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SUPPORTING INCREMENTAL CHANGES IN THE FIGHT AGAINST CORRUPTION

Independent Evaluation of the OSCE's Anti-Corruption Assistance 2011-2021



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ACRONYMS

APC	Agency for Prevention of Corruption	ODIHR	OSCE Office for Democratic Institutions and Human Rights
CoE	Council of Europe	OECD ACN	Anti-Corruption Network of the Organization for Economic Co-operation and Development
CPC	Conflict Prevention Centre (OSCE)	OIO	Office of Independent Oversight (OSCE)
CSOs	Civil society organizations	OMiS	OSCE Mission to Serbia
CPI	Corruption Perception Index	OSCE	Organization for Security and Co-operation in Europe
EU	European Union	POiB	OSCE Programme Office in Bishkek
EXB	Extrabudgetary (OSCE)	pS	OSCE participating States
FATF	Financial Action Task Force	SSG/R	Security Sector Governance and Reform
FO	Field operation	TI	Transparency International
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit	TNTD	Transnational Threats Department (OSCE)
GRECO	Council of Europe's Group of States against Corruption	ToR	Terms of Reference
IACA	International Anti-Corruption Academy	UB	Unified Budget
Moneyval	Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism	UNCAC	United Nations Convention Against Corruption
OCEEA	Office of the Co-ordinator of OSCE Economic and Environmental Activities	UNDP	United Nations Development Programme
		UNODC	United Nations Office on Drugs and Crime
		USAID	United States Agency for International Development
		WB	World Bank



1. Introduction

Corruption poses a threat to security and stability and diminishes the rule of law, efforts to advance democracy and effective state development. The Ministerial Council of the Organization for Security and Co-operation in Europe (OSCE), in its Decision No. 11/04 *On Combatting Corruption*, refers to corruption as ‘representing one of the major impediments to the prosperity and sustainable development of the participating States (pS) that undermines their stability and security and threatens the OSCE’s shared values’.¹

The OSCE has provided anti-corruption assistance to its participating States for approximately 20 years. Tasked with promoting transparency and accountability in the public sector, the OSCE has delivered support via a comprehensive approach to security through three dimensions of work: the politico-military, economic and environmental, and the human dimension. Within the OSCE Secretariat, anti-corruption work, which aims to foster good governance, is led by the Office of the Co-ordinator of the OSCE Economic and Environmental Activities (OCEEA). Complementary work is carried out under the third dimension by the Office for Democratic Institutions and Human Rights (ODIHR), which promotes the rule of law and ensures effectiveness of legislation. Anti-corruption efforts can also indirectly relate to work carried out in the OSCE’s politico-military dimension, when it supports authorities to combat money laundering and the financing of terrorism, and ensuring adequate legislation, co-operation and co-ordination at the national and regional levels.

Individual anti-corruption projects are implemented by the OSCE Secretariat as well as by the field operations (FOs).

Despite many efforts, a global look at the regions assisted shows high levels of perceived corruption and challenges to controlling it effectively. Therefore, a natural question arises regarding the role of the OSCE and its impact on anti-corruption, with several key considerations. First, that anti-corruption, albeit an important subject, is not the main and only objective for the OSCE to pursue. Secondly, that there are many other international and regional organizations that help countries address corruption directly or indirectly, some of them specialized in the subject matter. Thirdly, that the OSCE anti-corruption assistance during 2011–2021, amounting to an expenditure of €10.55 million (one third of which came from extrabudgetary funds) by the 14 field operations and the OCEEA combined, was rather modest.²

Until now, there has been no comprehensive insight into the OSCE’s work on anti-corruption and what, if any, difference it has made to improve anti-corruption policies, frameworks and practices that help reduce corruption overall in the participating States. In this context, in 2022, the Office of Internal Oversight (OIO) launched an organization-wide evaluation of the OSCE’s programmatic work on anti-corruption over the last decade, from 2011 to 2021. The purpose of this evaluation was twofold: to enhance learning by identifying lessons learned and good practices, and to ensure accountability for results. In this sense,

the evaluation incorporated both a backward- and a forward-looking approach. It was conducted between December 2022 and September 2023 and comprised several phases, including an initial in-house data collection phase, the development of an inception report, a data verification and validation phase, two field visits to the case study countries, Serbia and Kyrgyzstan,³ an organization-wide survey, interviews with key informants, data analysis and report writing.



2. Context and object of the evaluation

1.1 Corruption and anti-Corruption

The negative impact of corruption by undermining the rule of law, democracy, economic and social development, while hitting the most vulnerable segments of society the hardest, is generally well understood on global, regional and national levels.

However, there is no all-encompassing and universally recognized definition of corruption. Corruption can change its shape depending on the political, social, cultural and historical characteristics of a country or a region. The OSCE sees corruption as a cross-dimensional threat, posing risks to all the three security dimensions in which the OSCE operates. It relies on the concepts and definitions provided by other international organizations.

The most common definition of corruption has been developed by Transparency International (TI) as: “abuse of entrusted power for personal gain”.⁴ Despite its deficiencies,⁵ this definition is brief and therefore often used for pragmatic purposes.

International organizations that have developed conventions against corruption, including the United Nations, the Council of Europe (CoE) or the Organization for Economic Cooperation and Development (OECD), focus on different *forms* of corruption and their definitions, including active and passive bribery (both in the public and private sector), trading in influence, money laundering, accounting offences,

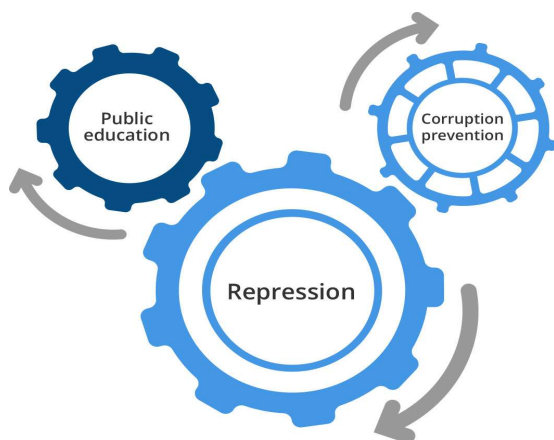
embezzlement, misappropriation, obstruction of justice, abuse of office and illicit enrichment.⁶ The explanatory reports to the conventions show that their authors had the goal to include the biggest possible number of the forms and elements of corruption criminalized, so that the countries joining the conventions would have the largest possible number of anti-corruption tools available to them.

With regard to ‘anti-corruption’, this largely refers to the measures taken, ideally following a comprehensive, or *holistic*, approach by a country to (1) prevent different forms of corruption, including through the adoption of legislation, preparing risk assessments, adopting codes of conduct, increasing the transparency of government, requiring public officials to declare their assets, income and other means; (2) prosecute those who commit corruption crimes and hold them accountable; and (3) raise awareness about corruption, introduce a policy of zero tolerance to it and encourage a change of culture or *modus operandi*.

The three elements should be complementing and reinforcing each other, hence ultimately forming a comprehensive, or *holistic*, approach that should generate positive changes (Figure 1). Although the three elements should be seen as equally important, the cogwheel of ‘repression’ shown here as the biggest is not accidental: a few countries supported by the OSCE have been advised by the OSCE⁷ and other organizations, including the anti-corruption network of the OECD (OECD ACN) and the Council of Europe’s Group of States against Corruption (GRECO),⁸ to demonstrate political will in primarily addressing high-level corruption to end impunity. Therefore, a lot of assistance provided to the countries in the OSCE region is aimed at

capacity-building and development on the level of law enforcement, prosecutors and judges to build and develop the necessary skills to address corruption.

FIGURE 1. HOLISTIC APPROACH TO CORRUPTION



Source: made by the evaluator

The usual antipodes of 'corruption' are *transparency*, *integrity* and *accountability*. Therefore, these terms are often used with reference to 'anti-corruption', i.e., the actions that have been taken or need to be taken to prevent corruption and sustain anti-corruption.

1.2 OSCE anti-corruption commitments

The OSCE anti-corruption commitments are described in a number of documents, including the 2003 Maastricht OSCE Strategy Document for the Economic and Environmental Dimension, as well as four Ministerial Council Decisions: from 2004 in Sofia,⁹ 2012 in Dublin,¹⁰

2014 in Basel¹¹ and 2016 in Hamburg.¹² The theme of anti-corruption was addressed by almost every OSCE Economic and Environmental Forum that took place between 2011 and 2021. It is also noteworthy that on 4 December 2020, the OSCE Ministerial Council adopted Decision 6/20 on Preventing and Combating Corruption through Digitalization and Increased Transparency, thereby "promoting the use of digital tools for early detection and prevention of corruption" and tasking "relevant OSCE executive structures, including field operations, within their mandates and available resources, to assist participating States, upon their request, in implementing the provisions of this decision".¹³

Official OSCE documents show the priorities and approach taken with regard to anti-corruption assistance by the OSCE. The key elements could be summarized as follows:

- Promotion of existing regional and international legal instruments of other international organizations and their recommendations (including the Council of Europe, OECD, UNODC and FATF), encouraging participating States to ratify and implement them ('avoiding duplication of efforts', 'advocacy role')
- Emphasizing long-term and comprehensive anti-corruption strategies ('holistic and sustainable approach to anti-corruption')
- Anti-corruption assistance to be provided to participating States upon their request ('demand-driven assistance')
- Making synergies with other themes (anti-corruption actions together with asset recovery, anti-money laundering, terrorist

financing, economic development, etc.) in a ‘multi-faceted’ approach to security

- Encouraging co-operation and co-ordination on all levels
 - National, including co-operation with all stakeholders (government, private sector, civil society, media)
 - Regional and cross-border
 - International, through international conventions and co-operation with other international organizations

1.3 OSCE Anti-corruption assistance 2011–2021

On the organizational level, the tasks of fostering good governance and combating corruption within the economic and environmental dimension lie with the OCEEA within the OSCE Secretariat. OCEEA works on national and regional projects related to asset recovery, financial investigation, promoting good governance and building transparent and accountable institutions. In addition to providing assistance to participating States, the OCEEA is also responsible for strengthening the work of the OSCE field operations and for reporting to the Economic and Environment Committee and the Permanent Council on key activities and engaging in a systematic dialogue with pS on all issues of relevance to the OSCE Economic and Environmental Dimension. The Economic and Environmental Forum is the main and highest-level annual event within the Economic and Environmental Dimension, promoting political dialogue on economic and environmental issues linked to security and preparing recommendations for decision-making bodies.¹⁴

OSCE field operations (FOs) provide the lion’s share of the OSCE’s anti-corruption assistance (see Table 1). Operating under tailor-made mandates, agreed by consensus of participating States, field operations assist host authorities to put OSCE commitments in the different dimensions of security into practice and foster local capacities through specific projects that respond to their needs. Field operations are supported by the OSCE’s Conflict Prevention Centre (CPC) in the Secretariat that acts as the OSCE-wide focal point for early warning and as an intermediary between FOs and the thematic departments.

The OSCE Office for Democratic Institutions and Human Rights (ODIHR) is the Organization's human rights institution, promoting the rule of law and ensuring effectiveness of legislation regarding the human dimension. Although not focussed on anti-corruption work per se, ODIHR provides relevant contributions by reviewing legislative frameworks and working with parliaments on the prevention of corruption.

The OSCE co-operates with relevant international partners, *inter alia*, the United Nations Office on Drugs and Crime (UNODC), the OECD, the World Bank (WB), the United Nations Development Programme (UNDP), the CoE, and the International Anti-Corruption Academy (IACA), and concluded several high-level memoranda of understanding with some of them.

An inventory of OSCE projects implemented by the OCEEA and FOs between 2011 and 2021 identified 163 projects that, in whole or in part, delivered anti-corruption assistance (see Table 1 below).¹⁵ Total expenditures over the period 2011–2021 were €10.55 million,¹⁶ fluctuating over time and distributed unevenly among the OCEEA (OSCE Secretariat) and the 14 FOs. About two thirds of the expenditures came from the Unified Budget (UB), with the remaining one-third coming from extrabudgetary funding.¹⁷

The two FOs with the largest expenditures on anti-corruption assistance were the OSCE Programme Office in Bishkek (€1.9 million) and the OSCE Mission to Serbia (€2.7 million). Therefore, case studies and two field visits were conducted to zoom into the OSCE's assistance provided in these two countries (see Sections 3 and 4 below).

TABLE 1. OSCE ANTI-CORRUPTION ASSISTANCE PROJECTS 2011–2021

Executive Structure	Country/area assisted	Number of projects	Expenditures (€)	% Extra-budgetary (ExB)
SEC (OCEEA)¹⁸	OSCE region	10	682,191	100%
Mission in Kosovo	Kosovo ¹⁹	4	89,517	100%
Mission to Bosnia and Herzegovina	Bosnia and Herzegovina	5	694,008	100%
Mission to Serbia	Serbia	19	2,712,765	50.78%
Presence in Albania	Albania	16	807,110	67.50%
Mission to Skopje	North Macedonia	5	155,487	0%
Mission to Montenegro	Montenegro	14	203,804	15.82%
Mission to Moldova	Moldova	1	7,112	0%
Project Co-ordinator in Ukraine	Ukraine	7	403,554	30.32%
Office in Yerevan	Armenia	18	687,877	0%
Programme Office in Astana	Kazakhstan	21	531,110	0%

Centre in Ashgabat	Turkmenistan	9	138,102	0%
Programme Office in Bishkek	Kyrgyzstan	13	1,909,937	0%
Project Co-ordinator in Uzbekistan	Uzbekistan	10	600,967	42.04%
Programme Office in Dushanbe	Tajikistan	11	961,696	0%
TOTAL	14 field operations + OCEEA	163 projects	10,585,237	35.72%

The OSCE anti-corruption assistance by type, summarized in Table 2 below, shows that the projects include not only traditional capacity development exercises, including conferences, seminars aimed at civil servants, law enforcement, prosecutors and judges, but also the development of methodologies and toolkits to sustain their skills, provide legislative assistance, including development and implementation of strategies, help with the implementation of international standards and engagement with the general public, fostering broader education, and awareness-raising campaigns. Some of the OSCE's work has a regional focus, such as the trial monitoring tool,²⁰ developed by ODIHR, which has been used by several FOs in South-Eastern Europe. An important trend (demonstrated, for instance, vividly in the case study of Kyrgyzstan and also emerging in

another case-study country, Serbia) is the use of digital tools in dealing with corruption, as encouraged by OSCE Ministerial Council No. 6/20.

At the OSCE Secretariat level, there has been a shift in the approach to anti-corruption assistance provided by the OCEEA from 2018 onwards, moving away from regional conferences and awareness-raising events, to focusing more on 'concrete' deliverables, including the review of legislation and facilitating the use and deployment of open data strategies, new digital technologies and skills. This has been particularly pursued in countries where field operations are no longer present (e.g., Armenia or Ukraine) and for which extrabudgetary funds were received.

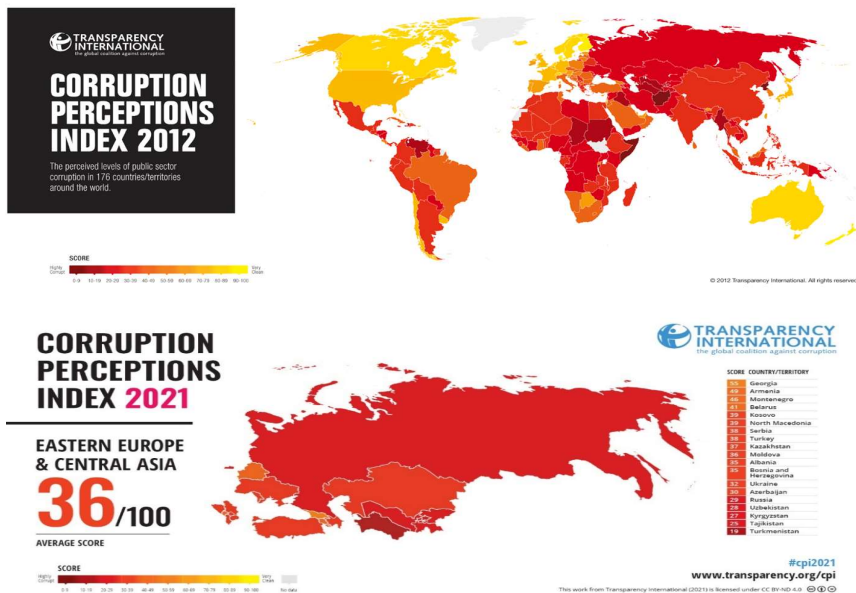
TABLE 2. OSCE ANTI-CORRUPTION PROJECTS BY TYPE OF ASSISTANCE

Regional and cross-border conferences
Training courses and seminars
Compliance with international standards (UNCAC, OECD, FATF)
Legislative work (development and implementation)
Methodologies and toolkits
Monitoring (case/trial monitoring, parliamentary work monitoring)
Awareness-raising campaigns, public education
Digitalization
Facilitation of co-operation

1.4 Anticorruption dynamics in OSCE participating states, with a focus on South-Eastern Europe and Central Asia

According to Transparency International's Corruption Perception Index, during the last decade Eastern Europe and Central Asia were the second-lowest performing regions²¹ after Sub-Saharan Africa, scoring on average 36 out of a possible 100, see Figure 2 below.

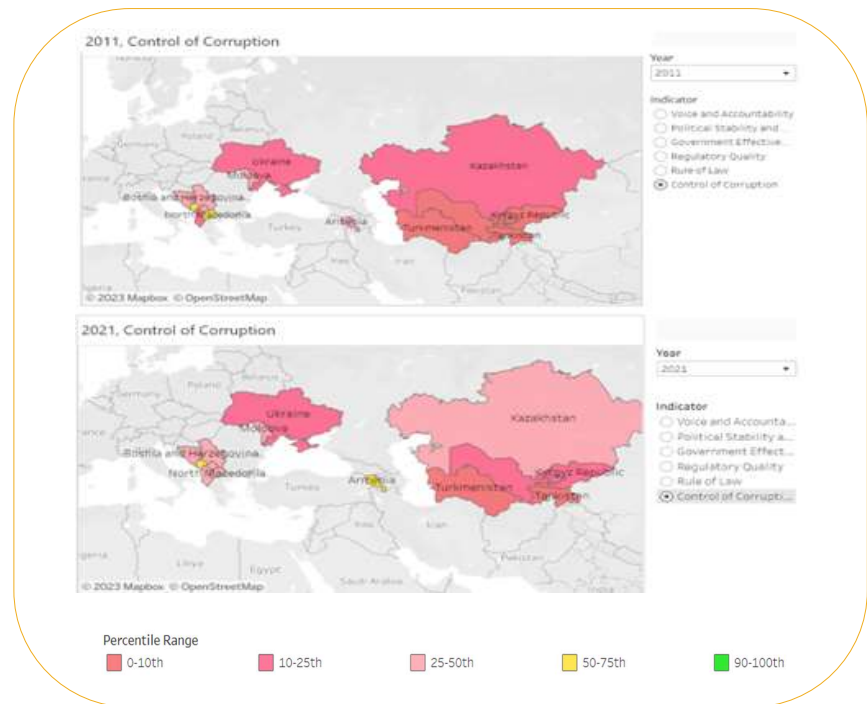
FIGURE 2. TRANSPARENCY INTERNATIONAL CORRUPTION PERCEPTION INDEX 2012 AND 2021



Source: Transparency International, 2012 and 2021²²

With regard to the control of corruption as measured by the World Bank,²³ the anti-corruption trend in 14 jurisdictions assisted by the OSCE looks slightly less discouraging. In 2021, as compared to 2011, the situation deteriorated in 4 out of 14 jurisdictions, namely Bosnia and Herzegovina, North Macedonia, Serbia and Tajikistan, whereas the other 10 slowly progressed, with Armenia, Kazakhstan and Uzbekistan advancing faster towards better results, see Figure 3.

FIGURE 3. CONTROL OF CORRUPTION IN 2011 AND 2021



Source: Compiled from World Bank. Worldwide Governance Indicators, 2011 and 2021²⁴



3. Evaluation approach and methodology

3.1 Evaluation criteria and evaluation questions

Five criteria were assessed in this evaluation of the OSCE's anti-corruption assistance: *comparative advantage/value added, coherence, effectiveness, sustainability and gender equality.*

The key evaluation questions were the following:

Comparative advantage/value added

What is the comparative advantage of OSCE's anti-corruption assistance (compared to that of other international organizations)?

How does the OSCE's anti-corruption assistance add value to OSCE's security co-operation?

How can the OSCE better leverage its comparative advantage to enhance anti-corruption results?

Coherence

To what extent is anti-corruption assistance co-ordinated internally (within the OSCE as an organization) and externally (government, international community, NGOs)?

How can the OSCE improve the internal and external co-ordination of its anti-corruption assistance?

Effectiveness

What are the (intended and unintended) results of the OSCE's anti-corruption assistance?

What factors facilitated and what factors inhibited the achievement of the OSCE's anti-corruption assistance results?

How can the OSCE improve the effectiveness of its anti-corruption assistance?

Sustainability

To what extent are gains made with anti-corruption assistance sustainable?

What factors could contribute to enhancing the sustainability of anti-corruption efforts?

Gender equality

To what extent and how are gender considerations incorporated into the OSCE's anti-corruption assistance?

3.2 Evaluation Approach and Methodology

The evaluation started out with **desk research** to map OSCE anti-corruption commitments, interventions and expenditures, using data from internal documentation systems, as well as publicly available official OSCE documents. The OSCE anti-corruption assistance project

mapping and portfolio analysis was verified and validated by the OSCE FOs and the OSCE Secretariat (OCEEA).

The evaluation then used a **case study approach** to answer the evaluation questions for two countries that received the most assistance in terms of expenditures from the OSCE in the evaluation period: Serbia and Kyrgyzstan.

The two case studies included field visits to the OSCE Mission to Serbia (OMiS) and the OSCE Programme Office in Bishkek (POiB) for in-person meetings with stakeholders, including senior OSCE leadership, programme and project managers, assistance beneficiaries and representatives of international donors and/or organizations. Third-party data and reports (UNODC, OECD ACN, GRECO and FATF), OSCE project documentation and monitoring data (project proposals, progress reports, self-assessment reports, decentralized evaluation reports) and interview notes and observations from the field visits were analysed to answer the main evaluation questions for the two country cases. Each field visit resulted in a comprehensive case study report, including individual findings and conclusions on the evaluation questions (chapter 3 and 4).

The **field visit to the OSCE Programme Office in Bishkek** took place on 6–8 February 2023, conducted by an external Anti-Corruption Expert and assisted by an Evaluation Focal Point of another field operation in the region. It was preceded by OSCE project mapping, analysis of project data and self-assessment reports, and a desk review of external evaluation and assessment reports, including from GRECO, FATF, the UNODC and Transparency International. Semi-structured interviews were conducted with the POiB (Head of the Programme

Office, senior leadership, project managers and co-ordination officer), government, business, civil society, state enterprise and independent local experts (12 people, including seven women), whose experience of working with the OSCE's anti-corruption assistance ranged from two to 20 years (eight years on average).

The **field visit to the OSCE Mission to Serbia**, conducted by an external Anti-Corruption Expert and OIO's Head of Evaluation, took place on 20–24 February 2023. It was preceded by project mapping, analysis of project data and OMiS project self-assessment reports, whenever available, a desk review of external evaluation and assessment reports, including from GRECO, the Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Moneyval), the UNODC, Transparency International and the EU. Semi-structured interviews were conducted with OMiS staff (Head of Mission, senior leadership, Economic Crime and Anti-Corruption Unit, Media Department, and Security Co-operation Department), beneficiaries (different government bodies, Judicial Training Academy, CSOs, journalists) and partner organizations (United States Embassy, UNODC). In total, 25 people were interviewed, including 12 women and 13 men, whose experience of working with the OSCE anti-corruption assistance ranged from one to 20 years (eight years on average).

After conducting these two cases studies, the evaluation team collected additional data through an internal **survey** and a number of **key informant interviews** with OSCE staff working on anti-corruption assistance to validate some of the case study findings, and to generate cross-cutting findings for the organization at large.

The survey was sent out to 54 people who work or previously worked on anti-corruption activities in the OSCE (some staff had left the organization by then). The evaluation received 31 survey responses (from 13 women, 18 men), representing a 57 per cent overall response rate.²⁵ Qualitative semi-structured interviews were conducted with 10 staff members (four women, six men) of various OSCE executive structures, including the OCEEA, ODIHR, CPC and the Transnational Threats Department (TNTD). Two workshops took place with the Evaluation Reference Group (ERG) to test and validate preliminary findings.

Data analysis was based on a mixed-methods approach consisting of primarily qualitative analysis, combined with quantitative analysis depending on the availability of primary and secondary quantitative data. Anonymous quotes based on the evaluation team's interview notes are used throughout the report to provide concrete examples of qualitative data collected. In general, the evaluation relied on the triangulation of various data sources and analysis whenever possible. Quality assurance was provided by an internal review within the evaluation team, as well as by an ERG comprising OSCE staff from different executive structures and a representative of the UNODC. The ERG was asked for input and advice throughout the evaluation process.

3.3 Challenges and limitations

Concerning challenges and limitations, the evaluation team applied the following risk mitigation strategies.

- **Lack of overview of OSCE's anti-corruption portfolio and limited performance and results data:** In the absence of an overview of OSCE's anti-corruption portfolio, the evaluation started out with mapping anti-corruption projects implemented by the OSCE over the period 2011–2021. Based on information available in the administrative system, OIO initially identified 151 projects. After verifying this list with the various executive structures, the list was updated with 12 more projects. The availability of performance information for the various projects was mixed. Missing relevant and/or comparable performance information was largely mitigated by asking executive structures to validate and/or complement the information and by reviewing project documentation (self-assessment reports, project assessment reports whenever available) and third-party sources (documentation from other organizations).
- **Limitations of reliance on interview data:** The evaluation relies largely on interview data. To mitigate the potential for biased answers of staff working on anti-corruption assistance and beneficiaries receiving assistance, the evaluation team relied on the triangulation of evidence wherever possible and on the expert judgement of the external subject matter expert to assess results achieved. Due to substantive staff turnover at the OSCE over the period of 10 years, the evaluation team reached out to former staff members for interviews as well.

- **Staff turnover within OIO's Evaluation section:** Due to staff turnover within OIO, it took more time to complete this evaluation than planned. The evaluation was managed by multiple staff members over time, which resulted in delays. This was mitigated to some extent by the active involvement of the Head of Evaluation throughout the evaluation process.
- **Resource constraints:** due to limited resources, OIO could only conduct two field visits for this evaluation. The two case studies selected provided rich examples of OSCE's anti-corruption work in two different OSCE regions, but the evaluation does not provide comprehensive insights into cross-organizational anti-corruption achievements. This has been mitigated to some extent by a cross-organizational survey, as well as a number of key informant interviews with OSCE staff across the organization to generate some cross-cutting findings.



4. OSCE anti-corruption assistance to Serbia

4.1 Background

Serbia is a landlocked country located in South-Eastern Europe. Its population is over 6.9 million, with more than half of its people living in urban areas.

The Mission to Serbia is an OSCE field operation based in Belgrade, with two field offices in Bujanovac, southern Serbia, and Novi Pazar, south-western Serbia. The Mission was established on 11 January 2001 at the invitation of the Government of the then-Federal Republic of Yugoslavia, first named the 'OSCE Mission to the Federal Republic of Yugoslavia', then renamed to 'OSCE Mission to Serbia and Montenegro' in 2003, and finally to 'OSCE Mission to Serbia' (OMiS) in 2006.²⁶

The mandate of OMiS, which has not changed since its establishment in 2001, stands on four pillars: rule of law and human rights, security co-operation, democratization, and media²⁷ The anti-corruption unit is part of the Rule of Law and Human Rights Department, which is engaged in legislative work, prevention measures and the promotion of integrity, capacity-building and helping Serbia satisfy international standards on anti-corruption and anti-money laundering measures. Additionally, anti-corruption as a cross-dimensional theme is addressed through increasing capacities of law enforcement and prosecution personnel by the Security Co-operation Department, and promotion of access to information and freedom of the press/media by

the Media Department. With respect to anti-corruption activities, the Mission helps to *"harmonize Serbian legislation and practice with international anti-corruption standards and build the authorities' capacity to better respect good governance principles"*, working *"in close co-ordination and partnership with other international organizations"*.²⁸

Serbia has been a member of the Council of Europe Group of States against Corruption (GRECO) since 6 June 2006. While proceeding swiftly with the implementation of recommendations during the first three rounds of evaluation, Serbia stumbled during the 4th round in 2015 and was qualified as 'globally unsatisfactory' by GRECO under its rules of procedures in 2017.²⁹ Subsequently, it had to undergo a constitutional reform process to address major deficiencies and ensure the independence of judges, as well as transparency in the law drafting process, and had to adopt a new Law on Corruption Prevention encompassing, among other matters, the issue of conflicts of interest and integrity. As evidenced further in this case study, OMiS played a critical role in helping Serbia address the challenges and improve compliance with recommendations.

GRECO adopted Serbia's 5th Evaluation Round report in March 2022,³⁰ issuing recommendations that, when complied with, would help seek progress in the areas that the international community, including OMiS, did not manage to remedy preventively (for instance, requiring 'rehabilitation' of the Anti-Corruption Council or publication of the recommendations of the Agency for Prevention of Corruption (APC)).

With regard to money laundering and terrorist financing, Serbia was subject to an increased monitoring procedure (the so-called 'grey list')

from 2018 until 2019, reporting annually to the Financial Action Task Force's (FATF) regional body Moneyval.³¹ With regard to addressing deficiencies, OMiS helped the country make progress in record short time, with Serbia subsequently being removed from the FATF 'grey list' in June 2019.³²

Serbia signed the United Nations Convention against Corruption (UNCAC) on 11 December 2003 and ratified it on 20 December 2005. The first review cycle of Serbia under UNCAC was in 2014,³³ the second one was ongoing at the time of writing.³⁴ Under the first review cycle, Serbian authorities requested technical assistance to improve implementation of the Convention, namely the establishment of the e-case management system and supporting capacity-building of competent officers and practitioners.³⁵ OMiS, together with other international organizations, has assisted Serbia comprehensively regarding the two priorities, with upscaling of the e-case management system to accelerate in the coming years.

Last but not least, Serbia has had EU candidate status since 2012, with negotiations progressing slowly since 2014. The EU has been the largest provider of financial assistance to Serbia since 2001, with grants up to €3 billion³⁶ and growing.³⁷ EU reports indicate major deficiencies and slow progress in a number of areas, including anti-corruption.³⁸

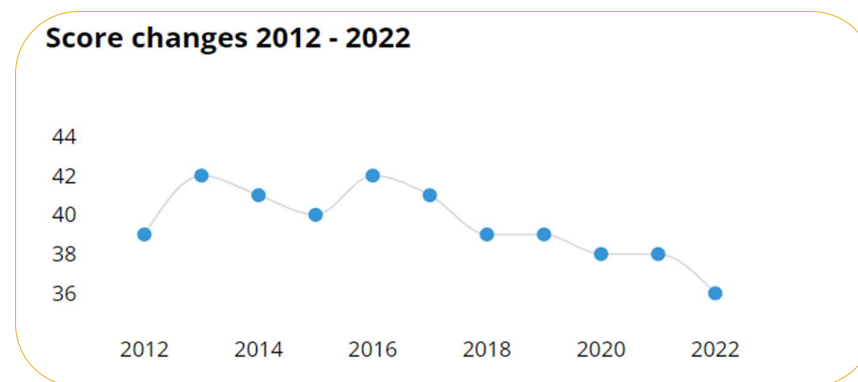
The relations between Serbia and Kosovo are a key priority, taking up the attention of various international organizations. The OSCE, through the support of its Mission to Serbia and in Kosovo within their mandates and to the extent possible, contributes to connectivity and

trust-building, thereby focusing first and foremost on security and co-operation. Consequently, other matters, democratization, good governance and *anti-corruption*, have arguably become secondary. This process has been labelled by some authors as 'stabilitocracy', i.e., the exchange of stability for external leniency on democracy,³⁹ much to the detriment of the reforms in the country, first and foremost in the anti-corruption field.

4.2 Corruption dynamics in Serbia

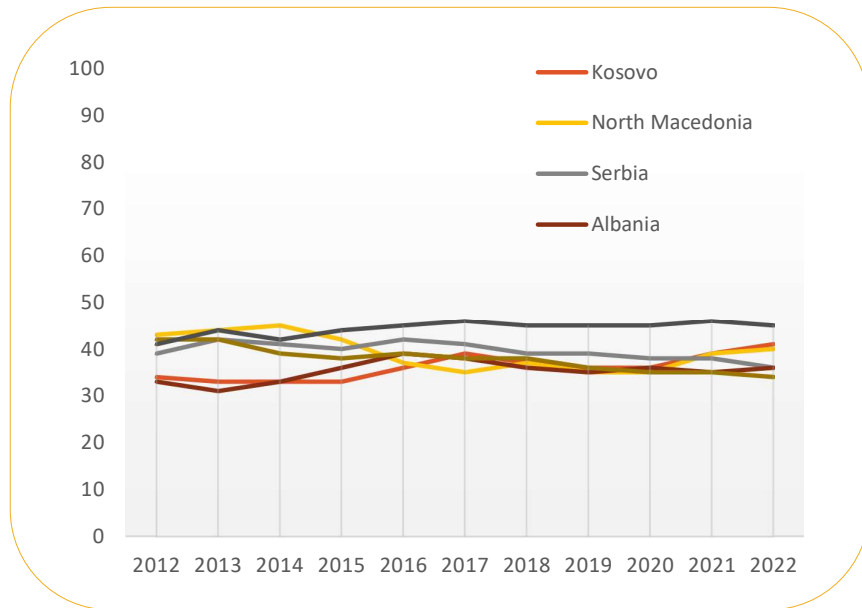
Corruption dynamics over the last decade have been steadily deteriorating in Serbia, measured by a number of international indices, including Transparency International's Corruption Perception Index (TI CPI) (see Figures 4 and 5 below),⁴⁰ the World Bank's Governance index on the country's capacity to control corruption (Figures 6 and 7 below) and the ERCAS/CIPE Public Integrity Index (Figure 8 below).

FIGURE 4. SERBIA'S TI CPI SCORE DYNAMICS IN 2012–2022



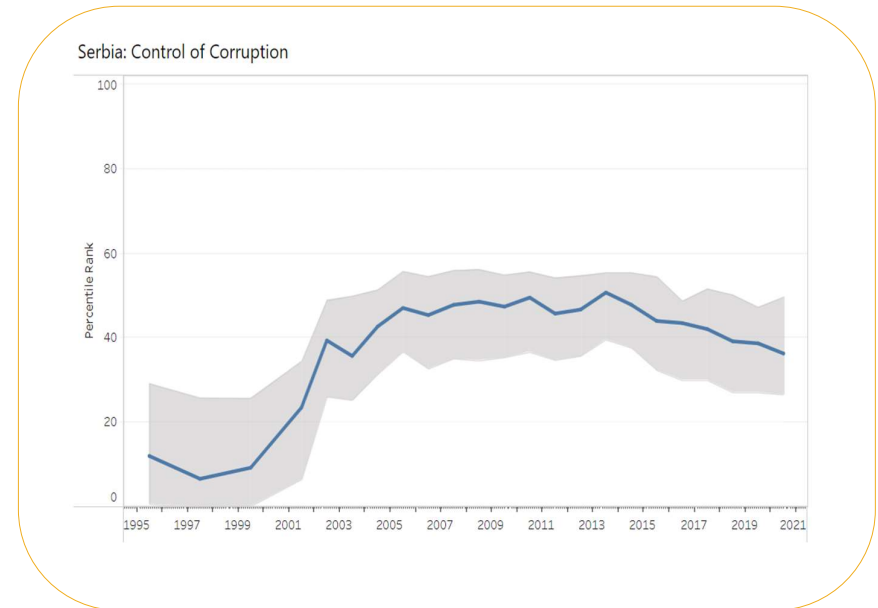
Source: *Transparency International Corruption Perception Index*⁴¹

FIGURE 5. SERBIA'S TI CPI SCORE DYNAMICS AMONG OTHER BALKAN COUNTRIES IN 2012–2022



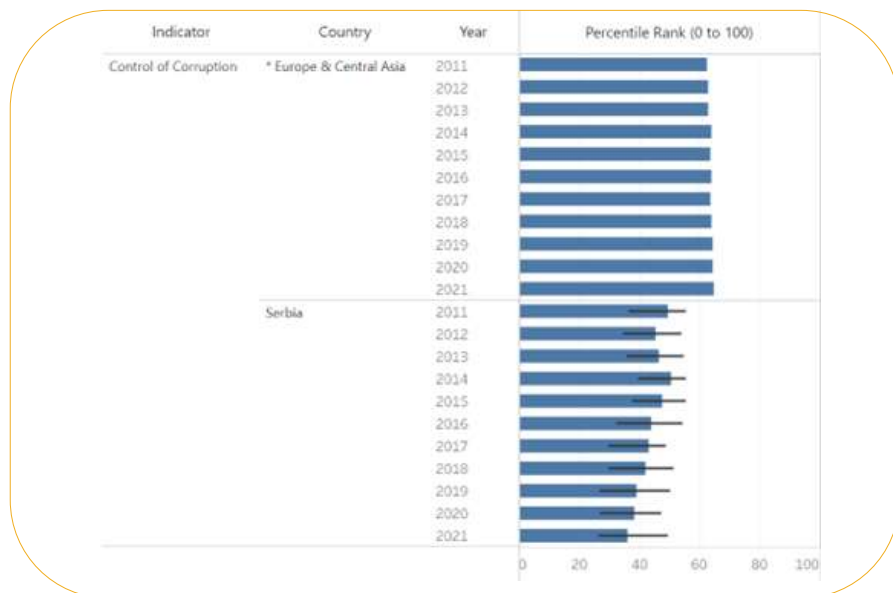
Source: Created using data of Transparency International Corruption Perception Index⁴²

FIGURE 6. SERBIA'S CONTROL OF CORRUPTION 1995–2021



Source: World Bank, Worldwide Government Indicators⁴³

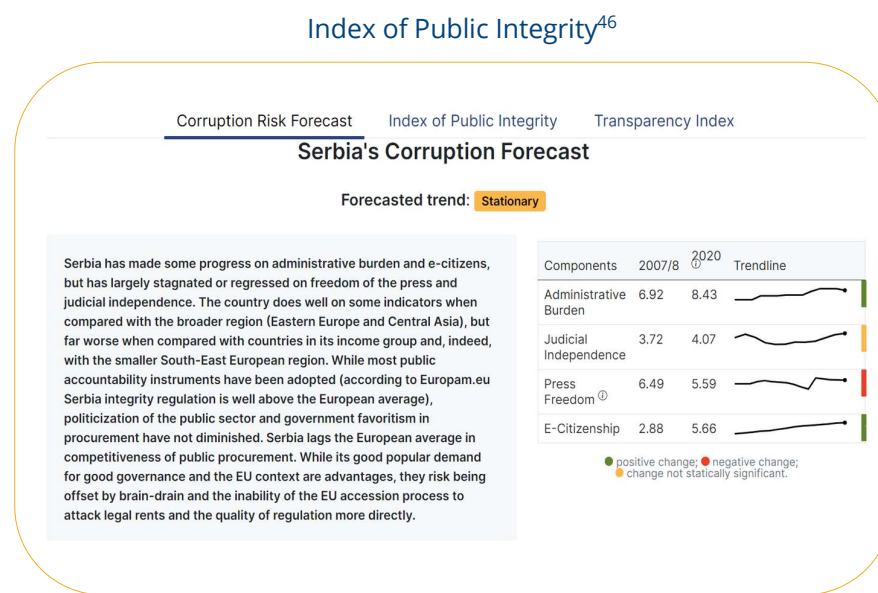
FIGURE 7. SERBIA'S CONTROL OF CORRUPTION PERCENTILE RANK 2011–2021⁴⁴



Source: World Bank, Worldwide Government Indicators⁴⁵

Serbia's corruption forecast on the Index of Public Integrity (Figure 8 below), based on the trend over the last decade (until 2020), is 'stationary', flagging issues of competitive public procurement, freedom of the press and judicial independence. OMIS has been supporting those areas, but for progress to be made more needs to be done.

FIGURE 8. INDEX OF PUBLIC INTEGRITY. CORRUPTION RISK FORECAST FOR SERBIA



Source: Index of Public Integrity. Serbia's Corruption Forecast, 2021.⁴⁷

The independent U4 research centre, working in co-operation with Transparency International, summarized Serbia's status of corruption and anti-corruption in the last 10 years as follows:

The evolution of corruption and anti-corruption in Serbia has followed the transition from a fragile government led by the Democratic Party to an increasingly centralised and authoritarian regime led by the Serbian Progressive Party. Even if there is no evidence of a significant change in the level of corruption, corruption in the Balkan country shapes

*political dynamics, resulting in the capture of political decision making and the political control of independent institutions, the judiciary and the legislature. The progress made in anti-corruption has been more on paper than in practice, with the implementation of those reforms being the main challenge.*⁴⁸

This summary is valuable to understand the context in which OMiS has been operating and the limitations of the effectiveness of anti-corruption assistance it has provided.

4.3 Overview of OSCE anti-corruption assistance to Serbia

The OSCE's anti-corruption assistance to Serbia in 2011–2021 was modest as compared to that of other international organizations, yet the largest among 14 participating States, amounting to €2.7 million with 19 projects implemented. The financial assistance was composed mostly of UB programmes (16 projects). Extrabudgetary funding was provided to three projects, with contributions made by the United States Mission to the OSCE through the United States Agency for International Development (USAID) in 2011–2013, by Italy under the Italian Chairmanship in 2017–2018, and by Norway and Italy in 2017–2021. The assistance was given under all the three OSCE dimensions of operation: politico-military, economic and environmental, and human.

As noted in the project documentation, including the OMiS project self-assessment reports and the interviews (see detailed analysis below), the assistance provided during the decade was extremely diverse. Anti-corruption assistance measures were taken both with regard to prevention and repression, and targeted many beneficiaries from the

state, local, non-governmental and private sector. Its main recipients of support were law enforcement officers, prosecutors and judges specialized in anti-corruption; the Agency for Prevention of Corruption; the Public Procurement Office and its appeals 'chamber'; the Commission for Protection of Rights in Public Procurement Procedures; the Authority for Prevention of Money Laundering (FIU); civil society organizations (CSOs); youth organizations; the media; and the Bar Association and Judicial Academy. The extrabudgetary assistance helped enhance civil participation in budgetary accounting and the development of the integrity plan methodology,⁴⁹ the organization of two regional conferences on the corruption prevention mechanism in the Western Balkans,⁵⁰ and one extensive project that followed up on the project's successful Phase I and was aimed at strengthening capacities and the purchase of small IT equipment for specialized anti-corruption units in the police and prosecution.⁵¹

The type of UB assistance comprised a contribution to drafting primary and secondary legislation, including through the participation in working group meetings; the development and publication of methodologies, textbooks, handbooks, manuals and typologies; assistance in conducting several national risk assessments; helping Serbia satisfy GRECO and Moneyval recommendations; and the development of websites. OMiS has also helped to establish and render long-standing capacity-development assistance and to select qualified staff to anti-corruption units and bodies, including the Agency for Prevention of Corruption, the Anti-Corruption Department and Internal Controls in the Ministry of the Interior, specialized anti-corruption prosecutors, the Public Procurement Office, and the Commission for

the Protection of Rights in Procurement Procedures. The Mission has also paved the way for setting up asset recovery and asset management offices and made impact assessments of the anti-corruption bodies (system) that were created, offering also recommendations on how to improve them.

FIGURE 9. WEBSITE OF AGENCY FOR PREVENTION OF CORRUPTION CREATED WITH SUPPORT OF OMIS



Source: *Website of the Agency for Prevention of Corruption of Serbia*⁵²

Multiple forms of capacity-building included high-level conferences both on the national and regional level; flagship annual conferences on international anti-corruption day; comprehensive training programmes for police, prosecutors and judges; building training curricula; online video training sessions; certification of experts in highly specialized fields (fraud examiners, forensics experts, media relations specialists); and the financing of study visits (to the

Netherlands, Poland, United Kingdom, Slovenia and the European Anti-Fraud Office (OLAF) in Brussels).

One of the most comprehensive capacity-building projects to enhance the capacities of law enforcement staff to fight corruption, which ran from in 2017–2021, was financed by the Kingdom of Norway and the Permanent Mission of Italy to the OSCE through extrabudgetary funds and was implemented by OMIS. The external evaluation concluded that the training sessions were highly relevant, timely, practical, with project results' indicators reached or even surpassed, leading to an increased number and quality of investigations (and indictments), and skills conveyed in a sustainable manner. However, the intensity of further training sessions without external support were anticipated to slow down.⁵³

During the reporting period, OMIS worked with other OSCE executive structures, including the OCEEA and ODIHR. Externally, it co-operated closely with the Council of Europe, EU, German Agency for International Co-operation (GIZ), the United States Office of Overseas Prosecutorial Development Assistance and Training (OPDAT), UNDP, USAID, and several embassies.

BOX 1. BUILDING AN INTEGRITY SYSTEM AT NATIONAL AND LOCAL LEVELS

OMiS's work on building integrity at national and local levels started many years before the evaluated period. During the period 2011-2021, the Mission organized several round tables on public accountability at national and local levels that promoted civic participation in local budgeting, then continued with the creation of the national Anti-Corruption Agency (now Agency for Prevention of Corruption, or APC), followed up with building the Agency's capacities in the area, which included training courses and study visits (e.g., to the Dutch Integrity Office), equipped it with the methodology to develop integrity plans, and helped draft them for the first seven municipalities. Additionally, OMiS made substantive contributions to the amendment of the Law on Corruption Prevention, which paved the way for integrity planning.

Results to date: The integrity system has been developed in Serbia's administration on national and local levels, and the development of integrity plans has become a requirement under the new Law on Corruption Prevention. The APC supervises the plans' development and provides recommendations for improvement. These plans are revised every three years, and two cycles have already been completed. The APC checked the quality of the plans of 10 ministries for the first and second cycles and made recommendations. However, all integrity plans are confidential and there is no requirement to implement the recommendations provided by the APC or include and mitigate the risks identified by it. This was criticized by GRECO, and Serbia

will have to address these deficiencies.⁵⁴ The integrity system developed in Serbia with the help of OMiS and assistance programmes of other organizations has attracted the attention of other OSCE missions in the Balkans (mission members from Bosnia and Herzegovina and Kosovo visited the OMiS Economic Transparency Unit in 2012). The integrity system was one of the key topics discussed at the Western Balkan Summit in April 2018. It brought to Belgrade more than 60 high-level representatives from all Western Balkan countries, as well as international stakeholders (OCEEA, ODIHR, GRECO, UNODC, UNDP, USAID) and participants from other countries. More recently, the assistance was followed up by the EU, which has helped the APC to pair with other EU Member States (Lithuania) to learn from their expertise.⁵⁵

4.4 Evaluation Findings

Comparative advantage

What is the comparative advantage of OSCE anti-corruption assistance (compared to that of other international organizations)?

- ✓ **Finding 1:** OMiS has been present in Serbia for more than 20 years, has built relationships with every institution it has worked with or helped set up; gained trust as a reliable, understanding and highly engaged partner; has listened to the needs of beneficiaries; and has delivered as agreed.
- ✓ **Finding 2:** As compared to other international organizations, OMiS is perceived as flexible, having less bureaucratic procedures, able

to adapt quickly to emerging needs and to quickly employ local experts who know the context, legislative framework and are preferred when sensitive topics are discussed.

- ✓ **Finding 3.** Beneficiaries have confidence in OMiS as a reliable and professional partner; they perceive it as a demand-driven organization that has no other agenda than to help them with their needs. They listen attentively to its advice and recommendations even if, in the beginning, they do not always agree with its points of view.

All the respondents interviewed praised the work of OMiS, many have worked with the OSCE since or prior to the creation of their institutions/specialized state departments, appreciated the professionalism of OSCE staff, and the very good understanding of the context and their needs. Several of them mentioned the importance of the OSCE's presence in the country, its engagement from the very beginning of activities (which started much earlier than the scope of this evaluation), which included the development of concept notes and draft legislation, listening to many different opinions, building institutions and strengthening the capacities of their staff. Many of them mentioned OMiS's proactiveness, its ability to offer best practices and to make suggestions of what could work well in Serbia, often being the first ones to offer such help.

The OSCE are partners, not just funders, they are interested in the subject matter, they travel with us to our events, other donors do not usually do that.

We have confidence that OSCE will assist us in the best possible ways.

They [OMiS] can detect and recognize issues that we are unable to do (...) they recognize our needs sometimes better than ourselves.

We [OMiS] have been on the ground for many years, we started things from scratch, built confidence, they respect us.

They do not like foreigners coming and telling them what to do. We have established professional relationships, which is very valuable.

We [OMiS] are not seen as a threat.

The interviewees said they were aware of OMiS's limited resources as they had been in constant and regular contact for many years, yet they would ask for help with their emerging (unexpected) needs as they knew OMiS was much more flexible and quicker than others.

OSCE is the most flexible, less bureaucratic than others.

I have worked with six different projects, but OSCE is the most flexible, so much easier to work with them.

Their projects are comparable to others but they have excellent procedures well-adjusted to short-term needs that might arise (...) They can operate as an 'emergency centre' rather than a hospital.

UB project can be amended based on needs. We [OMiS] are flexible to adjust based on changes.

Several interlocutors mentioned that OMiS's flexibility was also related to the fact they could employ quickly highly reputable local experts and since the pay was very small, tender procedures were simplified. They

also said that local experts knew better the context, legislative framework and could better advise on sensitive topics.

However, caution should be exercised when employing local experts from the public sector not only to avoid any potential, actual or perceived conflict of interest but also to refrain from paying for services that should generally be covered by the taxpayers of the beneficiary country.

None of the respondents believed the OSCE or OMiS had a specific agenda, apart from supporting them with their needs. Aware that OMiS is demand-driven, i.e., responding to the host country's needs and requests in line with OSCE principles and commitments and the Mission's strategic priorities, the beneficiaries stated that OMiS would be their organization of first preference. The majority of them had worked with the OSCE for many years and knew that the OSCE's budget was limited.

Several respondents said that the comparative advantage of OMiS was that it sometimes provided 'unpleasant' recommendations to the beneficiaries, which they resisted in the beginning but followed in the long-run as they trusted the opinion of their long-standing partner. The trust gained and ability to say 'unpleasant' matters makes the OSCE also a 'soft' power:

We highly value the opinions and views of OSCE experts even if we disagree. Because they prompt us to rethink some of our positions. Sometimes even when unpleasant their opinions were correct.

We [OMiS] never avoid telling our beneficiaries something is not ok.

OSCE is the softest of the soft powers. Because of that we can go quite deep.

This finding also offers opportunities for OMiS to use as leverage to continue supporting the reforms in a constructive and patient yet persistent manner.

Value-Added

How does OSCE anti-corruption assistance add value?

- ✓ **Finding 4:** Having in-depth knowledge of the context, OMiS provides on the one hand advice for beneficiaries and helps them make contacts to other international organizations or projects, while on the other it assists the government authorities in understanding and complying with the recommendations made by international organizations (GRECO, FATF/Moneyval, EU).
- ✓ **Finding 5:** OMiS is a dialogue-builder among different national-level stakeholders, bringing them together at one table and 'opening the doors' to where their entry would otherwise be denied.

Many respondents mentioned that the added value of the OSCE and its Mission is the institutional memory held by programme managers, their in-depth understanding of the context and of the strengths and weaknesses of the beneficiaries, as well as their ability to arrange meetings and events very quickly, since they knew the main focal points and were capable of making things work efficiently.

We were here for a long time, we could arrange things immediately, they [other projects] come to us because we have all the contacts.

Our presence in this space makes others more effective.

They [OMiS] are constructive, professional; they don't waste my time.

This combination of a long-standing presence and the knowledge of what works and what does not in Serbia, plus the possession of good and reliable contacts with the beneficiaries, also makes the work of other organizations more effective. For example, when GRECO found Serbia's compliance with its recommendations as 'globally unsatisfactory' (see section 4.1 above), OMiS provided technical assistance to the country to rectify the deficiencies, including working on integrity plans, conflict of interest, risk assessment, capacity-building, and lobbying regulation. Similarly, when Serbia was 'grey-listed' by FATF in 2018-2019, OMiS helped mobilize the resources to help the country satisfy the requirements and be upgraded:

Here is an example of co-operation that was timely and efficient: Serbia was grey-listed by FATF, we needed an urgent set of activities to escape the situation. First, we needed to produce a national risk assessment on anti-money laundering, then we presented it to all the stakeholders. OSCE helped us on that. Then they helped us produce typologies. Finally, we closed the gaps.

Several respondents mentioned that OMiS helped establish platforms of co-operation among different partners and built bridges of dialogue, making the Government listen to the voices of civil society or

journalists or amongst different government bodies that failed to co-operate.

Without the OSCE we would have no relations [with APC]. They do not communicate with the public, because of political pressure. They do policy work with the international community, but they remain unresponsive to the media.

The OSCE puts it on a higher level, they opened the doors to us to the Statistics Office, we would not have received the data without this help.

The OSCE is great in building those multi-professional platforms, inviting everybody together, prosecutors, lawyers, police, judges... When this happens, everybody is thrilled.

The OSCE opens some good contacts with prosecutors, now they come and consult us.

Coherence

To what extent is anti-corruption assistance co-ordinated internally (within the OSCE as an organization)?

- ✓ **Finding 6:** OMiS co-operates with other OSCE executive structures (e.g., OCEEA or ODIHR) when they organize regional conferences or joint projects. but with regard to anti-corruption activities this is not so frequent.
- ✓ **Finding 7:** On the mission level, different units and departments co-ordinate more frequently as they sometimes need to contact the

same beneficiaries that have different units working with them; however, co-operation is limited.

Several OMiS self-assessment reports mentioned the organization of regional conferences or projects conducted in co-operation with other executive structures. Additionally, OMiS staff referred to a few other ad hoc events, specifying that their role was limited to providing support on the ground.

We co-operate with the OCEEA on an ad hoc basis, mainly in environmental projects. If it is anti-corruption, we provide support when they have a project.

We assist the OCEEA on asset recovery. There is a regional ExB project on asset recovery.

One good example of a conference in Vienna was mentioned in 2015 when the OCEEA collected country representatives to discuss national risk assessments and produced a publication afterwards that was used to compare different approaches and practices (but which needs to be updated).

In 2015, a programme manager from Vienna invited government representatives to talk about national risk assessments and then made a very good publication with statistical data. A very good practical tool which we used but it needs to be updated.

Different structural units work with different areas of anti-corruption, prevention, repression, freedom of the press, which requires co-ordination among them. This co-ordination is not regular and several

respondents mentioned that communication could be improved as they did not always know what each of the units was doing, which occasionally may have resulted in the same people being invited to events organized by different OMiS units.

To what extent is anti-corruption assistance co-ordinated externally (with other players)?

✓ **Finding 8:** Although OMiS has been helping the national authorities implement international requirements issued by other organizations, the co-ordination among different international players could be improved.

OMiS has been helping Serbia satisfy GRECO, Moneyval, UNCAC and EU requirements (for more details please refer to the section on Effectiveness). Another good example is the OSCE-UNODC Joint Action Plan 2020–2022,⁵⁶ in which the OSCE's role is primarily seen as helping countries implement their commitments under different UN instruments. Despite those good examples, many international respondents agreed that co-ordination among different players could be improved.

Effectiveness

What are the (intended and unintended) results of the OSCE's anti-corruption assistance?

✓ **Finding 9:** Most of the intended results of OMiS's anti-corruption assistance were achieved: the legislative framework (on corruption prevention, public procurement, lobbying, codes of conduct and

many others) was significantly improved; specialized anti-corruption bodies built (Agency for Prevention of Corruption, Anti-Corruption Department, specialized anti-corruption prosecutors and judiciary, Public Procurement Office and Commission for Protection of Rights in Public Procurement); and capacities of operational staff were significantly strengthened.

- ✓ **Finding 10:** Despite the primary mandate of OMiS being to work with the Government, it has also helped build the capacities of the non-governmental sector and journalists to oversee the work of anti-corruption bodies.

OMiS project documentation, internal and external assessment reports, as well as GRECO, Moneyval and EU reports on Serbia note the progress achieved with regard to building legislation, institutions and capacities. The respondents interviewed on-site praised the work of OMiS in helping them achieve many of those results.

The OSCE supported changes in the legal framework, new institutions were set up to investigate corruption cases. This support was extremely important, focused on professional education of staff in newly departments, the colleagues that were taking part of these department did not have expertise. The majority came from basic prosecution offices, and never had experience practicing cases of corruption. (S10)

The OSCE assistance was especially important. As you know combating corruption is very broad, you need economic knowledge and skills, legal experts do not possess these skills on taxes, banking

transactions and financial evidence gathering, specialized knowledge is needed. Effects can be seen in successful operation of these specialized departments and their work.

The respondents highlighted the importance of training journalists on economic crimes, and of non-governmental organizations on corruption risks or lobbying, so they can monitor the work of government more effectively.

The OSCE helped prepare a handbook for journalists about economic journalism, including anti-corruption investigation. Political journalists cannot investigate this, very low knowledge of this.

For us it was important to work with them [OMiS], like recently on lobbying, because no-one else was dealing with these issues, neither NGOs nor international organizations.

- ✓ **Finding 11:** OMiS's long-term engagement in building capacities of specialized anti-corruption bodies, in particular in the police and prosecution, had a limited effect on the impunity of top-level officials, as almost no high-level corruption cases were addressed.

"Let's not fool ourselves, we do not have a single case of high corruption in the High Court," said the president of the High Court in Belgrade, whose Special Department of Organized Crime and Corruption is in charge of adjudicating all cases of corruption and organized crime in Serbia,⁵⁷

Although the most recent EU report on Serbia⁵⁸ acknowledged that "the number of indictments and the number of first instance

convictions for high-level corruption cases has slightly increased”, the majority of the respondents interviewed during the field mission stated that there was no political will to fight high-level corruption. Moreover, they said that prosecutors and judges resorted to ‘self-censorship’, or inaction, fearing consequences.

I believe that Serbia is a captured state.

High profile cases are never investigated, there's only information on low-level cases. Corruption cases are political ammunition against opponents.

The question is where are high-ranking officials in the statistics? This is politically-driven, prosecutors look at cases that get the green light so to speak. There is self-censorship. There is a couple of cases on highest officials at the local level, but those are politicians that got in conflict with the political establishment. Others who did the same were not investigated.

The main problem in Serbia today is self-censorship. People think too much of consequences.

Despite those pessimistic views, several respondents said that without this assistance the situation would be much worse.

What factors inhibited the achievement of OSCE's anti-corruption assistance results?

✓ **Finding 12:** OMiS units dealing with anti-corruption have reached the ‘glass ceiling’ on their level to see positive change in reducing corruption, referring to the lack of political will and the limitations

of their mandate (which is also shared and understood by their partners both in government and the non-governmental sector), yet there is an expectation by some that the OSCE should do more to not validate improper actions of the government.

- ✓ **Finding 13:** The mandate of OMiS as a field operation is limited in terms of driving anti-corruption reforms when there is no genuine demand for it or if the demand is changing, which sometimes leads to initially well-planned activities to be not implemented effectively.
- ✓ **Finding 14:** Without being strategic about its anti-corruption assistance, OMiS might risk becoming an emergency service provider, a niche-filler, rather than a strategic and long-standing partner that can not only be relied upon but also listened to.

Many of those interviewed, including OMiS staff, non-governmental actors, journalists and internationals, were pessimistic about both a change of political will regarding anti-corruption in the short-run and the OSCE's ability to improve the situation.

The OSCE has to work with the government. Our government does not want to fight corruption, they are the heart of corruption. Since the OSCE is to advise and help, they cannot blackmail them or order them around. Cutting contacts is not the best answer. The OSCE is doing what it can do.

We have no power to instruct anyone.

There is no political will to fight corruption.

However, several interlocutors mentioned that the OSCE and other international organizations should refrain from validating improper action (or inaction) of the government.

Do they want to improve the situation or co-operate with the government? Government people have expectations, they want to be praised by OSCE, validate their actions, they are getting this in return from OSCE, Council of Europe, and from the EU.

During 2018–2021 OMiS brought a powerful anti-corruption tool to the beneficiary: corruption proofing of legislation. As this instrument became part of a new Law on Corruption Prevention and was also a new function for the APC to perform, OMiS was proactive in not only supplying it with a well-developed methodology, national and international expertise and training for its staff, it also taught a non-governmental organization to monitor the effectiveness of APC's work. Moreover, OMiS sent recommendations (a joint opinion with an Italian project) to the authorities asking them to ensure that APC's work on anti-corruption proofing should be public and mandatory, but the result was not achieved. Consequently, the desired effect of this highly promising activity was not reached as originally planned.

We sent a joint opinion together with the Italian project, asking to amend the law so that APC's work on corruption proofing would be public and mandatory to take into account, but it was ignored.

Corruption proofing in legislation is the most fundamental, but no results so far. First, because not all legislation is covered. Second, because ministries ignore their duty to subject draft legislation to

corruption proofing. Third, there is no obligation for Parliament even to consider the recommendations of the APC and make them public.

Although OMiS's assistance is comprehensive, covering many subjects and areas, it sometimes lacks focus, trying to fill a niche where other international organizations are not active. As stated above, it does not always respond to government inaction or improper action even when it concerns the effectiveness of the assistance it has been providing.

Several of those interviewed mentioned that the OSCE's support was very comprehensive but that it was now time to become more streamlined and focus more on impactful priorities, in particular because the available budget was limited.

I think in the police and prosecution they have been trained on everything, probably they are the best trained in the region, we need to offer something with more impact.

We have only 100,000 euro and with inflation, this is less and less, we need to prioritise.

We should focus more; be more strategic (...) We need to choose our battles.

Several respondents from the beneficiary's side appreciated it when OMiS was more critical of their actions and actually encouraged them to take that view rather than please them, as they trust them.

I actually look forward to more discussions of issues we disagree on [with OMIS]. OSCE has different views on the police, their experts criticized work of MoI and they turned out to be right. What I want them to say is 'that you have a problem here'.

OSCE conducted impact assessments of laws related to public prosecutions in 2018 and also related to the courts in 2021. I have to say, they were not mild with their criticism. They can give you clear oversight what are the main deficiencies in the system.

Sustainability

To what extent are gains made with the anti-corruption assistance sustainable?

- ✓ **Finding 15:** OMIS's approach to implementing activities has been well thought through: all actions were undertaken incrementally with sustainability in mind, making sure that they are comprehensive and have a lasting effect.
- ✓ **Finding 16:** The dependence on donor assistance (including the OSCE's assistance) has been excessive, discouraging the government from searching for the budget knowing that donors would make it available to them. If the OSCE cannot provide support, then there will be others.

Both OMIS and its interviewed beneficiaries agreed that OSCE's anti-corruption assistance had a lasting effect and that many elements were added and followed up with sustainability in mind: working on legislation; facilitating the establishment of specialized bodies; building

the capacities of their personnel; supplementing capacity-building with textbooks, manuals and typologies, as well as online video training clips and e-learning platforms; training trainers to take over the initiatives; relying more on national experts; and investing into training establishments (e.g., the Judicial Academy).

We helped with legislation, had the organizations running, many of them like Public Procurement Office and the Commission are on their own feet now.

The project [training of specialized police and prosecutors for specialized bodies] was one the best and the most sustainable ever organised with the Ministry of the Interior. Since Phase 1 was so good, the 2nd phase started in 2017, one of the results of which was to set up the anti-corruption department.

Sometimes projects are ad hoc but they have a long-term effect. OSCE started rotating the wheel and we continued. They helped us peer up with two agencies and now we continue co-operation by funding it with our own budget.

Several respondents said that due to the high number of donors willing to assist, the government was not searching for ways to finance those activities themselves.

They have become lazy and spoiled by donors in anti-corruption.

We [OSCE] have become the de facto trainers, and there is no plan by Serbian partners to take it over. They say they have no budget, it is no priority, if the OSCE does not do it, it will go away.

I do not have fears that what we have managed to achieve this will remain sustainable. But there is still a whole range of topics where we need your assistance. If we could not get it, we would look for other partners or do it ourselves.

The Judicial Academy, a body built with donor assistance, has little budget no proper training premises in Belgrade, cannot fund international experts and has limited local expertise. It still relies heavily on external help and is not proactively searching for ways to become self-sustainable.

Finance is an issue. Our [Judicial Academy] budget is not extensive, when it comes to organize training courses we have to depend on donors. When it comes to lectures, we have professionals to provide training. We do not have a building, space to provide training.

Several of those interviewed said that assistance should continue for the effect to take place when the time is ripe.

You keep it alive, and wait until the moment comes. Every topic has at one point an option to make a wave, now we keep it on the agenda, keeping professionals skilled.

Gender Equality

To what extent and how are gender considerations incorporated into OSCE's anti-corruption assistance?

✓ **Finding 17:** Although OMiS pioneered a project with APC, producing a series of training courses and a manual for the public sector on gender issues, most of the implemented projects have a low 'gender' marker.

OMiS conducted a project with APC, producing a series of training courses and a manual for the public sector on gender issues. The findings of this work were presented at a conference dedicated to gender and corruption on international anti-corruption day, 9 December 2021. This information is also provided on the APC website:

OSCE Mission to Serbia significantly supports the Agency since its establishment by supporting different activities in the areas of lobbying, asset declaration control, introducing a gender perspective in the work of the Agency, corruption risk assessment, financing of political activities, website development, as well for the organization of international conferences dedicated to the International Anti-Corruption Day,⁵⁹

Many OMiS project self-assessment reports would mention the importance of gender mainstreaming, and yet they would mark it as being of low relevance. Most of the respondents would say that Serbia had many women working in all government sectors, and many of them in leading positions (Deputy Head of APC, Prosecutor General, Head of Commission for Protection of Rights in Public Procurement, judges), and therefore they did not see this question as very relevant for the anti-corruption sector in which they were working.

Among prosecutors and judges, 70 per cent are women.

Integrity is about the person, ethics, not about men and women. In a different project we did with criminology faculty, we looked at crime committed by men and women but we did not find any conclusive evidence.



5. OSCE anti-corruption assistance to Kyrgyzstan

5.1 Background

Kyrgyzstan is a landlocked country in Central Asia, located in the south of Kazakhstan and west of China. Its population is over 6.5 million, with the majority of people living in rural areas. Kyrgyzstan has experienced three regime changes accompanied by different levels of violence (in 2005, 2010 and 2020). Since 2021, the new government has embarked on a reform process, changing the Constitution from a parliamentary form of government to a presidential system. Kyrgyzstan ratified the UNCAC in 2005 and joined the Istanbul Anti-Corruption Action Plan of the OECD Anti-Corruption Network in 2004.⁶⁰ The first review cycle of Kyrgyzstan under the UNCAC was in 2017;⁶¹ the second started in 2021 and is still underway at the time of writing. The most recent OECD monitoring report of Kyrgyzstan was published in 2018,⁶² and the latest annual progress update in 2019.⁶³ In 2022 and 2023, Kyrgyzstan was subject to the fifth round of evaluation by the OECD implemented under a new methodology, with the first baseline report made available in late 2023. In 2018, Kyrgyzstan started exploring the possibility of joining the Council of Europe Group of States against Corruption (GRECO) and underwent a ‘simulated’ (pre-membership) desk review a few years later.

With regard to money laundering and terrorist financing, Kyrgyzstan’s first mutual evaluation report was adopted by the FATF regional body

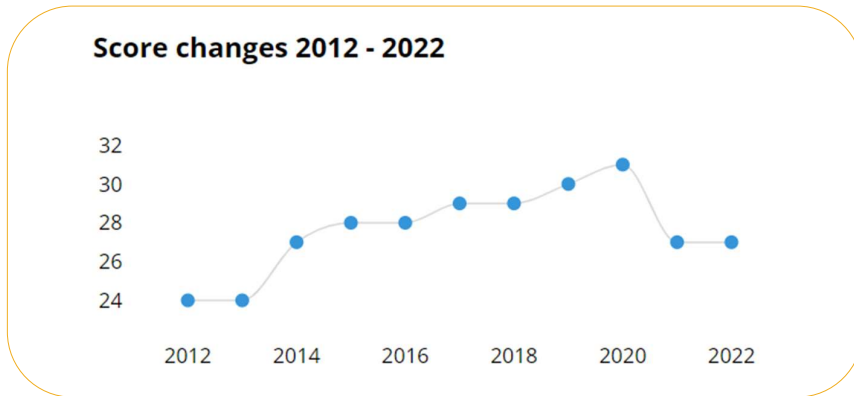
Eurasian Group in June 2007.⁶⁴ After falling short of fulfilling the recommendations, the country remained under an increased monitoring procedure (the so-called ‘grey list’) until 2014. As stated on the website of the OSCE Programme Office in Bishkek, thanks to its technical assistance Kyrgyzstan was removed from the list of non-co-operative countries in July 201.⁶⁵

Permanent Council decisions taken in 1998 and 2000.⁶⁶ set up the OSCE Centre in Bishkek and a field office in the city of Osh. In 2017,⁶⁷ the field office in Osh was closed and the Centre was transformed into the Programme Office in Bishkek (POiB).

5.2 Corruption dynamics in Kyrgyzstan

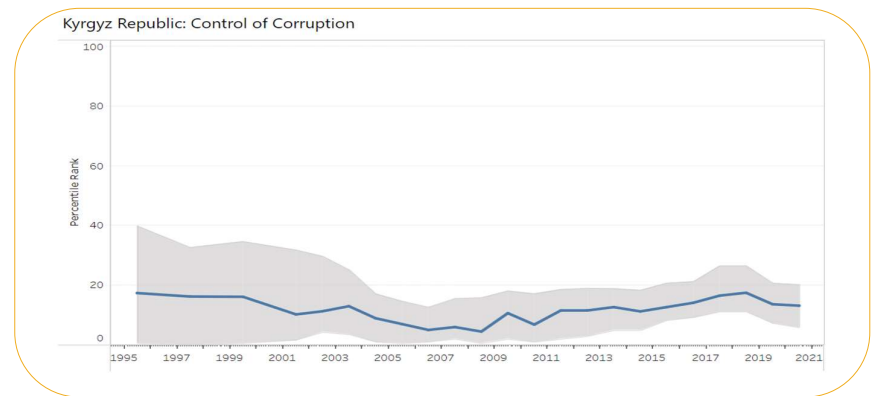
According to a number of international indices, including Transparency International’s Corruption Perception Index (see below Figures 10 and 11)⁶⁸ and the World Bank’s Control of Corruption, measuring the country’s capacity to control corruption (Figure 12 and 13 below) showed that Kyrgyzstan underwent a regress in 2021 back to its level of 2012; Kyrgyzstan faces serious issues of corruption.

FIGURE 10. KYRGYZSTAN TI CPI DYNAMICS IN 2012–2022.



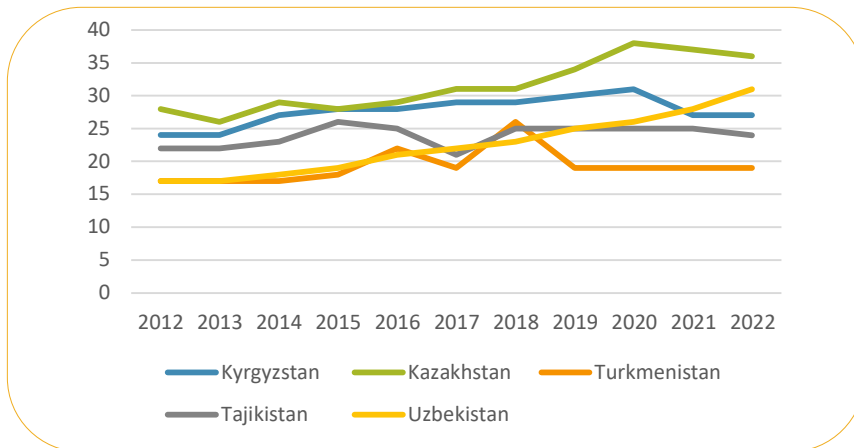
Source: Transparency International. Corruption Perception Index. Kyrgyzstan⁶⁹

FIGURE 12. KYRGYZSTAN'S CONTROL OF CORRUPTION IN 1995–2021



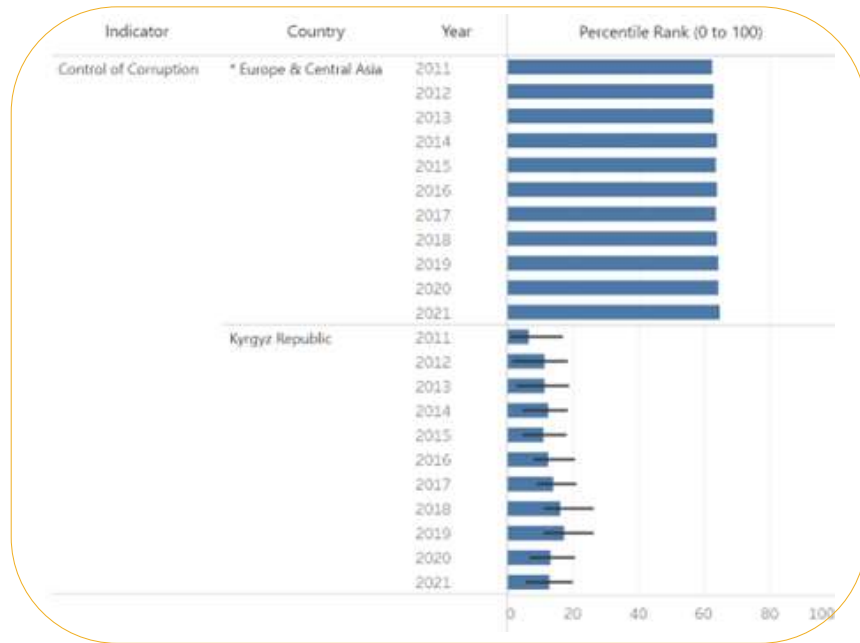
Source: World Bank. Worldwide Government Indicators. Kyrgyzstan's Control of Corruption⁷¹

FIGURE 11. SCORE DYNAMICS OF KYRGYZSTAN AND OTHER CENTRAL ASIA COUNTRIES ON TI CPI DYNAMICS IN 2012–2022



Source: Compiled using data of Transparency International. Corruption Perception Index⁷⁰

FIGURE 13. KYRGYZSTAN'S CONTROL OF CORRUPTION PERCENTILE RANK 2011-2021⁷²



Source: World Bank. *Worldwide Government Indicators. Kyrgyzstan's Control of Corruption in 2011–2021.*⁷³

However, the Index of Public Integrity (see Figure 14 below) forecasted a positive trend for Kyrgyzstan in 2020, recommending the country to improve the quality of legislation, digitalization and transparency. With regard to all three categories, the Programme Office in Bishkek played an important role in supporting the country with its anti-corruption work. However, an internal report of 2021 regarding the project “Supporting the Implementation of the State Strategy of Anti-

Corruption Policy and Facilitating Digital Transformation” found that one of the objectives of developing the concept of open financial reporting system was not met due to changes in state partner’s priorities and structures.

FIGURE 14. INDEX OF PUBLIC INTEGRITY. CORRUPTION RISK FORECAST



Source: *Index of Public Integrity, Corruption Risk Forecast for Kyrgyzstan*⁷⁴

5.3 Overview of OSCE anti-corruption assistance to Kyrgyzstan

The OSCE’s anti-corruption assistance to Kyrgyzstan in 2011–2021 was the second largest among 57 participating States, amounting to €1.9 million via 13 projects implemented. Apart from anti-corruption activities, several of those projects also included other topics (e.g., anti-money laundering, regulatory reform). The mandate of the POiB is “to develop, implement and report on programmatic activities [...] previously agreed upon in the framework of a consultative mechanism

between the Ministry of Foreign Affairs of the Kyrgyz Republic and the Office” and “[a]ll programmes and projects, including those financed from extrabudgetary sources, are to be implemented in close co-operation and consultation with the Government of the Kyrgyz Republic.”⁷⁵

All assistance to Kyrgyzstan was from UB resources, and falls within the scope of the OSCE’s second dimension on economic and environmental activities. The assistance ranged from setting up a hotline at border crossing points and the international airport (2011); support of CSOs and educating the youth (2012); building capacities of public supervisory councils set up at every government body (2013); reducing the regulatory and administrative burden for businesses by conducting an inventory of legal and regulatory acts that affect business and eliminating those that are not necessary or obsolete (2014–2016), subsequently creating an ‘eRegistry’ tool at the Ministry of Justice enabling ongoing monitoring by government and civil society of normative acts (2017); hiring local experts to analyse corruption risks in different ministries, municipalities and state enterprises (2016–2019); and developing, implementing and monitoring the national anti-corruption strategy and action plans of 2018–2020 and 2020–2024.

Additionally, the OSCE helped with a breakthrough IT project in Kyrgyzstan called ‘Tunduk’, customizing and expanding an IT platform (named “X-Road”) donated by the Estonian Government that enables a digital document exchange among different state bodies. ‘Tunduk’ was launched and actively further developed from late 2018, helping the country to implement the Concept of Digital Kyrgyzstan 2019–2023. This has become a ‘joint venture’ for the Government, which set up a

state enterprise and hired IT experts and business analysts to maintain and expand it (paying them competitive salaries); civil society and businesses contributed financially (€6,000) to the platform.

Furthermore, POiB aimed to build the capacities of anti-corruption compliance officers in the regions, train prosecutors, publish anti-corruption textbooks for university students, and develop manuals and corruption risk management methodologies that were ultimately adopted by the Government and became mandatory (2019–2021). The OSCE also has been helping Kyrgyzstan in fulfilling recommendations of the OECD ACN, UNCAC and FATF (see above regarding the removal of Kyrgyzstan from the FATF ‘grey list’) and in joining GRECO. This was done by both providing expert assistance, local as well as international, and by covering travel expenses to the plenary sessions of these international organizations/groups.

As stated above, in 2021 a planned activity of developing a concept of open financial reporting system and an e-learning module was not implemented due to the change of government and its priorities.

BOX 2. DEVELOPMENT OF THE DIGITAL DOCUMENT EXCHANGE PLATFORM ‘TUNDUK’: A CORRUPTION REDUCTION TOOL

The history of ‘Tunduk’ dates back to 2015 when the Estonian Government donated to Kyrgyzstan the so-called X-Road platform, an open-source software and eco-system solution that provides unified and secure data exchange between private and public sector organizations. Further assisted by Estonia and USAID, Kyrgyzstan introduced a customized state-wide electronic

interoperability layer in 2016. The X-Road in Kyrgyzstan, 'Tunduk', was named after the X-shaped roof structure of the yurt, a traditional symbol that is also displayed on the Kyrgyz flag, representing unity and harmony within the community, regardless of individual differences. Symbolically, the name was chosen for a historical breakthrough system for the country.

It took several more years for 'Tunduk' to be accepted, customized and internalized. With POiB's assistance, the platform was further developed: additional servers were procured, more IT experts and business analysts hired, the establishment of a separate state enterprise called 'Tunduk' under the Ministry of Digital Development was facilitated, alongside advocacy work for having e-documents recognized by a new law, which was ultimately adopted in January 2023.

Eventually, the digital document exchange platform has become a powerful anti-corruption engine, paving the way for the country's progress in reducing corruption and creating a modern e-governance state with e-services and information exchange ensured between the state, citizens and businesses.

Nationals of Kyrgyzstan now have a 'Tunduk' application on their mobile phones, with immediate access to many government services as well as personal documents (passport, driver's license and birth or marriage certificates, and many others). The benefits of 'Tunduk' mentioned by the beneficiaries are multiple and growing: reducing opportunities for corruption ('elimination of physical contact between citizens and civil servants', 'changing

behavioural patterns'); convenience ('no need to carry documents, everything available on the mobile phone'); efficiency ('saving state and municipal budget resources'); increasing fairness and access to state services ('e-queues for kindergartens and hospitals'), transparency and speed of state service provision.

'Tunduk' is characterized as a very tangible, 'real' deliverable for citizens, transforming the country to a new level of automation, acting as a 'locomotive' for many other digital transformations, including eliminating tedious work with multiple databases, registers and cadastres that were marked by big challenges of quality, duplication and absence of data, and hence were more prone to corruption and manipulation.

The data exchange between state bodies, some of which strongly resisted the 'Tunduk' system in the beginning, has grown from nine million transactions in 2019 to 900 million in early 2023. Yet most importantly, 'Tunduk' has made both the state e-services and various data registers and databases more structured, transparent and traceable: these steps of success are believed by many to be a significant turning point.

5.4 Evaluation findings

Added Value

How does OSCE's anti-corruption assistance add value?

- ✓ **Finding 18:** POiB's approach to helping partners is flexible, non-bureaucratic; the anti-corruption assistance is holistic, focusing on building high quality, long-term and sustainable risk-based corruption prevention mechanisms. The local experts hired by the OSCE are highly qualified, dedicated and resilient to outside pressure.
- ✓ **Finding 19:** Being a long-term and trusted partner, POiB has found ways of protecting good initiatives against the backdrop of various regime changes.
- ✓ **Finding 20:** POiB has played an important role in supporting the government authorities to make contact with other international organizations (e.g., GRECO), understand and comply with their recommendations (OECD ACN) and improve the country's rating by helping it to be removed from the FATF 'grey list'.

The OSCE has been thorough in its approach to anti-corruption, focusing on building long-term and sustainable corruption prevention mechanisms, including risk assessments and corruption proofing in legislation. The local experts hired by the OSCE have been characterized in the interviews as highly qualified, dedicated and resilient to outside pressure, have helped the country achieve high quality results by analysing corruption risks in extremely complex (and

specialized) government sectors (for instance, construction, road building, state and municipal asset register and other registers, social fund, passport issuance, procurement, business inspections by prosecutors and by the tax inspectorate).

The interviewees were convinced that without the OSCE's assistance, corruption risk assessments and action plans developed to eliminate them would be less in-depth, less transparent and more formalistic.

POiB's approach to helping partners is flexible and non-bureaucratic, and understands the country's challenges and ambitions.

We see that in reality OSCE helps in restricting 'systemic' corruption; they take a holistic approach.

Without this expert assistance [on corruption risk analysis], government bodies would not analyse things transparently, they would do that formalistically.

The respondents appreciated the OSCE's vital support in protecting good initiatives (for instance, the IT platform 'Tunduk', or setting up the Data Protection Agency from scratch) and advising on governmental initiatives that would be detrimental to the country with regard to its international commitments (for instance, adoption of an economic amnesty law that would allow individuals who had obtained assets illegally to avoid prosecution by turning the assets over to the state treasury).

Additionally, both the self-assessment reports and interviews revealed that POiB has played a pivotal role in supporting Kyrgyzstan to keep in

contact with international organizations, helping them fill out their questionnaires, paying for their travel to plenary sessions and complying with recommendations and improving the country's rating (see above, regarding the removal of Kyrgyzstan from the FATF 'grey list').

OSCE knows issues in-depth, for joining GRECO or fulfilling OECD recommendations, OSCE has been very active in helping drafting legislation.

How does OSCE anti-corruption work contribute to security in the country?

✓ **Finding 21:** The OSCE's anti-corruption work is seen as having a direct impact to building security in the country by keeping anti-corruption work on track because corruption is perceived as a cross-dimensional issue and national security threat.

With regard to the OSCE's contribution to security, most respondents referred to the then-President's Decree of 2013 and the recently adopted Concept of National Security, which recognised corruption as a national security threat. Others mentioned that corruption was a cross-dimensional issue, which may be a cause of insecurity and instability. Therefore, no initiative or project can be viable without addressing corruption and POiB's role in continuing to help the government address anti-corruption issues and make reforms is deemed important.

Corruption is a comprehensive subject. Nothing is possible to ensure stability, security, it is impossible to fight illegal migration or do

anything without anti-corruption. One could implement multimillion projects but they will be in vain if we do not fight against corruption. The fight against corruption is essential.

The link between instability and corruption is direct.

Anti-corruption is one of the main directions; not only in politicomilitary dimension but also regarding economic security; people do not always face political-military threats; but every person faces injustice in the country.

Comparative Advantage

What is the comparative advantage of the OSCE's anti-corruption assistance (compared to that of other international organizations)?

✓ **Finding 22:** The OSCE, through its Programme Office in Bishkek, has become a long-term, trusted partner of the Government, and is the only international organization working with the state and municipal bodies on anti-corruption issues (and is therefore in a unique position). It uses this strength to drive innovative reforms through digitalization or to act as a catalyst of legislative reforms, being well aware that many corruption risks are embedded in the legislation.

All the respondents, including the governmental and non-governmental actors, were extremely positive of POiB's assistance, complimenting it for both its structure/procedures and the high professionalism of its programme officers. Throughout the years, the OSCE has become a trusted partner of the Government, the driver of

innovative reforms through digitalization, a catalyst of fundamental legislative changes with an in-depth understanding of the main corruption risks. Aware that many of these risks are embedded in the legislative framework, the OSCE also facilitates its amendment.

It was difficult for the respondents to compare the OSCE to other international organizations (World Bank, UNDP, UNODC, Asian Development Bank) as those no longer work with the Government in the anti-corruption field, preferring other areas or directing their assistance to NGOs, businesses or academia. The OSCE is therefore considered *unique* since no other organization has provided Kyrgyzstan with so much anti-corruption support, working consistently, step-by-step, with its different administrations despite the three regime changes the country has experienced. It has also managed to maintain a dialogue with the Government, which undoubtedly is the OSCE/POiB's strength and its major value in supporting Kyrgyzstan's reforms.

We are very much respected, OSCE is always mentioned by President and the Government in the speeches.

OSCE is great in supporting anti-corruption prevention mechanisms. We work only with OSCE.

OSCE is a unique project; we never had that kind of support in anti-corruption before.

Coherence

To what extent is anti-corruption assistance co-ordinated internally (within OSCE as an organization) and externally (government, international community, NGOs)?

- ✓ **Finding 23:** Coordination on the national level is ensured by POiB, working very closely with the Ministry of Foreign Affairs and having meetings with the National Security Council, where ministries, law enforcement, business community and civil society meet; co-ordination on the OSCE level is conducted through annual mission meetings; and co-ordination with donors is conducted through donor co-ordination meetings (however, the latter is limited regarding anti-corruption work, as the POiB is currently (as per 2023) the only organization that supports the Government in this area).
- ✓ **Finding 24:** The projects run by POiB under the same umbrella of 'good governance' comprise many individual activities (fighting corruption, money-laundering, financing of terrorism), yet the actual link between them is not always clear as those activities have different beneficiaries and implementing partners.

On the national level, co-ordination of anti-corruption actions takes place under the President's Office, through the National Security Council where ministries, law enforcement, business community and civil society meet in working group meetings. Until the regime change and constitutional reform of 2020, the working group under the National Security Council was the main driver of monitoring the implementation of sectoral action plans by ministries.

Priorities have not changed with regard to corruption since 2013, when the President adopted the decree stating that 'corruption is a national security problem'. Even with 3 revolutions, in the Secretariat of the Security Council, we always emphasised the importance of anti-corruption, no obstacles here, anti-corruption stays as a priority.

With regard to co-ordination on the OSCE level, there are annual mission meetings, both formal and informal, yet co-operation and co-ordination among different FOs, as stated by the respondents, is very limited and would be a good opportunity to explore.

Concerning co-ordination with donors, there are donor co-ordination meetings on a variety of topics. However, with regard to assisting government in anti-corruption activities, POiB is the only player, which makes duplication unlikely.

Additionally, POiB organizes regular lower-level co-ordination meetings with government representatives and implementing partners, which also help raise visibility, engagement and ownership.

As seen from project descriptions and self-assessment reports, UB projects targeting anti-corruption are also combined with other anti-money laundering and counter-terrorism activities. However, the respondents met during the field visit on-site confirmed that they were usually linked only on paper but not in practice as they had different beneficiaries and implementing partners. The link between anti-money laundering and anti-corruption could be noticed regarding the implementation of international standards/recommendations; yet the synergy was not clearly visible, which could be a good opportunity for further work to increase the cumulative impact.

Effectiveness

What are the intended results of the OSCE's anti-corruption assistance?

✓ **Finding 25:** Despite three regime changes and a high turnover of government officials, many of POiB's intended anti-corruption assistance results were achieved, which should eventually lead to having a robust corruption prevention system in place.

POiB managed to achieve its planned outputs of anti-corruption assistance: corruption risk analysis in multiple highly specialized areas (construction, road building, pension fund, social contribution fund, state enterprises, and many others); training of compliance officers; improvement of legislation (national strategy, action plan, law on corruption prevention and public procurement); development of multiple textbooks, manuals and methodologies; and, most importantly, several breakthrough digitalization projects, including the government information exchange platform 'Tunduk' and the IT register of business supervision.

Asked about the effectiveness of the OSCE's anti-corruption assistance, every respondent mentioned the government information exchange platform 'Tunduk' as the best anti-corruption achievement over the past years (see above).

Several respondents mentioned that 'Tunduk' was also a result of thorough, in-depth, long-term work of a few dedicated government representatives, as well as local experts and researchers whom the POiB hired for support. Their work included an analysis of corruption

risks that were transformed into actionable plans, the implementation of which were diligently monitored. Many of the sectors (public procurement, construction, road building, pension fund, social contribution fund, to name but a few), as well as state enterprises, were facing systemic challenges of corruption that would otherwise have remained unaddressed.

OSCE ensured monitoring of implementation of action plans. National Security Council acted as 'punisher' for those who did not comply and then in 2–3 years state bodies had to adapt and start doing something. They also identified corruption schemes. Many issues were embedded in the law.

Supported by OSCE, we worked out a methodology on supervision of public procurement; it includes all risks in all stages of procurement (...) now we see indicators that help us improve on every single stage of the procurement process.

The work on corruption risk analysis is also mentioned in the OECD ACN's 4th Round of Monitoring of Kyrgyzstan in 2018, specifying the OSCE's support in hiring independent experts who helped develop more than 20 anti-corruption departmental plans that took into account about 400 recommendations for the eradication of corruption.⁷⁶

The respondents also mentioned the importance of data protection in context of the launch of 'Tunduk', and appreciated the OSCE's assistance in persuading the Government to set up the Data Protection Agency in 2021. During the first year of its establishment, POiB helped

make it operational, providing experts and assets. Additionally, also assisted by the POiB, the Register of Holders of Personal Data Arrays was built in 2022.

There are downsides of digitalization: it increases cyber risks. Here the OSCE helped us set up the Data Protection Agency. In the beginning we had nothing, no people, not even furniture. OSCE helped with it. At the end of 2021, the body became operational.

The other 'tangible' result, recognized by the respondents as contributing to the reduction of corruption and to protecting businesses, was an IT register of business supervisions conducted by prosecutors and tax inspectors:

Now there is an online registration of inspections by the Prosecutor General's Office and Tax Inspection; as a result, the number of inspections reduced significantly, transparency increased.

After [the OSCE] developed the IT notification system of supervisory visits, their number decreased, businesses are more protected.

With regard to capacity-building, positive feedback was given regarding the skills obtained by prosecutors who said that they could detect more corruption offences, and regarding the training of anti-corruption compliance officers.

Finally, high praise was given for the consistent OSCE assistance in developing manuals, textbooks and methodologies. Their importance relies in the fact that they stay and are used while methodologies are adopted and have legal power and therefore become sustainable.

What are unintended results of the OSCE's anti-corruption assistance?

✓ **Finding 26:** One indirect (and arguably, unintended) result of the OSCE's anti-corruption assistance is the role played by POiB and ODIHR when helping other organizations perform their evaluations of the country and strengthening their impact by joining forces in pursuing international standards.

Apart from the aforementioned OSCE assistance in helping Kyrgyzstan comply with FATF requirements, POiB and ODIHR have been instrumental in helping build anti-corruption standards and advocating for reforms. For instance, the OECD ACN 4th Round Monitoring Report of Kyrgyzstan expressly thanked POiB for helping the OECD ACN organize a meeting with civil society and international organizations.⁷⁷ Additionally, the report referred several times to the Joint Opinion issued by the Venice Commission and ODIHR regarding recommendations for the disciplinary responsibility of judges in the Kyrgyz Republic.⁷⁸ This is a good example to demonstrate both the effectiveness and the coherence among different organizations and the national authority.

✓ **Finding 27:** Few initiatives did not prove to be as effective as initially planned (intended), and which were eventually discontinued by POiB.

Among the activities that were well designed but led to less successful results was the use of an 'e-Guillotine' software for monitoring the reduction of excessive legislative requirements for business, the

establishment of public supervisory councils, and the Open Government Partnership.

The initial idea of the Public Supervisory Councils (supported by a number of international organizations) was to set up a 'public voice' at every ministry, making them more transparent and accountable. However, members of these Councils were predominantly selected by the respective ministries themselves, and very few selected candidates achieved good results, while many others used them as a career opportunity.

Another disappointment was the lack of government participation in the Open Government Partnership,⁷⁹ which the OSCE had supported for Kyrgyzstan to join as the first country in the region. Eventually, POiB stopped funding as there was no response from the authorities.

What factors inhibited the achievement of OSCE anti-corruption assistance results?

✓ **Finding 28:** Over the last two years (2021-2023) the anti-corruption situation in the country has been deteriorating, which might have had a negative effect on the overall impact of anti-corruption assistance provided.

Despite a few successes of anti-corruption assistance provided by the OSCE, the respondents were not very optimistic about the overall impact of it since the situation in the last two years deteriorated after the constitutional reform adopted in 2021 significantly increased presidential authority and reduced the size and role of the parliament.

The respondents on-site in Kyrgyzstan agreed that although the mentality regarding corruption was changing and petty corruption was reducing, grand corruption, especially on a political level and where big interests were involved, was on the increase.

In 2010, everybody took bribes and they took bribes everywhere. Young people in particular changed in mentality since then. They used to give bribes at universities, getting a job. Now they know that it does not make sense.

They used to call us 'an island of freedom and democracy' in Asia. Not any more. We had open tenders; we had so much public participation.

The role of civil society has been reduced. Access to information is limited.

✓ **Finding 29:** An effective implementation of activities has been hampered by three factors: 1) the change of government priorities, restructuring of government bodies, and staff turnover related to the regime changes; 2) the closure of the field office in Osh in 2017, which had previously enjoyed closer interaction with the regions, and 3) less direct work with civil society.

The main obstacles for an effective implementation of anti-corruption activities, as mentioned by the respondents, was the restructuring of government bodies, change of their priorities and functions, and staff turnover that meant that POiB had to build contacts with the new officials in the Government and repeat some of the implemented activities or abandon them completely, since they were no longer in

demand (as discussed above regarding the budget accountability or the participation in the Open Government Partnership).

Increasing budget accountability was part of the anti-corruption strategy, now there is a new one on the way which does not have this provision any more.

After the last revolution in 2020, the anti-corruption sector under the Prime Minister was dismantled, Financial Police restructured.

Similarly, the decision to close down the field office in Osh in 2017 was also seen as a challenge for a closer interaction with the regions, as the issues of corruption are different there and these regions are not easy to reach.

We used to have local offices. They were closed in 2017. Very difficult to reach the regions, it was more effective then.

There is a big gap between the capital and the regions, more work needs to be done there.

Sustainability

To what extent are gains made through anti-corruption assistance sustainable?

✓ **Finding 30:** With regard to the most successful projects that are fully owned by the state authorities and which are regulated in adopted legislation, manuals and methodologies and have dedicated institutions, their fruits will likely remain sustainable yet external assistance is needed to make further improvements.

✓ **Finding 31:** Sustainability of assistance is an issue in a country undergoing transformations, government reshuffles and priority changes and therefore external support is necessary to protect the positive changes that have taken place.

What concerns the flagship IT project 'Tunduk', every respondent interviewed was confident that will remain sustainable for many years to come. POiB's initial role was in assisting the government with procuring servers, IT specialists and business analysts. Today there is a state enterprise, 'Tunduk', established under the Ministry of Digital Development offering as many as 148 digital services already and the number is growing. The government demonstrates full ownership of the system, hired 30 additional IT experts paying them a competitive salary and considers digital transformation as its top priority, enshrined in the national Concept of Digital Transformation 2019-2023. However, scaling up the system further, working on the quality of data requires many additional efforts that the government would not be able to implement without external assistance.

We understand that Tunduk is not just temporary but forever. People will not come back to paper.

It took us one year to make sure that paper-certificates are equal to digital certificates! This change made is irreversible. Government also saves lots of money with that.

Asked about which actions were taken to ensure sustainability, many respondents mentioned the importance of education that is followed by the publication of manuals and textbooks. With regard to corruption

risk assessments, the respondents said that well-developed methodologies for state bodies, which were adopted and became mandatory, helped them be more long-term. They also believed that fundamental changes in legislation were not so easy to reverse and therefore the investment in prevention, supported by the OSCE, was producing long-term results.

However, on the backdrop of government changes and a high staff turnover, many of the legal experts hired by the OSCE stated that OSCE support is necessary for them and for the reforms to survive and continue.

Without external support, there is high probability that with regard to anti-corruption action plans, identification of risks and their elimination, this work will lose the momentum and can deteriorate.

Gender Equality

To what extent and how are gender considerations incorporated into the OSCE's anti-corruption assistance?

✓ **Finding 32:** Gender equality is considered a cross-dimensional issue and POiB understands the importance of communicating it to the government partners, for instance by encouraging, wherever possible, the equal participation of women and men in training courses; when creating promotional or educational videos; by making sure that no gender 'feels disadvantaged'; by actively promoting women-led NGOs; and by ensuring equal pay for consultants irrespective of their gender.

With regard to gender equality, there was a genuine understanding of the issue demonstrated by all the respondents. Gender equality, similar to anti-corruption, is considered a cross-dimensional issue. POiB supports many active women-led or women-centred NGOs (with regard to private entrepreneurship, access to medicine and to the medical sector). There was also a deep understanding of the importance of communicating the issue to the government partners, for instance, by encouraging, wherever possible, the equal participation of women and men in training courses; when making any promotional or educational videos; by making sure that no gender 'feels disadvantaged'; and by ensuring equal pay for consultants irrespective of their gender.

Despite a recognition by some of the local respondents that in Kyrgyzstan, women's rights, in particular in the regions, were restricted, the trend in anti-corruption also helped them get more engaged. According to the respondents, women in anti-corruption were more active and more professional, and they drive major changes. For instance, the majority of compliance officers are women (the female/male proportion is 60 to 40). The biggest driver of fundamental anti-corruption changes (including risk assessments and action plans) was a woman, who also was the first head of 'Tunduk' and then became the head of the Data Protection Agency.

With regard to the IT area (which offers good pay but is mostly male-dominated), in 2022 the Government trained 50,000 female programmers who joined the market at the same time as many organizations in Kyrgyzstan 'went digital'.



6. Cross-cutting findings

The OSCE has no organization-wide framework for objectives or results with regard to anti-corruption. OSCE field operations have integrated anti-corruption activities in various programmatic workstreams, while the OCEEA implemented projects under rather broadly defined UB objectives and outcomes. Under the OCEEA's objective of "Enhanced security and stability through international co-operation on economic and environmental issues in the 2021 UB, one of its seven outcomes includes anti-corruption assistance, namely: Participating States have the capacity to implement national and international commitments in the area of economic good governance, including anti-corruption, anti-money laundering and combating the financing of terrorism".

KPI's used by OCEEA to internally monitor anti-corruption assistance results include Transparency International's Corruption Perception Index and the World Bank's Worldwide Governance Indicators on the country's capacity to control corruption. Although these are relevant indicators to measure higher level outcomes in the participating States, they do not provide meaningful insights into the OCEEA's performance.

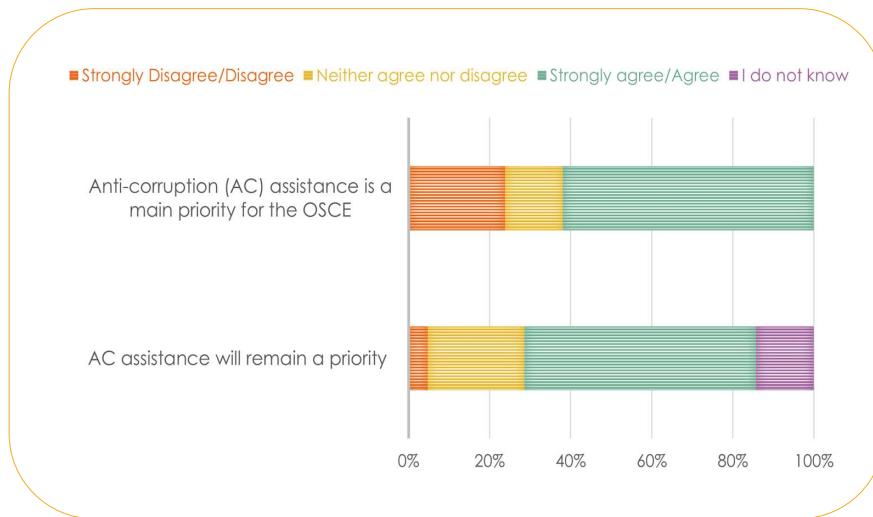
While the OCEEA's objectives and the intended outcomes related to anti-corruption did not much change over time, outputs did change but are also very broadly defined. In 2021, outputs included, for instance, "assistance provided to implement OSCE commitments in good economic governance", "facilitation of exchange of best practices and

experiences", and "expansion of OSCE e-learning modules and good governance and anti-corruption".

The OCEEA as a whole had an operational budget of €408,000 in 2021, and its anti-corruption projects were entirely funded with extrabudgetary resources. Interviews revealed that the OCEEA had switched in 2016 towards more reliance on ExB projects to be able to respond to requests and plan more medium and long-term, something which is inhibited by the yearly UB budget cycle.

Out of OCEEA's 25 staff members, three have anti-corruption assistance included in their job description. In terms of human resources dedicated to anti-corruption assistance in the OSCE as a whole, the evaluation team identified 23 project managers working on anti-corruption assistance across the OSCE. The survey results indicate that on average one to three staff members work on anti-corruption issues in different OSCE executive structures. Even though a majority of OSCE staff working on anti-corruption assistance believe that anti-corruption is a priority for their executive structure, and will remain so in the near future (see Figure 16), the Organization has only limited human and financial resources allocated to anti-corruption work.

FIGURE 15. PRIORITY GIVEN TO ANTI-CORRUPTION



Source: OSCE Survey

Taking this context into account, the evaluation team analysed the portfolio of work and conducted key informant interviews as well as a survey among current and former OSCE anti-corruption staff to generate some cross-cutting findings on the evaluation criteria.

6.1 Comparative Advantage

What is the comparative advantage of the OSCE's anti-corruption related work (compared to other international organizations) for participating States?

- ✓ **Finding 33:** The OSCE has long-standing political relationships that facilitate the crucial access needed to implement anti-corruption projects in pS.
- ✓ **Finding 34:** The OSCE works demand-driven and demonstrates a comparatively higher level of flexibility, enabling it to better and more quickly respond to pS' needs and requests.
- ✓ **Finding 35:** The OSCE provides anti-corruption assistance in niche areas that have not received much attention by other international organizations or peer review mechanisms.

According to OSCE staff surveyed and interviewed, the OSCE's anti-corruption-related work has several comparative advantages compared to that of other international organizations (IOs) for participating States:

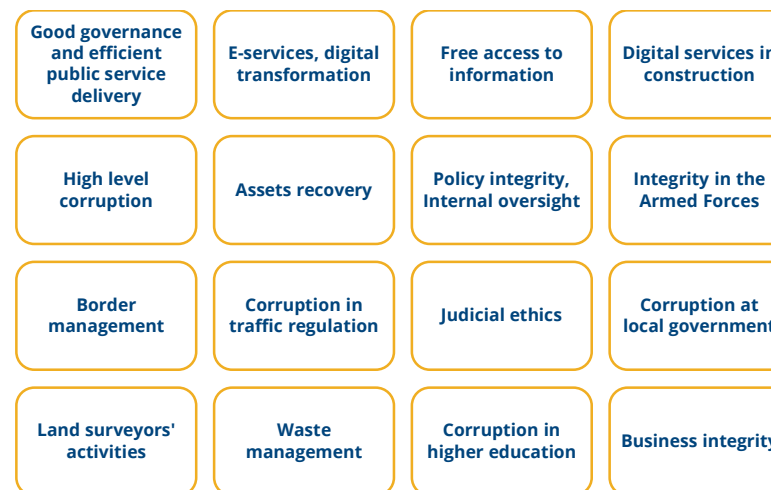
1. **Longevity and trust:** The OSCE has been working on anti-corruption assistance for a longer time compared to some other IOs, and has developed relationships with officials and stakeholders in participating States. This history of engagement and continuity can lead to a higher level of trust between the OSCE and participating States in a politically sensitive area.
2. **Demand-driven assistance and flexibility:** The OSCE's approach to anti-corruption work is based on needs and requests from participating States. They provide a wide range of support, from awareness-raising to legislative review, and deliver targeted capacity development, depending on the specific needs of each participating State. Being a decentralized organization with field presences in various locations, the OSCE

is often perceived as more agile and needs-driven. This allows for quicker responses and adjustments to changing circumstances, which can be an advantage in addressing anti-corruption challenges.

3. **Forum for dialogue:** The OSCE has a strong political dimension, with a forum for dialogue and consensus-building among participating States. Although dialogue is difficult at the moment, this does not diminish the need for it to create a conducive environment for anti-corruption efforts, as political support and consensus can help promote reforms and facilitate co-operation among states.

Looking at the 163 projects supported by the OSCE, the approach to assistance with regard to the chosen themes both favoured a traditional approach to anti-corruption, focusing on the three major pillars of anti-corruption, encompassing prevention, education and repression, but also taking a more *specific* look at individual sectors prone to corruption (high-level corruption, corruption in local government, traffic regulation, armed forces or border management) or resisting corruption (like good governance, e-services, integrity in the police, courts, armed forces or the private sector) (see Figure 16).

FIGURE 16. SPECIALIZED ANTI-CORRUPTION ASSISTANCE THEMES

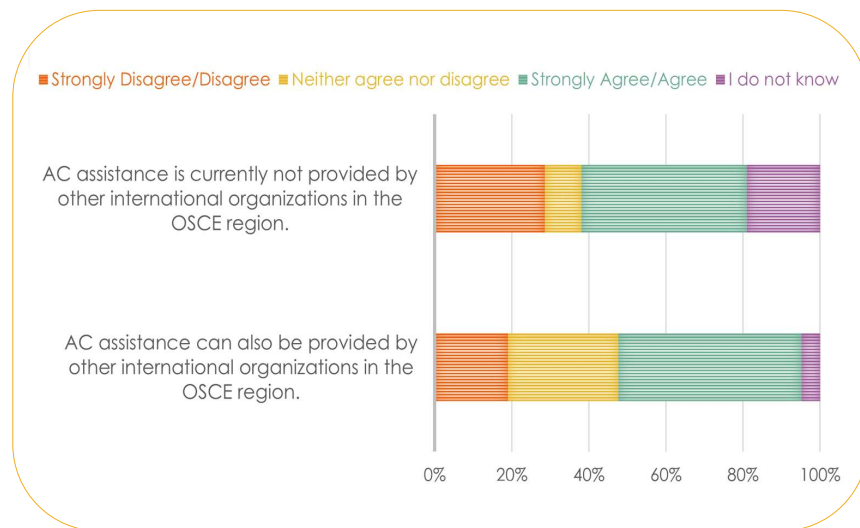


Several of the topics selected for support over the period of evaluation, including digital services in construction, corruption at the level of local government, land surveyors' activities or corruption in traffic regulation, have not received much attention by other international organizations or peer review mechanisms (GRECO, Moneyval, OECD ACN or UNCAC).

Part of the OSCE's anti-corruption assistance can be labelled as more traditional (capacity development aimed at civil servants, law enforcement, prosecutors and judges, legislative assistance, fostering broader education, and awareness-raising campaigns), while other forms of assistance are taking place in niche areas (see Figure 16). This could be one of the reasons for the mixed results on the survey questions on comparative advantage (see Figure 17). While 43 per cent

of the OSCE respondents believed the assistance provided by their executive structures/secretariat department was currently not provided by other international organizations, 48 per cent of them indicated that OSCE assistance could also be provided by other international organizations. Another reason could be the differences in presence of other international organizations in the different OSCE regions, as demonstrated in the case studies.

FIGURE 17. COMPARATIVE ADVANTAGE

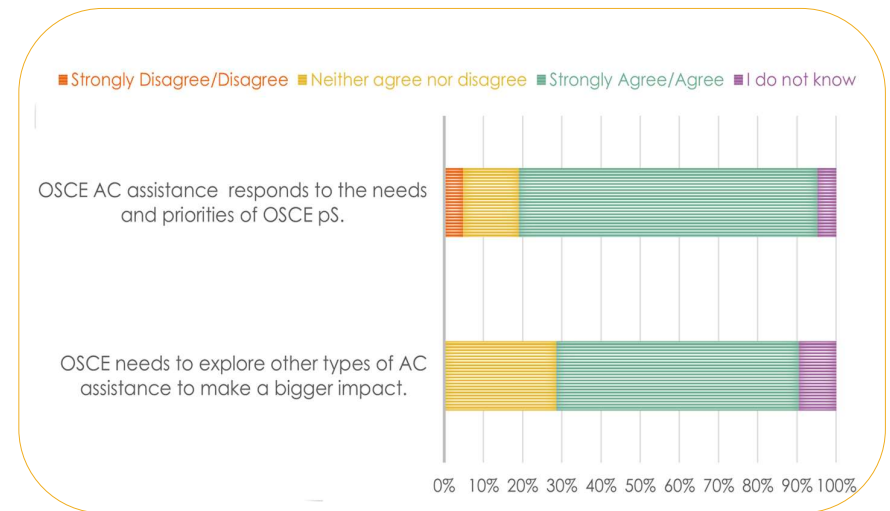


Source: OSCE Survey

In terms of the perceptions on the relevance of the assistance provided, most survey respondents agreed the OSCE assistance is relevant, but other forms of assistance should be explored to make a bigger impact (see Figure 18). Answers to an open question on possibilities for improvement further indicates that staff members

working on anti-corruption welcome a more strategic and whole-of-OSCE approach and an increased use of digital tools in anti-corruption assistance.

FIGURE 18. RELEVANCE



Source: OSCE Survey

How does the OSCE's anti-corruption assistance add value to the OSCE's security co-operation?

✓ **Finding 36:** OSCE's anti-corruption assistance adds value to security co-operation by promoting good governance in general and in the security sector specifically.

✓ **Finding 37:** Building on and integrating anti-corruption efforts into the work streams of the different dimensions of security, anti-

corruption assistance enhances the OSCE's comprehensive approach to security.

The OSCE's anti-corruption assistance adds value to its security co-operation in several ways.

First, it helps promote good governance and the strengthening of democracies. Corruption represents one of the major impediments to sustainable development, undermining stability and security. In the words of two survey respondents:

“Corruption corrodes the foundations of democracy, crippling the relationship between government and its citizens, and ultimately eroding trust in democratic institutions and of the officials within them to serve the public they represent. Fighting corruption and strengthening democracy are thus mutually-reinforcing priorities of the OSCE to support security in this country.”

“Corruption doesn't only divert resources from development, it corrodes public trust in government institutions, undermines the rule of law, impairs the systems of checks and balances, and contributes to violence and insecurity. This is why we address corruption not only as a crime and an impediment to development, but also as a direct threat to peace and stability.”

Second, it specifically helps promote good governance in the security sector, which is essential for maintaining stability and security. By addressing corruption within security apparatuses, such as police and ministerial structures, the OSCE's anti-corruption efforts contribute to building institutional integrity and trust in these institutions, which are

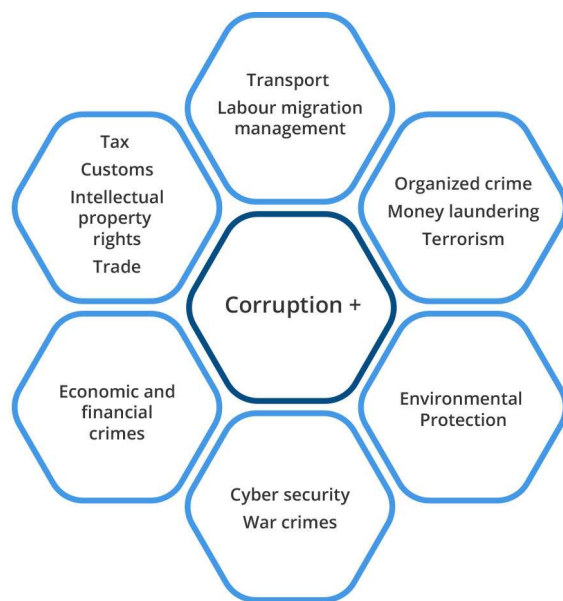
crucial for effective security governance. Moreover, the OSCE's anti-corruption assistance includes both a conceptual understanding of good security sector governance (see also the SSG guidelines referenced below) and practical support to partners. This combination of theoretical and practical assistance helps build capacity and expertise in addressing corruption in the security sector.

Thirdly, by building on and integrating anti-corruption efforts into the workstreams of the different dimensions of security, the OSCE can enhance the effectiveness and impact of its security co-operation and vice versa. As stated in the OSCE official documents described in Section 1.2 above, the approach to anti-corruption as well as anti-corruption assistance is not seen as an 'isolated' theme, but rather as multi-faceted and linked to other topics, such as organized crime, money-laundering, terrorist financing, environmental protection, cyber security, war crimes and other themes. In that respect, it is also cross-dimensional, combining the three dimensions of security in which the OSCE operates (see Figure 19 below).

The importance of promoting cross-dimensional synergies and the practical application to increase the impact of the objectives sought has been comprehensively elaborated in the OSCE Guidelines for Security Sector Governance and Reform (SSG/R) of 2022 developed by the CPC.⁸⁰ They state, in particular, that “(a) cross-dimensional approach to SSG/R support does not deliberately create additional tasks for their own sake but rather ensures synergies in the support provided by various OSCE actors, especially if these are located in different dimensions. It is about recognizing that support in one area of the security sector may affect another and, thus, that support is most

effective when provided in a complementary manner that takes advantage of synergies across the dimensions.⁸¹

FIGURE 19. MULTI-FACETED (CROSS-DIMENSIONAL) APPROACH TO ANTI-CORRUPTION



Source: made by the evaluator

6.2 Coherence

To what extent is anti-corruption assistance co-ordinated internally (within the OSCE as an organization) and externally (government, international community, NGOs)?

✓ **Finding 38:** Internally, there are examples of effective collaboration between different executive structures on anti-corruption assistance, but collaboration between the Secretariat and field operations can be further improved.

✓ **Finding 39:** Externally, anti-corruption assistance is co-ordinated closely with the assisted participating States, but there is room for improvement in co-ordinating and collaborating with other international organizations.

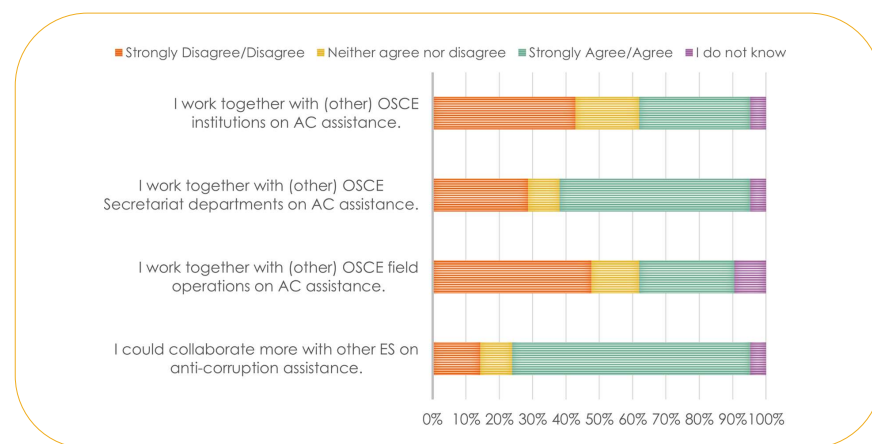
The survey results, interviews and ERG discussions confirmed that different OSCE executive structures and Secretariat departments collaborate on the issue of anti-corruption, but it is more ad hoc and project-based than strategic and structural. For example, the OCEEA collaborated with ODIHR and the CPC on such issues as lobbying and the development of e-learning modules on good governance and anti-corruption. The evaluation team also came across examples of regional projects where the OCEEA and the field operations collaborated. These types of collaboration enhance synergies and complementarities among different parts of the Organization and strengthen the overall impact of anti-corruption efforts.

At the same time, there are also challenges to promoting cross-dimensional and cross-departmental collaboration, related to differences in mandates of the different executive structures, different reporting lines, ‘turf’ issues, and the distribution of resources and responsibilities. Additionally, there may be political sensitivity, which requires cautious approaches.

Although all executive structures fall administratively under the Secretary General, the Co-ordinator of OSCE Economic and Environmental Activities and the Heads of field operations report separately to the Permanent Council on their programmatic anti-corruption activities. In addition, the mandates of different executive structures vary, and so does the staff capacity for anti-corruption work.

The survey results highlight that most staff working on anti-corruption across the OSCE believe they could collaborate more with others (see Figure 20). Interview results indicate that relevant staff believed that collaboration between different departments and dimensions was a strength, although there was room for improvement in terms of communication and co-ordination between Secretariat-based staff and field operations. This was also confirmed in the case studies included in this report.

FIGURE 20. OSCE INTERNAL COHERENCE



Source: OSCE Survey

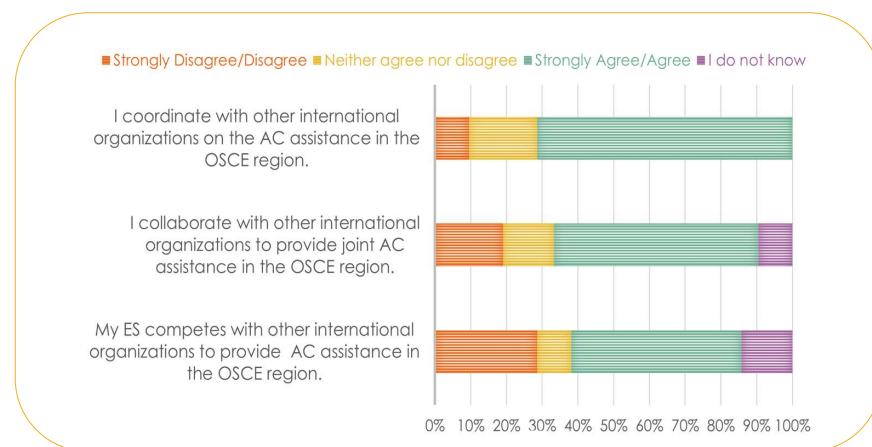
Even though co-ordination mechanisms, such as annual planning and co-ordination meetings, are in place, they may not be used to the fullest extent. Informal co-ordination meetings between the OCEEA and field operations have been organized at the margins of the forum cycle meetings to exchange information on activities and explore possibilities for collaboration. In practice, collaboration between the OCEEA and field operations on regional projects often seems to depend on personal relationships between OCEEA staff and staff in the field operations. Interviews and survey results indicate that co-ordination mechanisms could be improved and utilized more effectively to ensure meaningful co-ordination among different units and field operations. This may include regular co-ordination meetings, joint planning exercises and information-sharing platforms to facilitate communication and collaboration among various stakeholders involved in anti-corruption efforts.

In terms of external coherence, the evaluation team noted that the OSCE takes global practices into account when designing its anti-corruption projects. This ensures that the content of their assistance is aligned with established international norms and standards, which can enhance the quality and effectiveness of their efforts. The OSCE coordinates and collaborates with other international organizations, while also competing to provide assistance, as confirmed in the survey (see Figure 21) and in the case study on the OSCE’s anti-corruption assistance in Serbia.

Co-ordination with external stakeholders can be challenging due to differences in size, mandate and funding sources. For instance, there is a joint action plan between the UNODC and the OSCE, but it is not

legally binding and, according to one interviewee, requires good will from both sides to be effective. While it provides guidance on what to focus on, there may be competition and negotiation involved in agreeing on certain topics and regions of focus. This was confirmed in an interview with a UNODC representative working in South-Eastern Europe. The interview also confirmed that collaboration was mainly focussed on keeping each other informed and supporting each other's activities. From the perspective of the UNODC, it was perceived "a missed opportunity" that the OSCE was not part of the Berlin process aimed at promoting the EU accession for the Western Balkans. According to a UNODC representative, the roadmap that is being developed by the UNODC would benefit from OSCE support, while their regional framework could be useful for OSCE's anti-corruption assistance in the region.

FIGURE 21. OSCE EXTERNAL COHERENCE



Source: OSCE Survey

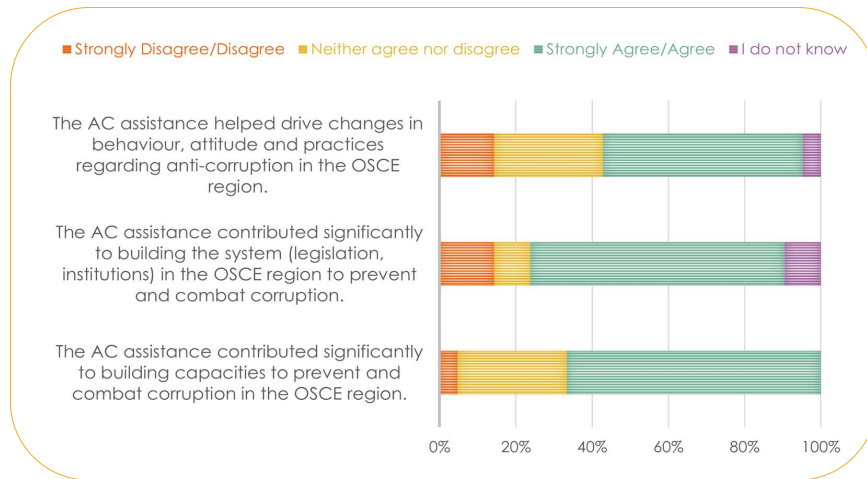
6.3 Effectiveness

What are the (intended and unintended) results of the OSCE's anti-corruption assistance in different countries?

- ✓ **Finding 40:** Although OSCE anti-corruption outputs have the potential to contribute to meaningful anti-corruption outcomes at the national level, the evaluation team was not able to objectively assess the OSCE's contribution to outcomes for the Organization as a whole.
- ✓ **Finding 41:** The OSCE executive structures would benefit from developing a theory of change that describes how and why OSCE interventions are expected to make contributions to anti-corruption outcomes.

According to perceptions of OSCE staff surveyed and interviewed, the OSCE's anti-corruption assistance has contributed to new and enhanced legislation, new institutions and improved capacities, and contributed to changes in anti-corruption practices, behaviours and attitudes in various countries (see Figure 22).

FIGURE 22. RESULTS



Source: OSCE Survey

Project documentation, case studies and key informant interviews revealed that the OSCE contributes to anti-corruption results in different areas:

1. **Prevention of corruption:** The OSCE has been engaged in projects aimed at preventing corruption in various countries, such as Moldova, Kazakhstan, Kyrgyzstan, Serbia and Tajikistan, by promoting good governance practices, regulatory impact assessments, and reducing regulations and costs for businesses and citizens. Sometimes the OSCE's work contributed to sustainable outcomes beyond the intended results in terms of building prevention capacities. For instance, the OCEEA's regional project on preventing corruption in Central Asia reported as an

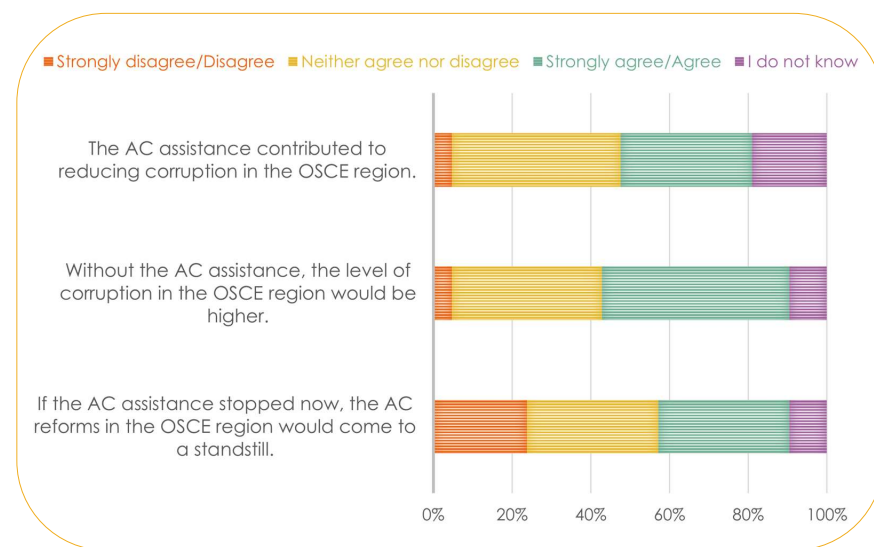
indirect outcome the reintroduction of the mandatory anti-corruption proofing of draft legislation in Kazakhstan.

2. **Enhancing capacities of law enforcement and prosecution:** The OSCE has supported the enhancement of capacities of law enforcement and prosecution agencies in countries such as Armenia and North Macedonia, through training and providing equipment to fight corruption, including the creation of specialized anti-corruption departments and the training of personnel.
3. **Digitalization of public services:** The OSCE has supported initiatives related to the digitalization of public services, for example in Kyrgyzstan, which can help reduce corruption risks by increasing transparency, efficiency and accountability in government processes.
4. **Stakeholder engagement and networking:** The OSCE has facilitated stakeholder engagement and networking among different actors, including government agencies, civil society organizations and journalists, to promote dialogue, an exchange of information, and mutual trust in the fight against corruption.
5. **Targeted assistance:** In countries such as Georgia, Moldova and Ukraine, the OSCE developed legislation and skills to assess money laundering risks related to cryptocurrency, building the capacity of officials to investigate money laundering risks associated with virtual assets and cryptocurrencies.

Although these various outputs of the OSCE's work have the potential to contribute to meaningful anti-corruption outcomes at the national level, the evaluation team was not able to assess the effectiveness of OSCE anti-corruption assistance at an organization-wide level.

The survey generated mixed results regarding the contribution of the OSCE's anti-corruption assistance to reducing corruption in the OSCE region and on the counterfactual, e.g., what would have happened in the absence of the OSCE's anti-corruption assistance (see Figure 23).

FIGURE 23. EFFECTIVENESS



Source: *OSCE Survey*

The results from the two case studies suggest that OSCE assistance could be seen as a necessary ingredient to build capacities in anti-corruption in different countries, without being sufficient to make significant improvements in the actual reduction of corruption. Developing hypotheses about the intended contribution of the OSCE's assistance in different countries and areas could be further explored

as part of developing Theories of Change that make OSCE's expected contribution to anti-corruption more explicit.

What factors facilitated and what factors inhibited the achievement of OSCE anti-corruption assistance results in different countries?

✓ **Finding 42:** Facilitating factors include government commitment, multi-stakeholder approaches, local ownership, high quality technical assistance and adaptive management strategies.

Survey and interview respondents were asked to identify factors that can facilitate or inhibit the achievement of anti-corruption assistance results. Some of the factors that can facilitate the achievement of anti-corruption results include:

1. **Government commitment:** The willingness and commitment of the government receiving anti-corruption assistance to address corruption and implement reforms are crucial for success. If the government demonstrates strong political will to combat corruption, there is evidence of achievement of anti-corruption results.
2. **Multi-stakeholder approach:** The engagement of multiple stakeholders, including government institutions, law enforcement bodies, prosecution, judiciary, civil society, media, business and the public at large, is essential for addressing corruption comprehensively. Co-operation and co-ordination among these stakeholders can facilitate the achievement of anti-corruption results as it fosters understanding, dialogue and ownership among different actors engaged in this field.

3. **Local ownership:** The involvement of local authorities and institutions in the design, implementation and monitoring of anti-corruption measures can facilitate the achievement of results. Local ownership ensures that the measures are aligned with the local context, mentality and practices, and increases the likelihood of sustainability.
4. **Knowledge and expertise:** The availability of expertise and knowledge in the area of anti-corruption can facilitate the achievement of results. Technical assistance, training and capacity-building programmes that enhance the skills and knowledge of local stakeholders can contribute to the effectiveness of anti-corruption measures.
5. **Flexibility and adaptability:** Flexibility in the planning and design of anti-corruption measures, taking into account the local context and ongoing efforts by other international donors and organizations, can facilitate the achievement of results. Being adaptable and responsive to the changing needs and dynamics of the country can increase the effectiveness of anti-corruption efforts.

✓ **Finding 43:** Inhibiting factors include shifting political support, lack of co-ordination and strategic approach, and resource limitations.

On the other hand, the lack of these factors plus several additions can inhibit the achievement of anti-corruption results, such as:

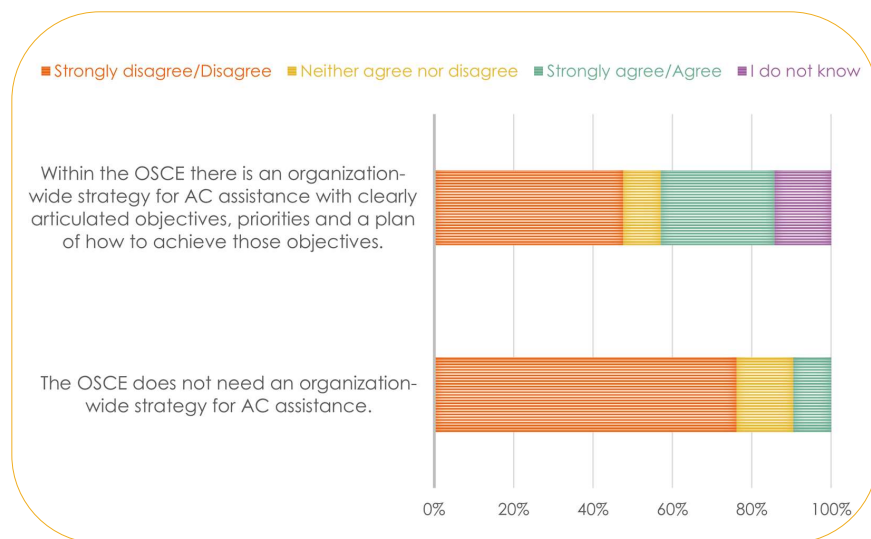
1. **Lack of political will:** If the government receiving anti-corruption assistance does not demonstrate strong political will

to combat corruption, it hinders the achievement of results. Without political buy-in, anti-corruption results are often stymied at the highest level. The lack of government commitment may further result in limited resources, inadequate legal frameworks, and insufficient enforcement measures, which undermine anti-corruption efforts. The priorities of the host country may also shift, which can result in a limited impact of the OSCE's assistance.

2. **Lack of co-ordination among stakeholders:** Without cooperation and co-ordination among different stakeholders involved in anti-corruption efforts, including civil society and independent journalists which promote transparency and accountability, the effect will be limited.
3. **Limited resources and long-term planning:** Insufficient resources, including financial, human and technical resources, can hinder the achievement of anti-corruption results. Without adequate resources, it may be challenging to implement and sustain anti-corruption measures effectively. An example that was cited on several occasions was the OSCE's yearly budget cycle, which does not promote long-term planning and consistent stakeholder engagement.
4. **Political and social challenges:** Political instability, social unrest and lack of trust in institutions can also hinder the achievement of anti-corruption results. Sensitivities related to historical legacies, perceptions and cultural factors may also pose challenges in implementing anti-corruption measures in some countries and areas.

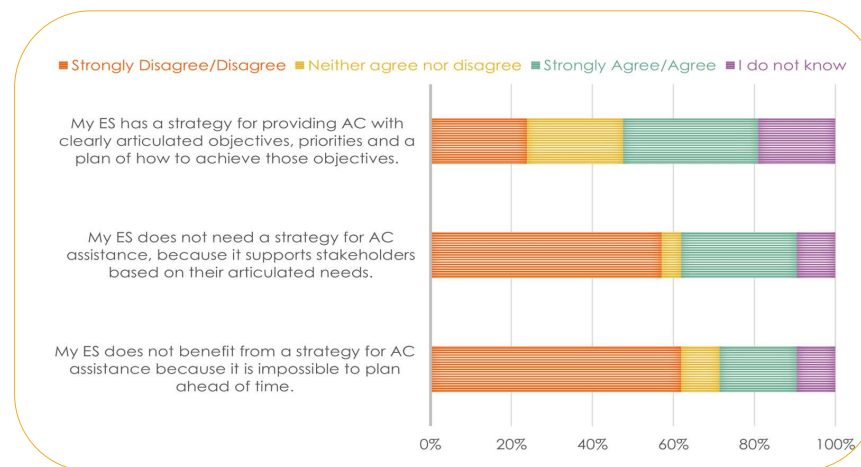
While most of the factors mentioned above are external factors that are difficult to influence, an important limiting as well as facilitating internal factor is related to co-ordination and collaboration. In addition, the Organization could take a more strategic approach towards providing anti-corruption assistance. The survey results (see Figures 24 and 25) indicate that a majority of respondents see the need for a strategy, both OSCE-wide and at the level of executive structures (76 per cent disagree that there is no need for an OSCE-wide strategy and 62 per cent disagree there is no need for a strategy at the level of their executive structure).

FIGURE 24. ANTI-CORRUPTION STRATEGY (OSCE-WIDE)



Source: OSCE Survey

FIGURE 25. ANTI-CORRUPTION STRATEGY (ES)



Source: OSCE Survey

6.4 Sustainability

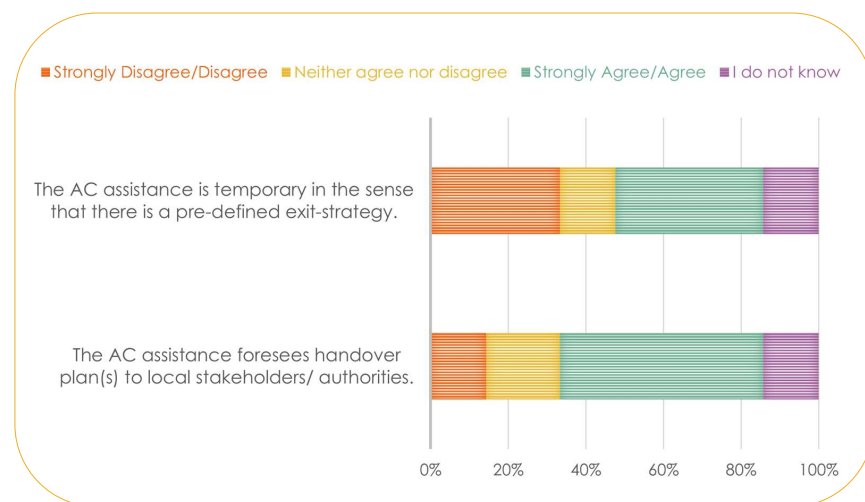
To what extent are gains made through anti-corruption assistance sustainable?

- ✓ **Finding 45:** Anti-corruption work needs local ownership and political will to create systemic change in the long run.
- ✓ **Finding 46:** Support for digital tools and legislative reform are more likely to result in sustainable gains.

The sustainability of gains made in anti-corruption assistance depends on various factors. In addition to political will as an important external factor, a key internal factor is the presence of an exit strategy. The survey results indicate mixed results on the use of exit strategies and

handover plans (see Figure 26). Such exit strategies are important to prevent governments from becoming too dependent on assistance. One key informant interviewee noted the complete lack of an exit strategy in their current work on capacity development, but also mentioned that they work with local partners, such as prosecutors and judges, to build their capacity to deliver courses. This indicates a recognition of the importance of local ownership and sustainability beyond the lifespan of the project, without going so far as planning a concrete exit.

FIGURE 26. SUSTAINABILITY OF OSCE ANTI-CORRUPTION WORK



Source: OSCE Survey

The development of textbooks, guidelines and manuals, as well as of training of trainers classes, can support the handover of skills and

knowledge. Another aspect mentioned is the development of digitalized processes to enhance sustainability, which is expanded on in detail in the case study on the OSCE’s assistance in Kyrgyzstan. By helping the anti-corruption agency in developing sustainable systems, they are promoting long-term efficiency and systemic change.

The involvement of local anti-corruption experts, as done in Serbia, is highlighted as a good approach to sustainability, as it promotes local ownership and expertise. However, multiple stakeholders also recognized the need for balance with international expertise, as international consultants can bring gravitas and valuable external perspectives. In addition, the involvement of local stakeholders in project design is important for sustainability to ensure anti-corruption efforts are integrated into the state machinery and sustained beyond the project lifespan.

Overall, sustainable gains in anti-corruption efforts require developing local capacity, involving local stakeholders and maintaining a balance between local and international expertise. Exit strategies, manuals and guidelines, digitized systems, and policies and instruments that are locally owned and driven can contribute to the sustainability of anti-corruption efforts beyond the duration of a project.

6.5 Gender Equality

To what extent and how are gender considerations incorporated into OSCE anti-corruption assistance?

✓ **Finding 46:** OSCE staff recognize the importance of gender equality and consider gender aspects when possible in their anti-corruption

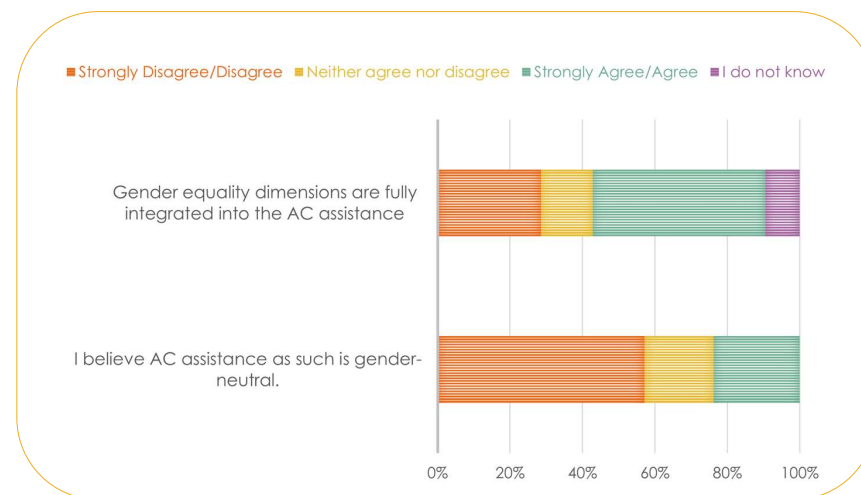
work, but it is often not seen as the most relevant element by beneficiaries of OSCE assistance.

The survey results indicate OSCE staff recognize the importance of considering gender aspects into their anti-corruption work, although there is room for improvement in doing so. Some of the ways in which OSCE anti-corruption project staff addressed gender equality include:

1. **Gender balance:** most projects aim for gender balance in training courses and in the composition of anti-corruption agencies and anti-money laundering efforts.
2. **Support for female candidates:** The OSCE promotes the participation of female candidates but one stakeholder mentioned that this support rarely went beyond that, suggesting that more efforts could be made to actively promote and support women's participation in anti-corruption efforts. For example, it was mentioned that prosecution institutions were still male-dominated in some countries, indicating potential gaps in achieving gender balance in all areas of anti-corruption work.
3. **Gender mainstreaming:** The OSCE has incorporated gender mainstreaming as an internal rule and requests project managers to systematically consider gender aspects in their work. Gender mainstreaming is seen as an important component of their work on public integrity and governance, and is integrated into existing documents, such as codes of ethics.

While gender equality is considered to some extent in the OSCE's anti-corruption work, some stakeholders also mentioned that there may be challenges in fully incorporating gender aspects into OSCE anti-corruption assistance efforts, with a limited understanding among some staff on how to effectively integrate gender considerations into their work. There may be also limitations in going beyond mentioning the issue and actively implementing concrete measures for gender mainstreaming due to local and cultural norms and practices.

FIGURE 27. GENDER EQUALITY



Source: OSCE Survey

7. Conclusions

Based on the analysis of evidence and identified findings, this section summarizes the main conclusions of the evaluation on the evaluation criteria.

Comparative advantage

CONCLUSION 1. The OSCE, acting both through the Secretariat and field operations, has the comparative advantage of being a longstanding, trusted and engaged partner that understands the context and needs of its participating States, is both demand-driven and proactive, responds quickly and is flexible, and finds creative ways to manoeuvre to push for incremental changes.

The OSCE is a valued and trusted partner of the government in participating States, possessing a comparative advantage as a longstanding and engaged organization that thoroughly understands the government's context and needs. It is both demand-driven and proactive, using flexible approaches to push for incremental changes. The OSCE's long-standing political relationships enable crucial access for implementing anti-corruption projects, while its decentralized nature enables a high level of flexibility in addressing the needs and requests of participating States. {Findings 1, 2, 3, 22, 33, 34, 35}

Value-added

CONCLUSION 2. The OSCE's value-added has been its long-term, consistent and cross-dimensional support in developing anti-corruption capacities of participating States and in acting as a

mediator between international organizations and government authorities, or among different stakeholders, thereby amplifying the impact of other international organizations working on anti-corruption efforts, and contributing to security co-operation objectives.

The OSCE has a unique advantage in South-Eastern Europe and Central Asia by engaging at the local level and having trusted partnerships with government. This allows the OSCE to have a good understanding of the big and small actors involved in anti-corruption efforts, and to identify areas of engagement based on their on-the-ground knowledge. The OCEEA/Secretariat adds value by providing assistance in countries where there is no field presence and by implementing regional projects. The OSCE's longstanding presence in its various locations, as well as its regional approach, is an asset in the fight against corruption. The consistent support, capacity-building efforts and facilitation of dialogue between stakeholders at the local level have amplified the impact of other international organizations. OSCE expertise in establishing sustainable mechanisms and improving compliance with international standards, along with its multidimensional and inclusive approach, contribute to its security co-operation objectives. {Findings 4, 5, 18, 19, 20, 21, 36, 37}

Coherence

CONCLUSION 3. Internally, co-ordination and co-operation between executive structures is more ad hoc than structural. Co-ordination between different units within individual field operations varies depending on (perceived) needs to co-ordinate.

CONCLUSION 4. Externally, the OSCE co-ordinates closely with the governments of participating States and sometimes with other international organizations, mostly helping participating States to comply with international anti-corruption requirements. Co-ordination with civil society and the media in some of the FOs is limited due to their mandates.

Internally, there are good examples of co-ordination and collaboration between different executive structures, but co-ordination and co-operation between field operations and the Secretariat is more ad hoc than structural. Co-ordination between different units within individual FOs is more frequent but also depends on whether they (or their beneficiaries) notice synergies between activities and a need to co-ordinate.

Externally, the OSCE, through its executive structures, co-ordinates very closely with governments; it also co-ordinates and co-operates with other international organizations where relevant, mostly helping participating States to comply with international anti-corruption requirements (GRECO, Moneyval, UNCAC or EU), including, in the case of Serbia and Kyrgyzstan, withdrawal from the FATF 'grey list'. By building civil society networks, the OSCE contributes to increased transparency and accountability, supporting the development of public trust in state institutions. Co-ordination with civil society and the media in some of the FOs is limited, however, due to their mandate. {Findings 6, 7, 8, 23, 24, 38, 39}

Effectiveness

CONCLUSION 5. OSCE anti-corruption assistance to participating States, including building comprehensive corruption prevention mechanisms, institutions, legislative frameworks, capacities and, more recently, digital tools, has the potential to contribute to meaningful anti-corruption outcomes at the national level. Assisted by the OSCE, two case study countries analysed in this evaluation, Serbia and Kyrgyzstan, were removed from the FATF 'grey list' in the period of evaluation.

The OSCE has helped participating States, acting through its field operations or, where they do not exist, through the OSCE Secretariat, to build anti-corruption systems, institutions, legislative frameworks, tools and skills. Although the OSCE has supported incremental changes in anti-corruption in various countries, this support has not significantly reduced corruption. The influence of the OSCE on reducing corruption is limited due to several external factors. For bigger impact in anti-corruption to be achieved, more needs to be done to co-ordinate, co-operate and communicate within the OSCE and beyond, to sustain, enhance and anchor anti-corruption results.

While OSCE's anti-corruption work benefits from facilitating factors like multi-stakeholder approaches, high-quality technical assistance, involvement of local partners and adaptive management strategies, it also faces significant obstacles in providing effective anti-corruption assistance. Some of these inhibiting factors are external, such as the challenging and deteriorating political situations in certain countries and insufficient political will of governments assisted. Other inhibiting

factors are more internal or OSCE-specific, including the limited financial, human and technical resources dedicated to anti-corruption activities, the lack of a strategic approach towards anti-corruption assistance provided, the limits in mandates of some FOs to primarily work with governments on anti-corruption efforts, and the lack of leverage on the part of the OSCE to push for changes. {Findings 9, 10, 11, 12, 13, 14, 25, 26, 27, 28, 29, 40, 41, 42, 43}

Sustainability

CONCLUSION 6. The OSCE has supported incremental changes in anti-corruption efforts in participating States, considering its long-term impact and supported sustainable change. In some locations, where it has provided support for a long time, there is a risk that beneficiaries become too dependent on external support.

The OSCE has been providing anti-corruption assistance, considering its long-term impact and therefore, apart from different training courses, it has 'extended' their reach by applying the training-of-trainers approach, developing manuals, textbooks and guidelines, co-operating with training academies and schools by contributing to their training curricula. Some projects have been successfully taken over by state authorities, and legislative frameworks and digital tools have had a strong potential for sustainable results as well. At the same time, as the OSCE has been a very flexible, professional and efficient service provider in some countries, beneficiaries might become too dependent on external assistance and less proactive in taking ownership of anti-corruption efforts. When the OSCE becomes too easy to reach, it can

become a disservice to the participating States. {Findings 15, 16, 30, 31, 44, 45}

Gender mainstreaming

CONCLUSION 7. Although the OSCE has made efforts to mainstream gender in its anti-corruption activities, the impact in the anti-corruption area is limited as gender equality is not perceived by beneficiaries as the most urgent issue to address.

The OSCE has made efforts to mainstream gender equality in its anti-corruption activities but has not developed any gender-targeted projects in the period of evaluation. Both OMiS and POiB have incorporated gender equality across their projects, recognizing its importance and communicating this issue to government partners. While OSCE staff acknowledges its significance and considers gender aspects when feasible, gender is often not seen as a priority in the fight against corruption by beneficiaries. {Findings 17, 32, 46}



8. Recommendations

In response to evaluation questions on possibilities to leverage the OSCE's comparative advantage, enhance effectiveness and sustainability of results, and improve internal and external co-ordination, this section summarizes the main recommendations for the OCEEA and the evaluated FOs: OMiS and POiB.

How can the OSCE better leverage its comparative advantage to enhance anti-corruption results?

Field operations can further leverage their long-standing and trusted partnerships with government and local stakeholders by creating pre-conditions for and consistently following up on the full achievement and sustainability of results.

As a long-standing, trusted and well-respected partner of its beneficiaries, OMiS should use this comparative advantage to create favourable conditions for and consistently follow up on the full achievement of results of its deliverables. Examples include agreeing on the exit strategy beforehand, and showing a response when the activities supported by it are not owned by the beneficiaries or the recommendations are not followed. In addition, when reaching a 'glass ceiling' to see positive changes in reducing corruption or promoting implementation of activities, opportunities should be explored to engage in political dialogue on obstacles encountered, and to team up with other OSCE executive structures and international organizations

to use their channels and political leverage to push for the implementation of agreed actions or reforms.

It is recommended that POiB continues to be vigilant about developments in the country. With regard to ensuring the sustainability of long-term support provided by the POiB, for instance regarding the IT platform 'Tunduk', more actions could be taken in 'securing' the investment of its efforts if the government priorities change. Possibilities could be explored of signing official documents (memoranda of understanding, co-operation plans or similar) which would require the beneficiaries to commit to not only accept the delivered product but also to encourage them to contribute more (including through the provision of premises, human resources or similar) and to sustain it. With regard to capacity-building and education, the practice of development of methodologies and textbooks is commendable. A step further could be to explore the possibilities of building e-learning modules with materials that are revised more quickly and made interactive to ensure higher and even more impactful engagement.

RECOMMENDATION 1. Seek ways of agreeing with beneficiaries on an exit strategy at a very early stage, through signature of memoranda of understanding or similar documents, to foster commitment and accountability, so that the activities are fully owned and anchored locally (OMiS and POiB).

How can the OSCE improve the effectiveness of its anti-corruption assistance?

The OCEEA and FOs can adopt a more strategic approach towards providing anti-corruption assistance, further leverage the OSCE's comprehensive approach to security and learn from decentralized evaluations.

The evaluation points out that the OSCE could be more strategic in its approach towards anti-corruption assistance, both at the organizational and decentralized level. A strategic approach at the organizational level could specify the objectives and intended outcomes, the role of anti-corruption assistance provided by different executive structures and the OSCE's cross-dimensional approach, and capitalize on the knowledge, experience and practices in the OSCE. It can also facilitate the design of national and regional projects that are complementary and inter-connected.

A whole-of-OSCE approach could be developed jointly with OSCE staff working on anti-corruption activities throughout the Organization, with periodic updates. Such an approach could be informed by insights from evaluations, expected future developments, and an organizational analysis of strengths, weaknesses, opportunities and threats (SWOT). The strategic approach of individual field operations, their objectives, outcomes, outputs and anti-corruption activities can be informed by such a whole-of-OSCE approach, and it can be used for extrabudgetary resource mobilization as well.

RECOMMENDATION 2. Develop a whole-of-OSCE approach towards anti-corruption assistance that can guide OSCE anti-corruption assistance in OSCE regions/countries (OCEEA, in collaboration with relevant executive structures).

FOs also benefit from a more strategic approach, without losing the flexibility to focus on what's necessary/feasible in the given context. OMiS's anti-corruption assistance has been comprehensive, covering many subjects and areas, but sometimes lacked focus, trying to fill the niche where other international organizations were not active. Without being strategic about its anti-corruption assistance, it might run the risk of becoming an emergency service provider rather than a strategic and long-standing partner that is both relied upon and listened to. It is advisable that OMiS focuses more on systemic changes, periodically reviews its effectiveness and, wherever possible, refrains from implementing activities that do not lead to impactful results. In this context, the good practice of OMiS on providing impact assessments (of developed anti-corruption institutions) should be encouraged and continued.

POiB should continue supporting the initiatives that are successful and have a strong impact on anti-corruption (digitalization, corruption risk assessment), and at the same time should continue seeking ways to support the Government to undertake the activities that are necessary but not yet or no longer an official governmental priority (budget accountability or further monitoring of anti-corruption action plans). As part of its strategic approach, POiB could pro-actively explore opportunities for reinstating POiB's field offices and strengthen co-operation with NGOs and academia to further the effectiveness of its anti-corruption assistance.

RECOMMENDATION 3. Develop and share field operations' strategic approach towards anti-corruption assistance to ensure

horizontal and vertical ownership and support from all OSCE executive structures and units (OMiS and POiB).

Building on a more strategic approach, the OCEEA, OMiS and POiB are encouraged to reflect on the intended outcomes, monitor key performance indicators and commission decentralized evaluations for projects that fall in the remit of the OSCE's 2022 Evaluation Policy. While this independent evaluation provides a first snapshot of anti-corruption assistance provided by the OSCE over a period of 10 years, and presents overall results achieved in two case study countries, hardly any of these projects have been evaluated externally. Decentralized evaluations can generate relevant insights for all stakeholders to learn along the way and adjust course when needed, and also increase the visibility of anti-corruption results and challenges, both within the Organization and towards participating States and external partners and donors.

RECOMMENDATION 4. Commission decentralized evaluations of larger projects and programmes in line with the OSCE's Evaluation Policy and disseminate results to relevant stakeholders (OCEEA, OMiS and POiB).

This evaluation highlights that more can be done to increase the awareness of beneficiaries on how gender equality dynamics relate to corruption and anti-corruption assistance, which could be addressed by developing gender-focused project components or gender-targeted projects.

RECOMMENDATION 5. Share existing information on how gender relates to corruption and anti-corruption across the Organization, and support field operations with the development of gender-

targeted project components or projects (OCEEA in collaboration with Gender Issues Programme/gender focal points and other stakeholders).

How can the OSCE improve the internal co-ordination of its anti-corruption assistance?

OCEEA and field operations can strengthen the co-ordination of activities and information-sharing to improve internal coherence of anti-corruption assistance and develop internal capacities.

Improved communication channels and more formalized information-sharing practices among different Secretariat units and field operations can help foster better co-ordination and further build capacities in anti-corruption work in the OSCE. More structural sharing of information can provide an opportunity to share results, learn from good practices and how to overcome challenges, and allow for discussions on possibilities for collaboration. More joint experience-sharing events among FOs are also advisable as this could be an opportunity for them to show good results, learn how challenges can be overcome or some achievements replicated.

RECOMMENDATION 6. Facilitate structural sharing of information on activities and results within and between different OSCE executive structures through the establishment of a working group, network or similar (OCEEA in collaboration with relevant executive structures).

RECOMMENDATION 7. Improve internal co-ordination on anti-corruption assistance within OMiS by organizing a structural information exchange between relevant units and staff (OMiS).

How can the OSCE improve the external co-ordination of its anti-corruption assistance?

The OSCE can further strengthen partnerships with external stakeholders, such as international organizations, NGOs and other relevant actors involved in anti-corruption efforts. In this context, external co-ordination between the OSCE and other international organizations could benefit from being more institutionalized to have a better mechanism for sharing practices, co-ordinating support actions and having a stronger leverage for pushing anti-corruption reforms. Particular attention should be paid to communicating both successes and deficiencies to various review mechanisms (GRECO, Moneyval, OECD ACN, UNCAC) and international organizations.

RECOMMENDATION 8. Explore further co-ordination and collaboration with other international organizations to collectively advocate for the implementation of agreed actions or reforms, for instance through establishing a formal co-ordination body or similar to share practices and co-ordinate support actions (OCEEA in collaboration with other executive structures).

At the local level, OMiS can capitalize on its local expertise and civil society partnerships to provide a more structural platform for co-

ordination among different actors to leverage resources, expertise, and knowledge, and avoid duplication of efforts.

RECOMMENDATION 9. Provide a platform for co-ordination and collaboration among different stakeholders providing anti-corruption support in Serbia (OMiS).



9. Good practices and considerations for other field operations

The case studies on OSCE's anti-corruption work in Serbia and Kyrgyzstan have highlighted a number of good practices and considerations that can be of relevance for other OSCE field operations providing anti-corruption assistance.

Following a holistic and long-term approach to anti-corruption assistance

The case studies highlight the importance of following a long-term and holistic approach towards anti-corruption assistance, including supporting preventative and repression measures, as well as awareness raising. Types of interventions may include support for constitutional and legislative reforms to ensure the independence of judges and transparency in law drafting, as well as capacity development for police, prosecutors, judges, NGOs, journalists etc. Supporting the digitalization of public services can provide a powerful tool to help reduce corruption risks by increasing transparency, efficiency and accountability in government processes.

Using longstanding local partnerships as leverage

Field operations with a longer presence and trusted relationships can act more as a 'partner' than as a funder in providing anti-corruption assistance. This provides opportunities to act as a 'critical friend' who can provide recommendations on anti-corruption systems and policies based on periodic risk and impact assessments of institutions and systems. Acting as partners can also help the co-creation of support delivered to ensure ownership and sustainability.

Facilitating dialogue among different stakeholders

Some OSCE field operations are well placed to bring together and co-ordinate the actions of various national (and international) stakeholders and facilitate a dialogue among actors that otherwise might not so easily engage with each other. Providing a local platform for dialogue and co-ordination also helps maintain relationships with all relevant actors, thereby building trust for future co-operation.

Finding the right experts to deliver assistance

When field operations hire experts to implement anti-corruption projects, they need to strike the right balance between international and local experts. While international experts can bring ideas, perspectives and experiences from abroad, local experts know better the context, legislative framework and sensitivities. Field operations should be cautious when hiring local experts from the public sector to avoid any potential, actual or perceived conflict of interest, and should

refrain from paying services that ought to be covered generally by the tax-payers of the beneficiary country.

Knowledge sharing & co-ordination

Field operations should share their approaches towards anti-corruption assistance with other OSCE executive structures to ensure horizontal and vertical ownership and support, as well as further (regional) co-ordination of their efforts. Results and challenges should also be shared with the various review mechanisms (GRECO, Moneyval, UNCAC, OECD ACN) and other international organizations with different mandates and possibilities to push for the implementation of recommendations.



10. Management response and action plan

Recommendation	Client - Accept (Yes/No/Partially)	Implementation Plan (if not accepted, add managements comments)	Implementation Date (estimate)
<p>1) Ownership/sustainability: Seek ways of agreeing with beneficiaries on the exit strategy at a very early stage, through signature of memoranda of understanding or similar documents, to foster commitment and accountability, so that the activities are fully owned and anchored locally.</p>	<p>OMiS: No</p> <p>POiB: Yes</p>	<p>The Mission has a general MoU with the Government of Serbia (GoS) and is guided in its work by the mandate, covering broad aspects of its support to host authorities. MoUs are signed exceptionally, on specific, multi-stakeholder and complex projects that require the buy-in from the highest level of the respective institutions. However, signing an MoU may cause significant delays in project implementation, considering the time-consuming procedures in the host country institutions. At the same time, this also puts a significant administrative burden on both OMiS members and staff members in the Secretariat, which would not be conducive to providing flexible, targeted and needs-oriented assistance.</p> <p>Ahead of the new project proposal cycle for the upcoming year, the respective team sits down with partners and beneficiaries to discuss the Mission's plans, based on host country and institutions' needs. These co-ordination meetings serve as the buy-in mechanism to develop ownership and sustainability. In more recent years, the Mission has furthermore agreed with partners on specific areas to phase out from (i.e. soft skill training), yet follows up on the phased out areas (i.e. how has the institution incorporated a specific training activity into its internal curricula.). In the framework of the project proposals, a section on sustainability and exit strategy is included, which the Mission will further strengthen in the drafting of the proposals.</p> <p>In 2025, the POiB will contract two independent consultants (international or local) under Special Service Agreements (SSA) who will draft a document encompassing POiB's strategic approach towards anti-corruption assistance to ensure horizontal and vertical ownership, including a separate section on the exit strategy.</p> <p>The exit strategy chapter will be incorporated into memoranda of understanding (MoU) per OIO's recommendation #1 to foster commitment and accountability of beneficiaries.</p> <p>Currently, cooperation plans are signed every year with state partners outlining activities to be implemented during the project year. They establish the common ground for work and ensure commitment from both sides.</p>	<p>2025</p>

<p>2) Strategic whole-of-OSCE approach to anti-corruption assistance: Develop a whole-of-OSCE approach towards anti-corruption assistance that can guide the OSCE's anti-corruption assistance in OSCE regions/countries.</p>	<p>OCEEA, in collaboration with relevant executive structures: Yes</p>	<p>OCEEA, in collaboration with relevant executive structures, will prepare an OSCE Strategy on Anti-corruption. The strategy will encompass a range of key elements, including capacity building activities, preventive measures, legal framework, and institutional enhancements in the OSCE participating states. Furthermore, the OSCE recognizes the need for innovative approaches that can address evolving forms of corruption. To this end, the collaborative effort will involve ongoing dialogues and consultations with participating states, experts, and relevant stakeholders to ensure that the strategy remains dynamic and responsive to emerging challenges.</p> <p>OMiS: OMiS will rely on OCEEA to lead this endeavour, and stands ready to participate and contribute.</p>	<p>2024-2025</p>
<p>3) Strategic approach of FOs: Develop and share field operations' strategic approach towards anti-corruption assistance to ensure horizontal and vertical ownership and support from all OSCE executive structures and units.</p>	<p>OMiS: Yes</p> <p>POiB: Yes</p>	<p>OMiS has started working on the strategic document that will formalize the Mission's approach to assist the host country in fighting corruption and money laundering. The document will cover the five-year period, from 2024 to 2029, and will draw from Serbia's new Anti-Corruption Strategy, international anti-corruption documents, such as the UN Convention on Corruption and the most recent GRECO recommendations, OSCE commitments, and Serbia's unique challenges. While this is an initiative of the Rule of Law/Human Rights Department, this document will reflect the whole-of-Mission approach and cover all areas of the Mission's anti-corruption and anti-money laundering assistance.</p> <p>Upon approval by the Head of Mission, the document will be accessible to other OSCE Executive Structures.</p> <p>In 2025, the POiB will contract independent international or local SSA consultants to develop a comprehensive document underlying whole of POiB's strategic approach towards anti-corruption assistance to the host State, including a chapter on the exit strategy (please refer to recommendation #1). The strategic paper will ensure horizontal and vertical ownership and support from all OSCE Executive Structures and units.</p>	<p>July 2024</p> <p>2025</p>
<p>4) Monitoring and evaluation: Commission decentralized evaluations of larger</p>	<p>OCEEA: Yes</p>	<p>OCEEA has already been commissioning decentralized evaluations. By delegating evaluation processes to specific regions or entities, the OCEEA aims to capture nuanced insights, tailor interventions to unique circumstances, and foster a deeper understanding of the impact of its initiatives at the grassroots level. Commissioned decentralized evaluations also promote</p>	<p>Ongoing</p>

<p>projects and programmes in line with the OSCE's Evaluation Policy and disseminate results to relevant stakeholders.</p>	<p>OMiS: Yes</p> <p>POiB: Yes</p>	<p>knowledge-sharing, strengthens partnerships, and contributes to the development of sustainable evaluation practices within the regions under assessment.</p> <p>OMiS: The Mission's strategic document will be implemented for the period 2024 – 2029. Half-way through the implementation, the Mission will commission a decentralized evaluation to cover the period from 2022 to 2027, in light of the fact that the OIO-led evaluation covered the period 2011-2021. The Mission will plan the budget for this evaluation during the preparation of the 2027 UBP. Since other projects in the RoL/HR Department will qualify for the decentralized evaluations at the same time, requiring significant funds, the Mission would appreciate OIO support.</p> <p>In 2024, the POiB proposes to allocate funds for external evaluation through contracting independent consultants who will evaluate larger projects in line with OSCE's Evaluation Policy and disseminate results to relevant stakeholders.</p>	<p>November 2027</p> <p>2024-2027</p>
<p>5) Gender mainstreaming: Share existing information on how gender relates to corruption and anti-corruption across the Organization, and support field operations with the development of gender-targeted project components or projects.</p>	<p>OCEEA in collaboration with GIP/gender focal points and other stakeholders: Yes</p>	<p>The work has already been done, including through the group created by OSCE Gender Programme on Anti-corruption and Gender. OCEEA also works closely with OSCE Gender Programme during every stage of the project implementation, in order to mainstream gender into our initiatives and increase the positive and lasting impact of our action. OCEEA recognizes that empowering women and promoting gender equality are integral to sustainable anti-corruption efforts. By integrating gender considerations into project components, the organization contributes to broader social goals, fostering inclusive development and advancing the overall effectiveness of our anti-corruption initiatives.</p> <p>OMiS: In 2021, the Mission together with the Agency for Prevention of Corruption (Agency) developed an anti-corruption toolkit (Manual) aimed at gender mainstreaming of the Agency's operations. The Manual is published on the website of the Agency as well as on the OMiS website: Gender Perspective of the Prevention of Corruption OSCE https://www.osce.org/mission-to-serbia/556665</p> <p>The Mission will be happy to share its experience in assisting the Agency to develop the toolkit with any interested OSCE ES. Also, the Mission will appreciate to receive guidance and practical</p>	<p>Ongoing</p>

		advice from the OCEEA on the development of gender targeted project components or projects.	
<p>6) Internal co-ordination OCEEA: Facilitate structural sharing of information on activities and results within and between different OSCE executive structures through the establishment of a working group, network or similar.</p>	<p>OCEEA in collaboration with relevant executive structures: Yes</p>	<p>OCEEA will create an anti-corruption working group, which will co-ordinate on OSCE efforts in preventing and combatting corruption in the OSCE region. This initiative aims to streamline and enhance collaborative efforts across the organization, consolidating resources and expertise to effectively prevent and combat corruption. The working group will facilitate a cohesive and synchronized approach to address the emerging challenges posed by corruption within the OSCE region.</p> <p>OMiS: The Mission relies on the OCEEA to initiate. It may not necessarily be a WG, but could be biannual exchanges.</p>	<p>2024-2025</p>
<p>7) Internal co-ordination OMiS: Improve internal co-ordination on anti-corruption assistance within OMiS by organizing structural information exchange between relevant units and staff.</p>	<p>OMiS: Yes</p>	<p>OMiS: The 2024-2029 strategic document that the Mission is developing to define its approach to assisting the host country in fighting corruption and money laundering will define structural information exchanges and co-ordination between the relevant OMiS departments. In the meantime, regular internal co-ordination meetings with relevant units and staff are being held. Meetings are held on a monthly basis between RoL and SCD and can include DD and Media, depending on the topic. OMiS also holds interdepartmental planning meetings prior to drafting respective UB projects to decide on specific areas of cross-programmatic co-operation.</p>	<p>July 2024</p>
<p>8) External co-ordination OCEEA: Explore further co-ordination and collaboration with other international organizations to collectively advocate</p>	<p>OCEEA in collaboration with other executive structures: Yes</p>	<p>OCEEA will conduct a stakeholder mapping in collaboration with other Executive structures. The stakeholder mapping process aims to identify and engage key actors within the international community, including other organizations, agencies, and entities working towards common goals on regional and local levels. By understanding the diverse landscape of stakeholders, OCEEA seeks to establish co-operation and foster synergies that will amplify the impact of collective efforts.</p> <p>In addition to stakeholder mapping, OCEEA envisions the creation of a formal or informal coordination group. This group will serve as a structured platform where representatives from OSCE and other international organizations can convene to share valuable insights, updates,</p>	<p>2024-2025</p>

<p>for the implementation of agreed actions or reforms, for instance through establishing a formal co-ordination body or similar to share practices and co-ordinate support actions.</p>		<p>and information on their respective activities. This collaborative mechanism will be designed to promote transparency, reduce duplication of efforts, and enhance overall coordination in addressing shared challenges.</p> <p>The coordination group will provide a dynamic forum for open dialogue, enabling participants to exchange best practices, lessons learned, and innovative approaches. Through this interactive platform, OCEEA and its counterparts aim to leverage the collective strengths of diverse organizations, thereby maximizing the efficiency and effectiveness of their combined initiatives.</p> <p>OMiS: The Mission will rely on OCEEA to initiate; finds the proposal useful. The Mission already collaborates with international organizations such as the Council of Europe, UNODC, The EU, GIZ as well as the US and other embassies active in improving the rule of law in Serbia.</p>	
<p>9) External co-ordination OMiS: Provide a platform for co-ordination and collaboration among different stakeholders providing anti-corruption support in Serbia.</p>	<p>OMiS: Partially</p>	<p>There is an existing platform owned by the Government of Serbia, where both national and international stakeholders participate and exchange information and views. In line with Serbia's European accession plans, the Ministry of European Integration, together with other relevant Ministries (in this case the Ministry of Justice) is in charge of co-ordinating sector-specific support to key reform areas, including on anti-corruption. These co-ordination meetings take place two to four times a year, for which an Excel table is shared that is filled out by international partners to include their projects on specific areas. The Mission regularly contributes to these sectors working group meetings. In addition, the Mission's Security Co-operation Department hosts an international partner meeting on police reform and support to the Ministry of Interior, in which the Rule of Law and Human Rights and other Departments are also invited to attend. In this meeting, assistance in the area of preventive corruption practices in the police as well as investigations for example are also discussed. Furthermore, in the framework of other projects, the Mission has regular exchanges with international actors on the topic (GIZ, EU, Council of Europe, UNDP), from the highest to the technical level. In addition, the Mission has for the past seven (7) years been organizing the international anti-corruption conference gathering of relevant national and international stakeholders to discuss the outstanding issues in the area of corruption prevention.</p>	

Annex I: List of evaluation findings

COMPARATIVE ADVANTAGE

SERBIA

Finding 1. OMiS has been present in Serbia for more than 20 years, has built relationships with every institution it has worked with or helped set up; gained trust as a reliable, understanding and highly engaged partner; has listened to the needs of beneficiaries; and has delivered as agreed.

Finding 2. As compared to other international organizations, OMiS is perceived as flexible, having less bureaucratic procedures, able to adapt quickly to emerging needs and to quickly employ local experts who know the context, legislative framework and are preferred when sensitive topics are discussed.

Finding 3. Beneficiaries have confidence in OMiS as a reliable and professional partner; they perceive it as a demand-driven organization that has no other agenda than to help them with their needs. They listen attentively to its advice and recommendations even if, in the beginning, they do not always agree with its points of view.

KYRGYZSTAN

Finding 22. The OSCE, through its Programme Office in Bishkek, has become a long-term, trusted partner of the Government, and is the only international organization working with the state and municipal bodies on anti-corruption issues (and is therefore in a unique position). It uses this strength to drive innovative reforms through digitalization or to act as a catalyst of legislative reforms, being well aware that many corruption risks are embedded in the legislation.

CROSS-CUTTING

Finding 33. The OSCE has long-standing political relationships that facilitate crucial access needed to implement anti-corruption projects in pS.

Finding 34. The OSCE works demand-driven and demonstrates a comparatively higher level of flexibility, enabling it to better and more quickly respond to pS' needs and requests.

Finding 35. The OSCE provides anti-corruption assistance in niche areas that have not received much attention by other international organizations or peer review mechanisms.

VALUE-ADDED

SERBIA

Finding 4. Having in-depth knowledge of the context, OMiS provides on the one hand advice for beneficiaries and helps them make contacts to other international organizations or projects, while on the other it assists the government authorities in understanding and complying with the recommendations made by international organizations (GRECO, FATF/Moneyval, EU).

Finding 5. OMiS is a dialogue-builder among different national-level stakeholders, bringing them together at one table and 'opening the doors' to where their entry would otherwise be denied.

KYRGYZSTAN

Finding 18. POiB's approach to helping partners is flexible, non-bureaucratic; the anti-corruption assistance is holistic, focusing on building high quality, long-term and sustainable risk-based corruption prevention mechanisms. The local experts hired by the OSCE are highly qualified, dedicated and resilient to outside pressure.

Finding 19. Being a long-term and trusted partner, POiB has found ways of protecting good initiatives against the backdrop of various regime changes.

Finding 20. POiB has played an important role in supporting the government authorities to make contact with other international organizations (e.g., GRECO), understand and comply with their recommendations (OECD ACN) and improve the country's rating by helping it to be removed from the FATF 'grey list'.

Finding 21. The OSCE's anti-corruption work is seen as having a direct impact to building security in the country by keeping anti-corruption work on track because corruption is perceived as a cross-dimensional issue and national security threat.

CROSS-CUTTING

Finding 36. OSCE's anti-corruption assistance adds value to security co-operation by promoting good governance in general and in the security sector specifically.

Finding 37. Building on and integrating anti-corruption efforts into the work streams of the different dimensions of security, anti-corruption assistance enhances the OSCE's comprehensive approach to security.

COHERENCE

SERBIA

Finding 6. OMiS co-operates with other OSCE executive structures (e.g., OCEEA or ODIHR) when they organize regional conferences or joint projects, but with regard to anti-corruption activities this is not so frequent.

Finding 7. On the mission level, different units and departments co-ordinate more frequently as they sometimes need to contact the same beneficiaries that have different units working with them; however, co-operation is limited.

Finding 8. Although OMiS has been helping the national authorities implement international requirements issued by other organizations, the co-ordination among different international players could be improved.

KYRGYZSTAN

Finding 23. Coordination on the national level is ensured by POiB, working very closely with the Ministry of Foreign Affairs and having meetings with the National Security Council, where ministries, law enforcement, business community and civil society meet; co-ordination on the OSCE level is conducted through annual mission meetings; and co-ordination with donors is conducted through donor co-ordination meetings (however, the latter is limited regarding anti-corruption work, as the POiB is currently (as per 2023) the only organization that supports the Government in this area).

Finding 24. The projects run by POiB under the same umbrella of 'good governance' comprise many individual activities (fighting corruption, money-laundering, financing of terrorism), yet the actual link between them is not always clear as those activities have different beneficiaries and implementing partners.

CROSS-CUTTING

Finding 38. Internally, there are examples of effective collaboration between different executive structures on anti-corruption assistance, but collaboration between the Secretariat and field operations can be further improved.

Finding 39. Externally, anti-corruption assistance is co-ordinated closely with the assisted participating States, but there is room for improvement in co-ordinating and collaborating with other international organizations.

EFFECTIVENESS

SERBIA

Finding 9. Most of the intended results of OMiS's anti-corruption assistance were achieved: the legislative framework (on corruption prevention, public procurement, lobbying, codes of conduct and many others) was significantly improved; specialized anti-corruption bodies built (Agency for Prevention of Corruption, Anti-Corruption Department, specialized anti-corruption prosecutors and judiciary, Public Procurement Office and Commission for Protection of Rights in Public Procurement); and capacities of operational staff were significantly strengthened.

Finding 10. Despite the primary mandate of OMiS being to work with the Government, it has also helped build the capacities of the non-governmental sector and journalists to oversee the work of anti-corruption bodies.

Finding 11. OMiS's long-term engagement in building capacities of specialized anti-corruption bodies, in particular in the police and prosecution, had a limited effect on the impunity of top-level officials, as almost no high-level corruption cases were addressed.

Finding 12. OMiS units dealing with anti-corruption have reached the 'glass ceiling' on their level to see positive change in reducing corruption, referring to the lack of political will and the limitations of their mandate (which is also shared and understood by their partners both in government and the non-governmental sector), yet there is an expectation by some that the OSCE should do more to not validate improper actions of the government.

Finding 13. The mandate of OMiS as a field operation is limited in terms of driving anti-corruption reforms when there is no genuine demand for it or if the demand is changing, which sometimes leads to initially well-planned activities to be not implemented effectively.

Finding 14. Without being strategic about its anti-corruption assistance, OMiS might risk becoming an emergency service provider, a niche-filler, rather than a strategic and long-standing partner that can not only be relied upon but also listened to.

KYRGYZSTAN

Finding 25. Despite three regime changes and a high turnover of government officials, many of POiB's intended anti-corruption assistance results were achieved, which should eventually lead to having a robust corruption prevention system in place.

Finding 26. One indirect (and arguably, unintended) result of the OSCE's anti-corruption assistance is the role played by POiB and ODIHR when helping other organizations perform their evaluations of the country and strengthening their impact by joining forces in pursuing international standards.

Finding 27. Few initiatives did not prove to be as effective as initially planned (intended), and which were eventually discontinued by POiB.

Finding 28. Over the last two years (2021-2023) the anti-corruption situation in the country has been deteriorating, which might have had a negative effect on the overall impact of anti-corruption assistance provided.

Finding 29. An effective implementation of activities has been hampered by three factors: 1) the change of government priorities, restructuring of government bodies, and staff turnover related to the regime changes; 2) the closure of the field office in Osh in 2017, which had previously enjoyed closer interaction with the regions, and 3) less direct work with civil society.

CROSS-CUTTING

Finding 40. Although OSCE anti-corruption outputs have the potential to contribute to meaningful anti-corruption outcomes at the national level, the evaluation team was not able to objectively assess the OSCE's contribution to outcomes for the Organization as a whole.

Finding 41. The OSCE executive structures would benefit from developing a theory of change that describes how and why OSCE interventions are expected to make contributions to anti-corruption outcomes.

Finding 42. Facilitating factors include government commitment, multi-stakeholder approaches, local ownership, high quality technical assistance and adaptive management strategies.

Finding 43. Inhibiting factors include shifting political support, lack of co-ordination and strategic approach, and resource limitations.

SUSTAINABILITY

SERBIA

Finding 15. OMIS's approach to implementing activities has been well thought through: all actions were undertaken incrementally with sustainability in mind, making sure that they are comprehensive and have a lasting effect.

Finding 16. The dependence on donor assistance (including the OSCE's assistance) has been excessive, discouraging the government from searching for the budget knowing that donors would make it available to them. If the OSCE cannot provide support, then there will be others.

KYRGYZSTAN

Finding 30. With regard to the most successful projects that are fully owned by the state authorities and which are regulated in adopted legislation, manuals and methodologies and have dedicated institutions, their fruits will likely remain sustainable yet external assistance is needed to make further improvements.

Finding 31. Sustainability of assistance is an issue in a country undergoing transformations, government reshuffles and priority changes and therefore external support is necessary to protect the positive changes that have taken place.

CROSS-CUTTING

Finding 44: Anti-corruption work needs local ownership and political will to create systemic change in the long run.

Finding 45: Support for digital tools and legislative reform are more likely to result in sustainable gains.

GENDER EQUALITY

SERBIA

Finding 17. Although OMiS pioneered a project with APC, producing a series of training courses and a manual for the public sector on gender issues, most of the implemented projects have a low 'gender' marker.

KYRGYZSTAN

Finding 32. Gender equality is considered a cross-dimensional issue and POiB understands the importance of communicating it to the government partners, for instance by encouraging, wherever possible, the equal participation of women and men in training courses; when creating promotional or educational videos; by making sure that no gender 'feels disadvantaged'; by actively promoting women-led NGOs; and by ensuring equal pay for consultants irrespective of their gender.

CROSS-CUTTING

Finding 46: OSCE staff recognize the importance of gender equality and consider gender aspects when possible in their anti-corruption work, but it is often not seen as the most relevant element by beneficiaries of OSCE assistance.

Annex II: List of documents cited

OSCE documents

1. Aleksandar Živanovič, Evaluation of the Project *Enhancing the Capacities of the Serbian Police to Fight Corruption – Phase 2, 2017–2021*, commissioned by the OSCE, 2021.
2. OMiS self-assessment reports, from 2017 to 2021.
3. OSCE Mission to Serbia, brochure. Accessed on 27 February 2023, https://www.osce.org/files/f/documents/8/e/285186_0.pdf.
4. OSCE, Best practices in combating corruption, accessed on 8 January 2023, <https://www.osce.org/files/f/documents/9/a/13738.pdf>.
5. OSCE, [Final Document of the Nineteenth Meeting of the Ministerial Council, Dublin, 6-7 December 2012 | OSCE](#).
6. OSCE, [Final Document of the Twelfth Meeting of the Ministerial Council, Sofia, 6-7 December 2004 | OSCE](#).
7. OSCE, [Final Document of the Twenty-First Meeting of the Ministerial Council, Basel, 4-5 December 2014 | OSCE](#).
8. OSCE Ministerial Council Decision 4/16 on Strengthening Good Governance and Promoting Connectivity. Hamburg, 2016," accessed on 10 January 2023, <https://www.osce.org/files/f/documents/2/8/289316.pdf>. MC.DEC/4/16 (osce.org)
9. OSCE Ministerial Council Decision No. 6/20 on Preventing and Combating Corruption through Digitalization and Increased Transparency. Tirana, 2020," accessed on 10 April 2023, <https://www.osce.org/files/f/documents/3/7/479759.pdf>.
10. OSCE Ministerial Council Decision No. 11/04 on Combating Corruption, accessed on 26 December 2022, <https://www.osce.org/files/f/documents/7/4/23047.pdf>
11. OSCE Ministerial Council Decision No. 6/20 on Preventing and Combating Corruption Through Digitalization and Increased Transparency, accessed on 20 March 2023, <https://www.osce.org/files/f/documents/3/7/479759.pdf>
12. OSCE Permanent Council Decisions No. 245 of 23 July 1998, No. 339 of 10 February 2000 and No. 1250 of 27 April 2017.
13. OSCE Secretariat Conflict Prevention Centre. *Guidelines for OSCE Staff. Security Sector Governance and Reform, Vienna, January 2022*, accessed on 2 April 2023, <https://www.osce.org/secretariat/512470>.
14. OSCE Secretariat Conflict Prevention Centre, 13 September 2021, 33, accessed on 20 March 2023, https://www.osce.org/files/f/documents/6/5/74783_3.pdf.
15. OSCE, Trial Monitoring: A Reference Manual for Practitioners, Revised edition 2012, accessed on 8 January 2023, <https://www.osce.org/odihr/94216>.
16. POiB Self-assessment reports, from 2014 until 2021.

17. Secretariat of the OSCE and UNODC Joint Action Plan 2020–2022, signed on 17 July 2020.

Council of Europe documents

18. “Council of Europe Criminal Law Convention on Corruption. Strasbourg, 27 January 1999,” accessed on 26 December 2022, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168007f3f5>

19. “Council of Europe Group of States against Corruption. Fourth Evaluation Round. Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors. Compliance Report Serbia. Strasbourg 16–20 October 2017,” accessed on 28 February 2023, <https://rm.coe.int/fourth-evaluation-round-corruption-prevention-in-respect-of-members-of/1680792e56>.

20. “Council of Europe Group of States against Corruption. Fifth Evaluation Round. Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. Report on Serbia. Strasbourg 21–25 March 2022,” accessed on 28 February 2023, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a7216b>.

21. *European Commission for Democracy for Law (Venice Commission), OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR). Joint Opinion on the Draft Amendments to the Legal Framework on the Disciplinary Responsibility of Judges in the Kyrgyz Republic, 13–14 June 2014, Venice*, accessed on 12 March 2023, <https://www.osce.org/files/f/documents/f/b/120508.pdf>.

FATF/Moneyval/Eurasian Group documents

22. “Eurasian Group on Combating Money Laundering and Financial of Terrorism. First Mutual Evaluation on Anti-Money Laundering and Combating the Financing of Terrorism. Kyrgyz Republic,” 14 June 2007, accessed on 21 March 2023, <https://eurasiangroup.org/files/uploads/files/news/eagkyrgyz.pdf>.

23. “Financial Action Task Force. Publication. Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Moneyval). Anti-Money laundering and Counter Terrorist Financing Issues. Serbia. 4th Enhanced Follow-up Report and Technical Compliance Re-Rating. November 2021,” accessed on 3 March 2023, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Fur-serbia-2021.html>.

European Commission documents

24. *European Commission, 2022 Communication on EU Enlargement policy, Serbia 2022 Report, Brussels, 12 October 2022*, accessed on 28 February 2023, <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Serbia%20Report%202022.pdf>.

25. *Serbia 2022 Report, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 12 October 2022, 19*, accessed on 4 March 2023, <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Serbia%20Report%202022.pdf>.

Organization for Economic Cooperation and Development. Anti-Corruption Network

26. *Organization for Economic Cooperation and Development. Anti-Corruption Network for Eastern Europe and Central Asia. Anti-corruption reforms in Kyrgyzstan. 4th round of monitoring of the Istanbul Anti-Corruption Action Plan. 4 July 2018, Paris, 16–17*, accessed on 7 February 2023, <https://www.oecd.org/corruption/acn/OECD-ACN-Kyrgyzstan-4th-Round-Monitoring-Report-2018-ENG.pdf>.

United Nations documents

27. *United Nations. Conference of the States Parties to the United Nations Convention against Corruption. Executive summary of the report. Serbia. Vienna, 2–6 June 2014*, accessed on 1 March 2023, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1401187e.pdf>
28. *United Nations. Conference of the States Parties to the United Nations Convention against Corruption. Executive summary of the report on Serbia. Vienna, 2–6 June 2014, 13*, accessed on 1 March 2023, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1401187e.pdf>
29. *United Nations. Conference of the States Parties to the United Nations Convention against Corruption. Executive summary of the report. Kyrgyz Republic. Vienna, 19–23 June 2017*, accessed on 1 March 2023, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1702230e.pdf>.
30. *United Nations Convention against Corruption. New York, 2004*, accessed on 26 December 2022, https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.

Press releases, articles, publications

31. *Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Moneyval). Moneyval congratulates Serbia for removal from FATF's grey list*, accessed on 1 March 2023, https://www.coe.int/en/web/moneyval/home/newsroom/-/asset_publisher/zTE3FjHi4YJ7/content/moneyval-congratulates-serbia-for-removal-from-fatf-s-grey-list-.

32. Committee to Project Journalists. *Kyrgyz authorities order Kloop news outlet to take down article on alleged corruption*, 2 February 2023, accessed on 12 February 2023, <https://cpj.org/2023/02/kyrgyz-authorities-order-kloop-news-outlet-to-take-down-article-on-alleged-corruption/>.
33. Daily Krik. *President of the High Court Stepanovič: We do not have trials for high corruption, Dolovac makes statements as if we live in Scandinavia*, 11 November 2020, accessed on 5 March 2023, <https://www.krik.rs/predsednik-viseg-suda-stepanovic-nemamo-sudjenja-za-visoku-korupciju-dolovac-daje-izjave-kao-da-zivimo-u-skandinaviji/>
34. Global voices. *No good news for media freedom in Kyrgyzstan as government arrests journalists, activists, and bloggers*, 19 December 2022, accessed on 2 February 2023, <https://globalvoices.org/2022/12/19/no-good-news-for-media-freedom-in-kyrgyzstan-as-government-arrests-journalists-activists-and-bloggers/>.
35. Euractiv. *Serbia to receive largest-ever grant to rebuild railway*, 21 February 2023, accessed on 1 March 2023, <https://www.euractiv.com/section/politics/news/serbia-to-receive-largest-ever-eu-grant-to-rebuild-railway/>.
36. OSCE. *OSCE Programme Office in Bishkek. Kyrgyzstan removed from FATF non-co-operative countries list, with OSCE assistance*, accessed on 21 March 2023, <https://www.osce.org/bishkek/120724>.
37. Reporters without Borders. *Kyrgyzstan: RSF Condemns the deportation of Bolot Temirov to Russia*, accessed on 2 February 2023, <https://rsf.org/en/kyrgyzstan-rsf-condemns-deportation-bolot-temirov-russia>.
38. U4 Anti-Corruption Resource Centre, *Serbia: Overview of Corruption and Anti-Corruption Changes in the Last 10 Years*, 17 April 2020, accessed on 4 March 2022, <https://www.u4.no/publications/undefined.pdf>
39. Wouter Zweers et al., “The EU as a promoter of democracy or ‘stabilitocracy’ in the Western Balkans?” A report by The Clingendael Institute and the Think for Europe Network (TEN), February 2022. Accessed on 3 March 2023, <https://www.clingendael.org/publication/eu-promoter-stabilitocracy-western-balkans>.

Indexes

40. Mungiu-Pippidi, Alina, *European Research Centre for Anti-Corruption and State-Building (ERCAS) and the Center for International Private Enterprise (CIPE). Kyrgyzstan’s Corruption Forecast, 2021*, accessed on 8 January 2023, <https://corruptionrisk.org/country/?country=KGZ#forecast>.
41. Mungiu-Pippidi, Alina, *European Research Centre for Anti-Corruption and State-Building (ERCAS) and the Center for International Private Enterprise (CIPE). Serbia’s Corruption Forecast, 2021*, accessed on 4 March 2023, <https://corruptionrisk.org/integrity/>
42. Transparency International. *Corruption Perception Index*, accessed on 7 January 2023, <https://www.transparency.org/en/cpi/2022>.

43. Transparency International. *Corruption Perception Index. Kyrgyzstan*, accessed on 7 January 2023, <https://www.transparency.org/en/cpi/2021/index/kgz>.
44. World Bank. *Worldwide Government Indicators. Kyrgyzstan's Control of Corruption in 1995–2021*, accessed on 8 January 2023, <http://info.worldbank.org/governance/wgi/Home/Reports>.
45. World Bank. *Worldwide Government Indicators. Control of Corruption in 2011–2021 in Kyrgyzstan, Europe and Central Asia*, accessed on 8 January 2023, <http://info.worldbank.org/governance/wgi/Home/Reports>.

Websites

46. Agency for Prevention of Corruption of Serbia. Website. Accessed on 10 March 2023, <https://www.acas.rs/eng/index>
47. FATF website. <https://www.fatf-gafi.org/>.
48. Government of the Republic of Serbia. Ministry of European Integration. “EU funds,” accessed on 1 March 2023, <https://www.mei.gov.rs/eng/funds/eu-funds/>
49. GRECO, <https://www.coe.int/en/web/greco>
50. Kyrgyz Tourism. “The Flag of the Kyrgyz Republic,” accessed on 20 March 2023, <https://kyrgyzstan-tourism.com/blog/kyrgyz-flag/>
51. Moneyval website. <https://www.coe.int/en/web/moneyval>
52. OECD, <https://www.oecd.org/corruption/acn/>
53. Organization for Security and Co-operation in Europe. “What is the OSCE,” accessed on 14 March 2023, <https://www.osce.org/whatistheosce>
54. OSCE. Programme Office in Bishkek website, <https://www.osce.org/programme-office-in-bishkek>.
55. OSCE Mission to Serbia website. <https://www.osce.org/mission-to-serbia>
56. OSCE website. www.osce.org.
57. Open Government Partnership. <https://www.opengovpartnership.org/our-members/>.
58. Transparency International website. <https://www.transparency.org/en/cpi/2022>.

Endnotes:

- ¹ OSCE Ministerial Council Decision No. 11/04 on Combating Corruption, accessed on 26 December 2022, <https://www.osce.org/files/f/documents/7/4/23047.pdf>.
- ² The EU, for instance, spent around €3.5 billion in the period from 2010 to 2021 on supporting justice systems and anti-corruption frameworks abroad, <https://ecdpm.org/work/rethinking-eu-support-rule-law-taking-stand-sustainable-development>. The expenditures are also modest in comparison to OSCE's total expenditures, which in 2021 were €135.7 million for UB and €27.0 million for ExB.
- ³ Due to limited resources, OIO was not able to undertake additional field visits for this evaluation.
- ⁴ What is corruption, Transparency International, <http://www.transparency.org/what-is-corruption>
- ⁵ For instance, it does not include the other 'party' to the act of corruption, which might not necessarily have power but is still seeking personal benefits by illegal means, for instance, to avoid something (e.g., a fine) or to obtain something (e.g., a privilege).
- ⁶ Council of Europe Criminal Law Convention on Corruption. Strasbourg, 27 January 1999, accessed on 26 December 2022, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168007f3f5>; United Nations Convention against Corruption. New York, 2004, accessed on 26 December 2022, https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.
- ⁷ OSCE, Best practices in combating corruption, accessed on 8 January 2023, <https://www.osce.org/files/f/documents/9/a/13738.pdf>.
- ⁸ OECD, <https://www.oecd.org/corruption/acn/>, GRECO, <https://www.coe.int/en/web/greco>.
- ⁹ Final Document of the Twelfth Meeting of the Ministerial Council, Sofia, 6–7 December 2004 | OSCE
- ¹⁰ Final Document of the Nineteenth Meeting of the Ministerial Council, Dublin, 6–7 December 2012 | OSCE
- ¹¹ Final Document of the Twenty-First Meeting of the Ministerial Council, Basel, 4–5 December 2014 | OSCE
- ¹² OSCE Ministerial Council Decision 4/16, Strengthening Good Governance and Promoting Connectivity. Hamburg, 2016, accessed on 10 January 2023, <https://www.osce.org/files/f/documents/2/8/289316.pdf>. MC.DEC/4/16 (osce.org).
- ¹³ OSCE Ministerial Council Decision No. 6/20, Preventing and Combating Corruption through Digitalization and Increasing Transparency. Tirana, 2020, accessed on 10 April 2023, <https://www.osce.org/files/f/documents/3/7/479759.pdf>.
- ¹⁴ Normally it consists of two preparatory meetings and a concluding Forum in September. As the participating States could not agree on the proposed agenda for 2023, it was organized as a Chair's conference in 2023.
- ¹⁵ The evaluation team later also came across a project implemented by the Transnational Threats Department in the Secretariat, which is not included in this table. In 2015–2016, the TNTD implemented an Anti-Corruption Interactive Training Programme for Border Guards, Customs Services and Anti-Corruption Authorities of Moldova and Ukraine, which resulted in a platform for regional border security and management services to co-operate and share experiences, but had no follow-up to date.
- ¹⁶ The total expenditures are for all projects, which in several instances included not only anti-corruption but also other components, including activities against money laundering and terrorist financing, border security, business regulation or other topics.
- ¹⁷ UB expenditures do not include staff salaries. Extrabudgetary funding was provided by (in alphabetical order) Austria, Belgium, Canada, the Central European Initiative, Czechia, the European Bank for Reconstruction and Development, Finland, France, Germany, Italy, Morocco, Lichtenstein, Lithuania, Netherlands, Norway, Serbia, Switzerland, Turkey and the United States.
- ¹⁸ In addition to ExB project expenditures, OCEEA estimates that approximately 30–35 per cent of the OCEEA's operational expenses (€420,400 in 2021) have been directed towards anti-corruption initiatives over the years, to fund activities such as the development of the Handbook on Combating Corruption (2016), its translation into Russian and other languages, the development of e-modules, and anti-corruption activities related to the annual Economic and Environment Forum.
- ¹⁹ All references to Kosovo, whether to the territory, institutions or population, in this text should be understood in full compliance with United Nations Security Council Resolution 1244.
- ²⁰ OSCE, Trial Monitoring: A Reference Manual for Practitioners, Revised Edition 2012, accessed on 8 January 2023, <https://www.osce.org/odjhr/94216>

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- ²¹ Given the complexity of the concept of corruption itself, as well as the latent and changing nature of its different forms, the measurement of corruption and anti-corruption poses many challenges. Due to its covert nature, corruption is often measured by the perception of it, Transparency International's Corruption Perception Index (CPI) is the most known measure, conducted since 1995.
- ²² Transparency International, Corruption Perception Index, accessed on 6 January 2023, <https://www.transparency.org/en/cpi/2012> and <https://www.transparency.org/en/cpi/2021>.
- ²³ Control of Corruption captures perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests. Percentile rank indicates the country's rank among all countries covered by the aggregate indicator, with 0 corresponding to the lowest rank and 100 to the highest.
- ²⁴ World Bank. Worldwide Governance Indicators, accessed on 6 January 2023, <https://info.worldbank.org/governance/wgi/Home/Reports>
- ²⁵ Of the 31 respondents, 10 were former staff members; 21 of them filled out the multiple-choice questions that were used to create graphs for the Cross-cutting Findings section.
- ²⁶ OSCE Mission to Serbia, brochure, accessed on 27 February 2023, https://www.osce.org/files/f/documents/8/e/285186_0.pdf.
- ²⁷ Ibid.
- ²⁸ Underlined by the author, OSCE Mission to Serbia, official website, accessed on 27 February 2023, <https://www.osce.org/mission-to-serbia/good-governance>.
- ²⁹ Council of Europe Group of States against Corruption. Fourth Evaluation Round. Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors. Compliance Report Serbia. Strasbourg 16–20 October 2017, accessed on 28 February 2023, <https://rm.coe.int/fourth-evaluation-round-corruption-prevention-in-respect-of-members-of/1680792e56>.
- ³⁰ Council of Europe Group of States against Corruption. Fifth Evaluation Round. Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. Report on Serbia. Strasbourg 21–25 March 2022, accessed on 28 February 2023, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a7216b>.
- ³¹ Financial Action Task Force. Publication. Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Moneyval). Anti-Money laundering and Counter Terrorist Financing Issues. Serbia. 4th Enhanced Follow-up Report and Technical Compliance Re-Rating. November 2021, accessed on 3 March 2023, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Fur-serbia-2021.html>.
- ³² Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Moneyval). Moneyval congratulates Serbia for removal from FATF's grey list, accessed on 1 March 2023, https://www.coe.int/en/web/moneyval/home/newsroom/-/asset_publisher/zTE3FjHi4YJ7/content/moneyval-congratulates-serbia-for-removal-from-fatf-s-grey-list.
- ³³ "United Nations. Conference of the States Parties to the United Nations Convention against Corruption. Executive summary of the report. Serbia. Vienna, 2–6 June 2014," accessed on 1 March 2023, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1401187e.pdf>.
- ³⁴ UNCAC Civil Society Coalition. UNCAC Review Status, accessed on 1 March 2023, <https://uncaccoalition.org/pagesuncacreviewstatustracker>.
- ³⁵ Underlined by the evaluator. United Nations. Conference of the States Parties to the United Nations Convention against Corruption. Executive summary of the report on Serbia. Vienna, 2–6 June 2014, 13, accessed on 1 March 2023, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1401187e.pdf>.
- ³⁶ Government of the Republic of Serbia. Ministry of European Integration. EU funds, accessed on 1 March 2023, <https://www.mei.gov.rs/eng/funds/eu-funds>.
- ³⁷ Euractiv. "Serbia to receive largest-ever grant to rebuild railway," 21 February 2023, accessed on 1 March 2023, <https://www.euractiv.com/section/politics/news/serbia-to-receive-largest-ever-eu-grant-to-rebuild-railway>.
- ³⁸ European Commission, 2022 Communication on EU Enlargement policy, Serbia 2022 Report, Brussels, 12 October 2022, accessed on 28 February 2023, <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Serbia%20Report%202022.pdf>.
- ³⁹ Wouter Zweers et al., The EU as a promoter of democracy or 'stabilitocracy' in the Western Balkans?, A report by The Clingendael Institute and the Think for Europe Network (TEN), February 2022. Accessed on 3 March 2023, <https://www.clingendael.org/publication/eu-promoter-stabilitocracy-western-balkans>.
- ⁴⁰ Ranking the perceived levels of public sector corruption from 0 (perceived as highly corrupt) to 100 (very clean).
- ⁴¹ Transparency International. Corruption Perception Index. Serbia, accessed on 1 March 2023, <https://www.transparency.org/en/cpi/2022/index/srb>.
- ⁴² Transparency International. Corruption Perception Index, accessed on 2 March 2023.
- ⁴³ World Bank. Worldwide Government Indicators, accessed on 4 March 2023, <http://info.worldbank.org/governance/wgi/Home/Reports>.

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- ⁴⁴ Percentile rank indicates the percentage of countries worldwide that rate below the selected country. Higher values indicate better governance ratings. This statistically likely range of the governance indicator in percentile rank terms is shown as a thin black line. For instance, a bar of the length of 75 per cent is interpreted as follows: an estimated 75 per cent of the countries rate worse and an estimated 25 per cent of the countries rate better than the selected country. The thin black lines indicate the corresponding 90 per cent confidence interval.
- ⁴⁵ World Bank, Worldwide Government Indicators, accessed on 4 March 2023, <http://info.worldbank.org/governance/wgi/Home/Reports>.
- ⁴⁶ Mungiu-Pippidi, Alina, European Research Centre for Anti-Corruption and State-Building (ERCAS) and the Center for International Private Enterprise (CIPE). Serbia's Corruption Forecast, 2021, accessed on 4 March 2023, <https://corruptionrisk.org/country/?country=SRB>.
- ⁴⁷ Ibid.
- ⁴⁸ U4 Anti-Corruption Resource Centre, Serbia: Overview of Corruption and Anti-Corruption Changes in the Last 10 Years, 17 April 2020, accessed on 4 March 2022, <https://www.u4.no/publications/undefined.pdf>.
- ⁴⁹ US Mission to the OSCE's contribution of €700,000 in 2011–2013.
- ⁵⁰ Italy's contribution of €15,000 in 2017 and 2018.
- ⁵¹ Norway's and Italy's contribution of 360,000 and 60,000 respectively in 2017–2021.
- ⁵² Agency for Prevention of Corruption of Serbia. Website. accessed on 10 March 2023, <https://www.acas.rs/eng/index>.
- ⁵³ Aleksandar Živanović, Evaluation of the Project *Enhancing the Capacities of the Serbian Police to Fight Corruption – Phase 2, 2017–2021*, commissioned by the OSCE, 2021.
- ⁵⁴ Council of Europe, Group of States Against Corruption, Serbia's Fifth Evaluation Round, 21–25 March 2022, page 12, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a7216b>
- ⁵⁵ Agency for Prevention of Corruption. Projects. Facility Supporting Strengthening Rule of Law in the Republic of Serbia (EU for Fight Against Corruption and for Fundamental Rights), accessed on 15 March 2023, https://www.acas.rs/eng/pages_eng/projects.
- ⁵⁶ Secretariat of the OSCE and UNODC Joint Action Plan 2020–2022, signed on 17 July 2020.
- ⁵⁷ Daily *Krik*. President of the High Court Stepanović: We do not have trials for high corruption, Dolovac makes statements as if we live in Scandinavia, 11 November 2020, accessed on 5 March 2023, <https://www.krik.rs/predsednik-viseg-suda-stepanovic-nemamo-sudjenja-za-visoku-korupciju-dolovac-daje-izjave-kao-da-zivimo-u-skandinaviji/>.
- ⁵⁸ Serbia 2022 Report, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 12 October 2022, 19, accessed on 4 March 2023, <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Serbia%20Report%202022.pdf>
- ⁵⁹ Underlined by the author. Website of the Agency for Prevention of Corruption, accessed on 5 March 2023, https://www.acas.rs/eng/pages_eng/projects
- ⁶⁰ The Istanbul Anti-Corruption Action Plan (IAP) is a sub-regional peer-review programme launched in 2003 in the framework of the OECD ACN. It supports anti-corruption reform in Armenia, Azerbaijan, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Mongolia, Tajikistan, Ukraine and Uzbekistan through country reviews and continuous monitoring of the participating countries' implementation of recommendations to assist with the implementation of the UN Convention against Corruption (UNCAC) and other international standards and best practices.
- ⁶¹ United Nations. Conference of the States Parties to the United Nations Convention against Corruption. Executive summary of the report. Kyrgyzstan. Vienna, 19–23 June 2017, accessed on 1 March 2023, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1702230e.pdf>.
- ⁶² <https://www.oecd.org/corruption/Anti-corruption-reforms-in-Kyrgyzstan.htm>.
- ⁶³ Ibid.
- ⁶⁴ Eurasian Group on Combating Money Laundering and Financing of Terrorism. First Mutual Evaluation on Anti-Money Laundering and Combating the Financing of Terrorism. Kyrgyz Republic, 14 June 2007, accessed on 21 March 2023, <https://eurasiangroup.org/files/uploads/files/news/eagkyrgyz.pdf>.
- ⁶⁵ OSCE. OSCE Programme Office in Bishkek. Kyrgyzstan removed from FATF non-cooperative countries list, with OSCE assistance, accessed on 21 March 2023, <https://www.osce.org/bishkek/120724>.
- ⁶⁶ OSCE Permanent Council Decisions No. 245 of 23 July 1998 and No. 339 of 10 February 2000.
- ⁶⁷ OSCE Permanent Council Decision No. 1250 of 27 April 2017.
- ⁶⁸ Ranking the perceived levels of public sector corruption from 0 (perceived as highly corrupt) to 100 (very clean).
- ⁶⁹ Transparency International. Corruption Perception Index. Kyrgyzstan, accessed on 7 January 2023, <https://www.transparency.org/en/cpi/2021/index/kgz>.
- ⁷⁰ Transparency International. Corruption Perception Index, accessed on 7 January 2023, <https://www.transparency.org/en/cpi/2022>.

⁷¹ World Bank. Worldwide Government Indicators. Kyrgyzstan's Control of Corruption in 1995–2021, accessed on 8 January 2023,

<http://info.worldbank.org/governance/wgi/Home/Reports>.

⁷² Percentile rank indicates the percentage of countries worldwide that rate below the selected country. Higher values indicate better governance ratings. This statistically likely range of the governance indicator in percentile rank terms is shown as a thin black line. For instance, a bar of the length of 75 per cent is interpreted as follows: an estimated 75 per cent of the countries rate worse and an estimated 25 per cent of the countries rate better than the selected country. The thin black lines indicate the corresponding 90 percent confidence interval.

⁷³ World Bank. Worldwide Government Indicators. Control of Corruption in 2011–2021 in Kyrgyzstan, Europe and Central Asia, accessed on 8 January 2023,

<http://info.worldbank.org/governance/wgi/Home/Reports>.

⁷⁴ Mungiu-Pippidi, Alina, European Research Centre for Anti-Corruption and State-Building (ERCAS) and the Center for International Private Enterprise (CIPE). Kyrgyzstan's Corruption Forecast, 2021, accessed on 8 January 2023, <https://corruptionrisk.org/country/?country=KGZ#forecast>.

⁷⁵ OSCE, The Secretariat, Conflict Prevention Centre, 13 September 2021, 33, accessed on 20 March 2023, https://www.osce.org/files/f/documents/6/5/74783_3.pdf.

⁷⁶ Organization for Economic Co-operation and Development. Anti-Corruption Network for Eastern Europe and Central Asia. Anti-corruption reforms in Kyrgyzstan. 4th round of monitoring of the Istanbul Anti-Corruption Action Plan. 4 July 2018, Paris, 16–17, accessed on 7 February 2023, <https://www.oecd.org/corruption/acn/OECD-ACN-Kyrgyzstan-4th-Round-Monitoring-Report-2018-ENG.pdf>.

⁷⁷ Organization for Economic Co-operation and Development. Anti-Corruption Network for Eastern Europe and Central Asia. Anti-corruption reforms in Kyrgyzstan. 4th round of monitoring of the Istanbul Anti-Corruption Action Plan. 4 July 2018, Paris, 10, accessed on 7 February 2023, <https://www.oecd.org/corruption/acn/OECD-ACN-Kyrgyzstan-4th-Round-Monitoring-Report-2018-ENG.pdf>

⁷⁸ European Commission for Democracy for Law (Venice Commission), OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR). Joint Opinion on the Draft Amendments to the Legal Framework on the Disciplinary Responsibility of Judges in the Kyrgyz Republic, 13–14 June 2014, Venice, accessed on 12 March 2023, <https://www.osce.org/files/f/documents/f/b/120508.pdf>.

⁷⁹ The Open Government Partnership provides a platform for reformers inside and outside of governments around the world to develop initiatives that promote transparency, empower citizens, fight corruption and harness new technologies to strengthen governance. It currently has 76 members, with the Kyrgyz Republic stated as an 'active' participant on the platform's official website: <https://www.opengovpartnership.org/our-members/>.

⁸⁰ OSCE Secretariat Conflict Prevention Centre. Guidelines for OSCE Staff. Security Sector Governance and Reform, Vienna, January 2022, accessed on 2 April 2023, <https://www.osce.org/secretariat/512470>.

⁸¹ Ibid, 50.



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