

BUILDING INTEGRITY: PROCESS AND IMPACT BOSNIA AND HERZEGOVINA



FOREWORD

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At the NATO Summit in Warsaw, Heads of State and Government endorsed the NATO Building Integrity (BI) Policy. They recognised that “corruption and poor governance are security challenges which undermine democracy, the rule of law and the economic development”. The NATO BI Policy reaffirms that transparent and accountable institutions under democratic control are fundamental to stability in the Euro-Atlantic area and are essential for international security cooperation.

Countries need to strengthen their institutional and operational capabilities with a view to enhancing their resilience against unpredictable security threats. The NATO BI Program was launched in 2007 as part of the Alliance’s commitment to defence institution building and defence capacity building. It is focused on developing practical tools to support nations to strengthen integrity, transparency and accountability and reduce the risk of corruption. Through dialogue, exchange of experience and education and training, this programme

provides nations with mechanisms and tools to make defence and security institutions more effective.

Fostering good governance and embedding the principles of integrity, transparency and accountability in defence establishments is an objective that requires continuous long-term efforts. In this regard, BI underpins defence reforms by reinforcing their effectiveness and sustainability. At the same time, it is broader in scope as it involves a process of generating and sustaining change – a change of institutional mindset and a change of the organisational culture of defence establishments.

As a driving force for change and projecting stability, the NATO BI Programme provides a strategic approach to building integrity through promoting proven values, norms and principles as well as through identifying good practices and policies that countries apply in order to enhance the effectiveness of their defence and related security sector. BI also creates synergy between national ownership of defence reforms and international cooperation to promote good practices. Political will at a national level is vital for initiating and sustaining reforms by drawing upon available tools and methodology developed at an international level, such as the NATO BI Self-Assessment and Peer Review Process. A strong vision and a clear strategy are essential for the implementation of recommendations and priorities at a national level.

I would like to commend the efforts of the Ministry of Defence of Bosnia and Herzegovina and its leadership to strengthen the integrity, transparency and accountability of its defence and related security sector. As an active participant and beneficiary of the NATO BI Programme, Bosnia and Herzegovina has systematically followed the different steps of the NATO BI process, resulting in the adoption by the Ministry of Defence of a Plan for Integrity and Fight against Corruption for the period of 2015-2019. I encourage the Ministry of Defence of Bosnia and Herzegovina to pursue the implementation of the recommendations of the NATO BI Peer Review Report.

I want to congratulate the Peace Support Operations Training Center (PSOTC) of the Armed Forces of Bosnia and Herzegovina for its active role as one of the Implementing Partners of the NATO BI Programme and a significant contributor to the implementation of the NATO BI Education and Training Plan.

Sharing experience and knowledge is part of the learning process and I trust that the present publication will contribute to consolidating the BI Community of Practice based on our common values.

Ambassador Alejandro Alvargonzález



FOREWORD

Ms MARINA PENDEŠ

Minister of Defence of Bosnia and Herzegovina



I am happy to have yet another opportunity to underline how important the issue of integrity is for the defence sector. A lack of integrity, professionalism or accountability creates room for corruption. Corruption is a daily security threat to modern society which demands focus on individual and institutional integrity-building, transparency of processes and accountability at all levels of government and society in general. That focus is embodied in democratic values, the rule of law, and respect for human rights, responsible resource management and timely tackling of malpractices that lead to corruption. The defence sector, including the Armed Forces, is a social segment that has its own specificities which make respecting these values particularly important. In view of the importance of integrity and having in mind difficulties that we are facing, we are committed to steadfastly countering the risks that threaten the prosperity of our society as a whole.

In promoting integrity as a permanent value we rely on our experiences as well as those of international actors. The Ministry of Defence of Bosnia and Herzegovina recognizes the importance the Alliance has attached to Building Integrity and preventing corruption in the defence sector. NATO's Building Integrity Programme, including the Tailored BI Programme for South Eastern Europe, has provided a great many ideas and vital tools and practical support on how to make them part of our daily work. The Ministry of Defence of Bosnia and Herzegovina has been NATO's partner in this programme for almost a decade now. Through our joint efforts, we have completed the BI Self-Assessment/Peer Review Process for the Ministry of Defence of Bosnia and Herzegovina. Our work together helped us identify a number of examples of good practices, which secured a respectable assessment of the Ministry's vulnerabilities and corruption risks. It has also raised the importance of the issue of integrity in our work environment to the next level and promoted the importance of the Partnership Goal on Integrity Development.

The period behind us has been very dynamic in terms of the evolving importance of ethics, integrity and the fight against corruption. While we have to focus on solutions when problems arise and invest our energies to mitigate potential consequences, we are also investing great efforts in preventing and eliminating the root causes of corruption. A systemic and comprehensive approach, which insists on conscientiousness and accountability is at the same time a tool and an objective. We have thus provided for strategic planning to strengthen professionalism and leave no room for corrupt behaviour. In that sense, the Ministry of Defence of Bosnia and Herzegovina has a clearly articulated Policy on Building Integrity and Preventing and Combating Corruption, which sets out general requirements and guidelines, authorities and implementation methods. We have also adopted the 2015-2019 Plan for Building Integrity and Fighting Corruption, which is a strong tool. We are aware that the implementation of plans and policies is closely related to effective communication with influential stakeholders, getting the message across and the adequate training of personnel. We are therefore proud of our Peace Support Operations Training Center and appreciate very much the support all the partners and NATO itself have provided to this institution, allowing it to play the prestigious role of the key domestic and important international education provider in the field of Building Integrity.

Finally, I would like to highlight that the defence sector reform in Bosnia and Herzegovina is perceived as the most successful reform in our society, and we will continue to invest efforts to maintain that perception. Efforts towards building integrity of each and every individual, institution and society as a whole will contribute to that objective. Aware of the importance of this process, we are committed to further cooperation with NATO in this field. Positive experiences and excellent results of the programme are an incentive for us to remain a proactive partner, and a contributor, as well as a beneficiary, of tools available under the NATO Building Integrity Programme.

Marina Pendes

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I. About the NATO Building Integrity Programme

THE BUILDING INTEGRITY PROGRAMME: AN OVERVIEW

The Building Integrity (BI) Programme is a NATO-led capacity building programme providing practical tools to help nations strengthen integrity, transparency and accountability and reduce the risk of corruption in the defence and security sector.

BI promotes good practice, processes and methodologies, and provides nations with tailored support to make defence and security institutions more effective.

The programme was established by the Euro-Atlantic Partnership Council in November 2007 in the framework of the Partnership Action Plan on Defence Institution Building (PAP-DIB), which helps partners to develop effective and efficient defence institutions under civilian and democratic control.

At the Chicago Summit (2012), the NATO Heads of States and Government, noting the progress of BI and the need for a more structured approach, established BI as a NATO Discipline and agreed on the Building Integrity Education & Training Plan.

In December 2013, when NATO Foreign Ministers identified defence capacity building support to partners and, potentially, non partner countries as a key objective, BI was earmarked as an instrument to help promote democratic values and human rights, contribute more generally to security and stability, and help develop or enhance interoperability.

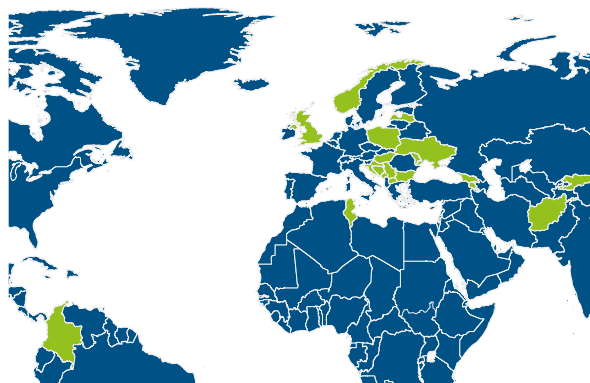
At the Wales Summit (2014), Building Integrity was reaffirmed as a key component of the Defence and Related Security Capacity Building Initiative.

At the Warsaw Summit (2016), the Heads of State and Government endorsed the NATO Building Integrity Policy. An Action Plan is developed to support the implementation of the Policy.¹

The BI Programme also supports the implementation of the United Nations Security Council Resolution 1325 on Women, Peace and Security and has integrated a gender perspective into its methodology and practical tools.

BI is tailored to meet national needs and requirements. It is demand driven and participation is on a voluntary basis. It is open to NATO Allies, Euro-Atlantic Partnership Council members, Mediterranean Dialogue, Istanbul Cooperation Initiative and Partners Across the Globe. Requests from other nations are reviewed on a case by case basis by Allies.

Nineteen nations are currently engaged in the Self-Assessment/Peer Review Process (as of November 2016), out of which fifteen have completed the process: Afghanistan, Armenia, Bosnia and Herzegovina, Bulgaria, Colombia, Croatia, Georgia, Hungary, Latvia, the Republic of Moldova, Montenegro, Norway, Poland, Serbia, the former Yugoslav Republic of Macedonia² and Ukraine.



THE BUILDING INTEGRITY TOOLKIT

The BI Programme focuses on developing practical tools to help nations strengthen integrity, transparency and accountability, and reduce the risk of corruption in the defence and security sector. The toolkit includes:

- The BI Self-Assessment and Peer Review Process;
- Tailored Programmes;
- Education and Training Activities;
- Publications.

THE BI SELF-ASSESSMENT QUESTIONNAIRE AND PEER REVIEW PROCESS

The BI Programme includes a set of tools available to help nations assess their risk of corruption and strengthen good governance. Participation is on a voluntary basis and BI support is tailored to meet national needs and requirements.



¹ The text of the NATO Building Integrity Policy can be accessed at: http://www.nato.int/cps/en/natohq/official_texts_135626.htm?selectedLocale=en

² Turkey recognizes the Republic of Macedonia with its constitutional name.

The BI Self-Assessment Questionnaire (SAQ):

Completing the SAQ is the first step in the process. Countries that decide to take part in BI can, on a voluntary basis, fill it in. It is a diagnostic tool that, when completed, provides nations with a snapshot of existing procedures and practices. It addresses current business practice in the defence and security sector. This includes:

- Democratic control and engagement;
- National anti-corruption laws and policy;
- Anti-corruption policy in the defence and security sector;
- Personnel-code of conduct, policy, training and discipline;
- Planning and budgeting;
- Operations;
- Procurement;
- Engagement with defence companies and suppliers.

While primarily intended for Ministries of Defence, some nations have used the SAQ for other ministries in the defence and security sector.

The completed SAQ is forwarded to the NATO IS who is responsible for the conduct of the Peer Review and in-country consultations. The NATO-led expert review team does not share information with third parties. The composition of the NATO-led Peer Review team and the Peer Review activities are coordinated with the country.

The Peer Review and in-Country Consultations:

The completed SAQ is reviewed in-country with representatives of the government. The aim of the Peer Review is to better understand the current situation, exchange views on best practices and on practical steps to strengthen the transparency, accountability and integrity of the defence and security sector.

Each peer review is tailored to the individual nation. It is strongly recommended that the SAQ and peer reviews be developed with contributions from Parliamentarians and the civil society including NGOs, media and academics.

The Peer Review Report:

The Peer Review Report, prepared on the basis of the completed SAQ and consultations in capitals, identifies good practice as well as recommendations for action. This is intended to help nations develop a BI Action Plan and make use of existing BI and other NATO mechanisms.

The Peer Review Report in principle covers three areas:



The Action Plan:

Having completed the SAQ and Peer Review Process, many nations proceed with the development of a national action plan. In doing this, nations are recommended to make full use of NATO resources and partnership tools. Nations are also encouraged to take advantage of expertise of civil society organisations from within their own country and region. Such an approach helps promote transparency and build local capacity.

Where possible, the BI Programme is integrated and aligned with national processes as well as NATO partnership mechanisms, including the Individual Partnership Cooperation Programme, Membership Action Plan, Individual Partnership Action Plans, Partnership Planning and Review Process, and within the framework of the Defence and Related Security Capacity Building Initiative. This also includes identifying opportunities to link with other ongoing programmes such as the Professional Development Programme for Georgia and Ukraine, and the Defence Education Enhancement Programme (DEEP) for Ukraine.

Countries can request BI support without being obliged to proceed to the next phase. The whole process can be conducted on a one-off basis or as part of a repeated cycle.

TAILORED PROGRAMMES

Two tailored programmes aimed at meeting the specific needs and requirements of the countries concerned were developed: the Tailored BI Programme on South Eastern Europe (SEE) - under the auspices of the South Eastern Europe Defence Ministerial (SEDM) process, and the Tailored BI Programme for Building Integrity and Reducing the Risk of Corruption in the Afghan National Security Forces (ANSF).

EDUCATION AND TRAINING (E&T)

Education & Training (E&T) are key to making and sustaining change and to producing long-term benefits. Courses are organized to assist and train nations in building capacities and enhance institutions in the spirit of co-operative security.

A large spectrum of tailored educational activities can be offered to assist the country: these include residence, online and mobile courses, activities organized periodically and others on demand to address special needs, pre-deployment and professional development training, "train-the-trainers" activities. They are aimed at personnel in the defence and security sector (civilian and military) and can be held in different languages. Some courses are organised directly by NATO and others by the NATO BI implementing partners.

As tasked by the North Atlantic Council, work has focused on developing a structured and sustainable approach to education and training. The BI Education and Training Plan, developed in cooperation with the NATO Military Authorities and agreed by the North Atlantic Council, addresses NATO's current and future operations and ongoing NATO civilian and military efforts to contribute to good governance in the defence and security sector.

Working in cooperation with Allied Command Transformation, the NATO IS serves as the Requirement Authority for the BI Discipline, meaning that it defines the required capabilities and performance competencies to be developed through the E&T activities. The Centre for Integrity in the Defence Sector (CIDS, Norway) serves as the Department Head and is responsible for translating operational requirements into education and training objectives with a subject, programme, module and/or course.

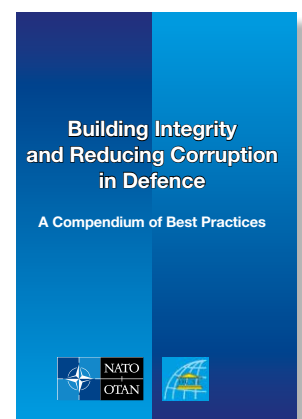
PUBLICATIONS

The book "Building Integrity and Reducing Corruption in Defence: a Compendium of Best Practices" provides a strategic approach to reducing corruption risks. It focuses on practicalities of designing and implementing integrity-building programmes in defence, while taking into account the cultural specifics of defence organisations.

The second volume of the Compendium will be issued as a series of pamphlets.

In addition to these publications, others are regularly produced and distributed by NATO and implementing partners.

The BI Website (<https://verity.hq.nato.int/BuildingIntegrity>) includes information on the BI Programme, the latest events and related publications, as well as a community of experts.



THE ACTORS



NATO STAFF

The BI Programme is developed and managed by the NATO International Staff. The NATO civilian staff work in close cooperation with NATO Military Authorities, including the NATO Military Staff as well as Allied Command Transformation, Allied Command Operations and subordinated commands. They meet regularly in the framework of a task force led by NATO-International Staff.

BI IMPLEMENTING PARTNERS

BI is supported by a network of implementing partners drawn from NATO and non NATO countries, civil society and other international organisations: they provide expert advice, host events and conduct research and analysis.

- United Nations Office on Drugs and Crime (UNODC, Vienna)
- Centre for Integrity in the Defence Sector (CIDS, Norway)
- Defence Resources Management Institute (DRMI, USA)
- Geneva Centre for Democratic Control of the Armed Forces (DCAF, Switzerland)
- Geneva Centre for Security Policy (GCSP, Switzerland)
- Ministry of Defence Bulgaria
- Ministry of Defence Norway
- NATO School Oberammergau (NSO, Germany)
- Naval Postgraduate School (NPS, USA)
- Norwegian Agency for Public Management and Government
- Defence Academy (UK)
- Turkish PFP Training Centre (Turkey)
- Peace Support Operations Training Centre (PSOTC, Bosnia and Herzegovina)
- Swedish National Defence College
- Transparency International UK Chapter (TI, United Kingdom)

The NATO International Staff has also worked closely with the Organization for Security and Co-operation in Europe (OSCE), the Asian Development Bank (ADB, Kabul office) and the World Bank (Kabul Office). This is consistent with the BI approach to add value and offer contributions that complement the efforts of others, in particular those working in a theatre of operation.

BI POOL OF SUBJECT MATTER EXPERTS

BI is supported by a pool of Subject Matter Experts (SMEs) drawn from national civilian and defence ministries, international organisations and civil society. These experts provide advice and take an active role in the development and implementation of all aspects of the BI Programme. SMEs are called on as required and have taken an active role in conduct of Peer Reviews, conduct of BI E&T as well as development of factsheets and documenting good practice.

FINANCIAL CONTRIBUTORS

The BI Programme is supported by voluntary contributions to a Trust Fund managed by NATO International Staff and led by Bulgaria, Norway, Poland, Switzerland and the United Kingdom. Contributions to the BI Trust Fund are used for ministerial capacity building and are considered as Official Development Assistance (according to the OECD principles).

Financial contributions have been provided by: Austria, Belgium, Bulgaria, Czech Republic, Finland, Iceland, Ireland, Lithuania, Netherlands, Norway, Poland, Slovakia, Switzerland, United Kingdom, and United States.

In addition, BI is also supported by in-kind contributions provided by Allies and Partners.





II. BOSNIA AND HERZEGOVINA: BUILDING INTEGRITY SELF ASSESSMENT AND PEER REVIEW REPORT





BUILDING INTEGRITY

SELF ASSESSMENT

PEER REVIEW REPORT

BOSNIA AND

HERZEGOVINA

August 2014

BOSNIA AND HERZEGOVINA - BUILDING INTEGRITY SELF ASSESSMENT PEER REVIEW REPORT

OVERVIEW

1. The Building Integrity Self-Assessment Process is a part of the practical tools developed in the framework of the Building Integrity (BI) Programme. The BI Self-Assessment Questionnaire (SAQ) is designed to provide nations with a snapshot of current structures and practices. The subsequent BI Peer Review helps nations to confirm areas of good practice and those that may require further effort. The BI programme is focused on providing practical assistance with defence reform and building capacity in the defence and security sector. This includes promoting good practice and helping nations to meet their commitments agreed within the UN and other frameworks.
2. The Peer Review noted that there is very strong support for taking forward NATO's integrity building and anti-corruption programme within Bosnia and Herzegovina's Ministry of Defence. Bosnia and Herzegovina has been a long standing contributor to the BI Programme. The Peace Support Operations Training Centre (PSOTC) is recognised as a BI Implementing Partner and has developed BI courses to support implementation of the NATO BI Education and Training Plan. These activities also contribute to the tailored BI programme developed in cooperation with the South-Eastern Europe Defence Ministerial (SEDM) process.
3. This report is focused on the Peer Review of the Self-Assessment Questionnaire completed by the MOD BiH to which all directorates and agencies, and the armed services, responded. Meetings and interviews were conducted between 25-27 March 2014, with key personnel of the MOD BiH (both civilian and military).
4. The reply provided to the Self-Assessment Questionnaire was relatively thorough and provided essential information in most areas. Input from the Joint Staff on military aspects of personnel management, salaries and procurement were not addressed fully, but clarified during the interview process. Senior leadership and MOD officials in the Peer Review meetings demonstrated a strong commitment to strengthen transparency, accountability and integrity. Understanding of corruption risks in the MOD and armed forces is beginning to become widespread, although a thorough risk assessment is highly recommended. The relationship between the MOD and media is good, with the recent Ethic Line initiative begun by the Defence Minister being warmly welcomed.
5. In 2009, the Parliamentary Assembly of Bosnia and Herzegovina established the Agency for the Prevention of Corruption and Coordination of the Fight against Corruption, a Strategy for the Fight against Corruption (2009 - 2014) and an Action Plan for the Fight against Corruption (2009 - 2014). This Agency was tasked to manage most activities dealing with an anti-corruption campaign. However, due to delays with the establishment of executive authorities in Bosnia and Herzegovina during 2009-2010, there was also a delay in the establishment of this Agency. Initially, the Agency was not staffed appropriately for most posts, with only managers filling some positions. This is one of the main reasons for delays in execution of the tasks defined in the Strategy and Action Plan for the Fight against Corruption. The MOD now has its own approved action plan to counter corruption. Sufficient legal and other policies are in place in Bosnia and Herzegovina related to anti-corruption and existing legal frameworks provide the appropriate basis for policy implementation. At the present time, anti-corruption measures are seen as inadequate by society, although the MOD is the most progressive government agency.
6. The complete support of the government leadership from the top down in its enforcement of anti-corruption measures is limited by the complex political situation. MOD programmes used to address corruption risks are not fully developed as yet and a concrete implementation plan for the anti-corruption action plan will be essential.
7. The Peer Review Team noted that there is no established building integrity education and training for civilian or military personnel and vetting of personnel assigned to sensitive positions does not take place.
8. The Peer Review Team noted the following examples of good practice:
 - a. Establishment of an "Ethics Hotline" for anonymous reporting of illegal activities and the public support of the Minister in its promotion and utilisation.
 - b. The use of special commissions and transparent procedures to select personnel for enlisted military service and officer candidates, to address requests for service extensions, education courses abroad that are longer than six months and other personnel management decisions which are a corruption risk.
 - c. The enactment of a law on whistleblowing and the full protection of such individuals under the BiH legal system.
9. The Peer Review Team offers the following general recommendations for Bosnia and Herzegovina's consideration:
 - a. Initiate systematic and comprehensive building integrity education and training for all civilians and military personnel. Encourage senior leadership to continue to openly promote programmes to build integrity and increase transparency.

- b. Consider implementing special unscheduled audits of random procurement contracts.
- c. Review the full range of legislation, procedures and policies involved in the procurement process to determine if efficiencies can be made to the system.
- d. Develop a standard pre-deployment training module for all deploying units or detachments addressing corruption risks and good practice in the framework of operations.
- e. Conduct a complete and thorough risk assessment of all systems and processes, led by the Internal Audit Office.
- f. Develop an MOD internal action plan to address the recommendations from this report and how best to take this advice forward. The NATO International Staff and subject matter experts are available to provide support in the development, implementation and review of the above recommendations. Priority should be given to building capacity through education and training, and in strengthening the Internal Control System, starting with the Control Environment, where the top management are keen to make everyone responsible for doing their job.

10. For ease of reference a list of recommendations is set out at Annex 2. This is presented as a starting point and should serve to guide follow on activities and development of a tailored BI programme of cooperation. In taking this work forward it is recommended that the MOD make full use of the NATO tools including staff support available from NATO International Staff as well as NATO HQ Sarajevo. The MOD should also make use of activities offered through the SEDM processes as well as bilateral cooperation aimed at strengthening good governance in the defence and security sector.

I. DETAILED FINDINGS AND COMMENTS

DEMOCRATIC CONTROL AND ENGAGEMENT

11. The Presidency of Bosnia and Herzegovina, acting by consensus, exercises supreme operational and administrative command and control of the Armed Forces in peace and in wartime. The BiH Parliamentary Assembly has democratic control over the AFBiH and the MOD is the administrative organisation in charge of overall defence strategy and policy. The BiH Parliamentary Assembly's Joint Committee on Defence and Security executes a wide range of responsibilities to include: oversight of the implementation of the security and defence policies of BiH, oversight of plans pertinent to the structure of the Armed Forces, personnel policy and recruiting, salaries and allowances, education and training, professional conduct and ethical standards of civilian and military staff, equipment, military industrial work, procurement and export, import of weapons and military equipment, material assistance and contracts, combat readiness, military exercises and operations; the defence budget and budget execution; reports on the auditing of institutions in the domain of defence and security policy; and other issues related to the security of the country. This Joint Committee also monitors the work of the Standing Committee on Military Matters, the Ministry of Defence of Bosnia and Herzegovina, the Ministry of Security of Bosnia and Herzegovina and other executive bodies dealing with defence and security issues.

12. In addition, there is a Parliamentary Military Commissioner who has the role of military ombudsman. The Parliamentary Military Commissioner is an independent Commissioner of the BiH Parliamentary Assembly whose objective is to strengthen the rule of law and protection of human rights and freedoms of military personnel and cadets in the AFBiH and MOD BiH, as stipulated in the Constitution and international treaties. The Military Commissioner is directed to work professionally and not to advocate, protect or undermine the interests of any political party, registered organisation or association, or any citizens in BiH. The Military Commissioner is very proactive in his engagement with all military personnel and units, and his activities greatly benefit the armed forces. In the past four years, his office has handled some 450 complaints which covered such topics as promotions, quality of food and poor protective equipment for demining specialists.

13. The Law on Defence of Bosnia and Herzegovina stipulates that the BiH Presidency adopts the Defence and Security Policies of Bosnia and Herzegovina with the aim of providing strategic guidance. These are the highest level documents guiding such issues in BiH. A draft Defence Review has been completed, although a number of politically sensitive issues have yet to be decided upon by the BiH Presidency. The recommendations in this review along with the AFBiH Development and Modernization Plan will be the cornerstones of future policy. The Law on Defence and Law on Service in the AFBiH (2006) guide the functioning of the MOD and the armed forces. The BiH Joint Staff is within the Defence Ministry and performs its duties in accordance with the law and under the authority of the BiH Presidency and Defence Minister.

14. The Joint Committee for Oversight over the Security and Intelligence Agency of Bosnia and Herzegovina monitors the work of the Intelligence and Security Agency of Bosnia and Herzegovina (OSA) and has oversight regarding the appointment of the Director General and Deputy Director General of the Agency. The OSA is a civilian agency which has the status of an independent administrative institution of Bosnia and Herzegovina.

15. The MOD has issued a Policy on Public Relations which defines activities on providing factual, accurate, and

timely information to the public for the purpose of transparency, affirmation, trust, and to gain public support for the defence system of Bosnia and Herzegovina. Activities of the defence sector are presented to the public through the official website of the MOD, media presentations, and through the activities of teams of the Ministry of Defence and the Armed Forces across the country. Also, the Law on Freedom of Access to Information in BiH defines the right of access to information. This helps ensure that the public and specific target groups have the ability to engage in active discussions in the area of defence. The Office for Public Relations of the MOD maintains routine contact with all elements of society and replies to queries. In 2013, some 214 media requests were received with replies being processed normally within 72 hours. The law on free access to information requires that a response must be made within 15 days. The MOD Office for Public Relations cooperates actively with several NGOs.

RECOMMENDATION:

Continue to actively involve the Office for Public Relations in the promotion of building integrity activities.

NATIONAL ANTI-CORRUPTION LAWS AND POLICY

16. Bosnia and Herzegovina has ratified the UN convention on anti-corruption and joined GRECO (Council of Europe Group of States against Corruption), and participates in the World Bank Control of Corruption Index and Transparency International Corruption Perceptions Index. Bosnia and Herzegovina has developed a list of internal obligations not only as regards the application of the Convention, but also to make any necessary changes in national legislation. The poor implementation of existing legislation and the ambiguous nature of some relevant laws require action. A new Law on Public Procurement was adopted on 29 April 2014.

17. In 2009, the Parliamentary Assembly of Bosnia and Herzegovina adopted the Law on the Agency for Prevention of Corruption and Coordination of the Fight against Corruption, a Strategy for the Fight against Corruption (2009 - 2014) and an Action Plan for the Fight against Corruption (2009 - 2014). The Agency for Prevention of Corruption that was to have been formed in accordance with above-mentioned law would manage most activities dealing with the anti-corruption campaign. However, due to delays with the establishment of executive authorities in Bosnia and Herzegovina during 2009-2010, there was also a delay with the establishment of this Agency. While a number of managerial posts have been filled, staffing remains incomplete. This is one of the main reasons for delays in execution of the tasks defined in the Strategy and Action Plan for the Fight against Corruption. The Strategy and Action Plan issued by the Agency specifies tasks and responsibilities, including deadlines and other details. All institutions, including the Ministry of Defence, are required to create their own anti-corruption plans, including identification of jobs that are most prone to corruption. The approved MOD Action Plan now requires a detailed implementation plan.

18. At the state level, there is the Office for Audit of the Institutions of BiH, with equivalent offices at entity levels. The Audit Office is an external, independent auditor, reviewing financial practices of institutions of Bosnia and Herzegovina and therefore also the Ministry of Defence. It also conducts financial audits verifying financial reports and institutions' accounts, with the aim of assessing whether the financial statements are reliable and whether the balances of accounts reflect fully the results of budget execution. The Audit Office determines whether the leadership of the institution follows all applicable rules, whether the funds are used for intended purposes and evaluates financial management, internal audit functions and internal control systems. The Audit Office performs an audit and gives an opinion and a series of recommendations in its annual report on budget execution every year. This office gave a negative evaluation for the Ministry of Defence in 2011, but noted significant improvement in its 2012 report. The 2013 report should be completed by mid-year 2014.

19. Accurate data concerning any major government cases recently brought for prosecution of bribery or corruption is not available, but according to information from the media and NGOs, the fact that there are very few final verdicts in connection with crimes of this nature, including any "major" cases, raises the question of the efficiency of state institutions in the fight against corruption.

RECOMMENDATIONS:

- a. Contribute to development of a governmental plan to raise awareness and education of the general public aiming at public support for implementing the Anti-Corruption Strategy.
- b. Contribute to development/updating of a plan for integrity in state bodies.
- c. In addition to reliance on background checks, ensure financial disclosure reporting requirements are in place for persons in senior positions and those who work in sensitive positions and initiate efforts to develop respect for the rules on conflict of interest.
- d. Review policies regarding the obligation to report gifts received by officials and employees in state bodies during protocol activities, as well as other measures and activities to eliminate opportunities for corruption.
- e. Address the recommendations contained in the annual report of the Audit Office for the Institutions of Bosnia and Herzegovina.

ANTI-CORRUPTION POLICY IN DEFENCE AND SECURITY

20. No formal anti-corruption policy has been issued by the Minister of Defence, while the Law on Service in the AFBiH and the AFBiH Code of Ethics, the Law on Civil Service and associated regulations clearly prescribe obligations of civilian and military personnel in defence institutions. The Office of the Inspector General of the MOD has been designated as the coordinating office for addressing anti-corruption policy and integrity issues for the overall defence sector. Regarding corruption and unlawful activities, the Minister of Defence addressed the public in December 2013 with a new "Ethic Line" program and requested that if they have knowledge of any unlawful actions by the Ministry of Defence and the Armed Forces of Bosnia and Herzegovina, to report such illegal activities directly to him (e.g. bribes for admission of soldiers into professional military service, sale of munitions and weapons, etc.). In a media event on 24 March 2014, the Inspector General announced the results of the use of this line during the past 90 days in which some 28 incidents were reported and at present 19 have been resolved. The areas of greatest risk for bribery and corruption in the MOD and AFBiH have been determined to be in the process of public procurement of goods and services, disposal of excess ammunition and weapons, the recruiting process to fill vacancies for new soldiers, promotions and education.

21. The Ministry of Security of Bosnia and Herzegovina is the umbrella institution for other law enforcement agencies, including the Directorate for Coordination of Police Bodies of Bosnia and Herzegovina, Border Police of Bosnia and Herzegovina, State Investigation and Protection Agency, Agency for Forensic Examinations and Expertise, Agency for Education and Professional Training, Agency for Police Support, and the Service for Foreigners' Affairs. All of these agencies, including the Ministry of Security of Bosnia and Herzegovina are subject to parliamentary supervision by the Joint Committee on Defence and Security of Bosnia and Herzegovina. Also, the Minister of Security is a member of the Council of Ministers of Bosnia and Herzegovina. The Ministry of Security and its agencies cooperate with the Ministry of Defence within their jurisdictions. All of these organisations have a role in addressing corruption risks.

22. All members of the MOD and the Armed Forces of Bosnia and Herzegovina are legally obligated to report a crime. In addition, all personnel are encouraged through their training, to report any irregularities, either through the chain of command, the Inspector General, or the Parliamentary Military Commissioner. All personnel are reported to be familiar with the ways in which they can report corruption and other irregularities. Individuals who contact the Inspector General can do so anonymously or can request protection. Civil institutions are responsible for the prosecution of suspected crimes. In addition, on 1 January 2014 a whistleblower law went into effect and is viewed as a model for the wider region due to the legal protection of persons under the judicial system.

23. On 1 January 2006, the BiH Law on Defence and Law on Service in the AFBiH established the Office of the Inspector General as an autonomous department of the MOD BiH with the mission of ensuring that military personnel act in accordance with laws and regulations dealing with conflict of interest, professionalism and ethical behaviour. This system is comprised of the Office of the Inspector General at the BiH MOD and inspectors serving in commands and lower level units. They fulfil their mission by conducting ethics and professionalism training, the provision of assistance, and conducting investigations and inquiries.

24. The Law on Internal Audit of Institutions of Bosnia and Herzegovina defines the authority of internal auditors to evaluate the usefulness and efficiency of the system for financial management in terms of risk identification, risk assessment and risk management set by the leadership of the organization. The Head of the Internal Audit Office reports to the Defence Minister. Consistency in compliance with the law and sub laws as well as compliance with internal rules established by MOD Sectors is intended to address identified risks and focus on prevention. However, a full and comprehensive risk assessment has never been conducted in the MOD despite recommendations from the Internal Audit Office to do so. Shortcomings in accountability and valuations of equipment holdings, improved skills for auditors and a thorough identification of all systems and processes within the MOD is urgently needed.

25. Concerning the application of sanctions against personnel in cases of bribery or corruption, the Head of Internal Audit is required to inform the head of the respective organization regarding allegations of misconduct. Sanctions cover a wide range from warnings and criminal charges to discharge from service. There are different regulations for military and civilian personnel. The timeline for initiating such procedures is relatively short and procedures unclear. In previous practice, the Ministry of Defence informed the Prosecutors Office if criminal acts were suspected and any further process was conducted under its jurisdiction. The Ministry of Defence recently filed criminal charges with the Prosecutor's Office against several persons from the Ministry of Defence and the Armed Forces of Bosnia and Herzegovina for potentially corrupt activities. All cases were declared as beyond the statute of limitations according to the law (6 months for civilian personnel) and internal disciplinary procedures were not conducted. However, a very recent instance of corruption within the officer corps as regards recruiting practices was resolved with a reduction in rank for one officer. There are no special military courts in Bosnia and Herzegovina and all cases are under the jurisdiction of the civil courts. Despite no formal cases coming to a conclusion, these recent events have resulted in members of the MOD and the Armed Forces being more aware of the risk of corruption and that irregularities can be reported and investigated.

RECOMMENDATIONS:

- a. Urgently conduct a full risk assessment, develop and then implement a strategic action plan to address the high risk areas identified.
- b. Develop a plan to review all equipment holdings and determine appropriate valuations to improve accountability.
- c. Review responsibilities of both the Internal Audit Department and the Office of the Inspector General to ensure there is minimal overlap of their authority.
- d. The MOD should urgently adopt its own comprehensive anti-corruption strategy and plan.
- e. Initiate a proactive MOD media campaign focused upon both the general public (external audience) and the internal personnel of the MOD and AFBiH on its ethics and integrity programs.

PERSONNEL, EDUCATION AND TRAINING

26. Military personnel are subject to the provisions of the Law on Defence, the Law on Service in the Armed Forces of Bosnia and Herzegovina and the Code of Conduct for Members of the Armed Forces. The Code of Conduct was approved in 2006 and guides professional behaviour of all military personnel. A Code of Ethics, as an additional document, has recently been issued to units and covers the acceptance of gifts, gender equality and other values. Civilian employees and civil servants are subject to the provisions of the Labour Law of Bosnia and Herzegovina institutions, the Law on Civil Service in the Institutions of Bosnia and Herzegovina, the Code of Civil Servants in Institutions of Bosnia and Herzegovina and other associated regulations. Among others, these regulations define conflicts of interest and standards of behaviour for personnel, including special prohibitions and exceptions to the prohibition of receiving gifts and value of gifts that are acceptable in exceptional circumstances. The Law on Civil Service regulates what kinds of gifts are acceptable, and it is expected that these are reported to the individual's superior. Personnel are not required to report corporate hospitality such as travel, entertainment, or expenses. This is a high risk area and should be addressed.

27. There is some training in the area of ethics, professionalism, integrity building and anti-corruption at the level of the Ministry of Defence and the Armed Forces of Bosnia and Herzegovina. Code of conduct training is routinely conducted and the NCO course has a BI module. However, the overall training plan requires review to ensure appropriate modules on ethics and corruption risks are developed and then taught to all officers and NCOs.

28. Violations of the Code of Conduct by military personnel are handled by the chain of command. At the level of the Ministry of Defence, a special committee is responsible for disciplinary procedures for all civilian employees of the Ministry of Defence and the AFBiH. The Inspector General also has an important role in dealing with breaches of the Code of Conduct.

29. There is no rotation permitted for civilian positions in the MOD BiH and AFBiH (civil servants and employees), and no sensitive positions are defined in manning documents. The AFBiH also does not designate any particular posts which are sensitive nor have in place a formal rotation policy.

30. Professional development and career management policies provide guidelines to ensure that military personnel are assigned to appropriate positions in the MOD BiH and AFBiH on the basis of their abilities and performance. One of the key prerequisites for the advancement of military personnel is the annual performance evaluation. In practice, a very large percentage of military personnel have excellent formal evaluations which results in an unreasonably large number of personnel meeting requirements for promotion. In addition, the procedures and criteria for appointment and promotion are constantly being updated or changed, which contributes to opportunities for favouritism. Performance evaluation criteria should be unique and understood by each supervisor – so that personnel are marked on their performance and not on subjective criteria. Fulfilling position vacancies for military personnel is designed to be a transparent process, whether it is for internal or public vacancies, but the turbulence in policy changes has affected the actual openness of the process. In addition, the Law on Service in the Armed Forces of Bosnia and Herzegovina restricts the assignment of personnel to command and control functions to four years. Recognising corruption risks in human resource management, the MOD and AFBiH are trying to improve the transparency of the promotion system, performance evaluations and all aspects of career management.

31. The payment of salaries is done on a monthly basis in accordance with existing legislation. Salary levels are defined by law, and all salary levels are publicly available. Financial disclosure forms are required and individuals can not earn income outside of their government service without MOD approval. Pension payments are the responsibility of the individual entity's funds and there are differences in the calculation of the pensions, as well as differences in pension rights. Chains of command are separate from chains of payment. The soldiers' chain of command has an obligation to ensure payments are correct at different levels of command, and the payment system is centralized and conducted through a single treasury account.

RECOMMENDATIONS:

- a. Consider an internal MOD public information campaign focused on importance of transparency, accountability and integrity to further reinforce on-going work.
- b. Identify high risk civil and military posts that require special vetting and review procedures.
- c. Develop and publicise a code of conduct addressing acceptance of hospitality such as travel and entertainment.
- d. Review BI education and training requirements for MOD military and civilian personnel. This should include development of an implementation plan to embed BI into existing curriculum as well as developing new activities. The plan should address the impact of corruption on security and good practice aimed at reducing the risk of corruption.
- e. Review personnel management policies to include performance evaluations, promotions, recruiting, rotation policies and the use of detailed background investigations within the MOD.

PLANNING AND BUDGET

32. The defence budget, within assigned limits, is agreed on the basis of prescribed internal procedures and provided to the relevant authorities in accordance with the Law on Financing of Institutions of Bosnia and Herzegovina and International Obligations, and according to the instructions of the Ministry of Finance and Treasury. Planning for the defence budget is conducted in a transparent manner and includes a detailed review of costs by four defined programs, functional segments and categories of costs with input elements from functional areas and with written explanations. The defence budget is adopted by BiH Parliamentary Assembly and published as the annual Law on the Budget, with a detailed breakdown of costs and numbers of personnel. This is made available to the public and the budget is adopted annually. Also, through Framework Budget Documents, information about projected medium-term (three years: one budget year and two program years) expenditure by budget item is also made publicly available. The Public Relations Office of the MOD BiH provides these documents and other financial information to the media at their request or in the form of press releases.

33. The Ministry of Finance and Treasury of Bosnia and Herzegovina establishes the broad framework for budgetary planning for each ministry in BiH. For the MOD, there is the Defence Resources Board (DRB) which is comprised of the General Secretary of the Ministry of Defence, the Assistant Ministers of Defence. For the armed forces, there is a budgetary advisory committee which includes the Deputy Chief of Joint Staff for Operations and for Resources, the Joint Staff Directors and major commanders. Procedures for budget planning are prescribed in a document called "The Concept and Procedures of PPBES", which is published on the MOD website. The Department of Finance and Budget coordinates all activities concerning planning and the realization of the budget. This department provides the necessary information about the status of the budget, any need for corrections and adjustments, and responds to requests from the DRB while keeping the DRB fully informed.

34. The defence budget is funded through a single treasury account in the Ministry of Finance and Treasury of Bosnia and Herzegovina which is allocated from the state budget. The single treasury account does not allocate funds to lower levels within the defence establishment; however, the MOD BiH can develop internally its own system for decentralised budget execution - but has not done so in a comprehensive manner. Certain units do receive a nominal amount of petty cash for minor needs. The MOD BiH has no significant additional sources of income, but do still receive donations from outside parties. There is a small amount of defence income whose origin is related to the sale of surplus ammunition and weapons; however, this income goes to the State of BiH and not to the MOD BiH. All movable and immovable military property owned or under control of the Ministry of Defence was acquired from the previous entity MODs and armies. The MOD BiH has implemented two contracts negotiated by the former entity ministries of defence for the sale of arms and military equipment. In any future contracts the State of BiH will be entitled to 20% of any proceeds while the remaining 80% of any such proceeds will be transferred to the two Entities of Bosnia and Herzegovina. The volatile and politically sensitive issue concerning all property has yet to be resolved and remains a significant roadblock to reforms in the MOD and armed forces.

35. The Office for Audit of the Institutions of Bosnia and Herzegovina performs an annual financial audit of the Ministry of Defence. The report for 2012 is published on the official website of that office and includes detailed expenses and special capital investments, as well as recommendations for better financial performance. Long-term capital investments have to be approved by the BiH Council of Ministers. Concerning the audit process, the management of the Ministry of Defence prepares a presentation of its financial reports according to financial reporting frameworks outlined in various regulations and policies. This includes the creation, application and maintenance of internal controls relevant to the preparation and presentation of financial reports. Auditors then are required to prepare their report carried out in accordance with the Law on Auditing the Institutions of Bosnia and Herzegovina and the International Standards of Supreme Audit Institutions (ISSAI). An audit also evaluates financial management, the functions of internal audits and the system of internal controls. A final audit for the

execution of the 2013 budget ought to be completed by May 2014 – as of end-June this should be published soon.

36. It should be noted that in the approved budget for FY 2012, over 85% was spent on personnel costs (wages, salaries and staff) while in 2013 it was reduced down to about 78%. After taking into account fixed costs (utilities, electricity, telephone, fuel, transportation, ongoing maintenance), very few resources are left for discretionary spending on acquisition of equipment or improvements to infrastructure. MOD procurement planning is forced to prioritise any potential purchases to items that enable the fulfilment of obligations related to the support of civilian authorities and NATO peace support missions.

RECOMMENDATIONS:

- a. Develop a technical training program to promote good practice and strengthen skills of all personnel responsible for finance and budget tasks.
- b. Use the results from the analysis of positions conducted by the MOD BiH and Norwegian Agency for Public Administration to consider more efficient ways of conducting business.
- c. Develop a plan to work with the BiH Parliamentary Assembly and other responsible institutions in amending existing laws to allow for decentralized budget execution for logistics matters.
- d. Provide IT support for logistics budget execution, in order to track all key transactions in the budget execution in a timely manner. The temporary database that is currently in use needs to be expanded and used until the comprehensive IT logistic accounting system is in place and embedded within the overall accounting system.

OPERATIONS

37. Officers from the Armed Forces of Bosnia and Herzegovina are involved in operations abroad as part of multinational command staffs, while small military units of BiH are integrated into larger national contingents of NATO members. Anti-corruption matters related to operations are routinely included in pre-deployment training for the AFBiH, however there are no dedicated training modules on the subject. There is no specific military doctrine on how to address corruption issues for peace and conflict. There are regular visits to deployed units by BiH leadership, including the Minister of Defence, members of the Joint Committee for Defence and Security of the Parliamentary Assembly of BiH, the Parliamentary Military Commissioner, the Inspector General and military commanders. Due to the routine assignment of small BiH contingents to larger formations who provide all necessary support, there are no legal arrangements in place for procurement in conflict environments when urgent operational requirements are encountered.

RECOMMENDATIONS:

- a. Include a standard BI module addressing corruption risk in pre-deployment training, this should be considered as mandatory for all staff deployed.
- b. Develop a system to capture lessons learned and good practice from units and staff officers deployed aimed at reducing risks of corruption in framework of operations.
- c. Consider special training for contracting personnel who potentially could be deployed in support of a BiH contingent.

PROCUREMENT

38. The Parliamentary Assembly adopted a new Law on Public Procurement of Bosnia and Herzegovina in April 2014, which will come into force at the end of November 2014. This Law regulates the public procurement system in BiH, the rights, duties and responsibilities of participants in the procurement process and the control of public procurement. It also includes regulations for the procurement system of the Ministry of Defence and the Armed Forces. There are several exceptions where contracts can be exempted from the provisions of this Law and essentially these cover contracts related to state secrets; contracts whose execution must be accompanied by special security measures; contracts under which a particular procedure is prescribed by an international lending or donor organization; contracts in the field of defence related to the production or trade with armament, military equipment, and military materials; and the acquisition or rental, by whatever financial means, of land, existing buildings or other immovable property. All tenders are listed on the MOD website and an electronic data system is in use.

39. The Sector for Logistics and Procurement of the Ministry of Defence is responsible for all procurement in the Ministry. There is a lengthy process from initial armed forces planning and requirements determination

by the logistics sector through to the delivery of goods and services. This sector has too many personnel who lack the appropriate skills to perform their duties and some one third of staff positions remain unfilled. The AFBiH is responsible to plan and present their requirements to the MOD, after which the procurement office then evaluates, prepares required documentation and executes the purchase. Requests for tenders are published in the Official Gazette of Bosnia and Herzegovina and final contract awards are also listed in this publication. All contract proposals with complete documentation are sent to the Public Attorney of Bosnia and Herzegovina for approval. It is felt that this system wastes much time in the preparation of unnecessary short, medium and long term plans when the approved budget dictates year-to-year funds available for procurement. There are also problems with insufficiently defined technical elements necessary for the purchase of certain items of equipment. This could be speeded up by the development of predefined technical specifications.

40. The Procurement Commission (Tender Board) consists of professionals in the field of the items to be procured and in the field of public procurement. When the contracting authority (Defence Minister) appoints members of the Commission, he must ensure that the selected members of the Commission have sufficient knowledge to apply the law and implement approved procedures and that at least one member of the Commission holds a special certificate of expertise in the subject of public procurement. After appointment to the Commission, each member is obliged in accordance with the Law to make a statement of impartiality and confidentiality which confirms that there is no bias in favour of any party, and that they will strictly abide by the confidentiality required by law for the complete tender process. Written records of each tender submission and of subsequent changes are kept (in paper or electronic form) by the MOD. There are no special procedures in place for selecting, vetting and training members of the tender boards/procurement commissions at present. However, a new concept is under development to select a pool of some 60 personnel to serve on tender boards with special vetting and conflict of interest training to be given to these personnel.

41. Oversight of the procurement system in the MOD is the responsibility of the Internal Audit Office. Periodic external audits of the procurement system are conducted by the Office for Audit of the Institutions of Bosnia and Herzegovina. Professional military personnel and state officials are assigned to sensitive positions on the basis of their education and expertise. However, there are no rules for the rotation of personnel in sensitive posts. Disqualification on the basis of conflict of interest or potential corruption is defined by the laws of Bosnia and Herzegovina which regulate civil service and other relevant regulations. The contracting authority can reject the application for participation in any step of the procurement procedure or a tender, if the candidate or tendering company attempted to influence an action or decision in the course of the public procurement. The contracting authority must inform the company and the Director of the Public Procurement Agency when a request or tender is rejected and the reasons for the rejection, and make a note in the report on the procurement procedure. In the event that requests or offers that the contracting authority has received during the procurement cause or may cause any conflict of interest, the contracting authority is required to ensure the implementation of this law.

42. To ensure the completion of contracts, the amount of the required tender must be guaranteed at 1-2% of the offered price. This guarantee must be submitted prior to the deadline for the submission of bids. However, as regards quality control, a special unit exists under the assistant minister, but this is not fully staffed. It is responsible for determining the quality of procured goods or services.

43. The Law on Public Procurement defines procedures which describe "operationally necessary" and "single source" procurement exceptions. Some 90% of procurement is conducted under open procedures while there were no classified procurement tenders in 2013. The MOD does not now use agents or intermediaries for procurement and offsets are not used in BiH.

RECOMMENDATIONS:

- a. Review procurement and logistics systems in use to promote good practice and ensure that procedures and processes are as efficient and effective as possible.
- b. Review the staffing and skill requirements of key logistics positions and develop a training and personnel management plan to improve the capacities of these personnel.
- c. Establish special procedures for selecting, vetting and training members of the tender boards/procurement commissions in coordination with the development of the new pooling concept for tender boards.
- d. Establish internal control procedures within the area of logistics and procurement.

ENGAGEMENT WITH DEFENCE COMPANIES AND OTHER SUPPLIERS

44. The Defence Ministry has not initiated any programmes to help companies raise the standards of integrity and anti-corruption across procurement. In addition, bidding companies are not required to have an ethics program in order to be able to bid for work. The Law on Public Procurement requires the Agency for Public Procurement of BiH to develop an electronic information system which would, in addition to listings in the "Official Gazette", publish tender documentation and also requires the agency to initiate and support the development of electronic public procurement.

45. Each bidder who has a valid interest in a public contract and believes that the contracting authority during the contract award procedure violated the law has the right to object to the proceedings. Objections can be submitted to the contracting authority in writing within five days from the date the provider knew or should have known there was a violation of the Law, and not later than one year from the date of the alleged violation. If the contracting authority does not consider the complaint within the time specified in Article 51 of the Law, or rejects the complaint, the complainant may appeal in writing to the Office for Complaints Consideration within five days from the first working day after the deadline or in case the contracting authority rejects the complaint, the date the complainant was notified by the contracting authority. The contracting authority must send a copy of the appeal simultaneously with its submission to the Office for Complaints Consideration. In 2013, of some 85 tenders, 16 were contested by bidders, and three were upheld as being unfairly or illegally conducted, leading to a new procedure.

RECOMMENDATIONS:

- a. Review procurement procedures with a view to further simplify the process for lower value contracts.
- b. Determine if new legislation is necessary in order to require companies which do business with the MOD to have a written code of ethics.
- c. Consider initiating special programmes which would encourage defence companies to establish ethical codes for business practice.

II. CONCLUSIONS

46. The MOD of Bosnia and Herzegovina is actively engaged promoting good practice aimed at strengthening transparency, accountability and integrity. This includes a wide range of activities to enhance business practices and develop capacity of civilian and military personnel. The importance of the support provided by the Minister and his senior staff was highlighted in the course of consultations in Sarajevo. The MOD is commended for its proactive approach such as the introduction of the "Ethics Hotline" and its contribution to government plans to counter corruption.

47. The unique political situation in Bosnia presents considerable challenges to the MOD reform plans; nonetheless some progress has been made. Where possible, review of systems and processes and overall personnel management improvements should be initiated without delay.

48. The PSOTC has been a BI Implementing Partner since the launch of the NATO BI programme. In addition to its role in developing national expertise, the Centre has made significant contributions to the NATO BI Programme as well as the enhancement of regional capabilities in the framework of SEDM. This expertise should be used to assess training requirements, develop specialised modules and new courses to build capacity of civilian and military personnel.

49. In follow on work, the authorities should make full use of existing NATO tools and resources including NATO IS, NATO HQ Sarajevo as well as BI Subject Matter Experts.

50. The interviews conducted by the BI NATO Team were open, frank and wide ranging, as the team had full access and availability to the most senior MOD leadership as well as key personnel in important management positions. Personnel were aware of the Building Integrity Programme and knew the importance of the mandate for this work. Once further reforms take place and new processes are installed, it will take a period of time to observe positive changes as regards reducing corruption risk in the most vulnerable areas.

BOSNIA-HERZEGOVINA BUILDING INTEGRITY RECOMMENDATIONS AND GUIDANCE MATRIX

RECOMMENDATIONS	NEXT STEPS
	To be completed based on consultations between MOD and NATO HQ, NATO HQ Sarajevo
Continue to actively involve the Office for Public Relations in the promotion of building integrity activities.	
Contribute to a governmental plan to raise awareness and education of the general public aiming at public support for implementing the Anti-Corruption Strategy.	
Contribute to development/update a plan for integrity in state bodies.	
In addition to reliance on background checks, ensure financial disclosure reporting requirements are in place for persons in senior positions and those who work in sensitive positions and initiate efforts to develop respect for the rules on conflict of interest.	
Review policies regarding the obligation to report gifts received by officials and employees in state bodies during protocol activities, as well as other measures and activities to eliminate opportunities for corruption.	
Address the recommendations contained in the annual report of the Audit Office for the Institutions of Bosnia and Herzegovina.	
Urgently conduct a full risk assessment with a subsequent strategic action plan to address the high risk areas identified.	
Develop a plan to review all equipment holdings and determine appropriate valuations to improve accountability.	
Review responsibilities of both the Internal Audit Office and the Office of the Inspector General to ensure there is minimal overlap of their authority.	
The MOD should urgently adopt its own comprehensive anti-corruption strategy and plan.	
Initiate a proactive MOD media campaign focused upon both the general public (external audience) and the internal personnel of the MOD and AFBiH on its ethics and integrity programs.	
Consider an internal MOD public information campaign focused on importance of transparency, accountability and integrity to further reinforce on-going work.	
Identify high risk civil and military posts that require special vetting and review procedures.	
Develop and publicise a code of conduct addressing acceptance of hospitality such as travel, entertainment and gifts	
Review BI education and training requirements for MOD military and civilian personnel. This should include development of an implementation plan to embed BI into existing curriculum as well as developing new activities. The plan should address the impact of corruption on security and good practice aimed at reducing the risk of corruption.	

Review personnel management policies to include performance evaluations, promotions, recruiting, rotation policies and the use of detailed background investigations within the MOD.	
Develop a technical training program to promote good practice and strengthen skills of all personnel responsible for finance and budget tasks.	
Use the results from the analysis of positions conducted by the MOD BiH and Norwegian Agency for Public Administration to consider more efficient ways of conducting business.	
Develop a plan to work with BiH Parliamentary Assembly in amending existing laws to allow for decentralized budget execution for logistics matters.	
Provide IT support for logistics budget execution, in order to track all key transactions in the budget execution in a timely manner. The temporary database that is currently in use needs to be expanded and used until the comprehensive IT logistic accounting system is in place and embedded within the overall accounting system.	
Include a standard BI module addressing corruption risk in pre-deployment training, this should be considered as mandatory for all staff deployed.	
Develop a system to capture lessons learned and good practice from units and staff officers deployed aimed at reducing risks of corruption in framework of operations.	
Consider special training for contracting personnel who potentially could be deployed in support of a BiH contingent.	
Review procurement and logistics systems in use to promote good practice and ensure that procedures and processes are as efficient and effective as possible.	
Review the staffing and skill requirements of key logistics positions and develop a training and personnel management plan to improve the capacities of these personnel.	
Establish special procedures for selecting, vetting and training members of the tender boards/procurement commissions in coordination with the development of the new pooling concept for tender boards.	
Establish internal control procedures within the area of logistics and procurement.	
Review procurement procedures with a view to further simplify the process for lower value contracts.	
Determine if new legislation is necessary in order to require companies which do business with the MOD to have a written code of ethics.	
Consider initiating special programmes which would encourage defence companies to establish ethical codes for business practice.	



III. PLAN FOR INTEGRITY AND FIGHT AGAINST CORRUPTION OF THE MINISTRY OF DEFENCE OF BOSNIA AND HERZEGOVINA 2015-2019

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1. INTRODUCTION

The BiH MoD Plan for Integrity and Fight against Corruption (hereinafter the Plan) is a tool that will enable the Ministry of Defence of Bosnia and Herzegovina (hereinafter the BiH MoD) to assess the situation, design and implement specific measures to correct identified omissions in the areas of professionalism, ethics, integrity and risk of corruption in the defence sector. Specific activities, clearly identified activity leaders and timeframes, in combination with indicators of successful implementation, will be systematically integrated in order to strengthen integrity and reduce the risk of corruption and other forms of unprofessional conduct, with the objective to enhance ethical standards and good governance principles.

In line with the 2009-2014 BiH Strategy for Fight against Corruption and the associated Action Plan, in the previous period BiH MoD undertook activities to fulfil its obligations regulated by the document. On the basis of the requirement to systematically resolve the issue of building integrity, prevention and fight against corruption, the BiH Minister of Defence adopted the BiH MoD Policy on Building Integrity, Reduction of Risk and Fight against Corruption (hereinafter the Policy) on 31 December 2013. In the meantime, on 7 May 2015, the BiH Council of Ministers adopted the 2015-2019 Strategy for the Fight against Corruption and the Action Plan for Implementation of the 2015-2019 Strategy for the Fight against Corruption. The Strategy stipulates, inter alia, that the Law on the Agency for Prevention of Corruption and Coordination of the Fight against Corruption defines corruption as „any abuse of power entrusted to a public servant or a person holding a political position at the State, entity, cantonal levels and the level of Brčko District of Bosnia and Herzegovina, city or municipal levels, which may result in private gain. It may also include, in particular, any direct or indirect soliciting, offering, giving or taking of bribe or any other inappropriate gain or privilege or possibility thereof, which destroys the adequate exercise of any duty or conduct that are expected from the bribe recipient.”

Audit, as an independent, objective verification and consultation activity, created to add value and improve the operations of the organization, assists the BiH MoD to achieve its goals by ensuring a systematic and disciplined approach to the evaluation and improvement of efficiency of risk management, controls and management processes. Given the importance of this function, relevant audit findings and recommendations are an integral part of this document.

In this period, the BiH MoD has also recognized the importance the North Atlantic Alliance attaches to Building Integrity (BI) in the defence and security sector. The NATO BI Program provides practical support to participating countries in strengthening of integrity, transparency and accountability with a view to reducing the risks of corruption in the defence sector. The BiH MoD has been an active participant in the initiative from the onset. Bearing in mind the difficulties it encounters, the BiH MoD has intensified its efforts related to strengthening integrity and professionalism. In this context, among other activities, it joined the NATO BI Self-Assessment/Peer Review Process. As a result, in late September 2014 NATO HQ Brussels submitted its final report to the BiH MoD (Building Integrity Self-Assessment – Peer Review Report for BiH) on the status of integrity. The report is based on the analysis of answers provided by the BiH MoD to the standardized NATO BI Self-Assessment Questionnaire (SAQ) and on the interviews/discussions held by the NATO-led Peer Review expert team with key personnel of the BiH MoD and AFBiH, and with representatives of specific BiH institutions, agencies and NGOs in March 2014.

Accession to the European Union is another strategic priority for BiH. A comprehensive fight against corruption, which includes prevention, repression and coordination, is one of the key challenges for the rule of law in most countries that are going through the EU enlargement process, including BiH. Bearing in mind that attention is paid to the fight against corruption already in the early phases of integration into the European Union, and that opening of appropriate chapters is based on convincing results, BiH needs to show its resolve to undertake concrete, comprehensive and sustainable activities in order to combat corruptive practices. As one of the biggest BiH institutions, the BiH MoD has an important obligation in the implementation of relevant obligations and contributions to the Euro-Atlantic integration process.

In addition to the above, it is important to outline the legal framework for the fight against corruption in BiH. The most important parts of the legal framework are the laws and regulations in the following areas: criminal-legal procedures, public procurement, protection of whistle-blowers, conflict of interest, free access to information, etc.

In light of the above, and for the purposes of a comprehensive approach, it is important to emphasize that the Plan includes obligations stemming from the 2015-2019 Strategy for the Fight against Corruption and the Action Plan for implementation of the 2015-2019 Strategy for the Fight against Corruption, activities that the BiH MoD has an obligation to implement in accordance with the audit reports, results of the NATO assessment of integrity, including the new Partnership Goal “Integrity Development”, as well as other recommendations of organizational units of the BiH MoD. Documents used in the drafting of the Plan include:

- f. BiH Defence Law,
- g. Law on Service in Armed Forces of BiH,
- h. 2015-2019 Strategy for the Fight against Corruption and the Action Plan for Implementation of 2015-2019 Strategy for the Fight against Corruption (Agency for Prevention of Corruption and Coordination of the Fight against Corruption),

- i. Chapter 14, Instructions to the Parties from NATO HQ Sarajevo Commander and Commander of EUFOR in BiH (Change 25),
- j. Policy on Building Integrity, Risk Reduction and Fight against Corruption in the BiH MoD and AFBiH,
- k. Building Integrity Self-Assessment – 2015 Peer Review Report for BiH (NATO HQ Brussels),
- l. 2015 PARP Assessment for BiH (NATO HQ Brussels).

2. ASSESSMENT ON BUILDING INTEGRITY AND THE RISK OF CORRUPTION

A – RISKS AND CHALLENGES

The 2015-2019 Strategy for the Fight against Corruption emphasizes the fact that any reform process, and particularly the fight against corruption, is a complex and demanding process with obstacles on the way to achieving required effects. In order to reduce their impact on the implementation of the Strategy, as well as of the Plan, it is necessary to remove the following obstacles that can affect its successful implementation:

- m. Lack of political and other will – if there is no desire or resolve on the part of decision-makers at the political and administrative levels, one cannot expect that concrete and committed measures will be undertaken in the context of the fight against corruption, meaning that no measures at all or only ad-hoc and selective measures will be undertaken;
- n. Insufficient independence and competence of the implementers – without appropriate knowledge and skills, as well as freedom of action of implementers within the legal framework, the fight against a complex phenomenon such as corruption cannot be efficient or yield required results;
- o. Insufficient engagement of implementers – insufficient commitment of all leaders of the implementation of the Plan undermines the integral character of the complex system for fight against corruption, which will inevitably affect their work results;
- p. Lack of financial and other resources – shortage of financial and other resources necessary for an effective fight against corruption seriously informs the capacity of the anti-corruption system and thwarts implementation of required measures that are relevant for prevention of corruption;
- q. Lack of systemic approach and coordination – even the best possible anti-corruption policies and measures from the BiH MoD Plan cannot be effective if implemented occasionally, in an unorganized, fragmented way and without sufficient number of systemic activities and coordinated implementers;
- r. Lack of public support – the fight against corruption cannot be complete and effective if there is no public awareness of the detrimental consequences of corruption on the society and individuals, which is the basis for increased readiness of citizens to request and support anti-corruption activities and actively participate in them;
- s. Unfounded expectations regarding fast effects of the fight against corruption – the more present the corruption, the more citizens wish for it to be prevented. The expectation of instant effects over the shortest period possible can result in impatience and reduced public support for anticorruption measures and activities.

B – COORDINATION AND CONSULTATION MECHANISMS

For successful implementation of the Integrity Plan, as an efficient tool for implementation of the strategy for the fight against corruption, it is important to ensure appropriate internal and external coordination and consultation mechanisms, as well as to include all the factors on which the implementation of the minister's intent depends.

INTERNAL

The Policy on Building Integrity, Risk Reduction and Fight against Corruption in BiH MoD and AFBiH is a quality framework which:

- Establishes general requirements and guidelines for building integrity, prevention, risk reduction and fight against corruption,
- Defines the competences of the BiH MoD and AFBiH regarding building integrity, prevention, risk reduction and fight against corruption,
- Establishes methods and ways of building integrity, prevention, risk reduction and fight against corruption.

The Policy also establishes an organizational and management/command basis for building integrity, prevention, risk reduction and fight against corruption in the BiH MoD and AFBiH. It applies to all appointed officials, civil

servants, employees, civilian personnel, military personnel and cadets appointed or assigned to positions in the BiH MoD and AFBiH, and persons engaged on any basis for requirements of the BiH MoD and AFBiH.

The Board for Building Integrity and Fight against Corruption (hereinafter the Board) has been established and tasked with providing guidance and overseeing the implementation of the Policy. The Board consists of the Deputy Defence Minister, who acts as the Chair, the BiH MoD Secretary, who acts as the Deputy Chair, and the BiH MoD Inspector General, AFBiH JS Deputy Chief, and Assistant Minister for Intelligence as members, as well as a required number of other members to ensure the prescribed representation, plus the administrative team (coordinator and technical secretary).

The Board oversees the implementation of the Policy and gives proposals to the Defence Minister regarding building integrity, risk reduction and fight against corruption in the BiH MoD and AFBiH. The Board meets as required or at least every six months.

The Expert Group for implementation of the Policy (hereinafter the Expert Group) has been established and tasked with comprehensive planning, preparation and implementation of the Policy. Members of the Expert Group include one representative from each organizational unit of the BiH MoD and three representatives of the AFBiH JS. The Expert Group is chaired by the representative of the BiH MoD Office of the Inspector General, and the deputy chair is the representative of the Sector for Intelligence and Security Affairs of the BiH MoD.

The Expert Group analyses the situation in the area of building integrity, risk reduction and fight against corruption and proposes to the Board concrete measures for improvement of the situation in that area. The Expert Group meets as required or at least once in three months.

The following measures and activities are available, inter alia, for implementation of the Policy:

- a. Development of the risk assessment regarding threat to integrity and vulnerability to corruption in the BiH MoD and AFBiH,
- b. Development and implementation of the Action Plan for Prevention of Corruption in the BiH MoD and AFBiH,
- c. Training in the area of building integrity, prevention, risk reduction and fight against corruption, which will be organized for all levels of management, command and control in the BiH MoD and AFBiH,
- d. Participation in international training programs, seminars, workshops and conferences,
- e. Development and periodic updating of the „Integrity Self-Assessment of the Defence Sector“, as the initial tool for interaction between the BiH MoD and NATO in the area of integrity building and fight against corruption,
- f. Engagement of the Board and the Expert Group, which will monitor the implementation of the Action Plan and other options and undertake measures for their full implementation and upgrading,
- g. Consistent enforcement of previously adopted books of rules, instructions, codes and other regulations and official documents of the BiH MoD and AFBiH.

It is mandatory that all levels of management, command and control undertake disciplinary and other measures against those engaging in corrupt and other negative practices that undermine the integrity of the BiH MoD and AFBiH. The listed measures are mandatory also against individuals who fail to undertake necessary measures and actions to prevent corrupt and other negative activities in the BiH MoD and AFBiH.

The Policy defines the responsibilities of the BiH MoD as a whole and its organizational units as follows:

BiH Ministry of Defence:

- a. Plans and implements measures and activities aimed at improvement of the existing level of building integrity, prevention, risk reduction and fight against corruption in the BiH MoD and AFBiH,
- b. Develops, implements and monitors application of the action plan for prevention of corruption in the BiH MoD and AFBiH,
- c. Cooperates with national and international institutions and organizations on fulfilment of the purpose and the goal of the Policy,
- d. Provides guidance and approves training in the area of building integrity, prevention, risk reduction and fight against corruption in the BiH MoD and AFBiH,
- e. Cooperates and operates with relevant law enforcement bodies in BiH in the area of prevention, risk reduction and fight against corruption.

Office of the Inspector General

- a. Acts as the primary responsibility office for institutional obligations of the BiH MoD related to building integrity, prevention, risk reduction and fight against corruption,
- b. Coordinates and monitors execution of measures and activities of the BiH MoD and AFBiH related to the process of implementation of the Policy,

- c. Coordinates activities on development of the risk assessment document regarding threats to integrity and vulnerability to corruption in the BiH MoD and AFBiH and the action plan for prevention of corruption in the BiH MoD and AFBiH,
- d. Within its competences, cooperates with representatives of state institutions and BiH agencies and international organizations in relation to building integrity, prevention, risk reduction and fight against corruption in the BiH MoD and AFBiH,
- e. Reviews and, if required, updates the Policy once a year.

Intelligence-Security Sector

- a. Cooperates with the Office of the Inspector General, organizational units of the BiH MoD and AFBiH in relation to the timely detection of irregularities and corrupt activities,
- b. Cooperates with complementary agencies in relation to building integrity, prevention, risk reduction and fight against corruption in the BiH MoD and AFBiH.

Personnel Management Sector

- a. Develops programs and measures for prevention, risk reduction and fight against corruption related to personnel management,
- b. Facilitates participation of BiH MoD and AFBiH personnel in training and education programs in the area regulated by the Policy,
- c. Cooperates with the Office of the Inspector General and organizational units of the BiH MoD and AFBiH in relation to fulfilment of the purpose and goal of the Policy.

Procurement and Logistics Sector

- a. Develops programs and measures for prevention, risk reduction and fight against corruption in the area of resource management, and particularly in the area of procurement of goods and services,
- b. Cooperates with the Office of the Inspector General, Internal Audit Unit, Finance and Budget Sector and other organizational units of the BiH MoD and AFBiH, in relation to fulfilment of the purpose and goal of the Policy.

Finance and Budget Sector

- a. Conducts a transparent process of planning, programming, budgeting and execution of the budget for the BiH MoD,
- b. Through the system of budget execution control, contributes to building integrity, risk reduction, prevention and fight against corruption in the BiH MoD and AFBiH,
- c. Cooperates with the Office of the Inspector General, Internal Audit Unit, Procurement and Logistics Unit and other organizational units of the BiH MoD and AFBiH, in relation to fulfilment of the purpose and the goal of the Policy.

Internal Audit Unit

- a. Detects irregularities and indications of possible corrupt conduct,
- b. Cooperates with the Office of the Inspector General and organizational units of the BiH MoD and AFBiH to identify violations of laws and bylaws,
- c. Proposes measures for strengthening of integrity.

AFBiH Joint Staff

- a. Implements the Policy and the Action Plan for prevention of corruption in the BiH MoD and AFBiH,
- b. Cooperates with relevant organizational units of the BiH MoD in relation to building integrity, prevention, risk reduction and fight against corruption,
- c. Develops and implements training and education programs that support building integrity, risk reduction and fight against corruption in the AFBiH,
- d. Develops and implements programs and measures for building integrity, prevention, risk reduction and fight against corruption in the AFBiH.

BiH MoD organizational units

- a. Actively participate in the overall implementation, review and updating of the Policy,

- b. Actively participate in development and implementation of the action plan for prevention of corruption in the BiH MoD and AFBiH, including mutual cooperation of organizational units of the BiH MoD and AFBiH,
- c. Participate in activities, events and commitments of the BiH MoD related to building integrity, prevention, risk reduction and fight against corruption,
- d. Designate their respective points of contact for issues related to the Policy, who are also members of the Expert Group for implementation of the Policy,
- e. Make situation assessments, plan and implement internal measures and activities aimed at building integrity, prevention, risk reduction and fight against corruption.

EXTERNAL

As for the external aspects of coordination and consultations aimed at fulfilment of the integrity plan, the BiH MoD cooperates with institutions and organizations in BiH and international organizations dealing with building integrity, risk reduction and fight against corruption.

Cooperation within BiH includes the Joint Defence and Security Committee of the BiH Parliamentary Assembly, Parliamentary Military Commissioner, Agency for Prevention of Corruption and Coordination of the Fight against Corruption, and other national institutions and organizations, including the nongovernmental sector.

Cooperation with international organizations includes NATO, EU, OSCE, UN and other international organizations and agencies, including nongovernmental organizations.

Cooperation with NATO is particularly intensive through the NATO Building Integrity Programme and support to building integrity initiatives.

3. 2015-2019 BIH MOD ACTION PLAN FOR PREVENTION OF CORRUPTION AND FIGHT AGAINST CORRUPTION

STRATEGIC GOAL 1: BUILDING AND STRENGTHENING INSTITUTIONAL CAPACITIES AND ENHANCING REGULATORY FRAMEWORK FOR FIGHT AGAINST CORRUPTION

Strategic program 1.1.				
Identify agencies for fight against corruption at all levels of government where it has not been done so far, and develop mutual cooperation and coordination of all agencies for fight against corruption in BiH (1.1)				
No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.1.1.	Regularly maintain and enhance communication, coordination and cooperation between BiH agencies for fight against corruption (1.1.5.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA	Continuous	Memoranda of understanding and cooperation are being implemented
1.1.2.	Hold regular meetings of the Board for Building integrity and fight against corruption	Board Chair, BiH MoD Office of the Inspector General	Continuous	The Board set up and meets at least once in six months
1.1.3.	Hold regular meetings of the Expert group for the implementation of the Policy for building integrity and fight against corruption in the MoD and AFBiH	BiH MoD organizational units	Continuous	Expert group set up and meets at least once in three months

Strategic program 1.2.

Ensure administrative, financial and institutional capacities of the agencies for prevention of corruption in BiH in line with their authorities (1.2.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.2.1.	Ensure administrative, financial and institutional capacities of the agencies for prevention of corruption in BiH in line with their authorities (1.2.3.)	BiH MoD management	2nd year after adoption of the Plan	Ensure appropriate material, technical, regulatory and legal framework for the work of the BiH MoD Office of the Inspector General
1.2.3.	Develop harmonized training programs for the BiH MoD Office of the Inspector General (1.2.4.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Training plans and programs developed
1.2.4.	Continuous education of the personnel of the BiH MoD Office of the Inspector General based on harmonized training plans and programs (1.2.6.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Training conducted in line with plans and programs
1.2.5.	Ensure that risk management is incorporated into regular BiH MoD planning processes and that the BiH MoD management and control system is improved based on risk analysis	BiH MoD Internal Audit Unit in cooperation with the BiH MoD organizational units	2nd year after adoption of the Plan	Risk management incorporated into the planning processes of the BiH MoD organizational units
1.2.6.	Plan training for internal auditors and conduct quality control of the auditing process	BiH MoD Internal Audit Unit	1st year after adoption of the Plan	Training plans for internal auditors developed; quality control of the audit process and reporting conducted

Strategic program 1.3.

Enhance professionalism of public administration through establishment and implementation of transparent and measurable criteria for employment and promotion in the civil service (1.5.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.3.1.	Initiate amendments to regulations governing introduction, application and promotion of transparent and measurable criteria for employment and promotion in the civil service (1.5.2.)	BiH MoD Personnel Management Sector in cooperation with the relevant authority	2nd year after adoption of the Plan	Amendments to the Law on Civil Service formulated and sent to the relevant institutions for adoption
1.3.2.	Take part in implementation of amendments to the regulations governing introduction, application and promotion of transparent and measurable criteria for employment and promotion in the civil service (1.5.3.)	BiH MoD Personnel Management Sector in cooperation with the relevant authority	3rd year after adoption of the Plan	Amendments to the Law and bylaws proposed and adopted based on analysis results

Strategic program 1.4.

Harmonize development of training plans and programs in all public BiH institutions regarding prevention of corruption and coordination of fight against corruption (1.6.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
14.1.	Analyse capabilities and knowledge of civil servants employed in the BiH MoD regarding prevention of corruption and coordination of fight against corruption (1.6.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Personnel Management Sector, BiH CSA and BiH CPA	1st year after adoption of the Plan	Analysis conducted, the level of capability and knowledge of civil servants employed in the BiH MoD determined
14.2.	Based on the analysis, develop harmonized training plans and programs for prevention of corruption and coordination of fight against corruption in the BiH MoD (1.6.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Personnel Management Sector, BiH CSA and BiH CPA	2nd year after adoption of the Plan	Standardized training plans and programs developed
14.3.	Conduct continuous training in line with the harmonized training plans and programs for prevention of corruption and coordination of fight against corruption in the BiH MoD (1.6.3.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Personnel Management Sector, BiH CSA and BiH CPA	Continuous after development of plans and programs	Training being conducted
14.4.	Review requirements for education and training of civilian and military personnel in the BiH MoD on building integrity.	BiH MoD Personnel Management Sector in cooperation with BiH MoD Office of the Inspector General	1st year after adoption of the Plan	The review has been done and the implementation plan is being developed with the aim to include building integrity into the current curriculum

Strategic program 1.5.

Ensure competencies and professionalism of senior civil servants through consistent application of the selection criteria (1.7.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
15.1.	Analyse legal regulations for selection of senior civil servants in the BiH MoD with the aim of ensuring their competencies and professionalism (1.7.1.)	BiH MoD Personnel Management Sector in cooperation with BiH CPA, BiH CSA	1st year after adoption of the Plan	Analysis of legal regulations completed, measures identified for assessing expertise and professionalism
15.2.	Based on the analysis, propose amendments to the regulations governing selection of senior civil servants in the BiH MoD with the aim of developing more clear and accurate criteria (1.7.2.)	BiH MoD Personnel Management Sector in cooperation with BiH CPA, BiH CSA	2nd year after adoption of the Plan	Amendments to the law proposed in line with the analysis; a framework developed with identified competencies required for senior civil servants in the BiH MoD

1.5.3.	Review personnel management policies to include performance evaluations, promotions, recruitment, rotation policies and conduct vetting within the BiH MoD	BiH MoD Personnel Management Sector in cooperation with AFBiH JS	2nd year after adoption of the Plan	The review has been completed
1.5.4.	Use results of post analysis conducted by the BiH MoD and the Norwegian Public Administration Agency to find the most efficient modes of work	BiH MoD Personnel Management Sector	2nd year after adoption of the Plan	Analysis results are in use

Strategic program 1.6.

Reduce possibility of political or other influence on employees in public institutions (1.8.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.6.1.	Analyse regulations governing the work of BiH MoD employees with the aim of preventing political and other influence on their work (1.8.1.)	BiH MoD Personnel Management Sector in cooperation with BiH MoD Office of the Inspector General, BiH CPA and BiH CSA	3rd year after adoption of the Plan	Regulations analysed. Based on the analysis, a list of provisions has been identified as well as their impact on preventing political and other influence on the work of BiH MoD employees
1.6.2.	Conduct research to determine how political and other influence, if any, is exerted on BiH MoD employees (1.8.2.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA, BiH CSA	3rd year after adoption of the Plan	Based on the analysis, modes and manifestations of political or other influence on the work of BiH MoD employees have been identified
1.6.3.	Based on the analysis and research results, propose measures to prevent political and other influence on the work of BiH MoD employees (1.8.3.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA, BiH CSA	3rd year after adoption of the Plan	Measures have been proposed and sent to relevant authorities for action
1.6.4.	Harmonize procedures of internal control in the BiH MoD with the aim of preventing employees from being exposed to internal pressures (1.8.4.)	BiH MoD Internal Audit Unit and BiH MoD Office of the Inspector General	2nd year after adoption of the Plan	Internal control procedures developed and harmonized

Strategic program 1.7.

Provide financial funds for the implementation of strategies and associated action plans for fight against corruption at all levels in BiH (1.9.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.7.1.	Make assessment of required funds for the implementation of the Plan (1.9.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	1 st year after adoption of the Plan	BiH MoD has made an assessment of required funds for the implementation of obligations under the BiH MoD Plan

1.7.2.	In line with the assessment, plan funds in the BiH MoD budget for the implementation of the Plan (1.9.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	1 st year after adoption of the Plan	BiH MoD has made an assessment of required funds for the implementation of obligations under the BiH MoD Plan
1.7.3.	Ensure funds in the BiH MoD budget for the implementation of the Plan (1.9.3.)	BiH MoD Finance and Budget Sector	2 nd year after adoption of the Plan	Funds ensured for the implementation of obligations under the BiH MoD Plan

Strategic program 1.8.

Enhance regulation framework in BiH for fight against corruption with the aim of more successful cooperation and coordination among judicial and law enforcement agencies (1.10.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.8.1.	Analyse regulation framework in BiH for fight against corruption with the aim of enhancing cooperation and coordination among judicial and law enforcement agencies, particularly regarding recommendations of relevant international institutions (1.10.1.)	BiH MoD Office of the Inspector General in cooperation with the BiH MoD Intelligence-Security Sector and the BiH MoD Office for General and Joint Affairs	1 st year after adoption of the Plan	Analysis of regulatory framework in the BiH MoD conducted, cooperation obstacles identified as well as possibilities to enhance cooperation and coordination
1.8.2.	Based on the analysis results, propose required amendments to the regulatory framework for fight against corruption in the BiH MoD in order to improve cooperation and coordination among judicial and law enforcement agencies (1.10.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Intelligence-Security Sector and BiH MoD Office for General and Joint Affairs	2 nd year after adoption of the Plan	Proposals for amendments to the regulatory framework defined and sent for adoption
1.8.3.	Improve procedures in terms of sanctioning individuals in case of bribe or corruption	Heads of BiH MoD organizational units	2 nd year after adoption of the Plan	Procedures analysed and amendments made for their improvement
1.8.4.	Make a comprehensive and detailed risk assessment of all systems and processes in the BiH MoD	BiH MoD Internal Audit Unit	3 rd year after adoption of the Integrity Plan	Detailed risk assessment made, strengths identified and improvements proposed
1.8.5	Adopt an internal document to define the method of keeping a single record of judicial cases, internal correspondence with precise timelines for providing evidence regarding facts in cases before relevant courts	BiH MoD Office for General and Joint Affairs	1 st year after adoption of the Plan	Internal document adopted

1.8.6.	Establish a single record of cases against BiH MoD and cases initiated by BiH MoD, as well as all court and out-of-court settlements	BiH MoD Office for General and Joint Affairs	1 st year after adoption of the Plan	Single record of cases established
1.8.7.	Enhance internal controls pertaining to submission of evidence and affidavits to resolve disputes in favour of the BiH MoD	BiH MoD Office for General and Joint Affairs	1 st year after adoption of the Plan	Controls planned and conducted, timely submission of evidence and affidavits achieved
1.8.8.	Analyse lost cases and recognize weaknesses and deficiencies which led to unfavourable outcome for the BiH MoD	BiH MoD Office for General and Joint Affairs	2 nd year after adoption of the Plan	Analysis conducted regularly
1.8.9.	Finalize pending court cases ASAP with the most favourable outcome for the BiH MoD	BiH MoD Office for General and Joint Affairs in cooperation with the BiH Office of the Public Attorney	1 st year after adoption of the Plan	Pending court cases completed and penalties avoided
1.8.10.	Shorten internal communication in terms of timely action in civil and other court procedures and enable as efficient and timely flow of information and documents as possible	BiH MoD Office for General and Joint Affairs in cooperation with the BiH MoD organizational units	1 st year after adoption of the Plan	Timely internal communication and flow of information / documents achieved
1.8.11.	Submit copies of verdicts to the relevant organizational unit	BiH MoD Office for General and Joint Affairs	1 st year after adoption of the Plan	Organizational units informed and are working to remove deficiencies and weaknesses in the BiH MoD

Strategic program 1.9.

Enable the BiH CPA or agencies for prevention of corruption in BiH to provide opinions on draft anti-corruption laws (1.11.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.9.1.	Prescribe procedures on obtaining opinion of the BiH CPA or agencies for prevention of corruption regarding draft regulations containing anti-corruption provisions (1.11.1.)	BiH MoD Office of the Inspector General in cooperation with the BiH MoD organizational units and BiH CPA	2nd year after adoption of the Plan	Procedures adopted and are being implemented; regulations with anti-corruption provisions sent for opinion

Strategic program 1.10.

Harmonize BiH legislation framework with obligations stemming from ratified international conventions (1.12.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.10.1.	Identify BiH MoD obligations stemming from international conventions and standards governing fight against corruption, which are not included in bylaws and regulations (1.12.1.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA	1st year after adoption of the Plan	BiH MoD obligations stemming from international conventions and standards which are not included in bylaws and regulations identified
1.10.2.	Initiate amendments to bylaws and regulations based on obligations stemming from international conventions and standards governing fight against corruption, which are not included in BiH MoD regulations (1.12.2.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA	2nd year after adoption of the Plan	Proposal of amendments to bylaws and regulations defined and submitted to relevant authorities for adoption
1.10.3.	Adopt amendments to the legislation based on obligations stemming from international conventions and standards governing fight against corruption, which are not included in BiH MoD regulations (1.12.3.)	BiH Minister of Defence	3rd year after adoption of the Plan	Amendments to regulations and bylaws adopted

Strategic program (1.11.)

Implement recommendations of relevant international institutions and organizations for fight against corruption (1.13.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.11.1.	Identify relevant international institutions and organizations, which give recommendations related to fight against corruption (1.13.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD International Cooperation Sector and BiH CPA	Six months after adoption of the Plan	The list of relevant international institutions and organizations submitted to the BiH MoD Office of the Inspector General
1.11.2.	Continuous monitoring and implementation of recommendations of relevant international institutions and organizations for fight against corruption (1.13.2.)	BiH MoD Office of the Inspector General	Continuous	Recommendations identified, notifications for action submitted to relevant BiH MoD organizational units
1.11.3.	Take part in NATO's initiative for self-assessment of building integrity in the defence sector	BiH MoD organizational units	Continuous	Self-assessment of building integrity developed, NATO's recommendations are being implemented

1.11.4.	Take part in NATO's Building Integrity Programme	BiH MoD Office of the Inspector General in cooperation with BiH MoD International Cooperation Sector and organizational units	Continuous	Active participation in activities as set out by the Partnership Goal GO204 - Integrity Development
1.11.5.	Cooperate with the EU, NATO, OSCE, UN and other international organizations and agencies in fight against corruption	BiH MoD management and BiH MoD Office of the Inspector General in cooperation with other BiH MoD organizational units	Continuous	Active contribution

Strategic program 1.12.

Enhance prevention of corruption and fight against corruption by harmonizing anti-corruption legislation at all levels in BiH (1.14.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.12.1.	Analyse and identify inconsistencies in BiH MoD anti-corruption regulations in order to enhance fight against corruption (1.14.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	2nd year after adoption of the Plan	The list of anti-corruption regulations made, analysed, inconsistencies identified
1.12.2.	Initiate amendments to anti-corruption regulations in order to enhance fight against corruption	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	3rd year after adoption of the Plan	Proposals for harmonization of anti-corruption regulations defined and submitted to the relevant authorities for adoption
1.12.3.	Contribute to development of the National Plan for raising awareness and education of the general public with the aim of gaining public support for the implementation of the anti-corruption strategy and development/ update of the integrity plan in state agencies	BiH MoD Public Affairs Office and BiH MoD Office of the Inspector General	Continuous	Specific proposals submitted to the BiH CPA
1.12.4.	Cooperate with the Joint Committee for Defence and Security of the BiH Parliamentary Assembly and the Parliamentary Military Commissioner, and other institutions and agencies	BiH MoD management, BiH MoD Office of the Inspector General and AFBiH JS	Continuous	Participation in joint activities
1.12.5.	Review policies on reporting gifts received by civil servants and employees in the BiH MoD during protocol activities and other measures and activities to eliminate opportunities for corruption	BiH MoD Office for General and Joint Affairs	1st year after adoption of the Plan	Policies reviewed and analysed

Strategic program 1.13.

Improve the system and the process for more successful implementation of legal responsibilities of the BiH MoD

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
1.13.1.	Identify clear responsibilities of the organizational units for implementation of the goals under BiH MoD authority	BiH MoD organizational units and BiH MoD Secretary	1st year after adoption of the Plan	Analysis made, responsibilities aligned in all planning documents which ensure realization of BiH MoD goals
1.13.2.	Compile a list and description of systems and processes of BiH MoD organizational units with clearly defined goals, risks and responsibilities	BiH MoD Internal Audit Unit in cooperation with BiH MoD organizational units	1st year after adoption of the Plan	Systems descriptions regularly updated in accordance with changes in BiH MoD goals and organizations, and are used for risk analysis, improvement of internal controls and preparation of internal audit plans
1.13.3.	Improve audit planning and pay more attention to internal controls of the institution's business systems	BiH MoD Internal Audit Unit	Continuous	Fully aware of BiH MoD business systems and goals; they will be part of risk analysis based on which annual and strategic audit plans are developed

STRATEGIC GOAL 2: DEVELOPMENT, PROMOTION AND IMPLEMENTATION OF PREVENTIVE ANTI-CORRUPTION ACTIVITIES IN PUBLIC AND PRIVATE SECTOR

Strategic program 2.1.

Reduction of possibility of corruption through enhancement of proactive transparency of institutions and improvement of application of the Law on Access to Information (2.1.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.1.1.	Analyse contents of all regulations on free access to information in the BiH MoD to identify impediments to free access to information, and also requirements for harmonization of regulations (2.1.1.)	BiH MoD Public Affairs Office	1st year after adoption of the Plan	Regulations analysed, impediments to free access to information identified
2.1.2.	Based on the analysis, prepare amendments to the regulations on access to information in order to remove provisions which impede access to information (2.1.2.)	BiH MoD Public Affairs Office	2nd year after adoption of the Plan	Amendments defined, developed and sent to relevant authorities for adoption
2.1.3.	Based on the analysis, prepare amendments to the regulations in order to harmonize them (2.1.3.)	BiH MoD Public Affairs Office	2nd year after adoption of the Plan	Amendments defined, developed and sent to relevant authorities for adoption
2.1.4.	Develop a guide and information registry index in the BiH MoD (2.1.7.)	BiH MoD Public Affairs Office	1st year after adoption of the Plan	The guide and information registry index developed

Strategic program 2.2.

Enhance rights to free access to information by precisely defining exceptions from the general rule of the Law on Access to Information (2.2.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.2.1.	Analyse implementation of the law and regulations on access to information in BiH MoD in order to identify problems in practice, including interpretation of the exceptions to the rules on access to information (2.2.1.)	BiH MoD Public Affairs Office	1st year after adoption of the Plan	Analysis made, problems identified along with interpretation of exceptions to the rules
2.2.2.	Based on the analysis, propose amendments to regulations on access to information in BiH MoD including a more precise definition of exceptions to the right of access to information (2.2.2.)	BiH MoD Public Affairs Office	2nd year after adoption of the Plan	Amendments defined, developed and sent to relevant authorities for adoption
2.2.3.	Analyse regulations on access to information in BiH MoD in order to identify options for partial release of information (2.2.3.)	BiH MoD Public Affairs Office	1st year after adoption of the Plan	Analysis made, options for partial release of information identified

2.2.4.	Based on the analysis propose amendments to regulations on access to information in BiH MoD which will enable partial release of information (2.2.4.)	BiH MoD Public Affairs Office	2nd year after adoption of the Plan	Amendments made and sent to legislation authorities at relevant levels for adoption
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Strategic program 2.3.

Reduction of possibility for abuse of discretionary authority (2.5.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.3.1.	Analyse regulations governing the work of the BiH MoD in order to establish possibilities for abuse of discretionary decision-making (2.5.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Analysis conducted, possibilities for prevention of abuse of discretionary decision-making identified
2.3.2.	Analyse use of discretionary authority in order to introduce more transparency in a way that each decision for which this authority is exercised must be explained and publically announced (2.5.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Analysis conducted , possibilities identified for increasing transparency of use of discretionary authority
2.3.3.	In line with the analysis, identify criteria and conditions under which discretionary authority may be used and propose amendments to laws and bylaws of the BiH MoD governing the area (2.5.3.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Criteria and conditions for use of discretionary authority defined and amendments to regulations governing the area proposed

Strategic program 2.4.

Developing integrity and ethics culture in BiH public institutions (2.6.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.4.1.	Develop and introduce harmonized training programs governing prevention of corruption and prevention of conflict of interest in BiH MoD (2.6.1.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Training programs developed and harmonized with the BiH CPA and BiH CSA
2.4.2.	Conduct harmonized training for qualified education of civil and military personnel in the BiH MoD with the aim of developing the culture of integrity and ethics	BiH MoD Office of the Inspector General	Continuous	Continuous ethics and integrity education
2.4.3.	Adopt the Code of Ethics and the Integrity Plan of the BiH MoD and ensure their implementation (2.6.3.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	1st year after adoption of the Plan	The BiH MoD Code of Ethics and the Integrity Plan adopted and implemented, the employees have been informed on the content, information publically available

2.4.4.	Implement the Code for civil servants in the BiH institutions	BiH MoD organizational units	Continuous	BiH MoD civil servants aware of and adhere to the Code
2.4.5.	Implement the Code of Conduct for AFBiH members and define standards of conduct for BiH MoD and AFBiH personnel	BiH MoD organizational units	Continuous	AFBiH members aware of and adhere to the Code
2.4.6.	Implement the Code of Ethics for military personnel in BiH MoD and AFBiH	BiH MoD organizational units	Continuous	AFBiH members aware of and adhere to the Code
2.4.7.	Develop a standardized training module on combating corruption for all units deployable to PSOs and individuals deployed to military and military-diplomatic missions	AFBiH JS	Continuous	Training modules developed and regularly conducted
2.4.8.	Introduce mandatory training modules on building integrity and fight against corruption to officer and NCO professional development courses	AFBiH JS	Continuous	Training modules developed and training conducted
2.4.9.	Design and conduct a BiH MoD PR campaign with appropriate messages related to combating corruption in order to empower ongoing activities	BiH MoD Public Affairs Office, Board for Building Integrity and Fight Against Corruption and BiH MoD Office of the Inspector General	Continuous	Web page, public statements of officials, etc.
2.4.10.	Introduce mandatory training programs on building integrity, fight against corruption and corruption risk reduction which will be conducted at all levels of command and control in AFBiH	AFBiH JS	1st year after adoption of the Plan	Training models developed and regularly conducted
2.4.11.	Plan participation in international training programs, conferences, seminars and workshops on building integrity	BiH MoD Office of the Inspector General and BiH MoD Personnel Management Sector	Continuous	Attendance and active contribution
2.4.12.	Familiarization with the work, responsibilities, authority and duties of inspectors in BiH MoD and AFBiH	BiH MoD organizational units in cooperation with the BiH MoD Office of the Inspector General	Continuous	BiH MoD and AFBiH JS members informed on the authority of the BiH MoD Office of the Inspector General
2.4.13.	Support organization and attendance at NATO certified courses (officers and NCOs) on building integrity in PSOs conducted by PSOTC	AFBiH JS	IAW PSOTC training plans	BiH MoD and AFBiH members take part in training at NATO certified courses
2.4.14.	Establish and maintain a database of experts trained in building integrity and fight against corruption	BiH MoD Office of the Inspector General in cooperation with BiH MoD organization units	Continuous	Database established

2.4.15.	Initiate a proactive media campaign on ethics and integrity programs focused on external public and BiH MoD and AFBiH personnel	BiH MoD Public Affairs Office	Continuous	Media campaign ongoing
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Strategic program 2.5.

Harmonization of methodology for development and implementation of plans for fight against corruption in BiH public institutions and setting legal obligation for development of integrity plans in BiH institutions (2.7.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.5.1.	Create harmonized guidance for development of plans for fight against corruption in BiH MoD (2.7.1.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Harmonized guidance created in the BiH MoD
2.5.2.	Harmonize current integrity plans in the BiH MoD in line with legal obligations (2.7.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	2nd year after adoption of the Plan	The current Integrity Plan harmonized
2.5.3.	Make annual action plan for each subsequent year for the implementation of the BiH MoD action plan and include own requirements	BiH MoD organizational units	Continuous	Annual plan for each subsequent year made

Strategic program 2.6.

Improve procedure for establishing conflict of interest through the system of obtaining data on financial status with effective penalties for false reporting (2.8.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.6.1.	Analyse BiH MoD regulations on conflict of interest to identify possibilities for more efficient prevention of conflict of interest and stricter penalties for non-compliance (2.8.1.)	BiH MoD Office of the Inspector General	2nd year after adoption of the Integrity Plan	Analysis completed, identified possibilities for improvement of conflict of interest system and stricter penalties for non-compliance
2.6.2.	Based on the analysis, propose amendments to BiH MoD regulations on conflict of interest for more efficient prevention of conflict of interest and stricter penalties for non-compliance (2.8.2.)	BiH MoD Office of the Inspector General	3rd year after adoption of the Plan	Amendments to BiH MoD regulations on conflict of interest sent for adoption to relevant authorities
2.6.3.	Conduct comprehensive analysis of financial reporting to establish an effective system of control, processing financial disclosure data and eliminating obstacles for public disclosure (2.8.4.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Analysis conducted, system design created for financial disclosures and possibilities identified to eliminate obstacles for their public disclosure

2.6.4.	Ensure senior personnel submit annual financial disclosure reports	BiH MoD Office of the Inspector General and persons as mandated by Chapter 14, Change 25, Instructions to the Parties	Until 1 Feb each year	Public personal financial disclosure reports are submitted regularly
2.6.5.	Set up an electronic registry of financial disclosure reports (2.8.5)	BiH MoD Office of the Inspector General	2nd year after adoption of the Plan	Electronic registry of financial disclosure reports set up
2.6.6.	Set up an electronic database for continuous control of gifts received and their reporting by elected officials, executive managers and advisors (2.8.7)	BiH MoD General and Joint Affairs Office	1st year after adoption of the Plan	Electronic database set up, regular controls of gifts received and reported
2.6.7.	Develop special training programs on prevention of conflict of interest and financial disclosure (2.8.8)	BiH MoD Office of the Inspector General	3rd year after adoption of the Plan	Training programs developed, regular training of employees

Strategic program 2.7.

Continuous harmonization of legislation pertaining to public procurement with international obligations and standards (2.9)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.7.1.	Analyse implementation of the BiH Law on Public Procurement (2.91.)	BiH MoD Logistics and Procurement Sector	2nd year after adoption of the Plan	Analysis of legislation completed, recommendations made to reduce possibility of corruption in public procurement
2.7.2.	Continuous training of MoD employees on prevention of corruption in public procurement (2.92.)	BiH MoD Logistics and Procurement Sector in cooperation with BiH CSA	Continuous	Regular training on prevention of corruption in public procurement
2.7.3.	Transparently publish and update all registries of public procurement contracts and agreements with contracting parties (2.94.)	BiH MoD Logistics and Procurement Sector and BiH MoD Public Affairs Office	Continuous	Registries of contracts and agreements on public procurement published and regularly updated
2.7.4.	Develop a registry of planned public procurements with clearly specified characteristics of goods and services and make it publicly available to all interested suppliers (2.95.)	BiH MoD Logistics and Procurement Sector	1st year after adoption of the Plan	Registry made and publically available to all interested suppliers
2.7.5.	Create control mechanisms to ensure prevention of abuse in public procurement procedures (2.96.)	BiH MoD Logistics and Procurement Sector and BiH MoD Internal Audit Unit	1st year after adoption of the Plan	Efficient control mechanisms in place for prevention of abuse in public procurement procedures

2.76.	Strengthen MoD capacities in public procurement and introduce efficient control mechanisms (2.9.7)	BiH MoD Logistics and Procurement Sector and BiH MoD Internal Audit Unit	Continuous	Internal audits conducted, efficient control mechanisms in place, capacities strengthened through training and equipping
2.77.	Implement special unannounced audits of random procurement contracts	BiH MoD Internal Audit Unit	Continuous	Unannounced audit controls of random contracts are conducted
2.78.	Conduct audit of the public procurement system to promote best practices and ensure the procedures and processes are as efficient as possible	BiH MoD Logistics and Procurement Sector	3rd year after adoption of the Plan	The system audit completed along with the review of regulations, policies and procedures and possible improvements identified
2.79.	Review manning and requirements for qualified logistic personnel for key positions and develop training and plan for personnel management to improve logistic personnel capacities	BiH MoD Logistics and Procurement Sector in cooperation with the BiH MoD Personnel Management Sector	1st year after adoption of the Plan	Review made and manning plan developed
2.710.	Establish special procedures for selection and training of members of tender boards/ procurement commissions in coordination with the development of the new concept for creating a database of personnel which could potentially serve at tender boards	BiH MoD Logistics and Procurement Sector	2nd year after adoption of the Plan	Personnel selection procedures established and training conducted
2.711.	Selection of best bidder should be done IAW the BiH Law on Public Procurement for each specific type and quantity of work, taking care of each phase of the procurement process starting with procurement planning, tender documentation to conclusion of contracts with selected bidder	BiH MoD Logistics and Procurement Sector	Continuous	The overall process of selection of best bidder is done IAW with the BiH Law on Public Procurement
2.712.	An internal document should define the obligation of record keeping on received bank guarantees, their safekeeping and storing and responsibility for timely action with regard to them	BiH MoD Finance and Budget Sector in cooperation with BiH MoD Logistics and Procurement Sector	1st year after adoption of the Plan	Internal document on record keeping on received bank guarantees in place

Strategic program 2.8.

Strengthening the oversight function and responsibility for oversight omissions pertaining to conflict of interest, ethics, integrity, financial operations, compliance with professional and other standards (2.11.1)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.8.1.	Strengthen the capacities of the BiH MoD oversight bodies for exercise of their authority (2.11.1.)	BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	Continuous	BiH MoD IG Office and Internal audit units strengthened through manning, training and equipping
2.8.2.	Strengthen the responsibility of civil servants in areas pertaining to conflict of interest, ethics, integrity, financial operations, and compliance with professional and other standards (2.11.2.)	BiH MoD organizational units in cooperation with BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Analysis conducted, possibilities identified to improve oversight responsibility
2.8.3.	Improve procedures regarding responsibility of civil servants for oversight in the areas of conflict of interest, ethics, integrity, financial operations, and compliance with professional and other standards (2.11.3.)	BiH MoD organizational units in cooperation with BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Procedures regarding responsibility of civil servants improved
2.8.4.	Evaluate application of specific investigative actions in case of corruption in order to assess their efficiency	BiH MoD Office of the Inspector General	Continuous	Investigative actions applicable, efficient and lawful

Strategic program 2.9.

Strengthen personnel and other capacities and legislative framework for improvement of audit services and inspection bodies (2.12.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.9.1.	Analyse requirements for improvement of work of audit and inspection bodies for detecting irregularities in the work of the BiH MoD (2.12.1.)	BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Analysis conducted, concrete requirements for improvement of work and proposals identified and sent to relevant authorities
2.9.2.	In line with the analysis, ensure appropriate capacity building of audit services and inspection bodies to detect irregularities in the work of the BiH MoD in order to fight corruption more effectively (2.12.2.)	BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	3rd year after adoption of the Plan	Capacities provided in line with recommendations for appropriate capacity building of audit services and inspection bodies

2.9.3.	Enable continuous education for the BiH MoD Internal Audit Unit to adopt and apply new standards and audit techniques and familiarization with best practices (2.12.4.)	BiH MoD Personnel Management Sector and BiH MoD Internal Audit Unit	4th year after adoption of the Plan	Regular training and education of auditors, reports after education compiled and made publically available
2.9.4.	Review responsibilities of the BiH MoD Internal Audit Unit and BiH MoD Office of the Inspector General to minimize overlapping of responsibilities	BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	1st year after adoption of the Plan	Analysis made and review will be made as required
2.9.5.	Ensure regular direct cooperation of the BiH MoD sectors dealing with resources with the BiH MoD Internal Audit Unit and BiH MoD Office of the Inspector General	BiH MoD Personnel Management Sector, BiH MoD Logistics and Procurement Sector, BiH MoD Finance and Budget Sector, BiH MoD Office of the Inspector General, BiH MoD Internal Audit Unit	Continuous	Regular and concrete cooperation
2.9.6.	Create environment for unimpeded internal audit in line with adopted internal audit standards and methodology	BiH MoD Internal Audit Unit in cooperation with BiH MoD organizational units	Continuous	Regulations governing the work and engagement of internal auditors are complied with and they ensure unimpeded internal audit

Strategic program 2.10.

Establish more efficient communication channels between audit services and inspection bodies with the law enforcement agencies regarding findings which indicate possible corruptive behaviour (2.13.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.10.1.	Develop precise and binding procedures for exchange of information between audit services and inspection bodies with law enforcement agencies regarding findings which indicate corruption (2.13.1)	BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit	1st year after adoption of the Plan	Procedures for exchange of information developed
2.10.2.	Improve transparency of findings made by audit services and inspection bodies with periodic publishing of data on activities conducted and findings (2.13.2.)	BiH MoD Office of the Inspector General and BiH MoD Internal Audit Unit in cooperation with BiH MoD Public Affairs Office	Continuous	Data on audits and inspections available to public via web sites and media

Strategic program 2.11.

Improve responsibility and rationality in planning, collecting and spending public funds by improving transparency of the process (2.17)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.11.1.	Improve the system of internal control with the aim of strengthening responsibility and rationality in planning and spending public funds (2.17.1.)	BiH MoD Internal Audit Unit, BiH MoD Finance and Budget Sector and BiH MoD organizational units	Continuous	Controls regular, reports and recommendations made
2.11.2.	Ensure transparency in planning, collecting and spending public funds through public release of BiH MoD financial operations (2.17.2.)	BiH MoD Finance and Budget Sector	Continuous	Transparency ensured through public release of reports by BiH MoD
2.11.3.	Develop a plan to review ownership over equipment and assign appropriate value to increase responsibility	BiH MoD Finance and Budget Sector and BiH MoD Logistics and Procurement Sector	2nd year after adoption of the Plan	Plan developed and implemented
2.11.4.	Inventory standing assets in the BiH MoD in line with relevant regulations on inventory and the purpose of the inventory, particularly in case of discrepancies regarding property listed in financial books	BiH MoD Finance and Budget Sector	Continuous	Inventories made in line with relevant regulations
2.11.5.	Timely entry of assets in order to reconcile accounting and actual situation as established by the inventory for the purpose of accurate balance sheets	BiH MoD Finance and Budget Sector	Continuous	Entry of assets done in a timely fashion
2.11.6.	Register ownership over immovable defence property, assess the value and after that make entry into the BiH MoD accounting books	BiH MoD Finance and Budget Sector	After final solution of the ownership issue	Registration of ownership completed, as well as assessment of value and bookkeeping
2.11.7.	Hand over non-prospective sites and immovable defence property to reduce costs	BiH MoD Logistics and Procurement Sector in cooperation with AFBiH JS	ASAP	Handover of non-prospective sites and immovable defence property completed
2.11.8.	Accelerate assessment and registration of prospective defence property into BiH MoD accounting books for the purpose of accurate balance sheets	BiH MoD Finance and Budget Sector	2nd year after adoption of the Plan	Assessment and registration of prospective defence property into accounting books completed
2.11.9.	Be proactive in terms of implementation of donated funds, and when planning financing of activities consider the possibility of spending available donor funds	AFBiH JS in cooperation with BiH MoD Logistics and Procurement Sector BiH	Continuous	When planning financing of activities the possibility of using available donor funds is considered

2.11.10.	Pay attention to the principle of promptness when implementing and recording changes after receipt of donations in kind with an emphasis on standing assets, and improve the procedure of entering those changes into accounting books	BiH MoD Finance and Budget Sector	2nd year after adoption of the Plan	Record keeping updated and in line with the Book of Rules on accounting
2.11.11.	Receipt and recording of donations in kind should be governed by an internal book of rules or other type of regulation to improve internal bookkeeping, which should be comprehensive, as well as the procedure of receipt and recording of such donations	BiH MoD Finance and Budget Sector	2nd year after adoption of the Plan	Internal memo in place to improve internal record keeping of receipt and recording
2.11.12.	Establish efficient cost control for use of duty vehicles (repair, servicing, fuel consumption, insurance, etc.)	BiH MoD General and Joint Affairs Office	1st year after adoption of the Plan	The system of internal control in place as well as operational database for vehicles
2.11.13.	Establish separate bookkeeping for maintenance of passenger vehicles, which have maximum eight seats in addition to the driver's seat (M1 vehicles) and other motor vehicles (combat and non-combat vehicles, engineering machinery, buses)	BiH MoD Finance and Budget Sector	1st year after adoption of the Plan	Establish separate bookkeeping
2.11.14.	Draft template contracts for accommodation, and as per the decision of the BiH Council of Ministers the allowance should not include utility costs	BiH MoD Personnel Management Sector	1st year after adoption of the Plan	Template contracts drafted and do not include utility costs

Strategic program 2.12.

Improve supervision over budget planning and execution and responsibilities for non-compliance with regulations governing the processes (2.19.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
2.12.1.	Develop a methodology of monitoring programs/projects financed from the budget and their execution in practice to avoid use of funds for unintended purposes (2.19.1.)	BiH MoD Finance and Budget Sector	Continuous	Methodology developed and execution of the budget funds is regularly monitored
2.12.2.	Ensure transparency of planning and execution of annual BiH MoD budget (2.19.2.)	BiH MoD Finance and Budget Sector	2nd year after adoption of the Plan	Transparency ensured through public release of information on web page
2.12.3.	Conduct a comprehensive risk assessment focusing on the finance management system	BiH MoD Finance and Budget Sector in cooperation with BiH MoD Internal Audit Unit	2nd year after adoption of the Plan	Risk assessment conducted

2.12.4.	Provide IT support for budget execution concerning logistics to stay abreast of all key transactions. The current temporary database should be expanded and used until the IT logistic accounting system is in place and integrated in the overall accounting system	C4IM Sector in cooperation with BiH MoD Finance and Budget Sector and BiH MoD Logistics and Procurement Sector	2nd year after adoption of the Plan	IT support enables transaction monitoring; temporary database expanded
2.12.5.	Record all payments and disbursements to the cash desk accurately and appropriately in line with regulations on cash operations	BiH MoD Finance and Budget Sector	Continuous	Payments and disbursements to the cash desk accurately recorded

STRATEGIC GOAL 3: IMPROVEMENT OF EFFICIENCY AND EFFECTIVENESS OF JUDICIAL INSTITUTIONS AND LAW ENFORCEMENT BODIES IN THE AREA OF FIGHT AGAINST CORRUPTION

Strategic program 3.1.

Ensure appropriate mechanisms for reporting cases of corruption by employees in public institutions, as well as monitoring of follow-up actions (3.1.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.1.1.	Strengthen the awareness of civil servants through harmonized training focusing on the obligation to act upon corruption reports and to protect whistle-blowers (3.1.1.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA	Continuous	Harmonized programs prepared, training is conducted, respective information available on websites and other media
3.1.2.	Establish online systems and phone lines for reporting corruption in the BiH MoD (3.1.2.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	A number of systems and lines available, relevant information available on websites and other media
3.1.3.	Establish a methodology for harmonized recordkeeping on reports, processing and analysis of statistical data related to reports containing indications of corruption in the BiH MoD (3.1.3.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Methodology developed, harmonized with BiH CPA as required and available to the public
3.1.4.	Periodically process statistical data on reports of corruption in the BiH MoD IAW established methodology and make the data analysis available to the public (3.1.4.)	BiH MoD Office of the Inspector General	Continuous after 1st year after adoption of the Plan	The processing is done periodically, information of the findings is available to the public on websites and media

Strategic program 3.2.

Promotion of reporting and encouragement of active civic participation in the fight against corruption (3.2.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.2.1.	Design and implement public information campaigns on possibilities for active participation in the fight against corruption and ways of reporting corruption (3.2.1.)	BiH MoD Public Affairs Office in cooperation with BiH MoD Office of the Inspector General	Continuous after 1st year after adoption of the Plan	Campaigns designed and implemented, information on campaigns provided to BiH CPA
3.2.2.	Continuously promote online systems and telephone lines for reporting corruption and whistle-blower protection mechanism (3.2.2.)	BiH MoD Office of the Inspector General	Continuous	Information on online systems and phone lines for reporting corruption available to the public

3.2.3.	Consistently apply and further improve the existing whistle-blower protection mechanism (3.2.3.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA	Continuous	Data on the number of protected whistle-blowers available, measures for improvement of whistle-blower protection devised and available to the public
3.2.4.	Keep communication channels open in the BiH MoD (sealed mailbox, special phone line, email address) in order to encourage citizens, military personnel and other employees to report corruption	BiH MoD Office of the Inspector General	Continuous	There are sealed mailboxes, a special phone line, email address for reports and the "ethic line", including the option of anonymous reports

Strategic program 3.3.

Strengthening integrity of law enforcement bodies (3.3.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.3.1.	Regular development and upgrade, implementation of BiH MoD integrity plans (3.3.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	Continuous	Upgraded integrity plans are developed, reports on their implementation provided to the BiH CPA
3.3.2.	Conduct regular training in the area of prevention of and fight against corruption in BiH MoD (3.3.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	Continuous	Reports on conducted training are provided to BiH CPA, information available to the public
3.3.3.	Define the methodology and criteria and on the basis of them identify which positions and duties in the BiH MoD and AFBiH are vulnerable to corruption	BiH MoD Office of the Inspector General and BiH MoD Personnel Management Sector in cooperation with BiH MoD organizational units	2nd year after adoption of the Plan	Positions and duties identified
3.3.4.	Develop a system that will record lessons learned and good practices in order to reduce the risk of corruption in PSOs	AFBiH JS	1st year after adoption of the Plan	System established and in use

Strategic program 3.4.

Improve detection of corruption through creation, strengthening and application of efficient mechanisms and techniques for proactive approach to the process (3.4.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.4.1.	Apply official procedures for proactive approach to detection of corruption and exchange of information with law enforcement bodies regarding indications of corruption (3.4.1.)	BiH MoD Office of the Inspector General, BiH MoD Internal Audit Unit, BiH MoD Security-Intelligence Sector	2nd year after adoption of the Plan	Increased number of cases of corruption detected through the proactive approach based on procedures

3.4.2.	Consistent implementation of the obligation to report criminal acts of corruption IAW criminal legislation at all levels in BiH (3.4.5)	BiH MoD official and responsible authorities	Continuous	Increased number of reports of criminal acts of corruption in BiH
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Strategic program 3.5.

Establishing efficient cooperation and coordination among BiH institutions in detecting, proving and processing of corruption (3.5)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.5.1.	Development of analysis of actions in relation to criminal acts of corruption in the context of the reasons behind the disproportionately small number of final verdicts in comparison to the number of indictments (3.5.1)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Reasons established and proposals for increased efficiency of processing of corruption provided to relevant authorities
3.5.2.	Establish which aspects of cooperation and coordination among institutions are not efficient enough, which results in insufficient quality of proof of corruption before courts (3.5.2)	BiH MoD General and Joint Affairs Office in cooperation with the BiH MoD Internal Audit Unit, BiH MoD Intelligence-Security Sector and BiH MoD Office of the Inspector General	2nd year after adoption of the Plan	Reasons established and proposals for more efficient processing of corruption provided to relevant authorities
3.5.3.	Propose and adopt measures for improvement of communication, cooperation and exchange of information on criminal acts of corruption and coordination of the work of the BiH MoD with the institutions that have anti-corruption jurisdiction in BiH (3.5.3)	BiH MoD Office of the Inspector General	2nd year after adoption of the Plan	Measures defined, proposals for improvement of cooperation and coordination referred to relevant authorities

Strategic program 3.6.

Harmonization of programs for education in the area of prevention and coordination of the fight against corruption in institutions with anti-corruption jurisdiction (3.6)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.6.1.	IAW harmonized programs, conduct joint training for investigators for work on criminal acts of corruption and improved coordination in the process (3.6.1)	AFBiH JS	Continuous after 3rd year after adoption of the Plan	Training is implemented IAW harmonized programs, respective reports available to the public

Strategic program 3.7.

Specializing and additional education of judicial and law enforcement bodies in BiH, particularly in relation to application of more advanced measures for processing of perpetrators of criminal acts of corruption (3.7)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
3.7.1.	Analyse education requirements for authorized officials in terms of designing the application of measures for detection and proving of corruption (3.7.1.)	BiH MoD Intelligence/Security Sector and AFBiH JS in cooperation with BiH MoD Office of the Inspector General	2nd year after adoption of the Plan	Measures requiring training are identified, a list of organizational units and commands in which training needs to be organized is compiled
3.7.2.	Based on the analysis, develop a training program for authorized officials in application of measures for detection and proving of corruption (3.7.2.)	BiH MoD Intelligence/Security Sector and AFBiH JS in cooperation with BiH MoD Personnel Management Sector and BiH MoD Office of the Inspector General	3rd year after adoption of the Plan	Training programs developed and agreed, disseminated to all those who will be involved in the implementation
3.7.3.	Conduct training of authorized officials in relation to application of measures on detection, proving and processing of criminal acts of corruption (3.7.3.)	BiH MoD Intelligence/Security Sector and AFBiH JS in cooperation with BiH MoD Office of the Inspector General	Continuous After 3rd year after adoption of the Plan	Training conducted IAW harmonized programs, reports on the training are available to the public

STRATEGIC GOAL 4: RAISING PUBLIC AWARENESS AND PROMOTION OF REQUIREMENTS FOR PARTICIPATION OF THE ENTIRE SOCIETY IN THE FIGHT AGAINST CORRUPTION

Strategic program 4.1.

Implementation of a continuous and systemic public campaign on the causes, forms and consequences of corruption, including promotion of mechanisms for anticorruption measures (4.1.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
4.1.1.	Analyse the causes, forms and detrimental consequences of corruption to the BiH MoD, and in cooperation with governmental and nongovernmental institutions design public campaigns on this issue (4.1.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Public Affairs Office	Continuous	Analysis made in cooperation with civil society organizations, detrimental consequences to the BiH MoD identified, the basis for the public campaign developed
4.1.2.	Develop a campaign plan and program and implement them accordingly in cooperation with the media and civil society organizations (4.1.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD Public Affairs Office	1 st year after adoption of the Plan	In cooperation with civil society organizations and the public media, the BiH MoD developed a campaign plan and program, campaigns are implemented periodically
4.1.3.	Advance the public information strategy for the purposes of informing the public	BiH MoD Public Affairs Office	Continuous	New PI measures are developed and the existing PI measures are upgraded

Strategic program 4.2.

Allowing participation of civil society organizations in activities of public institutions in the fight against corruption (4.2.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
4.2.1.	Make information on development of drafts and adoption of bylaws available on the BiH MoD website (4.2.1)	BiH MoD organizational units in cooperation with BiH MoD Public Affairs Office	Continuous	Drafts and proposals of bylaws available on the website
4.2.2.	Establish whether new regulations are required to request from companies doing business with the BiH MoD to have a written code of ethics	BiH MoD Logistics and Procurement Sector	1 st year after adoption of the Plan	Current regulations analysed, there is a clear idea as to whether new regulations are required
4.2.3.	Initiate special programs in order to encourage companies to establish a code of ethics for their business operations	BiH MoD Logistics and Procurement Sector	1 st year after adoption of the Plan	Programs aimed to encourage companies doing business with the BiH MoD to establish a code of ethics have been designed

Strategic program 4.3.

Development, application and promotion of available mechanisms for reporting corruption with guaranteed confidentiality of actions upon reports of citizens (4.3.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
4.3.1.	Analyse the existing mechanisms for reporting corruption in the BiH MoD in order to identify possible areas for improvement of confidentiality of actions upon reports (4.3.1.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Existing mechanisms analysed, best practices studied and possibilities for their improvement identified
4.3.2.	Improve procedures for action upon reports of corruption in terms of confidentiality of information obtained, with a special emphasis on the protection of whistle-blowers (4.3.2.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Proposals for improved protection of confidentiality established and provided to relevant authorities

Strategic program 4.4.

Improvement of the system of objective public information about the work of institutions and promotion of positive examples of responses to corruption cases (4.4.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
4.4.1.	Conduct an analysis of the situation regarding availability of information in the BiH MoD IAW Open Government Partnership standards (4.4.1)	BiH MoD Public Affairs Office	1st year after adoption of the Plan	Analysis done in cooperation with civil society organizations
4.4.2.	IAW the results of the analysis, develop training programs on standards of objective informing of citizens on the work of the BiH MoD (4.4.2.)	BiH MoD Public Affairs Office	2nd year after adoption of the Plan	Training program developed in cooperation with civil society organizations
4.4.3.	Continuously conduct training for the purposes of promotion of the so-called active transparency in the BiH MoD (4.4.3.)	BiH MoD Public Affairs Office in cooperation with BiH MoD Office of the Inspector General	Continuous	Training, seminars and workshops regularly conducted
4.4.4.	Actively inform citizens on the work of the BiH MoD, offer positive examples of actions taken in relation to citizens' reports of corruption cases (4.4.4.)	BiH MoD Public Affairs Office in cooperation with BiH MoD Office of the Inspector General	Continuous	Data available to the public

Strategic program 4.5.

Strengthening the role of the civil society in the fight against corruption through participation in joint projects with public institutions (4.11.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
4.51.	Identify areas in the fight against corruption in which anti-corruption bodies and institutions with anti-corruption jurisdiction need technical support and assistance (4.11.1.)	BiH MoD Office of the Inspector General	Continuous after 1st year after adoption of the Plan	Areas of possible cooperation between civil society organizations and BiH institutions identified, information available to the public
4.52.	Establish cooperation between anti-corruption bodies in the institutions with anti-corruption jurisdiction with civil society organizations in areas in which they need support and assistance (4.11.2.)	BiH MoD Office of the Inspector General	Continuous after 1st year after adoption of the Plan	Cooperation established and improved, concrete cooperation projects are being prepared

STRATEGIC GOAL 5: ESTABLISHMENT OF EFFICIENT MECHANISMS FOR COORDINATION OF THE FIGHT AGAINST CORRUPTION, MONITORING AND EVALUATION OF IMPLEMENTATION OF THE STRATEGY

Strategic program 5.1.

Adoption and development of strategic documents for fight against corruption in BiH IAW the general principles defined in the Strategy

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
5.1.1.	Develop the policy of fight against corruption IAW the general principles of the Strategy (5.1.1.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	The policy is developed and harmonized with general principles of the Strategy
5.1.2.	Strengthen the cooperation and coordination between the BiH MoD and BiH CPA through signing of memoranda of understanding and cooperation (5.1.2.)	BiH MoD Office of the Inspector General in cooperation with BiH CPA	2nd year after adoption of the Plan	Memoranda of understanding and cooperation are signed

Strategic program 5.2.

Development, organization and implementation of harmonized training programs on the fight against corruption for representatives of institutions with anti-corruption jurisdiction in BiH (5.2.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
5.2.1.	Assess the training requirements of members of the BiH MoD that have anti-corruption authority (5.2.1.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	Training requirements defined
5.2.2.	Strengthen expertise through participation in joint exercises with BiH MoD representatives on prevention of corruption (5.2.2.)	BiH MoD Office of the Inspector General	Continuous	Training is conducted
5.2.3.	Appoint POCs in the BiH MoD for anti-corruption training (5.2.3.)	BiH MoD Office of the Inspector General	1st year after adoption of the Plan	POCs designated

Strategic program 5.3.

Regular monitoring of implementation of activities from the Action Plan for implementation of the BiH MoD Plan and ensuring continuous functioning of the system of reporting on implementation of activities from the Action Plan (5.5.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
5.3.1.	Make and analysis of the implementation of the annual action plan and provide it to the BiH MoD Office of the Inspector General	BiH MoD organizational units	Continuous	Analysis of the annual plan completed and provided by the end of current year
5.3.2.	Report and provide information to BiH CPA on annual implementation of activities from the action plan (5.5.1)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	Continuous after 1 st year after adoption of the Plan	BiH MoD provides data to the BiH CPA with an analysis

5.3.3.	Monitor and evaluate envisaged activities from the action plan with a periodical assessment of success (5.5.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	Continuous after 1 st year after adoption of the Plan	Evaluation and monitoring done on the basis of reports on implementation of the Integrity Plan
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Strategic program 5.4.

Assessment of implementation of the Integrity Plan and the Action Plan and informing the public and relevant authorities about the assessment (5.6.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
5.4.1.	Analyse and assess results of the implementation of the Integrity Plan (5.6.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	2nd year after adoption of the Plan	Analysis and assessment completed
5.4.2.	Based on the analysis inform the public and relevant authorities about the results (5.6.2.)	BiH MoD Office of the Inspector General	2nd year after adoption of the Plan	Results of the analysis are available to the public and relevant authorities

Strategic program 5.5.

Assessment of the requirement to revise the BiH MoD Plan and the action plan IAW the results obtained from the evaluation of implementation of these documents (5.7.)

No.	Action	Office of Primary Responsibility	Deadline	Implementation indicator
5.5.1.	Conduct annual evaluation of implementation of the Plan (5.7.1.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	Continuous after 1st year after adoption of the Plan	Annual reports on implementation of the Plan compiled
5.5.2.	On the basis of assessment of effects of implementation of the Plan propose necessary modifications in consultation with all interested parties (5.7.2.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	3rd year after adoption of the Plan	Necessary modifications of the Plan made IAW the proposals
5.5.3.	Collect information on implementation of the Plan and implementation of activities of all BiH MoD organizational units that are envisaged in the Action Plan (5.7.3.)	BiH MoD Office of the Inspector General in cooperation with BiH MoD organizational units	Last year of the implementation of the Plan	All information necessary for assessment of implementation of the Plan and the associated Action Plan collected
5.5.4.	Make an assessment of implementation of the Plan and compile a draft project for development of a new integrity plan (5.7.4.)	BiH MoD Office of the Inspector General	Last year of the implementation of the Plan	Assessment of implementation of the Plan completed, draft of the future plan developed

4. FINAL PART

A - COMMUNICATIONS STRATEGY

Communication within the organization and communication with external actors is key to success, not just in the process of strategic planning but also during the very process of implementation of plans. It is also important in the context of assessment, external monitoring and application of lessons learned in processes of the kind. Therefore, communication of important messages, intents, methods and methodology of work, as well as the overall understanding of the process in the next implementation period, is also important for implementation of the Plan. Communication will help convey important messages to all stakeholders and those that have the right of access to such information. Furthermore, it will also create a momentum in the implementation of the plan and demonstrate commitment on the part of the Ministry of Defence to combat corruption in the best way possible and enable the public to have their own independent stance on successes achieved in this area.

Internal communication and general interpretation of the contents of the integrity plan, the action plan, and obligations of all those responsible for their implementation shall be managed by the Office of the Inspector General, BiH MoD. If necessary, this can be done on daily basis but it is envisaged to be done through regular meetings of relevant bodies, direct information briefings and familiarization of all participants through the available media and in accordance with the general information strategy in the BiH MoD and AFBiH. As the expert staff body subordinate to the Minister of Defence, AFBiH Joint Staff will participate in all activities stemming from the Integrity Plan that include organizational units of the BiH MoD or where specifically mentioned.

External communication will be directed at the civil society, citizens, media, international and national governmental and nongovernmental organizations, as well as BiH institutions and agencies that the BiH MoD is obligated to inform. In charge of this form of communication and information should be the key personnel of the BiH MoD, primarily the Minister and Deputy Ministers of Defence, BiH MoD Inspector General, AFBiH JS Chief and other members, as decided by the Minister. The BiH MoD Public Affairs Office shall plan activities of the kind in a timely manner and in cooperation with the office of the Minister of Defence and the BiH MoD Office of the Inspector General. In this context, usual methods of communicating important information, messages and achievements, organization of press conferences, interviews, use of print and electronic media, which promote transparency and accountability in defence resource management, are to be applied. Furthermore, competent representatives of the BiH MoD and AFBiH shall actively participate in conferences, seminars, round tables and similar events in order to further the understanding of the situation regarding ethics, integrity, professionalism and prevention of corruption in the defence sector.

B - FUTURE ACTIVITIES

The Plan is a document that deals with the issue of professionalism and combating corruption in one of the biggest BiH institutions, whose strategic position in the society and beyond is clearly recognized. Factors that influence and can positively contribute to the assessment of the risk of corruption have also been identified, as well as activities required to promote the values of democratic society. Therefore, the Plan includes obligations from the 2015-2019 Strategy for the Fight against Corruption and the Action Plan for Implementation of the 2015-2019 Strategy for the Fight against Corruption, activities that the BiH MoD is obligated to conduct in accordance with the audit reports, the findings contained in the NATO assessment of the integrity situation, information about the „Integrity Development” partnership goal and the relevant recommendations of the BiH MoD’s organizational units.

In the period of implementation of the Plan, the organizational units of the BiH MoD, including AFBiH JS, shall:

- Analyse the contents of the Plan, compile an annual action plan for each coming year for implementation of activities within their purview, which is to be amended with their specific requirements. At the end of each calendar year, analyse the level of implementation of the Plan,
- Strengthen cooperation with the Agency for Prevention of Corruption and Coordination of the Fight against Corruption,
- Cooperate with bodies responsible for law enforcement, relevant inspection authorities and bodies that audit the work of BiH institutions,
- Continue comprehensive cooperation with NATO in relation to the building integrity initiative, including cooperation on the implementation of recommendations from the so-called “building integrity self-assessment” and fulfilment of the “Integrity Development” partnership goal, as well as with all other international organizations,
- Implement the Policy of Building Integrity, Risk Reduction and Fight against Corruption in the BiH MoD and AFBiH,
- Respect the legal framework for the fight against corruption in BiH, which includes important laws and bylaws that regulate criminal procedures, public procurement, protection of whistle-blowers, conflict of interest, freedom of access to information, etc.

The above listed activities shall lead to planned and systemic undertaking of steps to implement measures within the purview of the BiH MoD with the aim of strengthening integrity and thus increasing accountability and transparency, as well preventively and decisively combatting corruption in the defence sector.

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Date: 25 January 2016

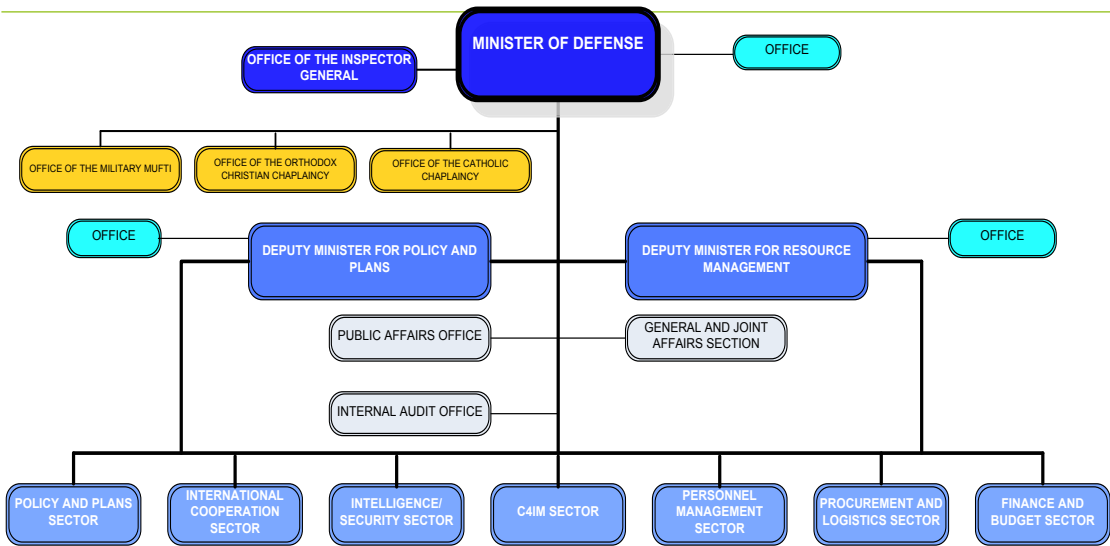
ABBREVIATIONS

BiH CSA	BiH Civil Service Agency
CPA	Agency for prevention of corruption and coordination of fight against corruption
BiH	Bosnia and Herzegovina
BI	Building Integrity
BiH MoD IG	BiH MoD Office of the Inspector General
GRECO	Council of Europe's Group of States against Corruption
BiH MoD	BiH Ministry of Defence
NATO HQ	NATO Headquarters
CSO	Civil society organization
AFBiH	Armed Forces of BiH
PARP	Planning and review process
PSOTC	Peace Support Operations Training Centre
SEDM	South-East Europe Defence Ministerial
UN	United Nations
AFBiH JS	AFBiH Joint Staff

REFERENCES

- a. BiH Law on Defence (BiH Official Gazette no. 88/05),
- b. Law on Service in AFBiH (BiH Official Gazette no. 88/05, 53/07, 59/09 and 45/12),
- c. Law on Civil Service in BiH Institutions (BiH Official Gazette no. 9/02, 35/03, 4/04, 17/04, 26/04, 37/04, 48/05, 2/06, 32/07, 43/09, 8/10 and 40/12),
- d. Law on Conflict of Interest in BiH Institutions (BiH Official Gazette no. 16/02, 14/03, 12/04, 63/08 and 18/12),
- e. Law on Protection of Whistle-blowers in BiH institutions (BiH Official Gazette no. 100/13),
- f. 2015-2019 Strategy for the Fight Against Corruption and the Action Plan for Implementation of the 2015-2019 Strategy for the Fight Against Corruption (Agency for Prevention of Corruption and Coordination of Fight against Corruption),
- g. Code of Conduct for Civil Servants in BiH institutions (BiH Official Gazette no. 49/13),
- h. Code of Conduct for Military Personnel in BiH Ministry of Defence and Armed Forces of BiH,
- i. Policy of Integrity Building, Risk Reduction and Fight against Corruption in the BiH MoD and AFBiH,
- j. Book of Rules on Internal Organization of the BiH MoD,
- k. Guidelines for Development and Implementation of the Integrity Plan (Agency for Prevention of Corruption and Coordination of Fight against Corruption, no. 03-50-536-1/13 of 31 December 2013),
- l. Chapter 14, Instructions to the Parties from NATO HQ Sarajevo Commander and Commander of EUFOR in BiH (Change 25),
- m. 2015 PARP Assessment for BiH (NATO HQ Brussels).

ORGANIZATIONAL CHART OF THE MINISTRY OF DEFENCE OF BOSNIA AND HERZEGOVINA



THE ROLE OF PEACE SUPPORT OPERATIONS TRAINING CENTER (PSOTC) OF THE ARMED FORCES OF BOSNIA AND HERZEGOVINA IN THE NATO BI PROGRAMME

INTRODUCTION

Peace Support Operations Training Centre (PSOTC)/ the Armed Forces of Bosnia and Herzegovina (AF BiH) is located nearby Sarajevo, Bosnia and Herzegovina. The Centre was established in 2005 as an international joint venture of 18 partner countries, led by UK with the purpose to deliver world class peace support training to the staff officers of the AF BiH deploying on international peace missions. Since then, the Centre evolved into internationally recognized education and training institution that extended its mandate to train international participants, military, police officers and civilians. The Centre was handed over to the AF BiH by the end of 2012, while still preserving its international profile by having international instructors on its staff and by training international students. Current partner nations that deploy its members permanently to PSOTC are: Albania, Austria, the former Yugoslav Republic of Macedonia¹, and Turkey.

A number of partner nations provide financial support to the Centre, namely Denmark, Norway, United Kingdom and United States. In addition, partner organizations such as NATO HQ, EUFOR, UN and OSCE provide financial and in kind support to certain projects. Number of international and national academic partner organizations support and cooperate with PSOTC by delivering joint courses (GCSP and University of Sarajevo) and through instructor's exchange (George C. Marshal Centre, PTECs and Western Balkan Regional Training Centres). The Centre has approximately 45 members (international and national, military and civilian), out of which 15 permanent Directing Staff members (instructors).

MAJOR ACHIEVEMENTS

The PSOTC, as a Partner Training and Education Centre (PTEC) since 2007 and one of five Regional Training Centers, on average conducts up to 30 education and training events per year, out of which 15-17 different residential and 6-8 international PSO related courses through deployment of its MTT. The Centre currently delivers six NATO certified courses as "NATO Selected" ones.

In the last ten years, the Centre trained over 6500 military, police and civil servants/students from more than 40 NATO and Partner nations (Annual average is cca 600 students; 25% are international students). In 2012, the PSOTC certified UN Police Course with the UN and at the same year, the Centre received accreditation from Sarajevo University for Euro Atlantic Security Course and Media Management in PSO Course in accordance with Bologna Process as postgraduate elective subjects (worth of 6 ECTS). The Centre received Full Training Capability Certificate from the US State Department in 2014.

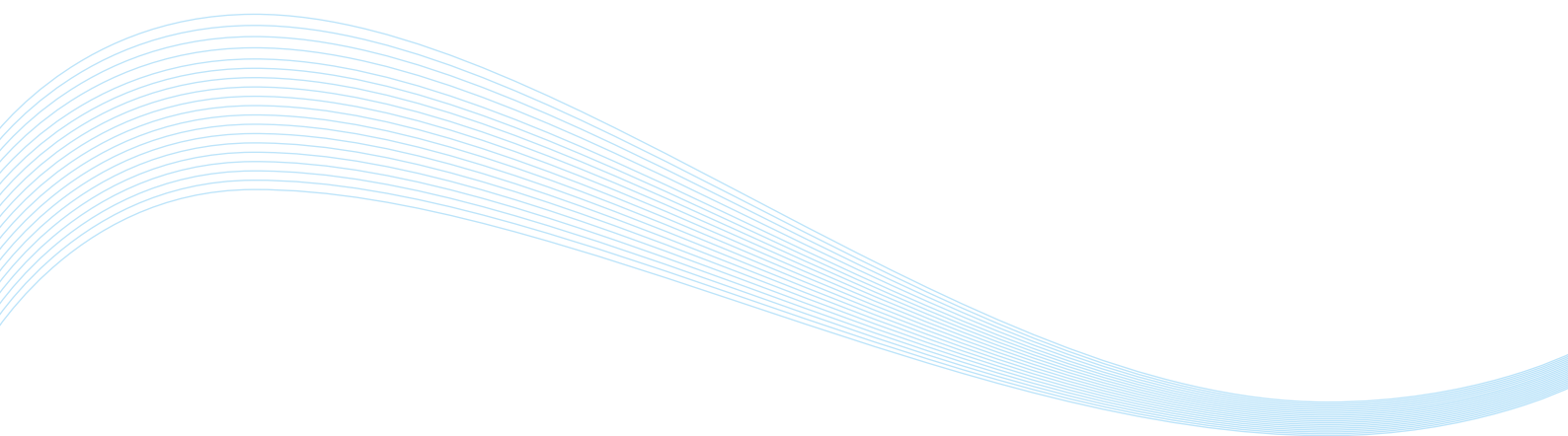
The last but one of the highest achievements of the Centre was NATO Institutional Unconditional Accreditation for Quality Assurance as of May 2016.

THE ROLE OF PSOTC IN NATO BI PROGRAM

The PSOTC is one of the implementing partners of NATO BI Program since its early beginning. The Centre delivers two residential NATO certified courses as "Selected Courses":

1. **ACT.495. - Building Integrity in Peace Support Operations Course** (for military OF2-OF4 and civilian and police equivalent). The aim of the Course is to educate and train selected military officers and civilian/ police personnel practices and processes and deliver a skill set that enables them to understand and counter the various types of corruption that undermines mission success in multinational PSO.
2. **ACT.496. - Building Integrity for Senior NCO Course** (for OR7-OR9). The aim of the Course is to raise awareness of corruption and promote integrity by strengthening the leadership and management skills of the Senior NCOs in order to enhance their professionalism, competency and effectiveness in national and multinational working environment.

In addition, the PSOTC conducts above-mentioned courses by using its MTT, which is supported by NATO BI Team. So far, PSOTC's MTT has been deployed to support BI training of the members of the armed forces of Albania, Georgia and Ukraine. In 2016, NATO BI Team plans to deploy PSOTC MTT to: Afghanistan, Armenia, the former Yugoslav Republic of Macedonia, the Republic of Moldova, Montenegro, Georgia and Ukraine.



<http://buildingintegrity.hq.nato.int/>