

United Nations Development Programme
Country: Turkey
Project Document

Project Title: Project for Support to Effective Implementation of National Anti-Corruption Strategy in Turkey

UNDP Strategic Plan 2008-2011 Outcome:

Key Result Area 2.3 Outcome: supporting national partners to implement democratic governance practices grounded in human rights, gender equality and anti-corruption;

UNDAF Outcome(s):

Outcome 1: By 2010, strengthen individual and institutional capacity for both democratic and environmental governance at local and central levels.

Expected CP Outcome(s):

CP Outcome 1.1: Increased individual, collective and institutional capacity for participation at all levels of decision-making

CP Outcome 1.2: Mechanisms for the implementation and monitoring of international norms and standards on human rights, including the judicial system strengthened and reformed.

Expected Outcome(s):

Increased ownership and strengthened capacity for the implementation of the newly introduced "Strategy for Increasing Transparency and Strengthening the Fight Against Corruption" and its Action Plan

Expected Output(s):

(Those that will result from the project)

Output 1: Public awareness and ownership on anti-corruption policies raised through different means and mechanisms developed including a holistic outreach strategy and information sharing platforms

Output 2: A comprehensive Gap Analysis and Change Management Plan developed for effective monitoring and oversight of the implementation of the Anti Corruption Action Plan

Output 3: Communication and coordination among the responsible institutions and with the PMIB enhanced for the successful implementation of the Anti-Corruption Action Plan

Output 4: Technical support provided for the implementation of the Anti-corruption Action Plan

Executing Entity: Prime Ministry Inspection Board

Implementing Agencies: UNDP Turkey

Brief Description

The Project at hand aims to create an enabling environment and empower the Prime Ministry Inspection Board for effective implementation of the newly introduced national strategy and action plan on anti-corruption. This provides the upstream and downstream level activities on anti-corruption aiming to create an enabling environment for a consensus-oriented policy making, implementation, increased ownership of the anti-corruption policies and create ground for an improved coordination mechanism.

Programme Period: 2006-2010
Key Result Area (UNDAF): "By 2010, strengthened individual and institutional capacity for both democratic and environmental governance at local and central levels."
Start date: 22 November 2010
End Date 22 November 2011
PAC Meeting Date 18 June 2010
Management Arrangement: NIM

Total resources required USD 240,000
Total allocated resources:
UNDP DGTTF USD 240,000

Agreed by Ministry of Foreign Affairs (MFA):


H. Renan ŞEKEROĞLU
Head of Department
Multilateral Economic Affairs

24.01.2011

Agreed by Prime Ministry Inspection Board (Executing Entity):

Agreed by (UNDP):


Shahid Najam
Resident Coordinator

I. SITUATION ANALYSIS

I.A. Background

Corruption is found in both rich and poor countries, developing and developed countries albeit in different forms and magnitude. Evidence from across the globe confirms that corruption hurts the poor disproportionately. Corruption hinders economic development, reduces social policies, and diverts investments in infrastructure, institutions and services. Moreover, it fosters an anti-democratic environment characterized by uncertainty, unpredictability and declining moral values and disrespect for constitutional institutions and authority. Corruption, therefore, reflects a democracy, human rights and governance deficit that negatively impacts human development and human security.

It is therefore not surprising that in the increasingly globalized world order, there has been a constant demand and from international community, multilateral institutions, human rights organizations and regional security blocs to contain corruption to avoid further erosion of public institutions and exacerbation of poverty, reduce threats to sustainable human development, and avoid possible spillover effects. Corruption is no longer an issue of ethics and morality of societies and countries, but has become a legitimate subject of national and international interest and concern, and is also subject to international regulation.

The United Nations Convention against Corruption (UNCAC), which has been recognized as a reference framework for the fight against corruption, recognizes that corruption is a multifaceted phenomenon that results, among others, from weak governance systems and failing institutions with multiple interactions among each other. In that respect, development of effective anti-corruption strategies is strongly emphasized in Article 5 of UNCAC, which calls upon state parties to develop and implement effective, coordinated anti-corruption policies that promote the participation of civil society and reflect the principles of rule of law, proper management of public affairs and public property, integrity and transparency. The inclusion of such strong and clear language reinforces the role of viable anti-corruption strategies in addressing the problem.

In this context, an effective anti-corruption strategy requires a detailed understanding of a country's governance and political environment. There can never be a one-size-fits-all approach to the corruption problem, mainly because of the historical, political, economic and social differences among countries. The quality and effectiveness of anti-corruption policies and programmes in a country rely on in-depth understanding of where, when, why and how corruption occurs—and the factors that allow it to persist—in that specific nation.

Based on UNDP's global experience, national strategies are easier to design and implement, by allocating national resources and identifying implementing institutions. In that respect, media, civil society, professional bodies, nongovernmental organizations (NGOs), community-based organizations, and political parties can also increase ownership of, and demand for, anti-corruption initiatives.

It is also imperative to accept that corruption is also a political problem that affects power relations. Therefore while shaping the strategies on anti-corruption, it is crucial to anticipate the nature, location, organization and strength of the resistance to the reforms. Such resistance can come from either inside or outside the bureaucracy (or from both sources). Effective anti-corruption strategies must include adequate mechanisms to address all possible sources and types of resistance. Therefore, a comprehensive change management plan needs to be developed for the successful implementation of strategies on anti-corruption.

Moreover, due to multifaceted nature of corruption, the way in which a state responds to corruption and corruption risks will necessarily involve a variety of state and non-state institutions. States may respond through existing institutions, create new ones or choose a combination of both. States also need to clarify the mandates and functions of the respective institutions and determine how these will interact with one another: in other words, while shaping the anti-corruption strategies, states need to define its institutional arrangements and communication strategies for their anti-corruption efforts.

I. B. Situation in Turkey

During the recent years the Turkish government has addressed the issue of corruption through a series of reforms promoted in close linkage to Turkey's EU accession process. The EU Accession Partnership identifies a series of priorities directly or indirectly related to the fight against corruption. The document requires the Government of Turkey, among other issues, to pursue reform of public administration and personnel policy in order to ensure greater efficiency, accountability and transparency and to fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.

A first "Action Plan for Enhancing Transparency and Improving Good Governance in Public Administration" was issued in 2002. A "Commission for Enhancing Transparency and Developing Efficient Public Governance in Turkey" was established to arrange for the preparation of strategies, plans, programmes and other necessary activities for enhancing transparency and reinforcing the fight against corruption, to share them with the public when necessary and ensure their implementation, to ensure cooperation with international organizations in the fight against corruption, and to determine the general principles regarding activities carried out and measures that need to be taken. However, as per some of the international actors working in the field of anti-corruption, the Commission has not taken any political initiative in anti-corruption issues¹.

A new set of anti-corruption reforms was planned in the 9th Development Plan covering 2007-2013, adopted by the Turkish Grand National Assembly on 28 June 2006. The package included the short-term priorities of the government concerning the enactment of legal instruments to better prevent and combat corruption. Among other measures, the package included changes in asset declarations and in the financing of political parties and elections, which are widely considered to be the key aspects for increasing transparency and reducing corruption in the political sphere.

In October 2006 a circular by the Prime Minister reinforced the role of Ministerial Commission for Enhancing Transparency in Turkey and Improving Good Governance by extending its duties to cover co-operation with international anti-fraud organizations, such as European Anti-Fraud Office (OLAF), and establishing principles and measures in this context. The circular also identified the Prime Ministry Inspection Board (PMIB) as the secretariat for the Ministerial Committee for Enhancing Transparency and Improving Good Governance, and assigned the Board with the task of providing technical and administrative assistance to the Committee in developing national anti-corruption strategies and monitoring their effectiveness.

External assessments by the Council of Europe, OECD and European Commission generally recognize that, at the time of the reports, despite the efforts of the government, only limited progress had been made in fighting corruption. The reports also point out the weakness of some of the measures undertaken and the failure to address some of the major loopholes in the system for prevention of corruption. The 2008 OECD/SIGMA Public Integrity System Assessment highlighted the persistently high levels of corruption in Turkey. The report stated that the main areas of grand corruption continued to concern the financing of political parties and the monitoring of expenditures related to elections, privatisation of energy, construction, and the media. The main

¹ European Commission Staff Working Document, 2009 Turkey Progress Report

hotspots for administrative corruption appeared to be the tax revenue authorities and the police, while some progress was registered in reducing corruption in tax administration.

Concerning the GRECO assessment², only 6 of the 21 recommendations previously formulated had been dealt with in a satisfactory manner, the remaining had either only been partly implemented or not implemented. It should be noted for the purposes of this assessment that the GRECO compliance report assessed Turkey as non compliant on the recommendation to entrust a body with the responsibility of overseeing the implementation of national anti-corruption strategies as well as proposing new strategies against corruption. The negative assessment was based on the fact that despite the acknowledged existence of various State bodies and forms of cooperation aimed at improving the fight against corruption, the Ministerial Commission was yet another example of the strong influence of the State and, in particular, of law enforcement in anti-corruption efforts in Turkey.

The absence of an overall anti-corruption strategy, action plan and coordination mechanisms between relevant state agencies was also highlighted by the mentioned external assessments as a cause for continuing concern. In response to those concerns during 2009 the Government of Turkey undertook a series of new reforms:

The name of the above-mentioned Commission was changed³ to the “Commission for Enhancing Transparency and Reinforcing the Fight Against Corruption in Turkey”. In addition, an “Executive Committee for Enhancing Transparency and Reinforcing the Fight Against Corruption”⁴, was created to prepare strategy plans for enhancing transparency and preventing corruption, to carry out the necessary work for such plans to be put into effect, to monitor and coordinate their implementation, to determine the measures to be taken and supervise their implementation, to provide coordination between public institutions and organizations and non-governmental organizations, to submit progress reports to the Commission for approval, to make changes to the plan in line with current developments in these matters, and to perform other tasks to be assigned in this framework.

The same circular charged the Prime Ministry Inspection Board with the duties of providing secretarial services to the Commission and the Executive Board in the execution of their tasks. Additional tasks for prevention of corruption were also assigned to the PMIB..

A New *Strategy for Increasing Transparency and Strengthening the Fight Against Corruption*⁵ (hereinafter referred as “Anti- Corruption Strategy”) was developed by the Executive Committee with the support of the PMIB. The referred Strategy was approved by the Council of Ministers as of 1 February 2010⁶.

The referred Strategy has three main components⁷ as summarized below:

- **Preventive Measures:** Measures with regard to the elimination of the factors or causes of corruption in Turkey. These include the measures for investigation of the financing of political parties and election campaign; providing technical assistance for development of the legislative framework on political ethics; monitoring the legislative process for the

² Joint First and Second Round Evaluation Compliance Report on Turkey, GRECO, April 2008

³ Prime Ministry Circular 2009/19

⁴ Chaired by the Deputy Undersecretary of the Prime Ministry and composed of the Deputy Undersecretaries of the Ministries of Justice, Internal Affairs, Finance, Labour and Social Security, and of representatives of the Association of Chambers and Exchanges of Turkey and of the workers union that has the largest membership

⁵ Prime Ministry Circular 2009/19 published in the Official Gazette on 5 December 2009

⁶ Decision of Council of Ministers No: 2010-56

⁷ Strategy for Increasing Transparency and Strengthening Fight Against Corruption

establishment of an Ombudsman institution in Turkey; capacity enhancement for the inspective units for fight against corruption; or determining the ethical principles and developing follow-up mechanisms for local administrators, etc.

- ***Measures for Applying Sanction:*** Measures with regard to the identification of the cases of corruption and required punishment. These include share of knowledge and effective coordination between units that work against corruption; making regulations for the protection of the individuals reporting the cases of corruption to the authorities at public and private sector, etc.
- ***Measures for Increasing Public Awareness:*** the measures for raising public awareness about the negative impacts of corruption. These include strengthening the role of media organs in the struggle against corruption; organizing conference and working meetings for the public opinion, non-governmental organizations and the public officials to adopt the fundamental methods and principles created according to the strategy; etc.

“The Action Plan for Increasing the Transparency and Strengthening the Fight Against Corruption” (hereinafter referred as “Action Plan”) was also developed and approved by the Executive Committee for the implementation of the Anti-corruption Strategy.

II. STRATEGY

Despite the efforts of the Government of Turkey in recent years, corruption remains a widespread issue in Turkey. The Government of Turkey are facing complex challenges in the process of fighting against corruption and promoting the principles of democratic governance such as transparency, accountability, participation, respect to human rights etc. In order to respond to those challenges, since 2002 the Government has taken a series of efforts that constitute centre-pieces of the EU accession process and its requirements particularly those responding to the Copenhagen political criteria. However, this has also created high expectations for actual delivery, which were expressed to be limited by international actors such as EU, OECD/SIGMA or GRECO. Within this framework, the Government responded to the situation with a comprehensive Strategy namely “Strategy for Increasing Transparency and Strengthening the Fight Against Corruption”, which brought together all single efforts of coordination and monitoring of anti-corruption in Turkey.

In this context, while the development of the referred Anti- Corruption Strategy is important, it is also crucial to note that its success lies in how well the measures that are included in the Strategy are implemented. The implementation of preventive anti-corruption policies shares many of the challenges, but is often further complicated by their cross-cutting nature as they usually affect many public institutions at the same time, and by the fact that they change the distribution of power and the generation of income, which generates many, often powerful, opponents. Therefore, the effective implementation of anti-corruption policies requires structured and systematic communication, training, and monitoring processes with clearly defined roles and responsibilities. This in turn has given reason for the Government of Turkey to intensify the cooperation with international partners to maximize the actual delivery of the measures and use of all resources available to provide the best response possible.

Anti-corruption is a long-standing component of UNDP’s engagement in the field of democratic governance. Although, UNDP globally has for many years supported explicit and implicit projects and activities that address the fundamental and often politically sensitive issues related to corruption, the Project at hand is the first initiative of UNDP Turkey with the Government of Turkey in the field of anti-corruption and expected to lay the ground for a longer partnership. Within this perspective, UNDP’s special niche in the field of anti-corruption in Turkey is to provide

technical assistance on institutional capacity-enhancement based on its global experience and technical expertise in providing anti-corruption policy and programme support services, as well as capacity to implement the nationally-owned anti-corruption policies and programmes. As per the initial contacts of UNDP Turkey and Prime Ministry Inspection Board, an assessment mission has been carried out regarding the preventive functions of PMIB in March 2010. The referred assessment was conducted in the framework of a regional project implemented by UNDP Bratislava Regional Centre (BRC) in cooperation with the UNDP Turkey. The main objective of the mission was mainly to conduct a detailed review of the capacities of the PMIB in the area of prevention of corruption and formulate recommendations for the development of the PMIB's capacities and indications on possible follow up activities to be implemented for this purpose.

As a result of the assessment mission of March 2010, a series of recommendations about the preventive functions of PMIB have been put forward under two possible scenarios: i) Under the current set-up keeping the role of PMIB in prevention of corruption limited to the areas of anti-corruption policy formulation, development of implementation plans, coordinating and monitoring the implementation of anti-corruption policies, promoting international cooperation; ii) Modification of the regulation of the PMIB and the law, which enables the PMIB to act as a multi-task agency with separate investigative and preventive structures and roles. The project at hand is developed based on the recommendations made under the first scenario, which aims to improve the preventive functions of anti-corruption under the existing setting of PMIB. Therefore, the project will focus on the creation of an enabling environment, public awareness raising on anti-corruption and enhancement of cooperation with relevant stakeholders for prevention of corruption.

Within this framework, the Project at hand aims to create an enabling environment and empower the Prime Ministry Inspection Board (PMIB), which has been given new tasks through the Prime Ministry Circular 2009/19 for the implementation of the national anti-corruption strategy and its action plan.

This provides the upstream and downstream level activities on anti-corruption aiming to create an enabling environment for a consensus-oriented policy making, implementation, increased ownership of the anti-corruption policies and create ground for an improved coordination mechanism. The project will also contribute to the creation of a common understanding for functional consensus and lay ground for standardized implementation mechanisms and tools, including administrative and procedural instructions, control requirements, monitoring and oversight systems.

In light of this holistic approach mentioned above, the Project will have the following outputs for the expected outcome of increased ownership and strengthened capacity for the implementation of the newly introduced "Strategy for Increasing Transparency and Strengthening the Fight Against Corruption" and "Action Plan for Increasing Transparency and Strengthening the Fight Against Corruption"

Output 1: Public awareness and ownership on anti-corruption policies raised through different means and mechanisms developed including a holistic outreach strategy and information sharing platforms

The Prime Minister's circulars of 2006 and 2009 designed an extensive role for the PMIB in the development and implementation of the "*Action Plan for Increasing the Transparency and Strengthening the Fight Against Corruption* ". The referred Action Plan was developed by PMIB and which has been developed by the PMIB and approved by the Executive Committee.

The Action Plan was developed along the lines of the functional distinction between Preventive, Coercive Measures and Measures to Raise Public Awareness under the "*Strategy for Increasing the Transparency and Strengthening the Fight Against Corruption*". Under the category of awareness raising, the Plan contains activities for informing the citizens on their right of reporting

corruption cases; carrying out regular surveys on perceptions of corruption; promoting educational activities against corruption and awareness raising campaigns through the media; organizing seminars, workshops and conferences on the theme of corruption.

The assessment report that is developed by BRC on capacity assessment of the preventive functions refers to the literature and practice of corruption prevention (as indicated in UNCAC), which describe disseminating knowledge on anti-corruption and involvement of the general public as one of the main elements for successful prevention of corruption. This can be achieved through various means, like a website or publications and the direct contact with the media for the organization of public campaigns or for regular information and public messages is crucial. At this point, the project will address the strategies that can ensure the effective cooperation with media and civil society for the development and promotion of information sharing campaigns on anti-corruption. The Project at hand aims to lay the ground for systematic and structured communication and cooperation lines with respective stakeholders particularly through the Outreach Strategy and its Action Plan.

Within this framework, in line with the measures included in the referred Strategy, activities in the Action Plan and recommendations included in BRC Assessment Report, the Project will focus on public awareness and ownership raising on anti-corruption and the measures taken therein. To this end, the following activities will be carried out in order to achieve the related Output:

Activity 1.1. Develop a coherent Outreach Strategy to increase the awareness on anti-corruption policies: In order to increase the awareness of the public and institutions on the measures that are newly introduced by “Anti- Corruption Strategy”, the Project will develop a comprehensive Outreach Strategy. The awareness of the public and key institutions about anti-corruption measures and the role of PMIB in the process needs to be improved for the successful implementation of the Strategy and Action Plan. Therefore, the proposed Outreach Strategy will include the issues that fall into the following categories:

- 1) Low level of awareness among the public and State bodies about national anticorruption strategies;
- 2) Low level of knowledge and understanding about the role PMIB in the process (key institutions at national level; mass media)

The Outreach Strategy is therefore expected to increase the ownership of the National Anti-corruption Strategy among the public at large, representatives of media, civil society, private sector and all related institutions. Therefore, this would also enhance the cooperation and interaction with all those that are concerned.

Activity 1.2. Develop and implement the Outreach Strategy Action Plan based on the issues raised in Outreach Strategy on Anti-Corruption: Based on the issues indicated in the Outreach Strategy, the project will also develop an Action Plan for its implementation. In this context, it is aimed to create an environment free from bias and of increased public trust and ownership towards the anti-corruption policies and initiatives in Turkey.

Within the scope of the Action Plan developed based on the issues raised in the Outreach Strategy, the awareness raising activities will include but not limited to the following actions:

- Organization of a national press conference - it can be in form of a breakfast type media conference for a limited participation from mass media organizations –in order to generate interest towards the national anti-corruption policies;

- Organization of a series of knowledge sharing seminars on anti-corruption policies by the staff of PMIB with the participation of academicians, civil society representatives and university students.
- Organization of an international conference to raise awareness about the importance of the issue and inform public about the recent developments in the field. Conference will therefore contribute to the improvement of the public, private and NGO cooperation in fight against corruption;
- Improvement of the website of PMIB, which will include international and national documents on anti-corruption;
- Publication of articles about anti-corruption measures, role and functioning of PMIB,
- Distribution and publication of the best practices in the area of anti-corruption;
- Development of monthly bulletins about the progress of work of PMIB in in the field of anti-corruption;
- Inclusion of the theme of anti-corruption on TV and radio public affairs program which would might include live discussions about the anti-corruption policies and recent developments in that field;

Output 2. A comprehensive Gap Analysis and Change Management Plan developed for effective monitoring and oversight of the implementation of the Anti Corruption Action Plan

PMIB, whose tasks have been expanded through the Prime Ministry Circular 2009/19, is responsible for providing secretarial services to the Commission and the Executive Board in the execution of their tasks given in the Anti-Corruption Strategy. Additional tasks for prevention of corruption were also assigned to the PMIB in relation to the Anti Corruption Action:

1. Coordinating Implementation of the Plan: The PMIB i) implements the approved strategy, plans and programs; ii) chairs the working groups to be established regarding the various topics of the Plan; iii) ensures cooperation and coordination between relevant public institutions and civil society organizations; iv) monitors the activities carried out for anti-corruption and develops cooperation with other agencies; v) reports back to the Committee on the implemented activities.

2. Promoting International Cooperation: The PMIB i) develops relations with international organizations; ii) participates to the activities of Task Forces developing legislation for implementation of international treaties (UNCAC and GRECO).

In relation to its monitoring role, the Project will develop a comprehensive gap analysis and change management plan in order to strengthen the monitoring and oversight role of the PMIB on the implementation of the Anti-Corruption Action Plan. To this end, the findings of the assessment report produced by BRC will be taken into consideration for the formulation of the following activities:

Activity 2.1 Analyze the gaps for effective monitoring and oversight of the implementation of the Anti-Corruption Action Plan: The gap analysis will include the analysis of the change management capacities of the responsible institutions for anti-corruption under the Anti-Corruption strategy. Therefore, the Project will undertake a gap analysis study, which is expected to set the issues for the identification of change supporters and opponents, as well as incentive packages. The analysis will involve surveys, roundtable discussions and workshops, desk based and field based data collection and analysis, as well as other mechanisms to gather the perspectives of policy makers and public officials on anti-corruption. The findings of the gap analysis will also provide the basis for the development of the Change Management Plan for the use of PMIB during and after the implementation of the Anti Corruption Action Plan.

Activity 2.2 Develop Change Management Plan for the use of PMIB: Change management is a fundamental competency required by the PMIB for the effective monitoring and oversight of the implementation of the Anti-Corruption Action Plan. To this end, specific change management strategies must be designed and implemented in line with newly introduced Strategy and Action Plan. Without such strategies even if the activities envisaged in the Action Plan are carried out properly, their impact on anti-corruption objectives will be undesirable. In that respect, based on the findings of the gap analysis conducted, a comprehensive Change Management Plan will be developed including the strategies of monitoring and oversight of anti-corruption to be used by the PMIB. Specifically, the Plan is expected to include the following:

- i) control requirements and adequate monitoring and oversight mechanisms;
- ii) the identification of change supporters and opponents, as well as incentive packages.

Activity 2.3 Conduct Trainings for PMIB based on the strategies of Change Management Plan: The Project will provide technical assistance to the PMIB for the implementation of the Change Management Plan developed. Therefore, based on the strategies envisaged in the scope the Change Management Plan a series of trainings will be conducted for the staff of PMIB. The referred trainings are expected to provide the basic skills about the following:

- managing the environment of change: i) creating the momentum of change; ii) analysis the change context.
- executing the change process that has been developed with the newly introduced tasks of the institutions through the Anti-Corruption Strategy: i) facilitating of change; ii) communication strategies about change.

Output 3. Communication and coordination among the responsible institutions and with the PMIB enhanced for the successful implementation of the Anti-Corruption Action Plan: The success of the implementation of the anti-corruption policies strongly relies on the effectiveness and cooperation of complementary institutions such as the prosecutors, the auditor general and the courts, etc. whose contribution and interaction play a crucial role. In accordance with the Anti-Corruption Strategy and Action Plan, PMIB works for the implementation of the Plan and coordination of the work of the State bodies concerned along with the following bodies:

The Commission for Enhancing Transparency and Reinforcing the Fight Against Corruption (which meets at least twice yearly) is the decision making body in the area of corruption prevention, it ensures the efficiency and coordination for the achievement of the objectives indicated in the Strategic Plan and discusses and approves the progress reports prepared by the Executive Board for Enhancing Transparency and Reinforcing the Fight Against Corruption.

The Executive Committee for Enhancing Transparency and Reinforcing the Fight Against Corruption (which meets in practice every week) prepares the Strategic Plan for preventing corruption; carries out activities required for its implementation; monitors and coordinates its implementation, identifying the measures to be taken.

A series of ad-hoc Working Groups are established through the Plan itself for the implementation of specific tasks. The composition of the working groups, duration of their work and reports to be prepared are determined upon the recommendation of the PMIB.

Within this framework, it is evident that there is a need of close interaction and communication between different institutions in order to carry out the elements for the effective implementation of preventive anti-corruption policies. In addition as also mentioned the Assessment Report produced by UNDP, involvement of the stakeholders external to the executive particularly civil society and

private sector seems to be one of the crucial fields that require attention while developing the role of the Board as corruption preventive agency. Therefore, the Project will address the measures, which will enable the effective cooperation and coordination among the responsible institutions and other relevant stakeholders concerned for the implementation of the Action Plan and with PMIB. In that respect, the following activities will be carried out in order to achieve the effective communication and coordination for the smooth implementation of the Anti-Corruption Action Plan:

Activity 3.1. Assess the current situation about the coordination and cooperation among the responsible institutions and with the PMIB in the implementation process of Action Plan: Until the launch of the Project in October 2010, it is expected that the implementation of the Action Plan would be progressed. In that respect, within the second quarter of the Project, needs, opportunities and assets with regards to the established coordination and cooperation mechanisms among the responsible institutions and PMIB will be assessed. The results of the referred analysis are expected to provide the basis for the development of the framework of action and the procedures and principles for strengthening the coordination and cooperation among the responsible institutions assigned under the Anti-corruption Action Plan.

Activity 3.2. Develop the framework of action for enhancing the cooperation and coordination processes during the implementation of the Action Plan: Based on the results of the current situation analysis on coordination and cooperation, the Project will set the framework for action to be taken for the facilitation of the cooperation process. The main objective of this activity is to develop a cooperation model for PMIB in line with the principles and standards developed.

The referred framework will set a series of possible means, tools or methods of cooperation and coordination such as the IT use, consultative seminars, workshops, etc.

Activity 3.3. Develop a set of procedures and principles ensuring the effective coordination and cooperation among the responsible institutions and with the PMIB: The newly developed Anti-corruption Strategy and Action Plan confer to the **Executive Committee** and the **PMIB** and to **ad-hoc Working Groups** the role of coordinating activities for the implementation of the Plan. It appears that the PMIB will lead and participate in the activities of the Working Groups that will be also responsible for monitoring the implementation of the Plan, reporting to the Executive Committee. In addition, the PMIB will ensure cooperation and coordination between relevant public institutions and civil society organizations, monitor the activities carried out for anti-corruption and develop cooperation with other agencies.

In that respect, the key element for the implementation of the Plan is the establishment of more intensive and better structured cooperation with the various stakeholders and State bodies involved. To this end, based on the results of the current situation analysis under Activity 3.1., the Project will develop the guidelines indicating the procedures and principles for ensuring the effective cooperation and coordination among the state bodies involved and with the PMIB.

The referred principles and procedures are thereby expected to contribute to the realization of the Framework of Action that will be developed under Activity 3.2. and achievement of the following for the effective cooperation and coordination process led by the PMIB:

- The formulation of relationships between PMIB and various stakeholders and State bodies involved for the implementation of the Action Plan based on the principles of mutual interaction and partnership;
- Development of an organisational consensus among the responsible bodies in order to define common objectives in the field of anti-corruption;
- Agreement on the means to be contributed by each stakeholder and State bodies in order to reach the objectives defined together.

Within that framework, the principles and procedures will thereby contribute to the development of the framework of action for cooperation and coordination process led by the PMIB during the implementation of the Action Plan.

Activity 3.4. Conduct tailor-made training seminars on effective coordination and cooperation mechanisms to be developed for State bodies involved and PMIB: The coordination role of the PMIB given under the Prime Ministry Circular 2009/19 and Anti-corruption Action Plan caused the responsibilities of the PMIB to be extended. Therefore, in order to strengthen the coordination of the state bodies involved, training seminars on certain issues of coordination will be conducted for the staff of PMIB. The topics of the training seminars will be determined in line with the results of the Current Situation Analysis under Activity 3.1., the issues addressed in the Framework of Action and procedures and principles developed for an effective cooperation and coordination model between the PMIB and state bodies concerned.

There will be five training seminars conducted but this number can be increased, if required. International best practices and experiences on the above listed issues will be benefitted for the formulation of the programs for training seminars.

Output 4. Technical support provided for the implementation of the Anti-corruption Action Plan: As per the Prime Ministry Circular 2009/19 and Anti-corruption Action Plan, the PMIB is given the responsibility to chair or delegate others to chair the working groups to be established regarding the various topics of the Anti-Corruption Strategy. In that respect, the Project will provide technical support to the implementation of the Action Plan through the providence of international expertise to the work of the working meetings, as required. The areas that need to be supported will be determined by the PMIB during the lifetime of the Project and tailor-made trainings on the specified areas will be realized for the working groups.

International best practices and experiences on the above listed issues will be benefitted for the formulation of the programs for training seminars. In that respect, UNDP will bring about the international experience and knowledge with the international experts recruited for specific areas of support.

Results and Resources Framework

<p>Intended Outcome as stated in the Country Programme Results and Resource Framework:</p> <p>CP Outcome 1.1: Increased individual, collective and institutional capacity for participation at all levels of decision-making</p> <p>CP Outcome 1.2: Mechanisms for the implementation and monitoring of international norms and standards on human rights, including the judicial system strengthened and reformed.</p> <p>Outcome indicators as stated in the Country Programme Results and Resources Framework, including baseline and targets:</p>			
<p>Applicable Key Result Area (from 2008-11 Strategic Plan):</p> <p>UNDP Strategic Plan Key Result Area 2.3 Outcome: supporting national partners to implement democratic governance practices grounded in human rights, gender equality and anti-corruption;</p> <p>Partnership Strategy: Partnerships with national and international stakeholders were established in order to contribute to the endeavors by the GoT particularly in the area of anti-corruption</p>			
<p>Project title and ID (ATLAS Award ID): Project for Support to Effective Implementation of National Anti-Corruption Strategy in Turkey</p>			
INTENDED OUTPUTS	OUTPUT TARGETS FOR (YEARS)	INDICATIVE ACTIVITIES	RESPONSIBLE PARTIES
<p><i>Output 1 – Public awareness and ownership on anti-corruption policies raised through different means and mechanisms developed including a holistic outreach strategy and information sharing platforms</i></p> <p><u>Indicator:</u></p> <p>Number of the participants who participated to the national conference, international conference and other platforms on anti-corruption</p> <p>Number of press news about anti-corruption</p> <p>Number of TV programs about anti-corruption</p>	<p><i>Use this column for more complex projects where an output takes more than one year to produce.</i></p> <p>N/A</p>	<p>1.1. Develop a coherent Outreach Strategy to increase the awareness on anti-corruption policies</p> <p>1.2. Develop and implement the Outreach Strategy Action Plan based on the issues raised in Outreach Strategy on Anti-Corruption</p>	<p>INPUTS</p> <p><u>International consultants:</u></p> <p><u>National consultants</u></p> <p><u>Organizational Expenses</u></p> <p><u>Flight and accommodation</u></p> <p><u>Translation expenses</u></p> <p><u>Printing Services</u></p>

<p>Number of the brochures & posters produced and disseminated</p> <p>Number of the references to the Anti-Corruption Strategy and Action Plan</p> <p>Number of stakeholder meetings</p> <p>Number of the articles publicized on anti-corruption</p> <p>Number of the visitors who have visited the PMIB website</p> <p><u>Baseline:</u> No baseline</p>			
<p><i>Output 2 - A comprehensive Gap Analysis and Change Management Plan developed for effective monitoring and oversight of the implementation of the Anti Corruption Action Plan</i></p> <p><u>Indicator:</u> Inclusion of the change management plan into PMIB's programming and planning for the oversight and monitoring of the implementation of the Anti-corruption Action Plan</p> <p>Number of the PMIB staff attended to the training seminars on change management</p> <p><u>Baseline:</u> No baseline</p>	<p>N/A</p>	<p>2.1 Analyze the gaps for effective monitoring and oversight of the implementation of the Anti-Corruption Action Plan</p> <p>2.2 Develop Change Management Plan for the use of PMIB</p> <p>2.3 Conduct Trainings for PMIB based on the strategies of Change Management Plan</p> <p>PMIB UNDP</p>	<p><u>International Consultants</u></p> <p><u>Organizational Expenses</u></p> <p><u>Flight and accommodation</u></p> <p><u>Translation expenses</u></p>
<p><i>Output 3: Communication and coordination among the responsible institutions and with the PMIB enhanced for the successful implementation of the Anti-Corruption Action Plan</i></p> <p><u>Indicator:</u> Inclusion of the procedures and principles of coordination in the working</p>	<p>N/A</p>	<p>3.1. Assess the current situation about the coordination and cooperation among the responsible institutions and with the PMIB in the implementation process of Action Plan</p> <p>3.2. Develop the framework of action for strengthening the cooperation and coordination processes during the</p> <p>PMIB UNDP</p>	<p><u>International Consultants</u></p> <p><u>Organizational Expenses</u></p> <p><u>Flight and accommodation</u></p> <p><u>Translation expenses</u></p>

<p>procedures of the PMIB and other State bodies during the implementation of the Anti-corruption Action Plan</p> <p>Number of the PMIB staff and working group members attended to the tailor-made trainings on strengthening the coordination mechanisms on anti-corruption</p> <p><u>Baseline:</u> No baseline</p>		<p>implementation of the Action Plan</p> <p>3.3. Develop a set of procedures and principles ensuring the effective coordination and cooperation among the responsible institutions and with the PMIB</p> <p>3.4. Conduct tailor-made training seminars on effective coordination and cooperation mechanisms to be developed for State bodies involved and PMIB</p>		
<p>Output 4. Technical support provided for the implementation of the Anti-corruption Action Plan:</p> <p>Indicator: Application of international experiences with regard to implementation of the Anti-corruption Action Plan</p> <p>Number of the training seminars on selected topics of anti-corruption for working groups</p> <p><u>Baseline:</u> No baseline</p>	<p>N/A</p>	<p>4.1 Provide international expertise and technical support for the successful implementation of the Anti-corruption Action Plan</p>	<p>PMIB UNDP</p>	<p><u>International Consultants</u></p> <p><u>Organizational Expenses</u></p> <p><u>Flight and accommodation</u></p> <p><u>Translation expenses</u></p>

Annual Work Plan

Year: 2010

EXPECTED OUTPUTS And baseline, indicators including annual targets	PLANNED ACTIVITIES <i>List activity results and associated actions</i>	TIMEFRAME				RESPONSIBLE PARTY	Funding Source	PLANNED BUDGET	
		Q1	Q2	Q3	Q4			Budget Description	Amount
Output 1 – Public awareness and ownership on anti-corruption policies raised through different means and mechanisms developed including a holistic outreach strategy and information sharing platforms	1.1. Develop a coherent Outreach Strategy to increase the awareness on anti-corruption policies				X	PMIB UNDP	UNDP	International Consultant	10,000 \$
	1.2. Develop and implement the Outreach Strategy Action Plan based on the issues raised in Outreach Strategy on Anti-Corruption				X	PMIB UNDP	UNDP	Travel & accommodation Translation costs Travel & accommodation Organizational expenses (printing, stationary, lunch, dinner and other miscellaneous expenses) Translation costs	80,000 \$

Year: 2011

EXPECTED OUTPUTS And baseline, indicators including annual targets	PLANNED ACTIVITIES <i>List activity results and associated actions</i>	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q1	Q2	Q3	Q4		Funding Source	Budget Description	Amount
Output 1 – Public awareness and ownership on anti-corruption policies raised through different means and mechanisms developed including a holistic outreach strategy and information sharing platforms	1.2. Implement the Outreach Strategy Action Plan based on the issues raised in Outreach Strategy on Anti-Corruption	X	X	X	X	PMIB UNDP	UNDP	Organizational expenses (printing, stationary, lunch, dinner and other miscellaneous expenses) Travel and Accommodation	14,000 \$
Output 2 - A comprehensive Gap Analysis and Change Management Plan developed for effective monitoring and oversight of the implementation of the Anti Corruption Action Plan	2.1. Analyze the gaps for effective monitoring and oversight of the implementation of the Anti-Corruption Action Plan	X				PMIB UNDP	UNDP	International Consultant Travel and Accommodation	10,000 \$
	2.2 Develop Change Management Plan for the use of PMIB	X				PMIB UNDP	UNDP	International Consultant	8,000 \$
	2.3 Conduct Trainings for PMIB based on the strategies of Change Management Plan		X			PMIB UNDP	UNDP	Organizational expenses (printing, stationary, lunch, dinner and other miscellaneous expenses)	25,000 \$

<i>Output 3-: Communication and coordination among the responsible institutions and with the PMIB enhanced for the successful implementation of the Anti-Corruption Action Plan</i>	3.1. Assess the current situation about the coordination and cooperation among the responsible institutions and with the PMIB in the implementation process of Action Plan		X			PMIB UNDP	UNDP	International Consultant	8,000 \$
	3.2. Develop the framework of action for strengthening the cooperation and coordination processes during the implementation of the Action Plan		X			PMIB UNDP	UNDP	Travel and Accommodation	10,000 \$
								Translation costs	
								International Consultant	
3.3. Develop a set of procedures and principles ensuring the effective coordination and cooperation among the responsible institutions and with the PMIB				X		PMIB UNDP	UNDP	International Consultant	8,000 \$
3.4. Conduct tailor-made training seminars on effective coordination and cooperation mechanisms to be developed for State bodies involved and PMIB				X		PMIB UNDP	UNDP	Organizational expenses (printing, stationary, lunch, dinner and other miscellaneous expenses)	40,000 \$

<p><i>Output 4. Technical support provided for the implementation of the Anti-corruption Action Plan</i></p>	<p>4.1 Provide international expertise and technical support for the successful implementation of the Anti-corruption Action Plan</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>PMIB UNDP</p>	<p>UNDP</p>	<p>International Consultant</p>	<p>27,000 \$</p>
<p>TOTAL</p>									<p>150,000 \$</p>

Management Arrangements

The project is considered as a joint initiative of the Government of Turkey and UNDP. The project will be executed by the Prime Ministry. Within the Prime Ministry the project focal point is the Prime Ministry Inspection Board (PMIB).

UNDP will act as the implementing agency. UNDP will provide its relevant knowledge and expertise in facilitating the capacity building and technical know-how activities. UNDP will be the responsible party to coordinate the activities with the relevant stakeholders and complying with the monitoring and evaluation reporting requested by the PMIB.

The costs of all project staff and personnel will be met from the resources of the project at hand. The costs of the UNDP program management will be borne by UNDP. The UNDP will implement the entirety of project activities in line with UNDP financial rules and regulations and report to the national designated agency (PMIB) on quarterly expenditures through the Combined Delivery Report.

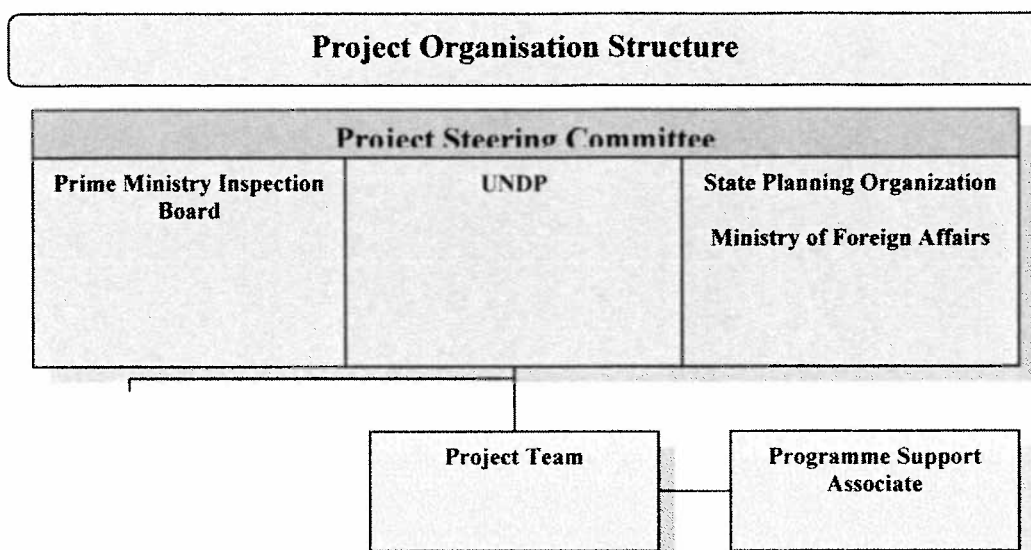
Depending on the requirements of the work, both short term international and national consultants will be recruited.

The Steering Committee, which will comprise of the PMIB, Ministry of Foreign Affairs, State Planning Organization and UNDP Turkey will provide the overall guidance to the project; monitors the project's outputs and their contribution to overall national development goals.

Day-to-day management shall be done by the Project Associate to ensure that the project produces the results (outputs) within the specified time lines and budget. Quality assurance will be ensured by the Democratic Governance Programme Manager with overall oversight and decision making provided by the Steering Committee.

Project activities that will be conducted with UNDP contribution will be carried out in accordance with the timeframe indicated in Annual Work Plan. The timetable will be revised in case of a possible contribution of other donor organizations.

The project will be audited, in line with the UNDP audit requirements, once in its lifetime at a minimum. Adequate financial provisions for the audit are included in the project annual work plan. When possible, UNDP's cost recovery shall be applicable.



Monitoring Framework And Evaluation

In accordance with the programming policies and procedures outlined in the UNDP User Guide, the project will be monitored through the following:

Within the annual cycle

- An Issue Log shall be activated in Atlas and updated by the Project Team to facilitate tracking and resolution of potential problems or requests for change.
- Based on the initial risk analysis submitted (see annex 1), a risk log shall be activated in Atlas and regularly updated by reviewing the external environment that may affect the project implementation.
- Based on the above information recorded in Atlas, a Project Progress Reports (PPR) shall be submitted by the Project Team to the Project Steering Committee through Project Assurance, using the standard report format available in the Executive Snapshot.
- a project Lesson-learned log shall be activated and regularly updated to ensure on-going learning and adaptation within the organization, and to facilitate the preparation of the Lessons-learned Report at the end of the project
- a Monitoring Schedule Plan shall be activated in Atlas and updated to track key management actions/events

Annually

- **Annual Review Report.** An Annual Review Report shall be prepared by the Project Team and shared with the Project Steering Committee.
- **Annual Project Review.** Based on the above report, an annual project review shall be conducted during the fourth quarter of the year or soon after, to assess the

performance of the project and appraise the Annual Work Plan (AWP) for the following year. In the last year, this review will be a final assessment. This review is driven by the Project Steering Committee and may involve other stakeholders as required. It shall focus on the extent to which progress is being made towards outputs, and that these remain aligned to appropriate outcomes.

Legal Context

This project document shall be the instrument referred to as such in Article I of the SBAA between the Government of Turkey and UNDP, signed on 21 October 1965.

Consistent with the attached Supplemental Provisions, the responsibility for the safety and security of the executing agency and its personnel and property, and of UNDP's property in the executing agency's custody, rests with the executing agency.

The executing agency shall:

- a) put in place an appropriate security plan and maintain the security plan, taking into account the security situation in the country where the project is being carried;
- b) assume all risks and liabilities related to the executing agency's security, and the full implementation of the security plan.

UNDP reserves the right to verify whether such a plan is in place, and to suggest modifications to the plan when necessary. Failure to maintain and implement an appropriate security plan as required hereunder shall be deemed a breach of this agreement.

The executing agency agrees to undertake all reasonable efforts to ensure that none of the UNDP funds received pursuant to the Project Document are used to provide support to individuals or entities associated with terrorism and that the recipients of any amounts provided by UNDP hereunder do not appear on the list maintained by the Security Council Committee established pursuant to resolution 1267 (1999). The list can be accessed via <http://www.un.org/Docs/sc/committees/1267/1267ListEng.htm>. This provision must be included in all sub-contracts or sub-agreements entered into under this Project Document.

ANNEXES

ANNEX I: OFFLINE RISK LOG

(see Deliverable Description for the Risk Log regarding its purpose and use)



Project Title: _____ **Award ID:** _____ **Date:** _____

#	Description	Date Identified	Type	Impact & Probability	Countermeasures / Mngt response	Owner	Submitted, updated by	Last Update	Status
1	Low level of political will in the implementation of the Anti-corruption Action plan	During the preparation	Environmental Implementation	Delay in the activities that need to be carried out in line with the Action Plan P= 2	Focus on more the awareness raising activities on anti-corruption in order to create an enabling environment and momentum for the implementation of the Action Plan	PMIB			No change
2	Low level of trust of the citizens towards the anti-corruption Strategies in Turkey	During the preparation	Environmental	Low ownership towards the anti-corruption policies and implementation of the Action plan P= 3	Identify the source of low and trust and develop response strategies accordingly	PMIB			
3	Politicization of corruption	During the preparation	Implementation	Low level of trust of the citizens and state bodies for the effective implementation of the action plan its results P= 3	Depoliticize anti-corruption efforts by focusing on its impact on development over the long term.	PMIB			