

FINAL REPORT

ALTERNATIVE MONITORING: IMPLEMENTATION OF GOVERNMENT ACTION PLAN TO COMBAT CORRUPTION



Project Name:	Alternative Monitoring of the Implementation of the National Strategy and Action Plan for Combating Corruption
Coalition Members:	Sahib Mammadov, Chairmain, Citizens' Labor Rights Protection League Nadir Adilov, Chairman, Azerbaijan Lawyers Confederation Ramil Iskandarov, Chairman, Eurasian Lawyers Association Elmari Mamishov, Azerbaijan Young Lawyers Association
Coalition partner	Information and Cooperation Network of NGO working against corruption
Drafted by:	Sahib Mammadov, Head of the Coalition
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Composition of the Coalition:

Citizens' Labor Rights Protection League

Contact person: Sahib Mammadov

Phone: +994 12 495 85 54

Email: clrpl@bakinter.net

Azerbaijan Young Lawyers Union

Contact person: Elmari Mamishov

Phone: +994 55 2 500 177

Email: elmari.mamishov@gmail.com

Eurasian Lawyers Association

Contact person: Ramil Iskandarov

Phone: +994 12 449 94 14

Email: ramil.iskandarov@gmail.com

Azerbaijan Lawyers Confederation

Contact person: Nadir Adilov

Phone: +994 12 440 96 82

Email: nadir.adilov@gmail.com

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The Civil Society Project is a USAID initiative, implemented by Counterpart International in partnership with the International Center for Not-for-Profit Law. The goal of the project is to assist the citizens of Azerbaijan and the Government of Azerbaijan in institutionalizing pluralistic representative approaches to shaping and implementing economic and social reform.

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Summary

This is the second report released by the Coalition of civil society organizations (CSOs) in the framework of the project for Alternative Monitoring of the Implementation of the National Strategy and Action Plan for Combating Corruption in Azerbaijan (Action Plan). The Coalition's first report focused on the results of monitoring the implementation and operation of hotlines in government agencies.

The purpose of this document is to:

- (i) Analyze the measures undertaken by the Commission for Combating Corruption (CCC) and the Cabinet of Ministers to implement the Action Plan;
- (ii) Assess the provisions of the Action Plan and the outcomes of activities undertaken to implement these provisions;
- (iii) Conduct a comparative analysis of adopted norms and international standards and evaluate the entirety of their application mechanisms.

1. Project Overview

The project for the Alternative Monitoring of the Implementation of the National Strategy and Action Plan for Combating Corruption is designed to increase the level of participation of the population through civil society organization (CSOs), community-based groups and local authorities in combating corruption. The project is implemented by a Coalition of CSOs with experience in similar initiatives and strong capacity to network with international and national governmental and non-governmental organizations (NGOs).

The long-term objectives of the project include:

- Increase public awareness by conducting information campaigns;
- Form public opinion to strengthen citizens' position in combating corruption;
- Transform non-systematized activities of CSOs into civil and legal frameworks;
- Increase transparency in government agencies through access to information;
- Strengthen cooperation with government agencies to improve the legal base and practices for combating corruption.

To achieve these objectives, the Coalition engages in the following activities (Annex 1):

- Monitors the implementation of the National Strategy and Action Plan;
- Provides recommendations for the review and reevaluation of the Action Plan;
- Discusses the recommendations with all interested parties;
- Discusses the recommendations with government officials for implementation.

2. Problem of Corruption in Azerbaijan

2.1 Recent Activities to Address Corruption

Over the past five years the Government of Azerbaijan (GOAJ) undertook a series of steps to reduce the level of corruption in the country: (i) Established the CCC and an anti-corruption

department under the General Prosecutor's Office; (ii) Adopted a number of laws to enhance access to information and transparency and improved cooperation with NGOs; (iii) Implemented the state program for combating corruption in 2004-2006 and adopted a new national strategy and action plan for 2007-2011.

As a result of these measures Azerbaijan moved up in the Transparency International Corruption Perception Index from the bottom third percentile to the twelfth. Despite this, according to the Global Competitiveness Index released by the World Economic Forum corruption continues to be a major obstacle for doing business.

On July 28, 2007 the President of Azerbaijan approved the National Strategy and Action Plan for Combating Corruption. The outcomes and gaps in implementation of the previous strategy for 2004-2006 were analyzed to develop a comprehensive document. NGOs and international experts were invited to participate in drafting the Strategy. According to the Action Plan central and local executive bodies are required to submit annual working plans to the CCC and provide bi-annual reports to the CCC and the Government. NGOs have been given broad room for cooperation in combating corruption, particularly in the areas of research, monitoring and capacity building.

The Action Plan represents a broad set of measures and activities across many dimensions, including legislation, governance, asset management, health, education, etc. It includes a list of government agencies accountable for specific activities and sources of funding. Additionally the Action Plan sets broad time frames for implementation and provides for the involvement of partner organizations.

2.2 Project Fit with State Action Plan

The project for the Alternative Monitoring of the Implementation of the National Strategy and Action Plan for Combating Corruption helps to “increase the role of civil society institutions in implementing the National Strategy” (Part V, Provision 56 of the Action Plan). Additionally it facilitates the creation of a monitoring system for strategy implementation through alternative monitoring and status reports (Part VI, Provision 59). The Coalition identified the strengthening of public relations (Part II, Provision 16) as an area allowing for immediate involvement.

This document reports on the results of the second part of the project, which includes the following components as focal points for monitoring activities:

- Measures undertaken by government agencies to implement the Action Plan;
- Progress made as a result of Strategy and Action Plan implementation;
- The role of CSOs in developing policies for combating corruption.

3. Monitoring Methodology

Throughout the monitoring process members of the Coalition solicited the input of a number of experts, CSOs, parliamentarians and government officials. Mr. Sabit Bagirov from the FAR Center for Economic and Political Research, legal expert Mr. Alimammad Nuriyev, and Mr. Vusal Huseynov, a representative of the CCC, are three of the experts who made significant contributions to the work of the Coalition.

3.1 Data Collection

The Coalition conducted verbal interviews and distributed questionnaires among government agencies to gather data on the implementation of the Action Plan.

Questionnaire. The agencies which participated in the questionnaire were selected on the basis of written reports submitted to the CCC and the Cabinet of Ministers. These submissions were included in the Action Plan as a control and reporting mechanism but often failed to materialize. The questionnaire forms were sent out to twelve government agencies. Information obtained thereof provides a general overview of how the Strategy and Action Plan are perceived by officials and also what steps are being taken towards implementation.

Interviews. In addition to the questionnaire the Coalition conducted a series of un-structured interviews with members of working groups under the CCC and experts of the Information and Cooperation Network of organizations working on combating corruption.

3.2 Analytical Tools

General Analysis. The Action Plan provides for the development and adoption of new laws to enhance compliance with international standards in the field of combating corruption. A broad overview was conducted by the Coalition to assess the degree of convergence with the relevant UN and European conventions on anti-corruption. The Coalition also made an analysis of the respective CCC report, introducing general qualitative and some quantitative indicators of progress.

Comparative Analysis. Using the information collected in interviews and with the help of the questionnaire the Coalition developed a comprehensive overview of Action Plan implementation item by item. This was compared to the information provided by government agencies along each provision. Annex 2 is a two-dimensional Action Plan progress tracker for 2007-2011 based on the perception of the government and the alternative monitoring of the Coalition of CSOs.

4. Monitoring System

4.1 Control Mechanisms

According to section IV of the Strategy for Combating Corruption appropriate government agencies should be assigned to exercise control over the implementation of the Action Plan.

To this end the CCC and the Cabinet of Ministers are empowered to take appropriate measures. The following tasks fall in the purview of these agencies:

- Monitor the implementation of the Strategy and report to the President on the implementation of measures envisaged in the Action Plan semi-annually;
- Analyze the scope of measures undertaken to implement the Action Plan and regularly present this information to the President.

4.2 Agency and Parliamentary Monitoring

Other government agencies were also given a role in the monitoring system for the implementation of the Action Plan, which includes:

- Adoption of specific implementation plans and their submission to the CCC for monitoring and control;
- Provision of information on the status of implementation to the CCC and the Cabinet of Minister semi-annually;
- Provision of similar updates by other agencies involved in the implementation of the Strategy and Action Plan.

Parliament (Milli Mejlis) is also involved in the monitoring system for Strategy implementation. The Cabinet of Ministers provides annual reports to the Milli Mejlis, which should include information on the measures carried out in the field of combating corruption.

4.3 Public Monitoring

Public monitoring is envisioned both in the Strategy and Action Plan. The objective is to increase transparency in public agencies, improve cooperation with CSOs, and raise public awareness. Effective public monitoring calls for a political, legal, and cultural environment conducive to strengthening access to information, freedom of speech, and protection of human rights. Section IV of the Strategy provides for a series of training courses to advance the professionalism, ethical behavior and responsibility of journalists specializing in anti-corruption issues.

5. Monitoring Mechanisms

The monitoring conducted by the Coalition was designed to be broad and included most sections of the Action Plan. Four key action parameters were established to ensure that the monitoring fully reflected the implementation process:

- Reflect compliance with the timeframes for activities set forward in the Action Plan;
- Where possible support the development of qualitative and quantitative indicators to gauge progress;
- Evaluate the impact of measures taken to increase transparency and reduce corruption (perceived changes in the situation);
- Report on the enforcement of control mechanisms according to the provisions of the Action Plan.

6. Monitoring Results

6.1 Reporting by Government Agencies

The Coalition conducted an analysis of the information gathered from twelve government agencies that received the questionnaire. It also undertook research to determine whether the implementation plans of these agencies are being uploaded to the web site of the CCC for public viewing and awareness.

In the questionnaire sent out to the central executive bodies the Coalition requested the following information:

- Report on the activity of the agency (ministry, committee, etc.) in 2008 according to section 12 of the Action Plan;
- Updates on the implementation measures undertaken according to section 58 of the Action Plan.

The following conclusions were made based on the results of the Coalition's analysis:

- (i) The central executive bodies generally do not seriously approach their obligation to prepare and submit annual implementation plans to the CCC before December 20;
- (ii) The central executive bodies do not seriously approach their obligation to submit status reports as provided in section 12 of the Action Plan;
- (iii) Although the Action Plan should be publicly available and according to article 29 of the law on obtaining information falls in the category of information which should be disclosed, this document was not placed on the web page of the CCC.

Summarized in the tables below are some examples of information provided by government agencies in response to the questionnaire:

Agencies with low awareness of Action Plan provisions

Agency	Response	Comments
Public Procurement Agency	Annual reports and other information regarding the procurement of goods (services) at the expense of the government is uploaded to the web site of the agency www.tender.gov.az .	From this response it appears that the agency has nothing specific to report on the implementation of the Action Plan.
Customs Committee	Reports on the implementation of the Action Plan are submitted to the Cabinet of Ministers and the CCC every six months.	The Coalition's investigation shows that the Customs Committee has not submitted any status reports yet.

Success story

The Ministry of Ecology and Natural Resources provided the following response to the Coalition: (i) According to the Action Plan and in compliance with the law on obtaining

information, updates are regularly published on the web site of the Ministry; (ii) Anti-corruption training courses were organized for employees; (iii) Salaries and other social payments are made to the individual bank accounts of employees working in the offices and branches of the Ministry; (iv) The Ministry informs the public about the hotline and operates a system of efficient response to appeals; (v) In compliance with the paragraph 2 of Decree No.614 of August 16, 2007 a Code of Professional Conduct for public servants of the Ministry has been approved. Training and seminars were conducted to inform employees about the new code. In these sessions discussion focused on topics, such as increasing the credibility of government agencies and service, building confidence in public officials, increasing transparency and the compliance with the code of ethics. The new code also stipulates the rights and obligations of public officials.

Conclusions

Delays in submissions. Due to delays in the submission of implementation plans and semi-annual reports to the CCC on the part of a number of agencies the CCC may not fulfill its obligations in regard to the timely evaluation and disclosure to the public of state measures for the implementation of the Strategy. In preparing the national report the CCC could not maintain the timeframe provided in the Action Plan.

Unstructured information. The CCC did not develop specific instructions or recommendations for the preparation of implementation plans and reporting. As a result the implementation plans submitted by government agencies lacked a unified structure. Each agency adopted a singular approach. This made the processing of information contained in these submissions more difficult than necessary and caused further delays in the drafting of the national report.

Lack of monitoring. The national report was prepared and published on the web site of the CCC. The analysis made by the Coalition is included in Annex 2 at the end of this document. There is no information to reflect that the CCC conducted any type of monitoring of implementation according to paragraph 59 of the Action Plan. Part of the report submitted by Parliament to the Cabinet of Ministers was dedicated to anti-corruption efforts but overall the information provided was not specific enough and showed a lack of serious analysis and monitoring.

Public monitoring. A number of surveys and investigations were undertaken by several NGOs financed by the CCC, including the Information and Cooperation Network of organizations working on combating corruption. At the request of the CCC the Network conducted surveys in the main regions of the country and reported their findings. The Coalition financed by Counterpart International conducted the monitoring of government hotline services. A monitoring report was drafted and released to the public.

6.2 Public Awareness

Raising public awareness in the field of combating corruption and increasing transparency was one of the main goals of the Strategy. The CCC and the Cabinet of Ministers committed to

providing timely and accurate information to the public of their assessment of Strategy implementation. The results of the monitoring conducted by the Coalition show that government activity in this area was satisfactory. The following steps were taken to raise awareness:

- (i) Information regarding Strategy implementation was provided on the CCC's web site;
- (ii) National norms in the field of combatting corruption and the relevant international agreements Azerbaijan is party to were published on the web site;
- (iii) The national report prepared by the CCC was also published on the web site;
- (iv) Members of the Coalition, NGOs and other CSOs of the Information and Cooperation Network received timely and comprehensive answers to all requests sent to the CCC. On the other hand, making contact with and obtaining information from the Cabinet of Ministers was difficult. No detailed information regarding the efforts to combat corruption are available on the the Cabinet's web site;
- (v) CSOs effectively cooperate with members of the CCC and members of the CCC working group. Members of the CCC and its working group participate and speak at events organized by CSOs;
- (vi) The CCC conducted information sessions, conferences, round tables and seminars related to the measures in the field of combatting corruption in the framework of the Support to the Anti-Corruption Strategy of Azerbaijan (AZPAC) project in Baku and main regions of the country. State officials, representatives of municipalities, CSOs and mass media participated in these events. In the framework of the grant competition announced by the CCC a number of NGOs received small grants and conducted awareness raising events and monitoring in various regions across the country in the field of combatting corruption and increasing transparency.

7. Recommendations

The alternative monitoring project exposed some difficulty in the effective use of implementation and control mechanisms incorporated into the National Strategy and Action Plan. A difference in attitude of various government agencies towards the preparation of implementation plans and sharing of information has been observed.

Based on these findings the recommendations of the Coalition can be divided into two groups: (i) ***Increase the responsibility*** of government agencies for the implementation of the Strategy; and (ii) ***Develop a standard methodology*** (regulations, recommendations, etc.) for the preparation of agency implementation plans and sharing of information.

Increase the responsibility of government agencies for the implementation of the Strategy:

- Adopt measures to enable the CCC to issue administrative warnings based on subordination rules;
- Introduce responsibility and punitive provisions to the relevant legislative acts;
- Assign responsibilities to agencies and individuals for the implementation of the Action Plan and make this information public on the CCC's web site;

-
- Ensure that annual implementation plans prepared and submitted to the CCC are published online and make relevant changes in the Strategy and Action Plan to enforce this provision;
 - Publish the semi-annual reports submitted by government agencies to the CCC and the Cabinet of Ministers on the web site of the CCC and the respective agency.

Develop a standard methodology:

- Introduce unified guidelines for the preparation of implementation plans and the sharing of information to increase the responsibility of government agencies and facilitate data handling and processing;
- Expand the scope of training and information sessions to include a larger number of public officials. Monitor the number of participants, geographical reach (trainings in the regions), and discussion focus.
- Create an additional working group with the participation of the CCC working group and experts from the Information and Cooperation Network to improve the existing methodology for developing implementation plans.
- Announce a tender for the design of training modules and training of trainers to conduct a series of courses to increase the professional competencies of public servants and law enforcement officials. Consider the possibility of offering internships abroad and in international organizations operating in Azerbaijan.
- Establish adequate information and knowledge management divisions in government agencies to increase the effectiveness of public relations efforts. Provide training to ensure good record-keeping, processing and response to information requests.
- Monitor and report on the participation and role of CSOs in the implementation of the Strategy and Action Plan. Support their involvement by providing full access under the law on obtaining information.

Next Steps for the Coalition

The Coalition will continue to prepare and publicize new monitoring reports and recommendations initiated in the framework of the project for the Alternative Monitoring of the Implementation of the Strategy and Action Plan for Combating Corruption. The reports will be circulated to the organizations concerned and offer follow-up on government action undertaken in response to the Coalition's recommendations. Additionally the Coalition will continue to engage in discussions of draft legal guidelines (e.g. regulations, methodologies, etc.) in cooperation with the relevant government agencies as well as the CCC.

Annex 1 Project Implementation Plan

				Year 1											
	Activity/Sub-activity	Lead	Other	M1	M2	M3	M4	M5	M6	M7	M8	M9	M10	M11	M12
1	Preoperational stage to form the project working group and conduct meetings with policy-makers.	CLRPL, AYLU, ELA	Other allies												
2	Project presentation to government agencies, media and international organizations.	ELA	NGOs, media, government, international orgs												
3	Monthly meetings of the Coalition and project experts	AYLU	Other coalition members, partners												
4	Develop the monitoring methodology for the implementation of the National Strategy and Action Plan	CLRPL	Other coalition members, partners												
5	Define the monitoring tools with project experts	CLRPL	Other coalition members, partners												
6	Conduct the monitoring of the National Strategy and Action Plan implementation	CLRPL, AYLU, ELA, ALC	Other partners and allies												
7	Process the results of the monitoring and develop recommendations	CLRPL, AYLU, ELA, ALC	Baku Law Centre, Anticorruption NGO Network												
8	Organize public discussions of the recommendations and press conference.	ELA	Coalition members, media, all stakeholders												
9	Release the monitoring report in English and Azeri. Distribute to government agencies and all interested parties.	CLRPL	Other coalition members, partners												
10	Evaluate results and determine which project outputs instigated positive changes.	CLRPL AGHB	Other coalition members, partners												

Abbreviations: CLRPL Citizens Labor Rights Protection
ALC Azerbaijan Lawyers Confederation

ELA Eurasian Lawyers Association
AYLU Azerbaijan Young Lawyers Union

Annex 2 Comparative Analysis: Implementation of the State Action Plan 2007-2011

	Measure	Activities or Outcomes	Government Report	Coalition Comments
I	Changes and improvements in the legislation			
1	Continue introducing UN and CoE conventions in national legislation as well as other international treaties in the area of combating corruption	<ul style="list-style-type: none"> - Conduct general assessment for compliance with conventions and preparation of final reports - Prepare draft normative legal acts for compliance of legislation with international documents 	Continue the introduction of conventions to the national legislation on anti-corruption in the framework of the Support of Anti-Corruption Policy of Azerbaijan (AZPAC) project implemented by the CCC and the EC. The project started in Sep 2008 and was scheduled for completion in Jun 2009. National and foreign experts were appointed to analyze compliance with international agreements.	Conventions are not fully introduced. Compliance of national legislation with international agreements has been evaluated.
2	Prepare draft legislative acts or proposals in the area of combating corruption	<ul style="list-style-type: none"> - Prepare draft law on the liability of legal entities - Prepare draft law on conflict of interest for civil servants and other public officials - Prepare proposals to the draft law on prevention of legalization of illegally obtained funds or other property and the financing of terrorism - Prepare legislative proposal on protection of whistle-blowers on corruption cases - Undertake measures to approve declaration form on financial disclosure for public officials - Prepare proposals for improvement of legislation aimed at developing monitoring mechanisms in the area of financing political parties and transparency of expenditures - Adopt the Code of Competition - Adopt the Administrative Procedural Code 	Draft law on criminal liability of legal entities presented to the working group on improving the Criminal Code organized together with the EC. It is intended to include legal entities in the new text of the Penal Code. Draft law on the legalization of money or other property acquired through criminal activity and terrorism financing presented to Milli Mejlis and passed in two readings. Administrative Process Code was passed in two readings. Draft documents were prepared on plea bargaining and lobbying. Local and foreign experts were appointed for AZPAC in preparation of these laws.	The draft laws were appraised and approved by international organizations.
3	Analyze legislation to combat corruption	<ul style="list-style-type: none"> - Assess normative legal acts in force - Prepare amendments to normative acts for regulating legal relations not covered by the legislation - Include anti-corruption measures in draft state 	Analyze legal acts to assess anti-corruption impact: draft law of on state financial control, documentation rules for road building and construction work carried out on loans obtained with a	State programs and policies include anti-corruption measures but in many cases they are not concrete.

		programs	state guarantee, programs on education, reliable food supply, traffic, etc.	
4	Create single electronic database of legal acts	<ul style="list-style-type: none"> - Update the database regularly - Keep the database constantly operational - Open the database to the public 	Legal acts are available to the public free of charge on www.e-qanum.az . The Ministry of Justice has an IT group for upgrades and database maintenance.	The database search mechanism is imperfect. In some cases legal acts, amendments, and addenda are not uploaded in a timely manner.
5	Provide for public participation in the preparation of draft legal acts for combating corruption	<ul style="list-style-type: none"> - Conduct public hearings with the participation of CSOs, private sector representatives, media and independent experts - Promote draft law proposals from CSOs, private sector representatives, media and independent experts - Assess proposals and conclusions in the field of legislation 	On 22 July 2008 an AZPAC seminar was held to offer the public the possibility to contribute to the draft law on the legalization of money or other property acquired by criminal means or terrorism financing. Along with state representatives, NGOs, mass media and representatives of IOs attended this seminar and their proposals and opinions were accepted.	Representatives of NGOs and CSOs specializing in anti-corruption were included in discussions. Experts from the Information and Cooperation Network for combating corruption participated in the analysis of legal acts.
6	Evaluate the necessity to pass laws on lobbying activity	<ul style="list-style-type: none"> - Study the international experience - Investigate possibility of lobbying activity in the context of national legislation - Prepare the final document on this issue 	Concept document drafted by working group to upgrade the legislation.	Research of international best practices. There was no discussion of the draft law.
II	Activities of government agencies			
7	Specify agency authorities and eliminate duplication in activity	<ul style="list-style-type: none"> - Conduct an analysis of the government agencies charter and other acts regulating their activity - Eliminate duplications in the activity of government agencies and develop legal and other proposals to increase efficiency - Define the authorities of public officials in the charter for agencies which are part of state body structures - Prevent the assignment of both regulatory and commercial functions to the same agency 	Projects of new regulations initiated at several ministries and committees. Structural duplications were eliminated. "One window" principle applied for the registration of real estate. Working groups established at some ministries to develop proposals.	Administrative reforms were not carried out in all agencies. Activities designed to raise awareness regarding the work of agencies were insufficient. Information or public relations units were established at most agencies.
8	Improve the processing of applications and complaints in connection with corruption-related violations	<ul style="list-style-type: none"> - Prepare proposals to improve the rules for processing of applications and complaints - Conduct efficient investigations of complaints - Organize the receipt of complaints via e-mail 	Rules for the review of complaints improved. Internal procedures to facilitate meetings between public officials and citizens improved. Special software applications developed to	Modern systems for receiving complaints established but operational response systems do not work.

			improve the registration and circulation of documents at several agencies. Local IT networks established. A number of projects initiated to improve the processing of citizen inquiries.	Traditional methods of review are still used. Agencies that created hotlines are equipped for operational response.
9	Improve the system of filing complaints on administrative decisions	<ul style="list-style-type: none"> - Develop institutional mechanisms for the enforcement of the Administrative Procedures Code - Conduct training for civil servants and judges after the adoption of the Code 		Proper mechanisms are being put into place to create an Administrative Procedures Code
10	Improve access to information	<ul style="list-style-type: none"> - Improve rules for access to information - Improve activity of units in charge of creating access to information - Conduct training in this area - Prepare proposals related to the activity of the institute of information ombudsman 	Trainings on methods and rules to receive and transfer information were conducted. Specialized departments were created to engage in information management and public relations. Administrators appointed to local and corporative networks and databases to improve the use of information resources.	The creation of information units and improvement of internal procedures in agencies is insufficient to meet Action Plan provisions. An institution for issues on access to information has not been established.
11	Conduct specialized research and public surveys to estimate the level of corruption	<ul style="list-style-type: none"> - Acquire information on causes, characteristics and level of corruption in general and by sector - Assess the efficiency of measures undertaken in the area of combating corruption - Identify new anti-corruption measures based on the results 	An inquiry was carried out by the Information and Cooperation Network of NGOs to gather information on the general causes of corruption in different fields, key features, levels. In July 2008 in the framework of the AZPAC project a two-day seminar was conducted based on the inquiry. Government officials, representatives of CSOs, and foreign experts attended this seminar.	The CCC organized a grant competition for NGOs to conduct monitoring of anti-corruption measures. The Council of State support to NGOs, Counterpart, OSI Relief Fund and other organizations funded NGO anti-corruption projects.
12	Prepare annual reports on the activity of government agencies	<ul style="list-style-type: none"> - Report on issues related to service, budget, complaints, transparency and measures undertaken in the area of combating corruption - Publish and disclose annual reports - Develop CCC sample guidelines for the preparation of annual reports 	Several government agencies provided reports on their activities. Some agencies have not submitted the required information. The Ministry of Taxes printed 1000 copies of its reports in Azerbaijani and English and presented it to the public.	The activities carried out along this provision of the Action Plan were unsatisfactory.
13	Improve the work of internal affairs divisions in	<ul style="list-style-type: none"> - Create opportunities for individuals to file complaints directly to internal affairs divisions 	Most government agencies established internal affairs divisions. Several	Some effort made to establish internal affairs

	government agencies	<ul style="list-style-type: none"> - Introduce operational response mechanisms - Inform law enforcement agencies about corruption-related crimes discovered by internal affairs divisions - Provide the necessary technical and human resources to the internal affairs divisions 	investigations were carried out by reps of internal affairs and law enforcement officials. Efforts made to provide adequate technical and equipment financing. Some agencies increased the number of internal affairs staff.	divisions. The activities of these divisions do not give relevant focus to anti-corruption measures.
14	Develop website which fully reflects that activity of government agencies	<ul style="list-style-type: none"> - Updated information on the web site regularly - Place information required by the law “on access to information” on the web site - Use the site as a service tool for the population 	Most government web sites were improved and proper information was provided. This item was not fulfilled comprehensively by several central executive authorities with exception of some local executive bodies.	The web sites of some agencies such as Ministry of Labor and Social Protection, Emergency Situations, Defense are not available.
15	Improve the collection of fees, tariffs and other payments in connection with the activity of government agencies and increase transparency	<ul style="list-style-type: none"> - Ensure that information on fees, tariffs, taxes and payments for other rendered services is easily visible on government premises - Reduce cash collection of fees, taxes, or other payments - Ensure that payment of salaries, pensions, social benefits and other social payments are done via bank accounts - Implement measures in the area of increasing transparency and learning from international best practices 	Payments are no longer required for certificates of property sale from legal entities or individuals. Activities on the cancellation of cash payment for state taxes, duties and other payments are ongoing. Agencies put up boards reflecting all the relevant information on documents required, feeds, opening hours, etc. The bank account transfer system for government salaries and social payments is spreading to the regions. At present 80% of retired persons get pension by means of plastic cards. The effectiveness of measures cannot be estimates at all agencies. More work is required to simplify access to information for citizens.	Serious problems with paid services provided by state bodies still exist. In State Traffic Police Service of Ministry of Internal Affairs, regional centers issuing citizens’ passports, Registration departments of district police offices, departments issuing ID cards, Notary and registration departments of civil status acts under Ministry of Justice high level corruption is still observed.
16	Strengthen public relations	<ul style="list-style-type: none"> - Establish hotlines in government agencies and informing the public about those hotlines 	Please refer to the first report released by the Coalition in June 2009	
17	Improve the activity of municipalities	<ul style="list-style-type: none"> - Provide transparent and competition based hiring policies at the municipalities - Organize anti-corruption training courses and seminars for the staff of the municipalities - Strengthen administrative control over the activity of municipalities 	Rules of interviews with candidates for appointment to municipalities were prepared and circulate. The issue of anti-corruption was included in the agenda of 17 seminars. A total of 1,512 municipality members and officials attended training courses. 667 advices	

			were given to municipalities covering different issues in order to execute municipality activities efficiently and to avoid violations. 445 of them concern anti-corruption issues. Protocols on administrative violations of 420 municipality members were made and sent to court.	
18	Prevent conflict of interest in the activity of civil servants and other public officials	<ul style="list-style-type: none"> - Conduct of training in the area of implementing legislation to prevent conflict of interest - Develop efficient monitoring mechanisms for the prevention of conflict of interest - Provide monitoring agencies for the prevention of conflict of interest with necessary resources 	A draft law to prevent the conflict of interest among public officials is under consideration.	The draft law on conflict of interest was drafted and discussed in public but approval is prolonged. No other activities carried out in this area.
19	Improve the code of ethics for civil servants and other officials	<ul style="list-style-type: none"> - Develop codes of ethics based on sector - Identify responsibilities for the violation of the code of ethics - Organize trainings on issues related to the code - Increases opportunities to file complaints on non-ethical conduct of civil servants - Inform the public about the code of ethics 	Ethics training courses conducted in government agencies. Four trainings conducted in the framework of the AZPAC project. About 300 state officials were invited to ethics trainings in the regions. Ethical behavior codes were adopted at many agencies. Hotlines were upgraded to facilitate complaints concerning the behavior of officers and proper changes were carried out concerning the organization of telephone information services.	The adoption of ethics codes is being delayed at many agencies. Violations occur in the Executive Power of Baku city, cabinet of Ministers, Ministry of Emergency Situations as reported by several NGOs.
20	Improve recruitment to civil service and increase transparency	<ul style="list-style-type: none"> - Conduct recruitment in all areas of civil service transparently and based on competition - Develop the necessary monitoring mechanism - Provide the public with the information on the terms of hiring for civil service 	Rules for receiving documents for vacancies in state employment services were simplified. An online system of applications was established. Interviews with candidates are recorded and archived. An appeals commission was established to handle complaints. The public was informed on the terms of acceptance into civil service.	Most admissions exams for public service were monitored by a Coalition member. Exams were also attended by local and international observers and media.
21	Improve the salaries of civil servants	<ul style="list-style-type: none"> - Increase gradually the salaries of civil servants - Conduct systematic merit-based increases - Improve the image of civil service 	Increased salaries of civil servants by 50%. Increased salaries of officers with special rank.	Observed increase of salaries for officers. Proper works carried out

		- Attract a specialized cadre to civil service		to provide social support.
22	Increase the professionalism of civil servants	<ul style="list-style-type: none"> - Identify the needs for increasing the proficiency of the civil servants and organize trainings - Improve the activity of education institutions and centers at government agencies - Study international best practices - Organize joint trainings for the personnel of the government agencies - Organize anti-corruption education programs 	Defined priorities for the training program in 2008. Organized training courses for senior staff on the management of personnel. Some officials were sent on training abroad. Authorities by the Commission. Anti-corruption modules were added to professional development courses.	Training courses of civil servants are limited. The number of participants is insufficient.
23	Develop a system of appraisals for civil servants	<ul style="list-style-type: none"> - Adopt evaluation guidelines and enforce them - Consider the results of evaluations in the promotion of civil servants 	Evaluation rules for public officials were developed. Trainings were conducted in the new methodology for the appraisal of officials.	The Coalition was unable to obtain any additional information relevant to this provision of the Action Plan.
24	Enforce a rotation system in civil service	<ul style="list-style-type: none"> - Identify areas where the rotation system will be applied and enforce the principle of rotation 	Legislative amendments were made to introduce the rotation system. In some agencies members of staff were rotated to optimize the allocation of human resources. Employees were rotated across functions and departments but generally at the same level.	The Coalition found this measure to be unsuccessful. As a result of rotation employees become independent of their supervisors. This creates the opportunity for protectionism.
III Activities of law enforcement agencies in combating corruption				
25	Improve the activity of the Commission for Combating Corruption (CCC)	<ul style="list-style-type: none"> - Organize professional trainings for staff at the Secretariat of the CCC and members of Working Groups (WC) - Engage representatives of civil society institutions, private sector, media and academia - Strengthen relations with international partners and participate in international initiatives - Conduct of surveys and monitoring, analyze results and undertake appropriate measures - Prepare proposals to improve the resource base - Prepare proposals to improve CCC's activity 	Strengthened resource base of the CCC. Increased salaries of staff members. The WC worked on improving legislation in cooperation with representatives of civil society and the private sector. The CCC took part in international and local initiatives, international relations were consolidated. Amendments made to the CCC's articles specifying financial support to NGOs.	Positive measures undertaken. Rational cooperation with international organizations established to increase the professionalism of the CCC and WC.
26	Improve the activity of the Anti-Corruption Department of the General Prosecutor's Office	<ul style="list-style-type: none"> - Ensure the Department is fully staffed - Engage personnel of the Anti-Corruption Department in specialized trainings in the area of combating corruption 	Provided the Department with the necessary equipment and staff numbers.	The necessary activities to implement this provision were completed.

		<ul style="list-style-type: none"> - Ensure the Department has a new building and strengthened logistics 		
27	Improve cooperation among government agencies conducting criminal investigation of corruption-related violations	<ul style="list-style-type: none"> - Undertake measures for the efficient mutual cooperation among agencies - Ensure efficient information and experience sharing among the agencies with the use of new technology - Establish a single database of corruption-related crimes 	The General Prosecutor's office began building a corruption crime database to centralize the collection of information on preliminary investigations of corruption-related crimes, as well as to improve supervision. Steps taken to connect the Ministry of Internal Affairs to the database.	The measures were incomplete. A common database was not created and there is still a lack of coordination among agencies.
28	Increase professionalism of law enforcement officers	<ul style="list-style-type: none"> - Strengthen the specialization of relevant employees in the detection, investigation and prosecution of corruption-related crimes - Organize training courses - Establish working groups consisting of staff from the training centers of law enforcement agencies, develop joint training programs - Study and apply international best practices 	Established working groups to increase the professionalism of officers in conducting investigations. Prepared some legal amendments to improve the effectiveness of investigations.	Implemented a number of activities that led to increased cooperation.
29	Strengthen operational investigation measures for the detection of corruption-related crimes	<ul style="list-style-type: none"> - Adopt wider operational investigation measures in the detection of the corruption-related crimes - Strengthen cooperation, conduct joint trainings - Prepare proposals on improving the efficiency of investigations to combat corruption 	Agency cooperation led to the detection and investigation of corruption cases. Joint activities were carried out by the Ministry of Internal Affairs and Ministry of Taxes. The Prosecutor General's Office conducted trainings to improve coordination in investigations.	The Coalition was unable to obtain any additional information relevant to this provision of the Action Plan.
30	Stimulate the provision of information to competent agencies and work with individuals involved in corruption related violations	<ul style="list-style-type: none"> - Study agreements on cooperation with the criminal prosecution agencies - Improve the protection of witnesses cooperating with law enforcement agencies 	Established a project group to examine the issues related to the agreement on cooperation with criminal prosecution under the workgroup for legislative improvements.	The Coalition was unable to obtain any additional information relevant to this provision of the Action Plan.
31	Publish court decisions	<ul style="list-style-type: none"> - Place court decisions online and provide regular updates 	Disciplinary action was taken in respect of four judges based on claims by citizens. An additional 22 cases were investigated. Court decisions were published on the internet and information was periodically updated.	Some activities were carried out to place court decisions online. The search system for Superior Court decisions is imperfect. Other courts did not publish decisions

				on the web.
32	Improve legislation regulating the activity of courts and judges, including subjecting judges to administrative liability	<ul style="list-style-type: none"> - Reconsider the grounds for charging judges with administrative liability - Study international best practices - Prepare relevant draft normative legal acts 	The Judicial-Legal Council developed projects of specific discipline rules. The project was discussed at meetings with the EC joint working group and consent on making amendments to the project was reached.	Studied international best practices and developed initial projects and discussions at the level of working groups. At present disciplinary proceedings for judges are executed on basis of old practice.
33	Undertake measures to improve the enforcement of the court decisions	<ul style="list-style-type: none"> - Increase the monitoring of enforcement of court decisions by judges - Punish employees responsible for shortcomings during the enforcement of court decisions - Prepare draft changes to the legislation in connection with enforcement of court decisions 	Seminars were held with participation of judges from Baku, Ganja, Shirvan, Sumgayit, Sheki cities and in Nakhchivan region. Number of law-enforcement officers was increased for implementation of court decisions and work optimization. The project on the incorporation of amendments to current normative-legal acts is in progress.	The Coalition was unable to obtain any additional information relevant to this provision of the Action Plan.
34	Improve the activity of lawyers	<ul style="list-style-type: none"> - Improve the resource base of the Lawyers' Bar - Increase the compensation for lawyers providing state legal assistance - Adopt a code of ethics for lawyers 	No activities were implemented. The resource base of the Lawyers' Bar was not improved. A plot was allocated for the construction of a Bar administrative building but no construction works were executed.	The amount paid to lawyers for legal redress paid on state account remains small. This influences the quality of advisory services.
IV	Development of entrepreneurship and improvements in privatization			
35	Adopt measures on the development of entrepreneurship	<ul style="list-style-type: none"> - Develop and strengthen the protection system of investments by entrepreneurs - Increase opportunities for entrepreneurs to take out loans - Prevent illegal intervention by government agencies in entrepreneurial the activity - Identify the problems of entrepreneurs arising as a result of relations with government agencies and undertake measures for their resolution - Study and analyze reports on Azerbaijan developed by international organizations in the economic sphere, prepare proposals 	The principle of "single window" registration for new businesses was adopted. Information on registration was published online by the Ministry of Taxes. Time to set up a business was reduced from 30 to 3 days. The number of new enterprises increased by 1,464 compared to 2007. The National Fund on Assistance for Entrepreneurship provided 74 million AZN to the private sector. The procedure for allocating land plots was simplified. A strategy	During the registration of entrepreneurship subjects the system "one window" is successfully applied. The activities implemented in relation with the other measures considered in this section of Action Plan were not effective.

			for the establishment of a securities market was developed.	
36	Improve privatization procedures	<ul style="list-style-type: none"> - Ensure equal right participation of all parties in the privatization process - Prepare proposals to improve state auctions - Undertake measures to prevent conflict of interest in the privatization process 	Announcements are published in the mass media and online. A hotline operates to provide and receive information related to privatization.	No serious activities were implemented to meet this provision of the Action Plan.
37	Undertake measures to increase transparency in privatization	<ul style="list-style-type: none"> - Improve the provision of information about the privatization process - Increase transparency in the selection of the independents advisors (experts) to be engaged in the privatization process 	Information and statistical reports related to the activities of the State Committee for Property Management is published online and in the media.	It is difficult to obtain information on privatization. Only general information is available online.
38	Improve the activity of agencies in charge of conducting financial monitoring and increase their transparency	<ul style="list-style-type: none"> - Prepare proposals to assign agencies in charge of financial monitoring and improve existing mechanisms - Identify the threshold for budget expenditures in all spheres - Prepare proposals on legislation regulating budget system and on improving budget content - Prepare proposals to develop and execute the local budget, as well as on monitoring and compliance with approved budget indicators 	Several legal proposals were drawn up and presented to the Cabinet of Ministers. The System of Management of Information of the Treasury is being implemented to improve and automate budget preparation and increase transparency. Oversight was increased in the administration of VAT payments.	Additional information was obtained on the measures related to the improvement of activities of agencies in charge of financial inspection.
39	Promote fair competition and equal participation in state procurement	<ul style="list-style-type: none"> - Increase monitoring of financial agencies over payments on state procurement contracts - Develop mechanisms limiting future participation in state procurement of legal entities and individuals who committed violations during tendering or in the execution of procurement contracts - Undertake appropriate measures for the immediate response to complaints to protect the rights of plaintiffs participating in state tenders - Inform law enforcement agencies on cases of corruption in state procurement - Assess the efficiency of state procurement procedures and improve existing legislation 	Contractors who commit violations during tendering lose the state guarantee required for participation and are prohibited from making applications for a certain period of time. Trainings were prepared to improve tendering procedures. The web site www.e-tender.gov.az was created and software to support electronic tendering is being tested. The monitoring system of state purchases was organized on the basis of a local computer network.	No serious activities were implemented to meet this provision of the Action Plan.
40	Increase transparency in	<ul style="list-style-type: none"> - Use the Internet to increase participation in state 	No information.	No serious activities

	state procurement	procurement contests and publish information on the results of the contests - Organize electronic state procurement		were implemented to meet this provision of the Action Plan.
41	Increase the level of professionalism in state procurement	- Prepare information brochures on state procurement - Increase the level of proficiency of experts engaged in organizing and conducting electronic state procurement, arrange trainings for them - Increase the responsibility of the tender commissions in the organization of tender procedures	Seminars and trainings were organized in government agencies for specialists involved in state purchases.	The measures taken were not sufficient to raise the level of professionalism in state procurement to the necessary level.
42	Increase transparency in state registration of the real estate	- Prepare proposals for the simplification of rules and time frames for the registration of property rights and eliminate obstacles in this process - Ensure that information on state registration is accessible via the internet	A draft cadastre law was prepared and approved. The list of documents required for legal registration was drawn up, simplified, made official in regional departments, and publicized. An internal affairs commission was established at the Service for State Registration of Real Estate. Procedures were simplified and the time it takes to register was reduced.	Necessary information, as well as fees for specific services is available on the web site of the Service for State Registration. An automated hotline was established. Certain re-organization processes are being carried out in the Committee on property issues.
43	Prevent the legalization of assets acquired as a result of illegal activity and strengthen institutional mechanisms	- Provide for cooperation and information sharing among agencies combating money laundering - Improve registration and reporting mechanisms for financial operations - Undertake measures to increase the volume of non-cash payments for public purposes	A draft law was prepared to strengthen the institutional mechanisms in preventing money laundering. The draft law was adopted in the second reading of the National Assembly.	The only activities in this field included the study of international best practices and the drafting of a law to prevent money laundering.
44	Implement international standards on the prevention of financing of terrorism and money laundering	- Instruct relevant employees of government agencies on measures against money laundering - Inform financial institutions and relevant government agencies on international standards and organize training courses - Undertake measures for the implementation of Financial Activity Task Force	No information	No information
45	Implement international audit standards	- Prepare manuals and recommendations regulating activity of the internal audit service in	A draft law was presented to the Cabinet of Ministers. New audit	Training activities were implemented as planned.

		<p>accordance with international standards</p> <ul style="list-style-type: none"> - Ensure compliance of monitoring over auditors' activity with international standards 	<p>inspection questionnaires were certified by the Chamber of Auditors. National and international accounting standards were published on the web site www.maliyye.gov.az. Transition to "Bazel II Capital" was completed to increase transparency in the bank system. Minimum requirements for disclosure for banks were established.</p>	<p>Changes related to the application of accounting standards are being realized very slowly.</p>
46	Increasing the quality of the audit service	<ul style="list-style-type: none"> - Prepare normative legal acts on increasing the auditors' responsibility - Improve the legal database regulating activity of the internal audit service - Ensure transparency in accountancy and financial reports of legal entities 	No information	No information
47	Improve the work of government agencies in issuing licenses and ensuring transparency	<ul style="list-style-type: none"> - Prepare recommendations for simplification of terms and conditions for licensing - Prepare recommendations for the transition to electronic-based consent functions (registration, granting licenses, approvals, certificates, etc.) 	<p>The Ministry of Economic Development in cooperation with the IFC began a project to improve the business environment. A centralized source to track licenses and application forms was established. Work is being conducted to transition to an electronic system of approvals.</p>	<p>No measures were taken besides those reflected in the information provided by the commission.</p>
48	Increase the efficiency of tax control and inspections	<ul style="list-style-type: none"> - Computerize the selection process of tax audit - Use an automate system for formalization of tax control and results - Develop software and a system of standard indicators for mobile tax inspections - Improve complaint mechanism to appeal the decisions of tax authorities - Organize control over the implementation of decisions made by tax authorities - Prevent cases of evasion by legal entities which are subject to compulsory audits 	<p>Software was designed to automate the random selection of tax payers for inspections. The rules on mobile tax inspections were improved in the audit subsystem of the Automated Management System (AMS) in order to increase objectivity. Search reports on legal entities not under inspection are being drafted to prevent evasion. Complaints and appeals are being handled on a regular basis. An ethics code was drafted to improve the work of contractors of the Ministry of Taxes.</p>	<p>Notwithstanding some improvement in the system of tax inspections, traditional methods are being used in practice.</p>
49	Simplify the provision of necessary information to	<ul style="list-style-type: none"> - Create internet access to information on budget accounts for taxpayers 	<p>Changes were made to existing software to create the possibility for</p>	<p>No measures were taken besides those reflected in</p>

	taxpayers	<ul style="list-style-type: none"> - Create internet access to taxpayer's information which is not considered a commercial secret - Provide for the electronic submission of tax declarations - Adapt the work of tax authorities to the IMF code on best practices in tax transparency 	obtaining electronic passwords and login during the initial registration of tax payers. Non-proprietary information was made available online. The number of tax payers using the electronic system for the submission of declarations reached 110,000. More than 600,000 declarations were submitted via this route.	the information provided by the commission.
50	Improve the collection process of customs tariffs and fees	<ul style="list-style-type: none"> - Create access to information on customs tariffs and fees in customs offices and online - Transition to the non-cash payment system for customs transactions - Improve complaint mechanisms for appeals against the decisions of customs - Organize control over the implementation of decisions made by customs - Accelerate the processing of goods at the border and create favorable conditions for business. 	Customs legislation and other relevant information were made available online. Bank terminals are functioning in nice customs offices and payments of duties and fees are made via wire transfer. Electronic information points on customs duties and tariffs, as well as the goods nomenclature and tracking of customs declarations were established. Amendments were made to the appeals procedure in the Customs Code.	No serious changes were made in this field.
51	Gradual application of compulsory insurance	<ul style="list-style-type: none"> - Prepare recommendations for the improvement of legislation on compulsory insurance - Establish institutional mechanisms for the implementation of compulsory insurance - Apply compulsory insurance 	Relevant laws were drafted and approved. A total of 50 million AZN was allocated from the state budget for compulsory medical insurance.	The legal basis for compulsory medical insurance was improved but the application process is delayed.
52	Undertake actions to determine the status and material-technical resource base of doctors	<ul style="list-style-type: none"> - Prepare recommendations on doctors' status - Implement doctors' recruitment based on transparency and competition - Adopt rules of behavioral ethics for doctors - Raise salaries and strengthen social security 	Legal changes are being developed to determine the status of doctors. Regulations are being drafted to improve hiring procedures in the profession.	No serious changes were made in this field.
53	Improve management in educational institutions	<ul style="list-style-type: none"> - Improve mechanism of conducting examinations, ensuring transparency and strengthening public monitoring - Increase the efficiency of complaint resolution in educational institutions 	Final year high school examinations were centralized. Results were available on the web site of the Ministry of Education for three days following publication. The Ministry's anticorruption workgroup anonymously interviewed 821 students from 10 state high schools. Parent lecture centres and Parent-Teacher Associations	The first results of final examinations carried out in a centralized fashion show that the application of this system caused increased corruption within the education system.

			were established in comprehensive schools to facilitate self-government and to involve parents in school management.	
54	Undertake actions to determine the status and material-technical resource base of teachers	<ul style="list-style-type: none"> - Prepare recommendations on teachers' status - Implement teachers' recruitment based on transparency and competition - Adopt rules of behavioral ethics for teachers - Raise salaries and strengthen social security 	Rules of ethical behaviour for employees in the education system were developed. A working group under Ministry of Education together with ABA-CEELI prepared an ethics model for education professionals. Information on vacancies in comprehensive schools is printed in the <i>Azerbaijan Teacher</i> newspaper at the beginning of each academic year to increase transparency in employment.	No serious changes were made in this field.
V	Public awareness and cooperation			
55	Bring information to public attention on the actions geared towards combating corruption and the implementation of the National Strategy	<ul style="list-style-type: none"> - Conduct workshops, conferences and seminars, and public hearings - Prepare educational publications, films, drawings and other aids - Conduct interviews and discussions between government officials and the media - Include training courses on anti-corruption in the curricula of higher and special education schools, training centers and centers for improving professional skills 	Information sessions with the participation of CSOs and the Prosecutor General's office were organized. An anti-corruption grant program was conducted for NGOs to conduct awareness campaigns in over 20 regions. Seminars were conducted in the framework of the AZPAC project with the involvement of local experts. The CCC published an anti-corruption book. A broad range of activities were conducted by different government agencies with the involvement of the public and media.	The Committee carried out some activities to increase awareness and access to information. The Committee worked with NGOs on organizing seminars, conferences, roundtables and distributed materials. The Committee published two editions of an anti-corruption book twice and distributed it to all interested parties through NGOs.
56	Increase the role of CSOs in the implementation of the National Strategy	<ul style="list-style-type: none"> - Involve NGOs, private businesses and other stakeholders in the implementation of the National Strategy - Implement courses and trainings to increase professionalism, ethics and the responsibilities of journalists that specialize in the field of combating corruption - Support CSO initiatives related to the implementation of the National Strategy 	The CCC established cooperation with NGOs and arranged grants for local NGOs working to fight corruption. Mass media and NGOs were invited to attend all ceremonies organized in Baku and the regions by the CCC.	No information

57	Promote cooperation in the field of combating corruption	<ul style="list-style-type: none"> - Cooperate with international and regional organizations and participate in various international programs and projects with the purpose of implementing the National Strategy - Continue cooperation with international organizations and corresponding agencies in foreign countries in the field of combating corruption - Solicit the technical assistance and advisory services of international partners in support of corresponding measures of the Action Plan - Take appropriate actions with the purpose of implementing recommendations in the field of combating corruption prepared within the frameworks of GRECO and the Istanbul Anti-Corruption Action Plan of the OECD - Take appropriate actions to implement recommendations in the field of combating corruption prepared by Transparency International 	<p>Actions were taken in the framework of all relevant agreements and organizations. The implementation of GRECO recommendations continues. A meeting of the Association of International Anti-corruption Authorities was held in Baku with the participation of government officials. Close ties were established with this organization. Cooperation with Transparency International continues. Cooperation with the EU was strengthened particularly in the framework of the AZPAC project. The CCC established productive relations with local, foreign and international NGOs within the period of preparation of National Strategy and Action Plan.</p>	No information
VI Monitoring system for the implementation of the National Strategy				
58	Actions undertaken by government agencies related to the implementation of the National Strategy	<ul style="list-style-type: none"> - Preparation of annual plans by government agencies and their submission to the CCC - Submission of information on the implementation status of the National Strategy by the central and local executive bodies to the CCC and the Cabinet of Ministers every six months - Submission of information on the implementation status of the National Strategy by other agencies responsible for its implementation to the CCC every six months 	<p>According to the results of monitoring implemented by the CCC some central executive authorities do not fulfill their obligations in presenting implementation plans to the CCC.</p>	<p>Central and local executive authorities and most agencies responsible for the implementation of the National Strategy do not present reports to the CCC every six months.</p>
59	Actions undertaken by the CCC and the Cabinet of Ministers related to the implementation of the National Strategy	<ul style="list-style-type: none"> - Assessment of the implementation status of the National Strategy - Preparation of the annual report on combating corruption by the CCC - Provision of annual reports by the Cabinet of Ministers to the Milli Majlis 	<p>Information covering the activity over a six-month period was made public and published online by the CCC. There is no progress report on the status of implementation of the National Strategy.</p>	No information