruption education in high school

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
44	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 is conducted (3rd quarter of 2020).	RA Ministry of Education, Science, Culture and Sport, Universities	The scope of program of the subject "Social Sciences" is changed.

In 2020, the review of the state standard of general education, subject programs and standards was performed. 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:

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

Thus, the action is considered **MOSTLY 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(ies)	Monitoring result
	2021	2021		

45	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).	Six trainings on anti-corruption and integrity were conducted with the participation of 63 civil servants. Other results are presented below.
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The Bureau of Civil Service of the Staff to the Prime Minister organized and conducted 6 (six) 2 days trainings on anti-corruption issues and integrity for the Integrity affairs organizers, which were attended by 63 civil servants. Training courses were conducted in local governments as well

In the first half of 2021, in order to ensure the transparency of the activities of the Lori Regional Administration, as well as to make the public awareness more effective, the regional and republican mass media covered the events, sessions, negotiations public importance and consultations of the Regional Administration.

Comparing the expected results and the work done, it becomes clear that the planned public awareness campaigns have not been fully and regularly implemented.

Comparing the expected results and the work done, it becomes clear that the planned regular seminars and awareness-raising actions were not performed regularly.

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

Action 46: Elaboration of distance learning modules for civil servants

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
46	The training of civil servants was organized using a distance learning model.	Training is carried out according to the modules (4th quarter of 2021).	Bureau of Civil Service of the Staff to the Prime Minister.	The implementation of the action is in the current stage of organizing the procurement process.

According to the Report, it is planned to conduct a distance training on "Integrity" for civil servants of the relevant bodies in the 4th quarter of 2021. At the same time, according to the information provided by the RA Ministry of Justice, the full implementation of the action is in the current stage of organizing the procurement process, as a result of which the organization conducting the training will be determined.

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

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

No.	Expected outcome	Monitoring indicator	Responsible body(ies)	Monitoring result
	2021	2021		
47	The online broadcasting system for testing stage of filling in the vacant positions and the civil service information system has been launched.	There is no monitoring indicator identified for 2021	Bureau of Civil Service of the Staff to the Prime Minister.	7 competitions were tested on the Civil Service information platform, 5 of which were broadcast.

According to the Report, the Civil Service Information Platform has been launched since 1 October, 2020, and from 1 October, 2020, competitions for filling vacancies in state bodies are held through the civil service information platform. On 21 December, 2020, the Ministry of Health conducted the first testing of the competition through the Civil Service Information Platform after the launch of the online broadcasting and civil service information systems for the vacancy testing phase, which was broadcast live on the official website of the Bureau of Civil Service of the Staff to the Prime Minister. Thus, although no monitoring indicator has been set for assessing performance for 2021, comparing the expected outcome and actions taken, as well as the fact that the above actions were performed last year, we can conclude that the action was not performed in the reporting period.

At the same time, according to the information provided by the Bureau of Civil Service, the organizational and legal department examined and found out that 7 competitions were tested on the civil service information platform, 5 of which were broadcast, i.e.. the testing phase took place: and 2 did not take place for various reasons, in particular, one was canceled and the other did not take place because there was no permission to take the test.

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

SECTOR 5: MONITORING, CONTROL AND PUBLIC COMMUNICATION

	2021
NUMBER OF PLANNED ACTIONS	1
OF WHICH IMPLEMENTED	1
OF WHICH MOSTLY IMPLEMENTED	-
OF WHICH PARTIALLY IMPLEMENTED	-
NOT 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(ies)	Monitoring result
	2021	2021		
48	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 of the Republic of Armenia has been presented, and steps have been taken aimed at reducing corruption risks.	2 surveys on the impact of corruption, public confidence and anti-corruption measures were conducted. The results of the surveys were published on the websites of the Council and the RA Ministry of Justice (4th quarter of 2022).	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)	Two public polls were conducted. Other results are presented below.

An agreement was reached between the Council of Europe and the Ministry of Justice of the Republic of Armenia to jointly develop a common methodology for conducting regular surveys on corruption, the level of public confidence and the impact of anti-corruption measures, and to conduct regular surveys based on that.

The MoJ conducts the surveys in cooperation with the International Republican Institute (IRI), delegating the latter to conduct the survey. In the framework of the regular public opinion polls conducted by the “International Republican Institute” international organization, during the first half of 2021, questions related to the fight against corruption were also provided to conduct surveys by the “International Republican Institute”. At the same time, a survey published by the International Republican Institute in February²² and May²³ 2021 also included questions related to the fight against corruption, which were also suggested by the Ministry of Justice.

²² https://www.iri.org/sites/default/files/final_for_publication_armenia_electoral_reform_march_8_2021.pdf

²³ https://www.iri.org/sites/default/files/armenia_ppt_final.pdf

In the framework of the “Armenia-Human rights and women in the armed forces in Armenia” project 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 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. The results of the survey were summarized and presented to the leadership of the RA Ministry of Defense.

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

METHODOLOGICAL RECOMMENDATIONS

1. There are measures for which actions for 2021 are planned without monitoring indicators (for example, see actions 12, 20, 22, 23, 41, 47). This does not allow to find out the real scope and the real impact of the action taken in a specific period of time. According to the Report on “The RA Anti-Corruption Strategy and Its Implementation Action Plan for 2019-2022” to be implemented in the first half of 2021” (hereinafter: Report) the monitoring indicators of the previous year were used as a basis for some of these actions. Moreover, among the mentioned, there are measures, the actions of which are envisaged for 2021-2022, but the Report uses monitoring indicators for the 2020 as a basis for the performance appraisal indicator.

It is proposed to change the Anti-Corruption Strategy Action Plans, and to review and envisage all actions for which there are no monitoring indicators for a specific period of time.

2. There are actions taken under some measures, which, however, are less important to achieve the result envisaged by the monitoring indicator. At the same time, this action is assessed as "partially implemented", but in reality they are less than the "partially implemented" assessment.

It is proposed to change the anti-corruption strategy action plans and to provide monitoring indicators for each action that provide qualitative rather than quantitative results.

3. 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 related to the action and the expected result are generally 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, analyzes and evaluations of the actions 1, 2, 3, 21, 43 presented in this report allow to conclude that these indicators do not fully allow to assess the qualitative aspects of the actions performed. For example, Action 43 does not specify how many universities should teach anti-corruption topics or at least how many students should take the courses/topics. Instead, the monitoring indicator is of a general nature, and it can be interpreted from this that even in one university the application of this educational model can be assessed by the competent bodies as done, but as a result qualitative problems arise.

It is recommended to include impact level indicators to measure the effectiveness of the implementation of anti-corruption action plans, through which it will be possible to assess whether the actions taken have led to the desired results and what impact they have had in the long-term perspective.

4. In order to assess and monitor the performance of the anti-corruption strategy and actions for its implementation, some monitoring indicators are based on assessments and indicators from one source, and comparisons with the results and information provided by other reliable sources are not made.

It is recommended to compare the information provided from several sources to check the monitoring indicators to evaluate the performance of the actions effectively.

5. There is a problem of sequence of actions. In particular, Action 13 sets the deadline for the development of model rules of conduct for public servants and civil servants in 2021, and the deadline for adoption is 2022. At least 2 annual trainings on model rules of conduct for civil servants should be conducted in 2021. It turns out that the model rules of conduct, which should be adopted in 2022, while training on them should be organized in 2021. The results of this monitoring showed that these trainings were not organized, as the model rules of conduct have not yet been adopted as teaching material.

Considering that the current year of training is coming to an end, it is recommended that this identified methodological issue be taken into account in order to avoid such problems in the future.

CONTENT RECOMMENDATIONS

1. Make the CPC's advisory opinions on integrity checking open and accessible to the public, ensuring the confidentiality of personal data provided by law, taking into account publicly available personal data (such as in the case of declarations).
2. Prior to sending the conclusions on integrity checking to the competent state bodies, provide it to the evaluated candidate in order to clarify and eliminate the inaccuracies, if necessary.
3. It is proposed to carry out a real assessment of the formation and capacity of the Anti-Corruption Policy Council, to identify the illegal grounds for membership of NGOs involved in violation of the requirements of the RA legislation and as a result to make appropriate legal decisions.
4. Prior to the launch of the new anti-corruption platform, ensure the smooth operation of the Anti-Corruption Monitoring Platform.
5. Adopt model rules of conduct for public servants and rules of conduct for civil servants, members of parliament and investigators.
6. Expand the scope of the term "family" of declaring officials and to include an adult child not residing with the official.
7. 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 their capacity building.
8. Continuously improve the quality of services provided to the citizens by the RA Police Patrol Service, including reducing the crowding of citizens in the territorial registration-examination subdivisions and the queues that cause dissatisfaction among the citizens, provide the administrative acts and protocols compiled against the citizens within the timeframe provided by law, ensure the uninterrupted operation of the patrol telephone service.
9. Review the Anti-Corruption Strategy and Action Plan in accordance with the methodological and content proposals presented in this report, as well as in the light of the situation in Armenia and the challenges arising as a result of the Artsakh war 2020.
10. Ensure the participatory organization of public discussions in the process of adoption of various actions and legislative acts, involve independent and specialized sectoral structures, and not be limited only to the publication of draft legal acts on the e-draft.am website.