

Gender Perspective of the Prevention of Corruption

MANUAL FOR MEASURING PROGRESS IN
CONTRIBUTING TO THE IMPROVEMENT OF
GENDER EQUALITY THROUGH THE WORK
OF THE AGENCY FOR PREVENTION OF
CORRUPTION

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Abbreviations

APC	Agency for Prevention of Corruption
LSGU	Local Self-Government Unit
CSO	Civil society organizations
OMiS	OSCE Mission to Serbia
PWD	Persons with disabilities
GE	Gender equality
RSO	Republic Statistical Office
LGE	Law on Gender Equality
LBS	Law on the Budget System

CHAPTER ONE

– Gender aspects of APC's competencies

Introduction

The OSCE Mission to Serbia (hereinafter: OMiS) has been cooperating directly with the Agency for Prevention of Corruption (hereinafter: APC) for more than a decade in the Republic of Serbia. APC was founded in January 2010, and during the first decade, it exercised its competencies while building its capacities.

The main focus on preventing corruption and cooperation with other stakeholders has also determined the speed of achieved effects in the work of this independent body. The occurrences and relationships on which APC works are very complex and layered. However, it is necessary that in its work, APC continually reflects on the impact it has in exercising its mandate, on the lives of women and men, either as officials or citizens, politicians or representatives of civil society and on the overall impact on gender equality.

APC is both a beneficiary of public funds and is obliged to implement gender-responsive budgeting under the Law on the Budget System, which places gender equality among the main objectives of the budget system in the Republic of Serbia (Article 4 of LBS).

As a public authority body, APC has an obligation to meet the provisions of the Law on Gender Equality concerning gender statistics, introducing a gender perspective in all strategies, action plans, and work plans, strengthening gender competencies, and creating, financing, and implementing special measures that contribute to closing the gender gap in the field of action, as well as improving gender competences of employees and working women and men.

On a global level, pressure is mounting to introduce a gender perspective in preventing and suppressing corruption more consistently while integrating the

gender perspective has become a standard for good planning and governance.

In conditions where corruption is widespread, and many citizens are exposed to it, special attention should be paid to multiple discriminated groups and the impact that corruption can have on access to services and realization of rights.

Evidence shows that women perceive and experience corruption differently from men and that women face corruption to a greater extent because of unequal power relations between men and women. Corruption exacerbates this power dynamic, restricting women's access to public resources, information, and decision-making, thus increasing social, cultural, and political discrimination. Some forms of corruption, such as sexual extortion and petty corruption, pose a particular burden on women.

Sexual extortion - one of the severe gender-based forms of corruption - can be defined as the abuse of power to gain sexual gain or advantage. The phenomenon affects women and girls worldwide, especially in low and middle-income countries or in smaller and remote areas. Sexual extortion is rarely included in definitions of corruption, even though it has been documented that women and girls are often forced to provide sexual services instead of money to access public services or public sector jobs. The fact that this form of corruption is not recognized in the Law on the Prevention of Corruption¹ does not mean that it is not present but rather invisible. In Serbia, sexual extortion in the context of corruption has yet to be researched alongside all other forms of corruption faced by different groups in society.

There is a growing pool of studies and analyses on gender equality in the context of corruption, which point to the potential importance of gender-respon-

1 "Official Gazette of RS", no. 35 of 21 May 2019, 88 of 13 December 2019, 11 of 12 February 2021 - Authentic Interpretation, 94 of 27 September 2021.

sive work on suppressing corruption as an element that contributes to quality. However, there are still surprisingly few practical examples of consistent application of this approach in the work of other bodies similar to APC.

The drafting of this manual and tools for introducing the gender perspective into the work of APC is, therefore, a pioneering endeavor. In addition to the benefits for APC itself, this venture aims to facilitate the exchange of gender-responsive experiences and practices in this area of action, as well as to inspire other related agencies to enhance their contribution to improving gender equality.

Purpose and goals of the manual

This manual was created as a partnership between gender-responsive policy planning and budgeting

experts and 23 APC employees who, from May to July 2021, attended nine weeks of 3 module training with the following topics: 1. Gender aspects of APC's mandate, 2. Introduction of the gender perspective in the work of APC and 3. Gender-responsive budgeting and APC.

The training goals were as follows:

- Support the introduction of the gender perspective in APC's work by strengthening the gender competencies of employees.
- Support APC employees in implementing existing tools for gender perspective introduction (gender statistics, gender analysis, introduction of the gen-

der perspective in all aspects of work, and gender-responsive budgeting)

- Create and test an innovative tool for strengthening gender equality in APC's purview through a collaborative approach to the tool's design.

The goals of the manual and tool are to:

- Contribute to the systematic inclusion of the gender perspective in the work of APC in the Republic of Serbia.
- Enable the practical application of tools for introducing the gender perspective in accordance with the competencies and plans of APC.
- Measure the progress in APC's commitment to improving gender equality by exercising its competencies and fulfilling obligations under the Law on Gender Equality and the Budget System.

Seven dimensions of gender impact in the field of corruption prevention

During training, APC was directed to examine the link between gender equality and corruption through a multidimensional matrix. That helps to avoid the trap of reducing the efforts to integrate the gender perspective to only one dimension, for example, by looking at specific corrupt transactions, because this does not use all the potential that the introduction of a gender perspective offers for effective work in preventing and suppressing corruption.

A matrix consisting of seven dimensions is displayed in the table.

No.	Dimension	Explanation
1	Individual cases of corrupt transactions	Looking at quantitative and qualitative participation of women and men in corrupt transactions ²
2	Gender-specific manifestation of corruption	Opening up the issue of sexual extortion ³ or corruption that relies on sexual favors, which is not sufficiently recognized in the normative strategic framework.
3	Gendered perception of corruption	Women and men in all societies have different attitudes towards corruption ⁴ . Factors such as socialization and acceptance of gender roles, social status, and life experiences impact the perception of corruption. When a difference is made between corruption created by someone's fundamental necessity to access a particular service (need) and corruption that has occurred because of a desire to increase already abundant resources (greed), it turns out that women are more prone to the first and men to the second type of corruption. Therefore, it is important to constantly question these differences and keep them in mind when designing analytical instruments, collecting data, drafting analyses, and preparing manuals or campaigns to raise public awareness of corruption.
4	Gender impact on measuring corruption	If we do not look at the gender aspects in research and measurements, we may even think that they do not exist since we lack data. Therefore, it is important that we always monitor data broken down by gender, as well as to capture small and significant differences in findings concerning different groups of women and men (age, education, place of residence, health status, etc.)

2 The gendered impact of corruption, Frédéric Boehm, Erika Sierra (2015)

3 The following warnings should be considered, issued by UNODOC in its publication *The Time is Now* - "The word sextortion is not used in the present publication, in view of the following ambiguities. The expression 'sextortion' was popularized by the International Association of Women Judges (<http://www.iawj.org/wp-content/uploads/2017/04/Corruption-and-Sextortion-Resource-1.pdf>) to capture the abuse of authority to extort sex. The term is intended to encompass any 'form of corruption in which sex, rather than money, is the currency of the bribe' (Carnegie, S. 2019). Sextortion: A crime of corruption and sexual exploitation. The International Bar Association]. Yet it has another meaning under the laws of some federal states in the United States of America such as Pennsylvania, where sexual extortion—shortened to sextortion refers to a situation where someone forces another individual to send them sexual images under the threat of exposing private or sensitive information, <https://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=2019&sessInd=0&act=100>. Sextortion is also used differently by the National Crime Agency of the United Kingdom of Great Britain and Northern Ireland (<https://www.nationalcrimeagency.gov.uk/what-wedo/crime-threats/kidnap-and-extortion/sextortion-webcam-blackmail>), 'as a form of webcam blackmail, where criminals befriend victims online by using a fake identity and persuade them to perform sexual acts in front of their webcams'

4 *Do Men and Women Perceive Corruption Differently? Gender Differences in Perception of Need and Greed Corruption*, Monica Bauhr and Nicholas Charon, Issue: Vol 8, No. 2 (2020): *Fighting Corruption in the Developed World: Dimensions, Patterns, Remedies*

No.	Dimension	Explanation
5	Gender impact of corruption	The relationship between gender equality and corruption is a two-way one. Corruption can reinforce gender-based stereotypes. For example, in most societies, there is still an expectation that women will be less prone to risk, and consequently to corruption than men. In this way, for example, the lower representation of women in politics or entrepreneurship was explained. However, recent research suggests that this is actually about barriers to women's participation ⁵ and their more difficult ascension to positions where decisions are made. That is what also creates barriers to their involvement in corrupt actions, rather than some biologically based inherent righteousness of women relative to men ⁶ . We should ensure that our work in this field does not contribute to the persistence of gender stereotypes.
6	Gender perspective in preventing corruption	Integrating a gender perspective into work achieves optimal compliance throughout institutional action, and this strengthens the effects of the APC work. Tools such as gender statistics, gender analysis, Gender-responsive budgeting, and Gender-responsive monitoring of the effects of work are used for this procedure.
7	Gender inequality as an obstacle to preventing corruption	If gender norms in society attribute activity to men as common or "normal," men will be more exposed to corruption in this area. The same is valid for women. For example, if it is common for men to drive faster than the speed limit, they will be more often targeted by traffic police and more often be in situations where they are offered, or they offer bribes to avoid paying the fine.

Gender aspects of APC's competencies

Gender aspects mean specific social, cultural, economic, political, and other characteristics that affect the life circumstances and needs of women and men from different groups and recognition that there are systemic barriers and inequality that women face in all spheres of life. Hence, there is a gender dimension in the prevention of corruption.

When considering the impact that corruption has on the lives of women and men, it is essential, in addition to gender, for the analysis to take into account other

intersectional factors that potentially further exacerbate unequal position: age, place of residence, health status, sexual orientation, national affiliation or any other personal property that may be the basis of discrimination, as defined by the anti-discrimination regulations of the Republic of Serbia.

In this context, a gender-responsive approach implies that these specific aspects are seen at every stage of the decision-making or public policy-making process and that the process aims to ensure equal rights and opportunities for women and men in public policy documents and practice. Different tools are used in this work, some of which are mandatory under the

5 For example, a 2008 survey found that 60% on women's representation in regional councils in 18 countries in Europe, concluded that when there are strong male networks of influence and control, corruption occurs more often, and the inclusion of women happens less often. Council of European Municipalities and Regions. (2008). Women in local politics in Europe: Figures from 34 European countries of CEMR's membership. Published by the Council of European Municipalities and Regions.

6 UNODOC, The Time is now. Addressing the Gender Dimension of Corruption, Vienna, 2020

Law on Gender Equality and the Budget System of the Republic of Serbia: integration of the gender perspective into all policies and measures, gender-sensitive statistics and records, and gender-responsive budgeting.

What gender aspects will be emphasized in preventing corruption, and by which institution depends on the mandate and competencies.

A summary of gender aspects in APC's competencies is given in the following table:

APC competencies in accordance with regulations	Gender aspects of competencies
1) Oversees the implementation of strategic documents, submits to the National Assembly a report on their implementation with recommendations for the conduct, issues the responsible entities' recommendations on how to address failures in the implementation of strategic documents, and initiates amendments to strategic documents.	1) Proposes to integrate the gender perspective into strategic documents, supervises the implementation of the gender perspective priorities in the prevention of corruption provided that priorities are recognized in strategic documents, and submits to the National Assembly a report on their implementation with recommendations for the conduct, gives responsible entities recommendations on how to address failures in the implementation of strategic documents involving gender perspectives and initiates amendments to strategic documents to contribute to gender equality in the given domain;
2) Issues general acts (bylaws).	2) Ensures that all general acts include a gender perspective and that all the acts prescribed by the Law on Gender Equality relating to APC have been adopted.
3) Initiates and conducts proceedings deciding on the existence of violations of the Law on the Prevention of Corruption and imposes measures in accordance with the Law.	3) Initiates and conducts proceedings ruling on the existence of violations of the Law on the Prevention of Corruption, including from the perspective of gender equality, and imposes measures in accordance with the Law
4) Rules on conflicts of interest.	4) Rules on conflicts of interest and keeping gender-sensitive statistics/records of public officials
5) Performs activities in accordance with the Law governing the financing of political activities, i.e. the Law governing lobbying.	5) In accordance with the Law governing the financing of political activities, i.e. the Law governing lobbying, integrates the gender perspective with the aim of integrating the obligations established by the Law on the Budget System, as well as the Law on Gender Equality, into the work of APC and other stakeholders in this field.
6) Files criminal charges, requests for misdemeanor proceedings, and initiatives to initiate disciplinary proceedings.	6) Files criminal charges, requests for misdemeanor proceedings and initiatives to initiate disciplinary proceedings; keeps records of criminal charges/requests for misdemeanor proceedings by gender (actors and type of violation)

APC competencies in accordance with regulations	Gender aspects of competencies
7) Manages and publishes the Registry of Public Officials and the Register of Assets and Revenues of Public Officials.	7) Manages and publishes the Registry of Public Officials and the Registry of Assets and Income of Public Officials. Data from the registry is collected and published so that it is available by gender and all other important characteristics
8) Audits assets and income reports submitted by public officials.	8) Audits assets, property, and income reports submitted by public officials; aggregate reports are also available by gender
9) Keeps and audits data from records prescribed by Law.	9) Keeps and audits data from records prescribed by Law; all data relating to persons is available and sorted by gender.
10) Acts on the complaints of natural and legal persons.	10) Acts on the complaints of natural and legal persons; aggregate reports on the conduct of representations are also available by gender
11) Gives opinions on the application of the Law on the Prevention of Corruption at its own initiative or at the request of natural or legal persons and takes positions relevant for the implementation of this Law.	11) Gives opinions on the application of the Law on the Prevention of Corruption at its own initiative or at the request of natural or legal persons and takes positions relevant for the implementation of this Law; keeps gender-sensitive records of actions and opinions that include elements relevant for the promotion of gender equality in the field of prevention of corruption;
12) Initiates the issuance of or amendments to regulations, gives opinions on assessing the risk of corruption in draft laws in areas particularly risky for the emergence of corruption and opinions on draft laws governing issues covered by ratified international agreements in the area of prevention and fighting corruption.	12) Initiates or amends regulations, gives opinions on assessing the risk of corruption in draft laws in areas particularly risky for the emergence of corruption and opinions on draft laws governing issues covered by ratified international agreements in the area of prevention and fighting corruption; particular attention is paid to what impact the regulation can have on citizens taking into account gender, place of residence, health condition or other personal property that is the basis for discrimination, and therefore increased exposure to corruption;

APC competencies in accordance with regulations	Gender aspects of competencies
13) Investigates the state of corruption, analyzes corruption risks, and compiles reports with recommendations to eliminate risks.	13) Investigates the state of corruption, analyses corruption risks, and compiles reports with recommendations to eliminate risks; investigates the state of corruption in relation to different groups in society, taking into account gender, place of residence, health condition or other personal property, compiles reports with recommendations for risk reduction
14) Oversees the adoption and implementation of integrity plans.	14) Oversees the adoption and implementation of integrity plans; ensures that models of integrity plans include the gender aspects of corruption, which would increase understanding of the gender specifics of corruption in all institutions obliged to draft integrity plans;
15) Adopts a training program and training guidelines in the area of corruption prevention and monitors the implementation of training in public authorities.	15) Integrates the gender perspective, adopts and implements additional training program that contributes to strengthening gender competencies in the field of prevention of corruption;
16) Engages in international cooperation activities in the area of prevention of corruption.	16) Engages in international cooperation and promotes gender-responsive approaches and good practices.

Status of gender statistics and records in the Agency for Prevention of Corruption

Gender statistics is a statistical field that extends across traditional areas to identify, produce, and disseminate statistics that reflect the realities of women's and men's lives and policy issues related to gender equality. Such information is vital for informing policymakers and for progress toward achieving gender equality. Gender statistics also play an important role in improving the entire statistical system, encouraging it to describe more accurately and fully the activities and characteristics of the population.

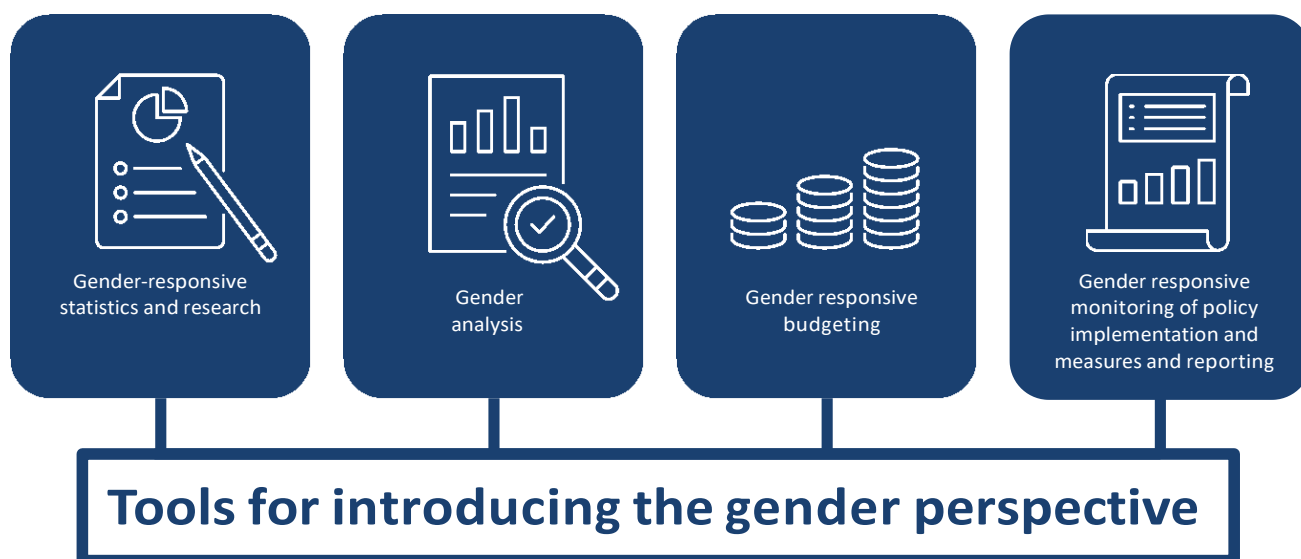
For example, it often happens that we are guided by our experience of working in the public sector, concluding, for example, that women and men are equally paid. But when we look at the data, we see an 8% pay gap, and if we analyze it in more depth, we see that in some sectors of the economy, it is actually 20%. If we collect data at the level of specific institutions, we may experience even greater differences in bonuses or allowances. In other words, without data, we don't know what is going on, so in the prevention of corruption, it is necessary to start with data.

During the nine-week training of APC employees, high importance is given to gender statistics. That's because gender statistics are the first of the four most important tools for integrating a gender perspective in work. In other words, without gender statistics, it is not possible to integrate the gender perspective. Since there is plenty of room for improvement on this step, this tool is structured to first address all deficiencies in existing forms, databases, records, and registries, so that gender-responsive planning can be pursued based on such data.

Furthermore, a significant part of APC's work consists precisely in collecting various data and reporting on its impact on the reduction or growth of corruption. The APC keeps the following databases and registries: **the Registry of Public Officials; Registry of Assets and Income of Officials; Records of Gifts; Records of Public Procurement Procedures, Privatization or other Procedures, Records of Annual Financial Statements of Political Entities; Registry of Lobbyists, and Records of Political Campaign Expenses Reports.**

These registries and records currently cannot automatically generate aggregate data by gender.

The APC factsheet already includes some of the required data by gender.



These are the structure of employees and other people working in the APC as of 31 March 2021:

Employment /service contract	Women		Men	
	Number	%	Number	%
Open term contracts	62	69	28	31
Fixed-term contracts	1	50	1	50
Casual and Temporary Employment Contract (CTW)	6	85	1	15
Service contracts	-	-	-	-
Total	69	70	30	30

However, other data at the time of drafting this manual is not available by gender and other important features. The specific data this request refers to is clarified in the tables in the second chapter.

In addition, certain new requirements are defined by Article 65 of the Law on Gender Equality, which APC will be obliged to collect.

Article 65 reads:

In order to monitor and achieve gender equality and report on it, public authorities and employers, as well as gender equality bodies, are obliged to record data sorted by gender.

Public authorities and employers record data on:

- 1) the total number of employees and workers;
- 2) the number and percentage of employed and working women, the number and percentage of employed and working men relative to the total number and percentage of employees, classified by gender and age of employees and workers;
- 3) qualifications held by employees and workers, sorted by gender;
- 4) the number and percentage of employees and workers in non-executive jobs and executive positions, sorted by gender;
- 5) salaries, and other allowances of employees and workers, expressed in average nominal amount and sorted by gender in categories for non-executive jobs and executive positions;
- 6) the number and percentage of employees and workers, sorted by gender and age, who in the previous two years were recruited more and the number and percentage of employees and workers by gender and age who were fired from their job, as well as the reasons for that;
- 7) the reasons why people of a specific gender have not been employed or assigned in greater numbers to a specific job;
- 8) the reasons why people of a specific gender have not been appointed or named in greater numbers to a specific executive position;

- 9) the number and percentage of applicants applying for executive positions or non-executive jobs in public authority bodies, i.e. for establishing an employment relationship or for another form of work engagement, sorted by gender and qualifications;
- 10) the number of complaints received from employees and workers, sorted by gender and age, on their exposure to harassment, sexual harassment or blackmail or any other treatment resulting in discrimination on the basis of sex, i.e., gender;
- 11) the actions of the employer or responsible person in the public authorities on the submitted complaints;
- 12) the number of litigations related to discrimination on the basis of sex, i.e., gender, as well as the number of litigations with a positive outcome for the employee and the actions of the employer or responsible person in the public authorities upon these court decisions;
- 13) the number and percentage of employees and workers, by gender, included in vocational training and additional education programs, as well as professional development of trainees, annually;
- 14) the number and percentage of employees of persons in management and supervisory bodies, commissions and other bodies in public authorities and employers, sorted by gender, qualifications and age;
- 15) the number and percentage of seekers and beneficiaries of free legal aid sorted by gender;
- 16) the number and percentage of reported cases of gender-based violence, classified by form of violence, gender of the victim of violence and gender of the perpetrator of violence and the relationship of the victim and the perpetrator;
- 17) the number and percentage of persons who have committed domestic violence sorted by gender and relationship between the perpetrator of violence and the victim of violence;
- 18) the number and percentage of convictions for violence against women and domestic violence, sorted by gender of the victim of violence and by gender of the perpetrator of violence.

In addition to data referred to in paragraph 2 of this Article, the bodies in charge of gender equality in the territorial autonomy unit, as well as in the local self-government unit, also keep data on:

- 1) the adopted development plans and other acts in areas within the competence of the territorial autonomy unit and local self-government units, containing the gender perspective and a concise description of the same;
- 2) measures and activities initiated by the body, which are in the function of achieving and promoting gender equality;
- 3) the effects of the activities of public authority bodies on achieving and promoting gender equality;
- 4) the realization of provincial and local budgets from a gender perspective;
- 5) the achieved level and quality of cooperation with other working bodies at the provincial and local levels;
- 6) gender sensitive data from the competence of territorial autonomy units and local self-government units;
- 7) activities of bodies dealing with the prevention and suppression of gender-based violence in the territorial autonomy unit and local self-government unit;

- 8) unpaid household work that public authorities are obliged to publish annually as administrative data on unpaid household work in order to determine its total value and its participation in gross national income.

Data that is recorded is expressed numerically or as a percentage and cannot contain personal data.

Data from paragraph 2 and 3 of this Article is kept in a separate form, which will also include any and all changes made to it, within eight working days from the day the change occurred. Public authorities, employers and gender equality bodies referred to paragraph 1 of this Article, are obliged to allow access to this data to the competent inspection, which in accordance with this Law conducts inspection control in this field, as well as to the Ministry at its request, in accordance with the protection of personal data.

SECOND CHAPTER

– Description of the Tools for Integrating Gender Perspective in APC's Work and Methodologies

Why is this tool needed

Integrating the gender perspective into the work of public authorities and independent bodies is a globally accepted primary strategy for enhancing gender equality. This strategy is not a goal in itself but rather a concerted and systematic procedure, approach, and manner of achieving gender equality within the competence of a particular authority. Gender equality thus becomes the backbone of all activities – keeping records and registries, research, policy-making and measures, implementing policies and measures, budgeting, drafting laws, planning, measuring the impact of draft laws on curbing corruption and gender equality in this area, implementation and monitoring of programs and projects.

It ensures a synergistic effect because efforts to improve gender equality are not isolated from other work processes but are integral to APC's activities. At all stages, from the development of the strategy to measures and procedures, budgeting, implementation, monitoring, and evaluation. The tool facilitates the application of this principle in an organized way so that it is possible to monitor progress, stagnation, and setbacks.

Basic purpose and description

The tool that APC has developed will contribute to the achievement of the following outcomes

1. Improved status of gender statistics and records in APC

2. Gender analysis of APC activities and budget
3. Priorities singled out for work on improving gender equality
4. A work plan has been drawn to improve gender equality for the next 12- 24 months.

The tool is designed to converge to the greatest extent possible the gender perspective with the competencies of APC. The tool is adapted to the starting/initial condition, where there are still not enough gender statistics, and there is no sufficient institutional understanding of the gender aspects of corruption, both in APC and in most similar bodies globally. Finally, since there are restrictions on APC employees regarding the time they can realistically set aside for the application of the tool, all audits are simplified to the maximum but still detailed enough to provide new insights.

Indicators and measurements

The tool includes **100 indicators of change** divided into **10 tables**, one for each of the 10 sectors where APC operates. The end sum of individual grades/scores returns an overall grade ranging from 200 to 600.⁷

Each of the 10 tables includes 10 indicators. Symmetry has been deliberately established among sectors to avoid the typical situation where only a few sectors are tasked with gender equality. Enhancing gender equality is the task of all sectors at the same time. **The maximum number of points per table is 60**

⁷ The 1-to-5 grading system that exists in schools was deliberately avoided. Grades 2 through 6 shift the attention from the score itself to the process of improving the condition, which is the goal of this tool.

and the minimum is 20. The lowest grade for an individual indicator is 2, and the highest is 6.

The tool enables the comparison of sectors and indicators within the Sector. It makes work easier because recommendations can later be grouped by similarity. For example, suppose gender records need to be improved in one Sector. In that case, it may also be the case in others, so it makes sense to merge recommendations and simultaneously invest synergistically in resources to achieve progress. On the other hand, there are sectoral specificities, i.e., opportunities for improving gender equality to focus attention on. For example, if new strategic documents are made, then recommendations regarding introducing the gender perspective in these documents will take priority in the application over a designated period.

Who is responsible for measuring?

Each table is directed at one of the 10 sectors in which APC operates. Each Sector evaluates the condition of its Sector on its own and compliance with the indicators in the table. For the first time, the measurements are conducted by consultants in cooperation with APC employees so that APC can simultaneously master the methodology and do the grading/evaluation. The proposal is to make the first two measurements

in 12 months, with the next measurements taking place once every 24 months.

Responsibility for the process

In the APC team, responsibility for the tools and regularity of measurement is taken by the person in charge of gender equality, in cooperation with the team in charge of gender-responsive budgeting. The measurement process itself is done in all sectors. Therefore, a person who will be responsible for planning and implementing the measurements should be appointed in each Sector, in cooperation with the person in charge of gender equality.

First evaluation - establishing the starting condition.

The initial assumption is that in collecting data on the starting condition, most indicators will not be rated high, as expected. Until now, gender equality has not been the focus of APC's work, and the tool itself is designed so that it is aimed to achieve improvement compared to the initial condition and not to the evaluation itself. Therefore, it is important to take the steps proposed in the "recommendations" column between the two measurements.

Each table technically includes the same categories.

Number	The number of indicators measured and constructed from the number of sectors and the serial number in the table. For example, sector 1, indicator 1.1, sector 2, indicator 2.2. etc. Each table has 10 indicators.
Indicator	That is what is measured. It is expressed as an assertion of the desired ideal condition, which is checked and compared to the reality of APC's work in the reporting period.
Status	Status is the actual condition when measuring. In the initial status, it will turn out that most indicators have no data, which is expected and should not be discouraging. On the contrary, the goal is to point to the existence of sufficient room for progress that is considerable and can be used.

How indicators/ sources of information are checked	Here it is clarified how to check the indicators or what is the source of information. That is, what you look at when measuring. The goal is to always measure in the same way, to make the data comparable.
Grade	<p>The grade column indicates a grade of 2 to 6 for each check of indicators. That is, the grade shows how close or far away we are from the desired condition.</p> <p>A range of grades from 2 to 6 was given to encourage APC to look at the actual condition, without fear of a grade 1, and a range of 5 grades is common in the cultural model, making it easier for evaluators to agree.</p> <p>For each indicator, therefore, it is necessary to evaluate:</p> <ul style="list-style-type: none"> - if it has not been met at all (grade 2), - if it has been met to a small extent (grade 3), - if it has been, but only 50% (grade 4), - if it has been to a large extent (grade 5) or - if it has been fully met (grade 6). <p>For every grade above 2, there must be unequivocal and tangible evidence. For example, if data is available by gender, then it is the breakdown of such data at the time of self-assessment, etc. In this way, using available data relevant to gender equality is encouraged.</p>
Recommendation	The last column is "recommendation", containing suggestions for further work. The recommendations are presented in a way so as to survive during the first three measurements in its current form and can be improved later as APC's capacities are strengthened.
Cumulative grade	<p>Finally, each table will have a cumulative grade, which is obtained by adding individual grades ranging from 2 to 6 for each indicator.</p> <p>This will provide, in the total for each of the individual tables, a maximum of 60, or the overall maximum of 600 points for all tables.</p> <p>The minimum cumulative number of points is 200, namely 20 per table, respectively.</p>

The evaluation process

Grades are made by consensus in the team. It encourages the exchange of opinions, arguments, and information in the APC team, and the measurement process strengthens gender competencies and a concerted understanding of status data and subsequent steps. Each of the individual tables takes 45 to 90 min-

utes to evaluate. In grades where there has been more discussion, the main reasons for prevailing in a particular direction are noted so that they can be better understood in the subsequent measurement. Measuring is simple and fun because it does not require much effort and provides new data. It also creates synergy within the team to contribute to improving gender equality in each Sector and at the APC level.

No.	Indicator	Status / condition at the time of measurement	Check method or source	Grade	Recommendation
	<i>A statement/ assertion that is checked and compared to the reality of the work of APC, the desired state</i>	<i>Realistic evaluation of the condition at a measurement</i>	<i>How the indicator is checked, or what the source of information is. i.e. what is looked at when doing the measurement</i>	<i>From 2 to 6</i>	<i>Steps to be taken to reach the desired condition</i>

What is ultimately done with measurement results

APC managers should be presented with measurements for all 10 sectors, as well as the main recommendations for the improvement of gender equality within the mandate of APC, in accordance with the Law on Gender Equality⁸, the Law on Prohibition of Discrimination, and the Law on the Budget System⁹¹⁰. Based on the recommendations, APC's gender-responsive activities will be planned.

In addition to being user-friendly, the advantages of this tool are that it directs the entire APC team towards the gender aspects of competencies, specifies an action to be taken regarding gender equality, contributes to the institutionalization of Gender-responsive budgeting, improvement of gender statistics and

strengthening the internal capacities for work on improving gender equality.

With this tool, APC becomes a gender-responsive agency that contributes to achieving outcomes towards closing the gender gap and fully integrating the gender perspective into its activities.

The tool is an innovation related to the practical integration of theoretical concepts that have not been integrated into the work of similar bodies. As such, it can also be an inspiration for other anti-corruption bodies. The tool is based on data, facts, and evidence and is an objective representation of the condition. The fact that it is a self-evaluation contributes to sustainability in the use of this tool and to a collaborative approach, absent which there is no progress on gender equality.

8 ("Official Gazette of RS", no. 52 of May 24, 2021)

9 ("Official Gazette of RS", no. 22/2009 and 52/2021)

10 ("Official Gazette of RS", no. 54/2009, 73/2010, 101/2010, 101/2011, 93/2012, 62/2013, 63/2013 – corr., 108/2013, 142/2014, 68/2015 - as amended, 103/2015, 99/2016, 113/2017, 95/2018, 31/2019, 72/2019 and 149/2020)

CHAPTER 3

– Tools for integrating the gender perspective into APC's work

Table 1 - Sector for Control of the Financing of Political Activities

Table 2 - Sector for the Verification of Assets

Table 3 - Sector for Conflict of Interest and Lobbying Issues

Table 4 - Sector for Prevention and Strengthening of Integrity

Table 5 - Sector for Cooperation with Media and Civil Society

Table 6 - Sector for Registries and Records

Table 7 - Sector for Legal Affairs

Table 8 - Sector for External Affairs and Strategic Development

Table 9 - Sector for General Affairs

Table 10 - Sector for Research and Analytics

Table 1. Sector for the Control of Financing of Political Activities

No.	Indicator/Desired condition	Status/ Condition at the moment of evaluation	How to check the condition or source	Numerical grade¹¹	Recommendation for improving the condition
1.1.	The number of political entities that have used some of the funds obtained from public sources ¹² to improve gender competencies.				
1.2	APC has stipulated in the content and way of keeping records ¹³ that data on the contributors that are natural persons must be available by gender.				
1.3	A number of persons authorized by political entities within the meaning of Article 31 of the Law on the Financing of Political Activities.				
1.4	APC conducts gender analysis of data by gender and other relevant data related to access to funding for female and male candidates.				
1.5	APC monitors political entities' campaigns and the number of men and women applying for monitoring (unemployed persons) and who conduct monitoring.				
1.6	The funds needed to carry out control activities relating to the gender dimension of the expenses of political entities are provided by the Budget of the Republic of Serbia. ¹⁴				
1.7	In cooperation with other bodies ¹⁵ , APC is improving the integration of the gender perspective into the process of controlling the costs of the election campaign for the President of the Republic and elections for members of parliament, deputies, and councilors.				

11 The grades are on a scale of 2 to 6.

12 Article 19 of the LAW ON THE FINANCING OF POLITICAL ACTIVITIES ("Official Gazette of RS", no. 43/2011, 123/2014 and 88/2019) The political entity is obliged to use the funds obtained from public sources in the amount of at least 5% of total funds received for regular work annually, for professional development and training, international cooperation and working with members.

13 Article 27. the same Law and the Rulebook on Records and Reports requiring harmonization with the Law on Gender Equality <https://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/drugidrzavniorганиorgani-zacije/pravilnik/2016/7/1/reg>

14 Article 33 of the Law on the Financing of Political Activities.

15 Mol, BRA and other bodies

No.	Indicator/Desired condition	Status/ Condition at the moment of evaluation	How to check the condition or source	Numerical grade ¹¹	Recommendation for improving the condition
1.8	As part of the audit report and additional publicly available findings, APC promotes findings concerning gender equality to political entities.				
1.9	As part of the audit report and additional publicly available representations, APC includes the media and other stakeholders in the political process, with the aim of better understanding the importance of integrating the gender perspective into APC's work in the Sector for Control of the Financing of Political Activities.				
1.10	APC proposes changes to the Law on the Financing of Political Activities to further integrate the gender perspective ¹⁶ following the Law on the Budget System and contribute to improving other bylaws in this area.				
SUM					

¹⁶ It could include targeted measures to boost access to funding for female candidates, or other measures that remove the recognized gender gap in access to funding.

Table 2. Sector for the Verification of Assets

No.	Indicator /CLAIM /Desired condition	Status / condition at the moment of the evaluation	How indicators/ sources of information are checked	Numerical grade ¹⁷	Recommendation
2.1	Analysis of the report on the finalized verifications of asset reports of officials also includes analysis of data by gender.				
2.2	Records of submitted requests for misdemeanor proceedings, criminal charges, and reports to competent state authorities include data sorted by gender.				
2.3	Information about outcomes on submitted requests for misdemeanor proceedings, criminal charges, and reports to the competent prosecutor's offices includes data sorted by gender				
2.4	Regular annual plans for auditing assets and income reports include aggregate data on persons by gender and positions included in the audit plan.				
2.5	Extraordinary audits of asset and income reports include aggregate data on persons by gender and position.				
2.6	Information about proceedings in course for to violations of the provisions of the Law on the Prevention of Corruption also includes gender-disaggregated data on persons.				
2.7	Training to raise public officials' capacity on obligations under the Law on the Prevention of Corruption (asset reporting and verification) includes information about participants sorted by gender).				

¹⁷ The grades are on a scale of 2 to 6.

No.	Indicator /CLAIM /Desired condition	Status / condition at the moment of the evaluation	How indicators/ sources of information are checked	Numerical grade ¹⁷	Recommendation
2.8	The APC annual report section ¹⁸ concerning data provided by this Sector also includes both gender-disaggregated data and information relevant to gender equality issues, as well as recommendations.				
2.9	Every two years, APC conducts a gender analysis of data in the Sector for the Verification of Assets to determine differences in the forms and representation of men and women in timely and full compliance with assets reporting obligations and data accuracy.				
2.10	Based on gender analysis, APC proposes and implements gender-responsive measures to improve the timeliness and accuracy of data on officials' assets.				
SUM					

¹⁸ APC's annual report is reviewed by the RS Parliament

Table 3. Sector for conflict of interest and lobbying issues

No.	Indicator /CLAIM/Desired condition	Status / condition at the moment of evaluation	How indicators/sources of information are checked	Numerical grade¹⁹	Recommendation
3.1	APC has conducted a gender analysis of conflicts of interest based on data that are collected and made publicly available.				
3.2	The number of public officials who have sought APC's consent to establish an employment relationship or business cooperation upon the termination of public office is publicly available and is sorted by gender.				
3.3	The number ²⁰ of public officials who have sought APC's consent for the simultaneous exercise of two or more public functions is publicly available and is sorted by gender.				
3.4	Data on the number of applications submitted for registration with/deletion from the Registry of Lobbyists is kept by gender.				
3.5	The number of public officials who perform other work or activity and who have informed APC within 15 days from the date of assuming public office is publicly available by gender of the public officials concerned.				
3.6	The number of public officials who have requested and obtained APC consent for performing another job or activity is publicly available by the gender of the officials concerned.				
3.7	The number of officials who have transferred management rights to another person within 30 days from the day of the election or appointment is publicly available by gender of the officials concerned.				
3.8	Information about persons who have received certificates of completed training for lobbyists is also available by gender.				

¹⁹ The grades are on a scale of 2 to 6.

²⁰ All data relates to the reporting period in the current year for the previous year.

No.	Indicator / CLAIM / Desired condition	Status / condition at the moment of the evaluation	How indicators/ sources of information are checked	Numerical grade¹⁹	Recommendation
3.9	Data on the first lobbying contacts of lobbied persons is also available by gender.				
3.10	The number of public officials that APC has determined to be violating the Law on the Prevention of Corruption is publicly available, including by gender.				
SUM					

Table 4. Sector for the prevention and strengthening of integrity

No.	Indicator /CLAIM/Desired condition	Status	Audit	Grade ²¹	Recommendation
4.1.	Educational program on ethics and integrity also includes gender aspects.				
4.2.	Data on the "Ethics and Integrity" training participants sorted by gender.				
4.3.	Statistics on misdemeanor charges (against a responsible person in a public authority body that has failed to conduct any training of employees and managers in accordance with the training program and training instructions and failed to report APC in writing on the implementation of training) sorted by gender.				
4.4.	The educational program on the integrity plan also includes gender aspects.				
4.5.	Statistics on misdemeanor charges (against the responsible person in the public authority body that has failed to submit to APC the integrity plan and a report on the implementation of the integrity plan and/or has not determined the person who will perform coordination activities related to the adoption, implementation and reporting on the implementation of the integrity plan) sorted by gender.				
4.6.	The LAP model integrates the gender perspective.				
4.7.	The integrity plan model includes the gender perspective				
4.8.	Support and advisory assistance in drafting local plans also include guidelines regarding gender equality				
4.9	In drafting national strategic documents for the prevention of corruption, APC issues proposals for preventing gender-specific forms of corruption (e.g. sexual exploitation through extortion of sexual services in order to exercise some right, obtain a service or take advantage of an opportunity ²²)				
4.10	The APC Annual Report section ²³ regarding the data provided by this Sector includes both gender-disaggregated data and information relevant to gender equality issues, as well as recommendations.				
SUM					

²¹ The grades are on a scale of 2 to 6.

²² The term sextortion is now established in international practice. People who have the power misuse it by soliciting sexual favors most often from women and girls, to enable them to advance at work, issue an administrative permit to them, give them a passing or good grade on an exam, etc. This is a specific form of corruption that particularly affects women, which is why it is important to better investigate, document and understand how to strengthen the mechanisms of defense against this form of sexual exploitation of women.

²³ APC's annual report is reviewed by the RS Parliament

Table 5. Sector for cooperation with media and civil society

No.	Indicator /CLAIM /Desired condition	Status	Audit	Grade ²⁴	Recommendation
5.1	APC strengthens public awareness, especially of CSO and the media, about the gender aspects of corruption.				
5.2	APC also informs about its activities in gender equality and corruption.				
5.3	APC also informs the media and civil society representatives of its activities in gender equality and corruption.				
5.4	In cooperation with CSO, APC organizes conferences, round tables or media interviews that include topics related to gender equality and corruption in their work field per Sector.				
5.5	As part of the CSO competition, which APC calls, as part of the criteria for evaluating project proposals, the APC further valorizes projects that have a gender component included, i.e. how much they contribute to preventing corruption in society, taking into account gender aspects.				
5.6	APC supports projects that specifically target gender aspects of corruption (for example, they include specific target groups, or sectors).				
5.7	APC internal reports also include information about gender-responsive activities, and the data are gender-disaggregated.				
5.8	APC's annual work report includes gender-responsive activities; all data is sorted by gender and other relevant characteristics.				
5.9	Data on data requesters under the Law on Public Media is sorted by gender and publicly available (subject, requester).				
5.10	The APC factsheet includes gender-disaggregated data.				
SUM					

²⁴ The grades are on a scale of 2 to 6.

Table 6. Sector for registries and records

No.	Indicator /CLAIM/Desired condition	Status	Audit	Grade ²⁵	Recommendation
6.1	APC Registry of Public Officials includes gender-disaggregated data and can be searched by gender.				
6.2	APC Registry of assets and income of public officials includes gender-disaggregated data, and search is enabled.				
6.3	Other APC registries about persons also include gender-disaggregated data and can be searched				
6.4	In training for public officials held by the Sector, APC keeps records of participants by gender.				
6.5	Records of employees in the tax administration's special unit for identifying the origin of assets are kept so that the data is available by gender.				
6.6	Records of legal entities in which a public official owns a stake or shares are also kept by gender				
6.7	Records of reports on the asset status of employees of state bodies competent for handling cases of organized crime, terrorism and corruption are also kept by gender.				
6.8	Publishing and updating on the website of APC public data from registries and special records from the purview of the Sector also include gender-disaggregated data.				
6.9	The gift catalog includes gender-disaggregated data on gifts.				
6.10	The APC Annual Report section ²⁶ , which relates to the data provided by this Sector, includes both section data and information relevant to gender issues.				
SUM					

²⁵ The grades are on a scale of 2 to 6.

²⁶ APC's annual report is reviewed by the RS Parliament

Table 7: Sector for Legal Affairs

No.	Indicator /CLAIM/Desired condition	Status	Audit	Grade ²⁷	Recommendation
7.1	APC continuously improves the system of work in accordance with the Law on Gender Equality.				
7.2	The annual plan for the improvement of gender equality has been prepared in accordance with the Law on Gender Equality, in cooperation with other sectors as an integral part of the APC Operating Plan.				
7.3	The Annual Report on the implementation of the Plan for Improvement of Gender Equality and recommendations in cooperation with other sectors has been prepared.				
7.4	The corruption risk assessment in the drafts and proposals of regulations includes an assessment from the GE perspective.				
7.5	The opinions on the risk assessment of corruption in the regulations also contain an assessment from the gender perspective.				
7.6	Information of public interest delivered on request also includes gender-disaggregated data.				
7.7	In the analysis of the complaints point to problems that lead to corruption in the public sector and who and how the problem affects, considering both gender, place of residence, health condition or age.				
7.8	All records on APC employees in the field of work are kept by gender, and APC also keeps records of unpaid work of employees in accordance with the Law on Gender Equality.				
7.9	Training of all employees includes competencies in gender equality				
7.10	APC cooperates with other bodies in the field of gender equality (<i>Ombudsman, Commissioner for Equality, and other competent bodies</i>).				
SUM					

²⁷ The grades are on a scale of 2 to 6.

Table 8. Sector for Foreign Affairs and Strategic Development

No.	Indicator /CLAIM/Desired condition	Status	Audit	Grade ²⁸	Recommendation
8.1	APC cooperates with international institutions, organizations, and initiatives intending to develop mechanisms and standards and improve practices in the area of prevention of corruption, including gender aspects of corruption				
8.2	APC follows international standards in the prevention and fights against corruption, especially conventions and international treaties ratified by the Republic of Serbia, including points of intersection of corruption and other gender-based phenomena (sextortion, violence, gender-based incitements to corruption, gender roles in corruption, etc.)				
8.3	APC contributes to relevant international and regional institutions and organizations by reporting on advances in understanding the link between gender regimes and corruption				
8.4	APC proposes that the inter-institutional protocols on cooperation, which it concludes with related institutions, integrate work on improving gender equality in the field of work				
8.5	APC presents the results of its work and participates in domestic and international meetings, conferences, seminars, and workshops in the field of gender-responsive fight against corruption				
8.6	APC integrates the gender perspective into the preparation, realization, and monitoring of the implementation of the APC Strategic Plan				
8.7	APC develops gender competencies in cooperation with and with the support of OMIS and other donors and partner organizations.				
8.8	Through IPA projects, APC seeks possibilities for affirming a gender-responsive approach in preventing corruption				
8.9	The international professional meetings that APC organizes include the topic of gender-responsive approaches in preventing corruption				
8.10	APC integrates the gender perspective into annual operating plans				
SUM					

²⁸ The grades are on a scale of 2 to 6.

Table 9. Sector for General Affairs

No.	Indicator /CLAIM/Desired condition	Status	Audit	Grade²⁹	Recommendation
9.1	The gender perspective is included in the design, development and maintenance of a single information system				
9.2	In the financial planning proposals and reports to the Ministry of Finance, within the program budget, APC includes data on gender-sensitive budgeting in the objectives and indicators.				
9.3	Among the employees of the Sector for General Affairs, there are women and men who have completed training to integrate the gender perspective into their work.				
9.4	APC audits the plans and the realization of the financial plan for the work of the APC, including in the part related to the improvement of gender equality in the field of work.				
9.5	Calculation of fees to APC Council members				
9.6	Calculations of fees per CTW contracts and part-time contracts				
9.7	Organization of occupational healthcare training for all employees				
9.8	Fire protection training				
9.9	APC implements the procurement procedure in accordance with the recommendations of the Public Procurement Office, which contribute to gender equality				
9.10	APC keeps records in the Sector for General Affairs so that data about persons is available by gender.				
SUM					

²⁹ The grades are on a scale of 2 to 6.

Table 10. Sector for Research and Analytics

No.	Indicator/CLAIM/Desired condition	Status	Audit	Grade ³⁰	Recommendation
10.1	An analysis of international practices was made to integrate the gender perspective into the area of suppression of corruption.				
10.2	An e-library of publications, research, recommendations and other documents on gender equality and the fight against corruption has been established.				
10.3	APC establishes and keeps records and analyzes the status of gender-responsive projects in the field of work.				
10.4	APC analyzes the allocation procedures for funds from the CSO budget for project implementation and analyzes the content of approved projects containing gender dimension elements.				
10.5	APC monitors, analyze, and systematizes findings on the overall gender impact of its activities.				
10.6	APC monitors the level of training of employees in the field of gender equality and keeps separate records thereof.				
10.7	APC integrates the gender perspective into future methodologies for its routine research.				
10.8	APC produces analytical reports with recommendations for improving gender equality in the field of work.				
10.9	APC is conducting research aimed at shedding light on the gender dimension of corruption				
10.10	APC presents to experts and the general public its research findings in this field.				
SUM					

³⁰ The grades are on a scale of 2 to 6.

