



## Contracting Authority

# Ethics for the Prevention of Corruption in Turkey

## Direct Grant Application Form

Budget line: EC General Budget of the item 22 02 04 01

Reference: TR 06 01.08 Ethics for the Prevention of Corruption in  
Turkey

Name of applicant:	Council of Europe
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# I. THE ACTION

## 1. DESCRIPTION

### 1.1 Title

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Ethics for the Prevention of Corruption in Turkey

### 1.2 Location

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Turkey

### 1.3 Cost of the action and amount requested from the Contracting Authority

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Total eligible cost of the action	Amount requested from the Contracting Authority	% of total eligible cost of action
EUR 1.500.000	EUR 1,350 000	90 %

### 1.4 Summary

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Duration of the action	24 months
Objectives of the action	Overall objective(s): To contribute to the prevention of corruption in Turkey in accordance with European and other international standards. Specific objective: To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials.
Partner(s)	Council of Ethics for the Public Service
Target group(s)	Public institutions responsible for applying the Regulation on the Principles of Ethical Behaviour of Public Officials (13 April 2005) including the ethics commissions of central institution <sup>1</sup> as well as governors and deputy governors
Final beneficiaries <sup>2</sup>	All public institutions and the public at large
Estimated results	<ol style="list-style-type: none"><li>1. The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate</li><li>2. A training package is available to support the application of the code of ethics for public officials</li><li>3. At least 10 trainers have been trained and are able to deliver ethics training</li><li>4. The governors, deputy governors, district governors and members of</li></ol>

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<sup>1</sup> Including here all Commissions at the 81 Provinces.

<sup>2</sup> "Final beneficiaries" are those who will benefit from the project in the long term at the level of the society or sector at large

	<p>ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials</p> <ol style="list-style-type: none"> <li>5. Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials</li> <li>6. At least 10 research studies are available on the risks of corruption in relation also to unethical behaviour and have been discussed in public</li> <li>7. The development and implementation of the codes of conduct for elected office holders and the judiciary will have been supported</li> <li>8. The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available</li> <li>9. Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured</li> </ol>
Main activities	<ul style="list-style-type: none"> <li>▪ Legal and Technical advice to improve Working Procedures of the Council of Ethics</li> <li>▪ Trainings on the application and implementation of the Code of Ethics</li> <li>▪ Training on curricula development with regard to Ethics and prevention of Corruption</li> <li>▪ Train the Trainers on Ethics and Ethics Code implementation</li> <li>▪ Training on application and implementation of the Code of Ethics at provincial levels and central levels</li> <li>▪ Research studies/System analysis in identifying risk corruption areas, and recommendations for improving the systems</li> <li>▪ Increase effectiveness and cooperation when promoting ethics conduct in other anti-corruption measures</li> </ul>

## 1.5 Objectives

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A successful strategy against corruption requires measures in a wide range of areas. Given that a project addressing different sectors at the same time is currently not feasible in Turkey, the present project will focus on one particular area of corruption prevention, namely the implementation of the Code of Ethics adopted in April 2005. Thus its overall contribution will be toward the prevention of corruption in Turkey in accordance with European and other international standards.

However, the project will also be used to evaluate the effectiveness and provide guidelines on improving the existing other anti-corruption measures, and proposals will be developed with regard to future anti-corruption strategies and bodies. In this way, the present project is expected to prepare the ground and have a value added component for more comprehensive anti-corruption programmes in the future.

The project's purpose will be to ensure the effective implementation of the Code of Ethics for public officials. This will be met when the following specific objectives have been reached:

- Building a culture of ethics and against corruption across the administration, not only at central but also at provincial levels.
- Adoption, provision and assimilation of training and guideline materials specifically designed to be used by different institutions and ethics commissions throughout Turkey.
- Ethics Training needs are met and have become sustainable by the provision of trained trainers.
- Research and studies have identified risks and opportunities related to ethics issues and corruption in general, thus give the grounds for preventive measure design work.

- The involvement of academic institutions through research and studies has brought up the incorporation of ethics issues and corruption in general in curricula of universities.
- Outreaching activities have been providing and distributing knowledge and practice to a large number of public institutions not only at central level but also to the 81 provinces (governors, deputy governors and ethics commissions).

Considering that the fight against corruption is an important issue with regard to progress towards accession to the European Union and in this connection with the Turkish National Programme for the Adoption of the *Acquis* (NPAA) – under chapter 4.25.5 – the following needs will also be addressed through this project and represent its value added nature:

- Enhance and increase co-operation between competent ministries and other institutions.
- Support the accession/implementation to the Criminal Law Convention on Corruption (ETS 173), the Civil Law Convention on Corruption (ETS 174), and the Convention on Laundering, Search, Seizure and Confiscation of Proceeds from Crime (ETS 141) of the Council of Europe.
- Support the reform, and implementation of national legislation, including Criminal Code, Criminal Procedure Code, Act on Public Procurement, Act on Declaration of Property.

## 1.6 Justification

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### 1.6.1 Relevance of the action to the objectives and priorities of the programme

Surveys and reports confirm the adverse effects of corruption and point at the urgency to address it. The 2001 economic collapse (and subsequent devaluation) has – among other things – been attributed to corruption, and the results of the 2002 elections have been interpreted as an expression of the desire of the population for political reform and firm action against corruption. In Transparency International's corruption perception index for 2006, Turkey ranks 60<sup>th</sup> out of 163 countries with a score of 3.5. Following higher perceptions of corruption between 2002 and 2004, a slight improvement was noted in 2005 and again in 2006.

Country	Transparency International Corruption Perception Index Score <sup>3</sup>									CPI rank
	1995	1998	2000	2001	2002	2003	2004	2005	2006	2006 <sup>4</sup>
Turkey	4.1	3.4	3.8	3.6	3.2	3.1	3.2	3.5	3.8	60

A number of measures has been carried out in recent years that helped improve the corruption situation. This includes progress in terms of ratifying relevant Council of Europe conventions and joining the Group of States against Corruption, GRECO.

In the 2005 Progress Report on Turkey (9 November 2005) the European Commission noted the progress made in the adoption of anti-corruption measures (criminal legislation, parliamentary investigations, access to information, establishment of the Ethical Board for Public Servants and adoption of code of conduct) but also raised a number of concerns, namely:

- The scope of parliamentary immunity
- Lack of transparency in the financing of political parties
- The weak efficiency and effectiveness of governmental, parliamentary and other bodies established to combat corruption
- The weak consistency of anti-corruption policies and the degree of coordination and cooperation
- The need for an overhaul of the inspection system

<sup>3</sup> Source: [www.transparency.org](http://www.transparency.org)

<sup>4</sup> From 158 countries included in the 2005 CPI.

- The need for strengthening of the dialogue between government, public administration and civil society
- The need to raise awareness of corruption
- The need for continuous support at the highest political level.

The Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey provides for three short-term priorities with regard to the anti-corruption policy:

- Fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.
- Ensure implementation of the Regulation on Principles of Ethical Behaviour for Public Officials and extend its provisions to elected officials, judiciary, academics and military personnel
- Limit the scope of parliamentary immunity in line with European practice.

The European Commission's progress 2006 progress report refers to the need to better regulate the financing and auditing of political parties and underlined again the need for better coordination of the anti-corruption effort.

The GRECO report for Turkey adopted on 10 March 2006 recommends among other things:

- to provide the Council of Ethics with sufficient independence, providing it with an appropriate budget and staff that would enable it to promote and promulgate the new codes of ethics throughout the public administration; to properly investigate complaints made against senior officials and undertake proactive studies into particular areas of concern in respect of ethical behaviour and corruption in the public administration
- to develop training material to be used in the training of all Public Officials on the new Code of Ethics and anti-corruption policies and to require all ministries and civil service bodies to include this training as part of their curriculum; it should be ensured that it forms a core part of the induction training for new civil servants as well as in the in-service training.

The GRECO recommendations also refer to the need for monitoring the effectiveness of anti-corruption measures:

- to develop systems for monitoring the impact of anti-corruption measures for the various sectors concerned.

The present project will build upon the progress made. It will help Turkey implement GRECO recommendations and make progress towards accession to the European Union.

The project will address this issue and support the development of codes of ethics for other categories of officials or holders of public office

### **1.6.2 Identification of perceived needs and constraints in the target country concerned.**

The present project will focus on the following components (based on identified problems and needs):

- Support the Implementation of the Code of Ethics across the public administration

Formal rules for officials of the public administration of Turkey have been in force since the mid-1960s. However, the establishment of the Council of Ethics for the Public Service<sup>5</sup> and the subsequent adoption of a code of ethics<sup>6</sup> now offer an opportunity to create a culture of ethics in the public

<sup>5</sup> Law no. 5176, published in the Official Journal on 8 June 2004.

<sup>6</sup> Regulation on the Principles of Ethical Behaviour of Public Officials, published in the Official Journal on 13 April 2005, no. 25785.

administration in line with the requirements of good governance. The Council and the Code of Ethics also have the potential to become building blocks of a strategy for the prevention of corruption in Turkey.

The Council of Ethics consists of eleven members elected by the Council of Ministers for a period of four years.

The tasks of the Council are:

- to determine whether public officials adhere to the Code of Ethics while performing their duties
- to investigate claims that the principles of the Code have been violated by a senior public official with a minimum rank of general manager or equivalent<sup>7</sup>
- to inform the relevant authorities on the results of such investigations
- to carry out or to commission studies and research which help establish a culture of ethics throughout the public administration.

In addition, the Code of Ethics (Article 25) provides the Council with the task to prepare, coordinate and execute training programmes for public officials or to cooperate with relevant ministries, other public institutions, universities, local administrations and non-governmental organisations in their fields about this matter. The Council of Ethics should thus support a wide range of institutions to make sure that they abide to the Code of Ethics and that they incorporate principles of ethics in their in-service training programmes.

- Need of the development of codes of ethics for other categories of officials or holders of public office

This will be done by assisting and supporting the understanding and the implementation of the framework those provisions of the Code of Ethics and the mandate of the Council of Ethics for the Public Service cover. However those provisions will and do not apply to the President, the members of the Parliament, members of the Council of Ministers, Turkish Armed Forces, members of the judiciary and universities.

- Need to develop systems of monitoring the effectiveness of prevention and other anti-corruption measures

The project will support system analyses of the effectiveness of key measures implemented in recent years, such as the reform of the criminal legislation, the Public Information Act and the Code of Ethics. Drawing on the results of these analyses, the project will support the development of new proposals for further anti-corruption measures and reforms.

- Need to ensure and enhance coordination of anti-corruption measures

The need for a coordinated approach against corruption in Turkey and the need to entrust a body with the responsibility of coordinating and overseeing the implementation of the national anti-corruption strategy has been underlined by the Council of Europe and the European Commission on several occasions.

The project will seek close cooperation with the technical commission that assists the Inter-ministerial Committee in the coordination of the Government's anti-corruption measures. It will also help develop further proposals aimed at improving the management, coordination and monitoring of Turkey's anti-corruption strategies.

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<sup>7</sup> See the list in Appendix 2 of the Code of Ethics. Complaints on other categories of officials received by the Ethic Council are forwarded to the disciplinary authority of the respective institution without further investigation by the Council.

### **1.6.3 Description of the target group(s) and final beneficiaries and estimated number**

Considering the above, thus the fact that the Council is tasked to prepare, and execute all ethics principle and provision of the training, this project will have the following main beneficiaries and target groups which in turn will result to be but not limited only as the final beneficiaries.

**Main Beneficiary/Counterpart:** Council of Ethics for the Public Service

The Council of Ethics: is composed of eleven members elected by the Council of Ministers for a period of four years and includes former and retired persons of certain seniority and with the following backgrounds:

- 1 minister;
- 1 provincial governor;
- 3 senior members of the public administration;
- 3 senior members of the judiciary;
- 2 directors or deans of university;
- 1 senior manager of a public agency.

#### **Target Groups:**

- Public institutions responsible for applying the Regulation on the Principles of Ethical Behaviour of Public Officials (13 April 2005) including their ethics commissions.
- 3 Members compose each ethics commission
- 81 Provinces of central institution as well as governors and deputy governors
- Other public institutions, universities, local administrations and non-governmental organisations
- Technical commission assisting the Inter-ministerial Committee in the coordination of the Government's anti-corruption measures.

In addition, Final Beneficiary list will include also all the list of the public officials that are and fall within the scope of the Council of Ethics for Public Service who have the minimum rank of the General Manager, equivalent, and higher, as provided by the Appendix 2 of the Law and Regulation of the Council of Ethics for Public Service.

In sum, it is expected that the number of the beneficiaries/target groups will reach approximately not less than **1000 persons**.

### **1.6.4 Reasons for the selection of the target group(s) and identification of their needs and constraints. How does the Action contribute to the needs of the target group(s) and final beneficiaries?**

The promotion of ethics is just one of many measures that need to be undertaken to prevent corruption. Prevention, in turn, is one of several components of a comprehensive anti-corruption strategy. Experience shows that anti-corruption strategies are more likely to be successful if they consist of political commitment and leadership, comprehensive anti-corruption legislation, the enforcement of legislation, corruption prevention programmes within public institutions, and public awareness and the involvement of civil society.

Institutions and organisations of the public administration are furthermore required to establish their own ethics commissions consisting of at least three people and being responsible for the promotion of a culture of ethics in their respective institutions (Article 29). These ethics commissions are and will be the counterparts of the Council of Ethics.

The Council of Ethics and the Code of Ethics thus provide a suitable legislative, normative and institutional framework for the promotion of a culture of ethics and the prevention of corruption in the public administration.

The Council of Ethics became operational in April 2005: thus a number of issues have been identified that require to be addressed with the purpose of enhancing their effectiveness. Therefore the selected target groups would acquire assistance and support through the following tools:

- Training: the Council and the ethics commissions in different institutions require support in the implementation of a wide range of training measures to build a culture of ethics and against corruption across the administration, not only at central but also at provincial levels.
- Training materials will need to be developed and tested or translated and adapted that can be used by different institutions and ethics commissions throughout Turkey.
- Training the Trainers: a critical number of trainers need to be trained in order to meet training needs and ensure sustainability beyond the duration of the project.
- Research and studies need to be commissioned in order to identify risks and opportunities related to corruption possibilities and prone area' issues. The involvement of academic institutions through such studies will also help incorporate ethics issues in curricula of universities.
- Support the development of codes of ethics for other categories of officials or holders of public office.
- Outreach: the Ethic Council needs to reach out to a large number of public institutions not only at central level but also to the 81 provinces (governors, deputy governors and ethics commissions)
- Introduce tools for monitoring the effectiveness of prevention and other anti-corruption measures, and this is because a wide range of anti-corruption measures have been undertaken by the authorities of Turkey in recent years. However, the impact of these measures has not yet been systematically evaluated.
- Provision of analyses of the effectiveness of key measures implemented in recent years, such as the reform of the criminal legislation, the Public Information Act and the Code of Ethics. Drawing on the results of these analyses, the project will support the development of proposals for further anti-corruption measures and reforms.
- Need to ensure coordination of anti-corruption measures

Some other issues cannot be resolved directly by the project but will need to be addressed by the Government. However it is expected that the project itself will have a guiding and supportive role on the following:

- Budget and staff: it appears that many of the needs cannot be met because of budgetary limitations and in particular the shortage of staff in the secretariat of the Council.
- Independence: currently, the staff and budget of the Council are part of the budget of the Prime Ministry. Given the mandate of the Council to investigate alleged violations of the Code of Ethics by senior officials, the Council should be provided with its own budget and staff in order to enhance its independence from the Government.

Thus, the main project partner is the Council of Ethics for the Public Service. Through the Council, the project will cooperate with a range of other institutions and partners, namely:

- the ethics commissions and the training facilities of different institutions of the public administration
- governors and deputy governors of the 81 provinces
- research and civil society institutions with respect to studies and analyses on corruption risks and prevention
- technical commission that assists the Inter-ministerial Committee in the coordination of the Government's anti-corruption measures
- the parliament and the judiciary with regard to the development and implementation of codes of ethics for these institutions.

In addition, addressing those needs as described above, it will allow Turkey to address an important provision of the United Nations Convention against Corruption, which has been signed by Turkey. This treaty requires countries to adopt comprehensive preventive policies (article 5). Furthermore, article 6 provides for the existence of a body or bodies capable of implementing preventive policies or

overseeing and coordinating the implementation of such policies (if more than one body is responsible for prevention). This body or these bodies should also increase and disseminate knowledge about the prevention of corruption. Furthermore it/they should evaluate the effectiveness of anti-corruption policies and measures. This body or bodies should be granted the necessary resources and level of independence.

## 1.7 Detailed description of activities

The intervention logic describing the nature of activities and the outputs/inputs as means of implementing the objectives set out through the intervention logic, will be the guiding tools to prepare the Project's Workplan during the inception phase of the project (first three months of the project term) where all the specific interventions, planning, timing, number and portfolio of participants and beneficiaries, assumptions, and risks, as well as indicators of success, including here the sources of indicators will be reflected in a detailed and planned manner. Following the inception phase the detailed workplan will be part of the project document, agreed and prepared in cooperation with the main beneficiaries and which will be approved also by the Steering Group at the Start up Conference. In turn the project document will then be the guiding instrument with all the necessary detailed information throughout the period of the implementation of the project.

### Intervention logic: Outputs and activities and means of implementation

Outputs	Activities	Specific Inputs/Mean
<b>General</b>	<b>Inception Phase/Start-up of the project</b>	
Activity 1	Start up activities/workshops/Meetings with the counterparts Ankara	2-3 meetings/workshops/ LTA (Ankara), PA (Ankara), and PA (Strasbourg) and short terms experts.
Activity 2	Establish Office and Procurement of Office Equipment Ankara	1 Office at the government premises (free of charge); 2 Computers; 1 Fax Machine, Office furniture for 2-3 persons
Activity 3	Preparation of Detailed Workplan and Inception Report Ankara	6 W/Days of LTA and ST Experts
Activity 4	Organisation of the Start up Conference Ankara	2 Days, in Ankara, aprox. 60 people from different regions/town
<b>Output 1</b>	<b>The staff of the Council of Ethics is trained and have the necessary working tools and procedures to better exercise their mandate</b>	
Activity 1	Review the working procedures of the Council of Ethics for the Public Service and its secretariat and make and implement proposals for improvement (Ankara)	Long-term adviser Up to 5 work days of short-term consultants 2 round-table discussions
Activity 2	Train the staff of the secretariat in the management of complaints received (Ankara)	Long-term adviser Up to 10 work days of short-term consultants 2 Training conferences
Activity 3	Train members of the Council in the investigation of complaints (Ankara)	Long-term adviser Up to 10 work days of short-term consultants 2 Training conferences and round-table discussions
Activity 4	Support and organise 2 study visits of staff of the Council of Ethics to study the experience of similar bodies in other European Union countries (i.e., Spain and Ireland/France)	2 International Travels to other international Ethics offices/Countries 10 Days in total for two visits 18 – 20 Persons
<b>Output 2</b>	<b>A training package/module is available to support the application of the code of ethics for public officials</b>	
Activity 1	Translate and review materials on ethics training available in other countries (Ankara)	Translation in writing of approx 200 pages Translation and Round Table Costs
Activity 2	Develop a coherent training package/curriculum for ethics training based on the provisions of the Code of Ethics (Ankara)	Long-term adviser Up to 20 work days of short-term consultants
Activity 3	Following a testing of the training package (under outputs 4 and 5), finalise the training package and make it available to different institutions for in-service training (Ankara)	Long-term adviser Up to 8 work days of short-term consultants
Activity 4	Produce and disseminate a training CD suitable for computer-	Cost for publication and production of CD

	based training (at large – 81 Provinces)	Cost of Distribution
<b>Output 3</b>	<b>Train the trainers programme is available- (At least 10 trainers have been trained and are able to deliver ethics training)</b>	
Activity 1	Select 10 to 15 trainers from training institutions of the public administration (Ankara)	Long-term adviser Up to 8 work days of short-term consultants
Activity 2	Train these trainers in the application of the training package (Ankara)	Long-term adviser Up to 15 work days of short-term consultants Up to 3 train the trainer workshops
Activity 3	Support these trainers in the delivery of initial training activities (under outputs 4 and 5) (Ankara)	Long-term adviser Up to 5 work days of short-term consultants Up to 1-2 train the trainer workshops
<b>Output 4</b>	<b>The governors, deputy governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials</b>	
Activity 1	Organise up to 10 training events for governors, deputy governors and district governors (to be determined at the inception phase)	Long-term adviser Up to 21 work days of short-term consultants Cost for up to 10 training events in provinces Translation of materials and productions/Photocopy/distribution of training materials Interpretation Costs Local Transport for 10 Return Local Transports Lunch/ Dinners for 60 Persons for 20 Days in Total
Activity 2	Organise up to 15 training events for members of ethics commissions in provinces and municipalities (to be determined at the inception phase)	Long-term adviser Up to 21 work days of short-term consultants Cost for up to 15 training events in provinces Translation of materials and productions/Photocopy/distribution of training materials Interpretation Costs Local Transport for 15 Return Local Transports Lunch/ Dinners for 80 Persons for 30 Days in Total
<b>Output 5</b>	<b>Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials</b>	
Activity 1	Organise up to 6 training events for members of ethics commissions and officials responsible for in-service training in different institutions of the public administration (Ankara)	Long-term adviser Up to 12 work days of short-term consultants Cost for up to 6 training events Lunch/ Dinners for 100 Persons for 12 Days in Total Interpretation Costs Translation of materials and productions/Photocopy/distribution of training materials
Activity 2	Organise up to 4 training events for senior officials of central level institutions of the public administration (under secretary, general director, president, general secretary and deputy general secretary levels) (Ankara)	Long-term adviser Up to 8 work days of short-term consultants Cost for up to 4 training events Lunch/ Dinners for 100 Persons for 4 Days in Total Interpretation Costs Translation of materials and productions/Photocopy/distribution of training materials
<b>Output 6</b>	<b>At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public</b>	
Activity 1	Commission at least 10 research studies (to be determined at the inception phase)	Long-term adviser Up to 25 work days of short-term consultants Cost for 10 research studies
Activity 2	Organise the publication and dissemination of the results of these studies Ankara and other regions	Publication and dissemination Costs
Activity 3	Support the Council of Ethics in the organisation of up to 5 public workshops on the results of these studies Ankara (to be confirmed after the inception phase)	Up to 5 workshops Cost for up to 5 events Catering for 65 Persons for 5 Days in Total Interpretation Costs Preparation of materials and

		productions/Photocopy/distribution of training materials
<b>Output 7</b>	<b>The development of codes of conduct for elected office holders and the judiciary will have been supported</b>	
Activity 1	Organise workshops on the needs and possibilities for developing codes of conduct for elected office holders and the judiciary: Introduction and brainstorming sessions with recommendations to what extent and scope these codes shall be developed. (Ankara)	Long-term adviser Up to 5 work days of short-term consultants Up to 3 workshops Catering for 30 Persons for 3 Days in Total Interpretation Costs Preparation of materials and productions/Photocopy/distribution of training materials
Activity 2	Support the development and drafting sessions of identified Codes of Conduct for elected office holders through workshops and direct technical advice (Ankara)	Long-term adviser Up to 15 work days of short-term consultants Up to 3 workshops Catering for 30 Persons for 3 Days in Total Interpretation Costs Preparation of materials and productions/Photocopy/distribution of training materials
<b>Output 8</b>	<b>The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available</b>	
Activity 1	Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics (to be determined at the inception phase)	Long-term adviser Up to 18 work days of short-term consultants Up to 5 studies Interpretation Costs Preparation of materials and productions/Photocopy/distribution of materials
Activity 2	Based on these studies, make proposals with regard to future anti-corruption strategies (to be determined at the inception phase)	Long-term adviser Up to 7 work days of short-term consultants
Activity 3	Organise up to 2 national conferences on the prevention of corruption in Turkey (Ankara and Istanbul)	Catering for 60 Persons for 2 Days in Total Interpretation Costs Preparation of materials and productions/Photocopy/distribution of training materials Cost for 2 national conferences
<b>Output 9</b>	<b>Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured</b>	
Activity 1	Support the organisation of regular meetings (once every six months) with the technical commission assisting the Inter-ministerial Anti-corruption Commission (to be determined at the inception phase)	Long-term adviser Up to 10 work days of short-term consultants Preparation of materials and productions/Photocopy/distribution of training materials
Activity 2	Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey (to be determined at the inception phase)	Long-term adviser Up to 10 work days of short-term consultants Preparation of materials and productions/Photocopy/distribution of training materials

## 1.8 Methodology

### 1.8.1 Methods of implementation and reasons for the proposed methodology

All the implementation, progress and results of the project will be reported on regular basis quarterly or every six months to the Steering Group Committee. The Project's Implementation Team, (the Long Term Adviser, the Local Project Officer, and the Project Coordinator in Strasbourg), and the assigned Project Director from the Council of Ethics will deliver the results and the implementation aspects in Ankara, but also coordinate and provide the reporting which will be in turn submitted by the Council of Europe in coordination and cooperation with the Project Director which will take place on quarterly basis but through other ways of reporting and regular contacts.

The methodology of implementation of these activities, thus of the project itself is evident in the above description of activities:

Given the fact that the Council of Ethics of the Public Service is the main institution ensuring the implementation of the Regulation on Ethical Behaviour, the project will initially focus on the strengthening of the capacities of the Council of Ethics and its Secretariat (the Unit) itself (**Output 1**).

In parallel, a training package will be developed to permit the training of other public institutions (**Output 2**).

A number of trainers will then be selected to apply this training package (**Output 3**) through training events at the level of governors (**Output 4**) and central institutions (**Output 5**).

In order to permit the Council of Ethics to better carry out its advisory and research functions and to ensure the involvement of academia in the promotion of ethics through their curricula (**Output 6**).

The Regulation is limited to certain categories of public officials. It is therefore necessary to support the development or implementation of similar codes for elected office holders and the judiciary (**Output 7**).

Furthermore, the effectiveness of such regulations and of other anti-corruption measures will need to be assessed (**Output 8**).

Finally, measures to promote ethics cannot resolve all corruption problems but must be carried out in coordination with other anti-corruption measures (**Output 9**).

Following the reasons for the proposed methodology and approach, the modus of action includes a mixture of the following types/nature of tools when organising activities and providing support to implement the proposed activities:

The following types of activities are proposed:

**Expert advise** – provided by the LT-Adviser within his/her competence/experience or, as necessary, by ST-Advisers selected according to their specific field of competence, through direct conversation with individual officials or groups of officials on the issues specified in the Workplan and wherever necessary.

**Expert opinions** – will be provided in writing, as necessary, to comment on the pieces of legislation or their drafts or other documents, by independent experts from the Council of Europe Member States via the CoE Secretariat.

**Study visits to EU Member States** - provide first-hand experience to complement the theory and help individuals to examine possible changes to their own procedures and approaches, and also initiate the basis for launching cooperation and networking with EU Member States.

**Roundtables and seminars** - allowing stakeholders/professional groups and individuals to look at ways in which their own policies can be reformed. They will also be used to contribute specialist knowledge to a broader debate on a given issue.

**Workshops** - allow a particular task to be undertaken involving multiple co-operating parties. Experts put their knowledge at the disposal of practitioners and officials. Workshops can also be used to provide specific advanced training.

**Training courses** – allow participants to acquire new knowledge and/or professional skills through interaction with a qualified trainer. Elements of self-education can be included.

**Research** – a way to get a comprehensive overview of a given issue to serve a basis for further analysis.

**Translations** - make important texts and information accessible in local languages and can be used as a tool in training activities and seminars.

**Publication and dissemination** of texts and/or audiovisual CD-ROMs - ensure that certain expertise or knowledge is made available to the widest possible audience.

**1.8.2 Where the action is the prolongation of a previous action, explain how the action is intended to build on the results of this previous action**

Within the framework of EU co-operation several activities are underway now and which are of relevance to anti-corruption measures and with which co-operation will be sought. These include:

- Judicial Modernisation and Penal Reform Programme (Ministry of Justice – Council of Europe).
- TR0204.05 strengthening the fight against organised crime (Turkish National Police and General Command of Gendarmerie-Twinning finished in November 2005).

Other international donors are also contribution of action promoting good governance:

- UNDP workshops were organised with the Turkish Chamber of Business Chambers (TOBB) to consider the role of business in governance reform.
- The World Bank has conducted a number of activities including a workshop in 2001 looking at ways of reducing corruption. The Bank has also been involved in a Public Expenditure and Institutional Review (PEIR).
- The OECD – through the SIGMA programme – is helping strengthen the newly established Turkish Public Procurement Agency.
- The United Office for Drugs and Crime (UNODC) provides support to the TADOC (Turkish International Academy against Drugs and Organised Crime).

**1.8.3 Where the action is part of a larger programme, explain how it fits or is coordinated with this programme. Please specify the potential synergies with other initiatives, in particular from the EC**

The Turkish National Programme for the Adoption of the *Acquis* (NPAA) – under chapter 4.25.5 – points at several needs, including:

- Enhanced co-operation between competent ministries and other institutions.
- Accession to relevant international conventions, such as the Criminal Law Convention on Corruption (ETS 173), the Civil Law Convention on Corruption (ETS 174), and the Convention on Laundering, Search, Seizure and Confiscation of Proceeds from Crime (ETS 141) of the Council of Europe.
- Reform, adoption or implementation of national legislation, including Criminal Code, Criminal Procedure Code, Act on Public Procurement, Act on Declaration of Property, and others.

In the 2005 Progress Report on Turkey (9 November 2005) the European Commission noted the progress made in the adoption of anti-corruption measures (criminal legislation, parliamentary investigations, access to information, establishment of the Ethical Board for Public Servants and adoption of code of conduct) but also raised a number of concerns.

In addition the 2006 Progress Reports on Turkey refers to the need to better regulate the financing and auditing of political parties and underlined again the need for better coordination of the anti-corruption effort.

The Council Decision of 23 January 2006 on the principles, priorities and conditions contained in the Accession Partnership with Turkey provides for three short-term priorities with regard to the anti-corruption policy:

- Fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.

- Ensure implementation of the Regulation on Principles of Ethical Behaviour for Public Officials and extend its provisions to elected officials, judiciary, academics and military personnel
- Limit the scope of parliamentary immunity in line with European practice.

The present project will build upon the progress made. It will help Turkey implement the GRECO recommendations and make progress towards accession to the European Union.

#### 1.8.4 Procedures for follow up and internal/external evaluation

##### Reporting

The daily implementation and reporting of specific activities of the project will be monitored by the Head of Division at the Cooperation Directorate (Directorate General of Human Rights and Legal Affairs) or his assigned Administrator/Coordinator at the Council of Europe in Strasbourg. He will ensure that reports are prepared and submitted as required, and provide all necessary support to the programme team in Ankara. The Council of Europe will submit the following reports:

The Nature and Content	Type	Reporting Period	Recipients
<p><b>Inception Report</b></p> <p><i>English and Turkish Versions</i></p>	<p>The inception report will contain a detailed work plan and the names of possible consultants. In its elaboration, the Logical Framework Approach shall be followed linking the project objectives to expected results and the activities needed in order to achieve the results. The inception report outlines the management structure of the project clearly describing the responsibilities of the main players as well as the decision-making process and information flow between the project participants.</p>	<p>Within 8 weeks of the Beginning of the Contract (8 weeks from the start of the contract)</p>	<p><u>Submitted to:</u> Council of Ethics Board CFCU EC Delegation</p>
<p><b>Monthly Progress Report</b></p> <p><i>English Versions</i></p>	<p>The report will list in detail the activities undertaken and assess the progress towards achievement of project objectives. This update will stress particularly the achievement of results.</p>	<p>To be submitted every by the 5<sup>th</sup> day of the upcoming month</p>	<p><u>Submitted to:</u> Council of Ethics CFCU EC Delegation</p>
<p><b>Quarterly (Interim) Reports</b></p> <p><i>English Versions</i></p>	<p>These reports will list more in detail the activities undertaken and assess the progress toward achievement of project objectives. The update will stress particularly the achievement of results and identify also potential risks during the forehead implementation period.</p>	<p>To be submitted every three months Accompanying further pre-financing payment request when and as foreseen under the Special Conditions)</p>	<p><u>Submitted to:</u> Council of Ethics CFCU EC Delegation</p>
<p><b>Final Report</b> (Narrative and Financial )</p> <p><i>English and Turkish</i></p>	<p>The final report should follow the inception report format and include an in-depth assessment of project implementation results and the level of achievement of the objectives. The final report will be complemented by</p>	<p>Not later than 30 days after the end of the project implementation period and accompanying final payment request</p>	<p><u>Submitted to:</u> Council of Ethics Board CFCU EC</p>

<i>Versions</i>	an evaluation of the impact of the project aimed at identifying the impact and the achievements of the project at the end of it. The Final Report and the Evaluation Report will contain lesson learnt and recommendations to be followed up by the beneficiary. The report will be finalised after incorporation of any comments from the CFCU, ECD and Council of Ethics		Delegation
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All draft reports and deliverables must be submitted to Council of Ethics and CFCU including a copy to the ECD within 15 days following the end of each reporting period.

All reports will be considered approved and final if within 15 days of their submission to each party when there have been no comments or objections/recommendations for changes.

Following approval by the Council of Ethics, the draft reports will be submitted to the Contracting Authority (CFCU) for final Approval. The Contracting Authority shall make the final letter of approval of the report in question. All reports with an exception of monthly reports (final versions) shall be in 6 copies (3 in English and 3 in Turkish language), together with electronic versions on a CD-ROM (in word format) shall be submitted to the Beneficiary, CFCU and ECD.

In addition to the above formal reports, the Council of Europe shall provide such information on project progress as is reasonably required by the Council of Ethics, CFCU and EC Delegation and can regularly inform the donors of political, economic or institutional developments of relevance to the project. The Council of Europe shall in particular provide the Council of Ethics, CFCU and European Commission with electronic and hard copies of:

- training material prepared under this project;
- reports of short-term specialists;
- any other publication produces during the course of the implementation of the project activities.

The Council of Europe shall pay particular attention to the confidentiality of data. Reports, as well as press statements made by the Council of Europe will make clear that any opinions expressed therein do not represent the opinion of the donor nor any government.

### **Evaluation**

Twelve months after the commencement of the project, an interim evaluation of the project will be submitted and reported by two external independent evaluators. Prior to the evaluation, the project management in consultation with the Project Director will prepare a detailed progress report which will be made available to the evaluators. Briefing and debriefing meetings prior to and after the evaluation shall be held between the evaluators and the Council of Europe in order to discuss details and provide information as needed. The evaluators will receive early information on the strategy, and indicators which will be identified in a coherent way and shall establish the way of the monitoring/evaluation of the project's implementation twelve months after the commencement of the implementation of the project.

### **1.8.5 Description of the role and participation in the action of the various actors (local partner, target groups, local authorities, etc.), and the reasons for which these roles have been assigned to them.**

#### **Central Finance and Contracts Unit (CFCU)**

The Central Finance and Contracts Unit (CFCU) is the Contracting Authority of the project. CFCU will be responsible for all procedural aspects of contracting matters and financial management, including payment of project activities.

Furthermore, CFCU will be also responsible for all aspects of call for proposals and contractual procedures of the projects to be funded by the grants programme.

The CFCU has the sole responsibility over the overall budgeting, tendering, contracting and payments, accounting and financial reporting aspects of the procurement of services, supplies, works and grants in the context of the EU funded programmes. The CFCU ensures that the EU rules, regulations and procedures pertaining to the procurement services, works and grants are adhered to, and to a proper reporting system is functioning.

### **The Delegation of the European Commission to Turkey (ECD)**

ECD will be responsible for below issues:

- provide advice to the Contracting Authority;
- exercise export control over the expenditures on the contract; and
- act as an observer in the period of implementation of Description of Action.

### **The Council of Ethics for the Public Service**

The Council of Ethics for the Public Service is the beneficiary institution responsible for project implementation on behalf of the Government of Turkey. The head of the Council of Ethics will appoint a senior expert of the Council as the Project Director. The responsibilities of the Project Director, in co-operation with the Long Term Adviser, are:

1. To contribute to the preparation of the work plan and to participate in the approval of the work plan.
2. To monitor the proper implementation of activities of the project and report to the Steering Committee.
3. To ensure that the implementation of activities is properly monitored and evaluated.

The Prime Ministry will also make office space available for project staff within the offices of the Council of Ethics. The Prime Ministry will allocate the staff to the secretariat of the Council of Ethics necessary to ensure smooth implementation of the project.

### **The Council of Europe**

The Council of Europe will be responsible for the implementation of the project and the use of the funds under a contract with the European Commission. The Council of Europe is expected to ensure the achievement of the project outputs as listed above. In order to achieve these results the Council of Europe may propose alternative or complementary project activities to those identified in this section, where it can clearly justify them. Within the Council of Europe, the Economic Crime Division of the Department of Technical Cooperation of the Directorate General of Human Rights and Legal Affairs will be responsible for co-ordination and supervision of the programme.

The **Steering Committee** of this project will consist of the Council of Ethics, representative the Central Finance and Contracts Unit, and representative of the ECD and the Council of Europe. The Steering Committee of this project will consist of the Council of Ethics, Council of Europe, Delegation of the European Commission and CFCU. The steering committee meetings will also involve other relevant authorities which are the Prime Ministry Inspection Board, Ministry of Justice, Ministry of Interior, National Police, Gendarmerie, Ministry of Finance (Financial Crimes Investigation Board- MASAK), State Security Courts, General Public Prosecutor's Office. It will take strategic decisions and supervise the proper implementation of the project. It will address the major

problems that the project might face. The Steering Committee shall be called to meet at the beginning of the project and every six months or when a serious problem arises. The responsibilities of the Steering Committee are the following:

- To make an assessment of emerging needs for a sound project implementation.
- To approve the overall work plan and the annual work plans.
- Recommend strategies in the light of national anti-corruption priorities and the Accession Partnership
- To make recommendations on the translation of newly developed strategies into policy.
- To conduct reviews of project reports and other documentation.
- To conduct a final review of the implementation.
- To recommend strategies for sustainability and follow up activities.

### **1.8.6 Team proposed for implementation of the action**

The Council of Europe, will recruit a Long-term Adviser (LTA)<sup>8</sup> and one Local Project Officer (LPO). The team will be based in Ankara and work directly with the Council of Ethics. This team will be responsible for project management and implementation of project activities in Ankara on behalf of the Council of Europe.

The Government will appoint a Project Director who will be funded by the Government and be a senior expert of the Council of Ethics Unit. S/he will function as the main counterpart in the organisation of project activities on behalf of the Turkish authorities.

The Council of Europe will aim to seek as a long-term adviser, an expert with relevant professional experience both in matters related to codes of conduct/public ethics and the prevention of corruption and in matters related to project implementation. This adviser will work directly with the Project Director and the Council of Ethics. The Long-term Adviser will be funded from the project budget.

The Long-term Adviser will be supported by a Local Project Officer and also be funded from the project budget. In Strasbourg, the project will be supported by a Project Coordinator who will also ensure proper project reporting, financial management and administrative support.

The project team will propose a Workplan detailing short-term and long-term consultants/experts that will be needed for the implementation of project activities. The Council of Europe will ensure the active participation of local professional skills where available, and a suitable mix of European and local experts in the project team. All local experts are to be independent and free from conflicts of interests. Civil servants and other staff of the public administration of Turkey shall not be recruited as experts within the project team.

### **1.8.7 Post of Long Term Adviser-Ankara**

The post-holder will be deployed in Ankara and shall be responsible for the successful accomplishment of the project's overall and specific objectives through ensuring, in co-operation with the counterpart[s] and/or the lead beneficiary institution[s], the implementation of the measures and activities agreed upon in the Project[s] Workplan. This includes:

- day-to-day liaison with the counterpart[s] in the beneficiary institution[s] assigned to the project, and with the project co-ordination team under the supervision of the Head of the Economic Crime Division and of the Anti-corruption and Fraud Unit at the of the Directorate for Co-operation of the Directorate General of Human Rights and Legal Affairs in the Council of Europe Secretariat in Strasbourg;

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<sup>8</sup> The profile and the CV of the LTA will be consulted with the Council of Ethics prior to contractual arrangements offered by Council of Europe.

- co-ordinating, organising, and overseeing the participation and work of the short-term experts recruited for individual activities/outputs of the Workplan;
- providing specific expertise and advice on the capacity of the expert on selected areas of the Workplan's outputs (in accordance with the specific profile of the candidate);
- co-operating, and representing the project and its objectives in meetings, with other international technical assistance projects, ensuring, where possible, co-ordination among donors and implementers;
- drafting reports on monthly and quarterly basis on the implementation of the project activities; their substance, and in accordance with the requirements of the donor.

### **Qualifications required**

- university degree in law, political science, or in a related field, or appropriate work experience;
- minimum of 8 years of professional experience at international and/or national level in criminal justice/law enforcement-related, academia, of which at least 4-5 years in matters related to anti-corruption/good governance/ethics;
- knowledge of the relevant international standards in the above mentioned fields, and in particular those set by the Council of Europe;
- familiarity with the current affairs of the relevant country, and experience in working in the region;
- proven experience and understanding of the delivery of international technical assistance projects, with knowledge of/experience in the implementation of EC and USAID funded projects is an asset;
- proven ability to work in an international, multi-cultural and difficult environments;
- experience in the management and supervision of staff;
- confirmed drafting skills (samples to be submitted if short-listed), and excellent oral and written English;
- that the candidate shall not be a civil servant or public official in the national system where the project is being implemented.

Council of Europe will be looking for candidates who are able, through negotiation and diplomatic skills to uphold the standards and values of the Council of Europe in sometimes challenging environments. Implementing projects with public funds, candidates will also display a high level of commitment to the stringent use of resources, and the principles of accountability and transparency vis-a-vis counterparts and interested parties.

### **1.8.8 Post of Project Coordinator/Officer (Grade B3/B4) – Strasbourg**

- Member of the project-team and assist the Head of Division/Unit and the Long term Adviser and short term experts by coordinating their relevant actions between Strasbourg and Turkey teams on their daily work;
- Assist the overall management and coherence of the project;
- Coordinate the project Workplan and its calendar of activities in cooperation and under the guidance of the Head of the Anti-corruption and Fraud Unit with the Project's, Long Term Adviser, and the Project Director and Local Project Officer in Ankara;
- Assist short-term and long-term experts when carrying out tasks and missions in the field;
- Provide administrative assistance to support the organisation of each project input;
- Assist and coordinate project team efforts in reporting, including financial reports;
- Assist in preparing project narrative reports;
- Assist and follow up on purchase orders, contracts and mission orders, travel and accommodation;
- Providing logistical support during missions; and
- Communicating with experts, following procedures for reimbursements and payment of experts' fees and travel expenses.

### **Qualifications required**

- Not less than 4 years of professional experience at national or international levels in criminal justice/law enforcement-related fields, of which 2 years at least of experience in matters related to corruption, money laundering and economic crime;
- Administrative experience (including target setting and planning, administration, finance and reporting);
- Experience in the management and coordination of international technical cooperation projects;
- Proficiency of spoken and written English language, knowledge of Turkish language is an asset;
- Communication, and IT skills;
- Ability to work in an international environment.

#### **1.8.9 Post of Local Project Officer (Grade B3/B4) - Ankara**

- Be part of the project-team and assist the Long term Adviser on their daily work;
- Assist the overall management and coherence of the project;
- Coordinate the project Workplan and its calendar of activities in cooperation and under the guidance of the Long-Term Adviser, the Project Director (nominated by the national authorities) and the Project Coordinator from Strasbourg;
- Assist Strasbourg-based PMU staff as well as short-term and long-term experts when carrying out tasks and missions in the field;
- Provide administrative and translation assistance to support the organisation of each project input;
- Ensure relevant field project reporting, including financial reports;
- Function as assistant to the Long-Term Adviser and of international and national experts when necessary.

#### **Qualifications required**

- Not less than 3 years of professional experience at national or international levels in criminal justice/law enforcement-related fields, of which at least some experience in matters related to corruption, ethics, money laundering and economic crime;
- Administrative experience (including target setting and planning, administration, finance and reporting);
- Experience in the coordination of international technical cooperation projects;
- Turkish mother tongue, proficiency of spoken and written English language and, ideally, knowledge of French;
- Translation and interpretation skills;
- Excellent knowledge of Excel and Microsoft programmes;
- Communication, and IT skills;
- Ability to work in an international environment.

#### **1.8.10 Main means proposed for implementation of the action**

- The long-term adviser and local project officer in Ankara and the Project Coordinator in Strasbourg
- Short-term consultant inputs (235 work days in total)
- Funds for the organisation of up to 50 workshops/training events
- Funds for 10 research studies
- Funds for 2 study visits
- Funds for 2 national conferences

The project office within the Council of Ethics will be equipped for two project staff with furniture, PC, fax, copy machine. Equipment shall be purchased under the Council of Europe procurement rules.





	Description	Months / 1 <sup>st</sup> Year												Months / 2 <sup>nd</sup> Year											
		1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
Output 7:	The development of codes of conduct for elected office holders and the judiciary will have been supported																								
Activities:	Organise workshops on codes of conduct for elected office holders and the judiciary to identify possibilities for the development of such codes																								
	Support the development of such codes through workshops, advice																								
Output 8:	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available																								
Activities:	Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics																								
	Based on these studies, make proposals with regard to future anti-corruption strategies																								
	Organise up to 2 national conferences on the prevention of corruption in Turkey																								
Output 9:	Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured																								
Activities:	Support the organisation of regular meetings (once every six months) with the technical commission assisting the Inter-ministerial Anti-corruption Commission																								
	Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey																								
	Wrap up – Closing Activity and Final Reporting Phase (max. one month after finalising the implementation period.)																								

## 2. EXPECTED RESULTS

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### 2.1 Expected impact

#### 2.1.1 The situation of target groups/beneficiaries

In summary, the relevant target group and beneficiary institutions within each sectorial area of the Government of Turkey have been so far engaged in a number of activities with far-ranging impact on anti-corruption work in the country. Such activities/reforms consist as following:

- A Law on the Right to Information (Law 4982) was adopted by Parliament in 9 October 2003. The law greatly increases the ability of non-governmental actors to exercise oversight over the government.
- The Turkish National Programme for the Adoption of the *Acquis* also covers areas such as freedom of association, liberation of the economy, harmonisation of statistics, *acquis* provisions related to corruption, judicial co-operation.
- Amendments to the banking law have been adopted in 12 December 2003 (Law 5020), including provisions on embezzlement in banking sector.
- The Law on Public Financial Management and Control was adopted by Parliament on 10 December 2003.
- Public Administration reform Law is before the parliament including provisions on delegation powers of local authorities and auditing system.
- The Law on the Establishment of the Council of Ethics for Public Service was adopted in 2004, which led to the creation of the Council of Ethics. A Code of Ethics for the staff of the public administration was adopted in 2005.
- A number of other measures are in force to prevent corruption in the public administration, including conflicts of interest and revolving doors.
- Efforts have been made to enhance the independence of the judiciary.
- A new Criminal Code, Criminal Procedure Code and a Code of Misdemeanours were adopted in 2005, and various forms of bribery have thus been criminalised.
- Turkey is a party to the OECD convention on bribery in international business transactions, a member of the Financial Action Task Force and has signed (but not yet ratified) the United Nations Convention against Corruption.
- Turkey ratified ETS 141, ETS 173 (January 2004) and ETS 174 (April 2003) and on 1 January 2004 became a member of the Group of States against Corruption – GRECO – which monitors compliance with European anti-corruption standards. The first evaluation report on Turkey was adopted by GRECO in March 2006.

It should be noted that formal rules for officials of the public administration of Turkey have been in force since the mid-1960s. However, the establishment of the Council of Ethics of Public Officials<sup>9</sup> and the subsequent adoption of a code of ethics<sup>10</sup> now offer an opportunity to create a culture of ethics in the public administration in line with the requirements of good governance. The Council and the Code of Ethics also have the potential to become building blocks of a strategy for the prevention of corruption in Turkey.

#### 2.1.2 Technical and management capacities of target groups

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<sup>9</sup> Law no. 5176, published in the Official Journal on 8 June 2004.

<sup>10</sup> Regulation on the Principles of Ethical Behaviour of Public Officials, published in the Official Journal on 13 April 2005, no. 25785.

The need for a coordinated approach against corruption in Turkey and the need to entrust a body with the responsibility of coordinating and overseeing the implementation of the national anti-corruption strategy has been underlined by the Council of Europe and the European Commission on several occasions.

At certain areas it appears that many of the needs cannot be met because of budgetary limitations and in particular the shortage of staff in the secretariat of the Council. Currently, the staff and budget of the Council are part of the budget of the Prime Ministry. Given the mandate of the Council to investigate alleged violations of the Code of Ethics by senior officials, the Council should be provided with its own budget and staff in order to enhance its independence from the Government.

The Council of Ethics became operational only in April 2005 when the Code of Ethics was published. After one year of operations a number of needs have been identified that would need to be addressed to enhance their effectiveness. The Council of Ethics is established within the structure of the Prime Ministry that provides logistical and administrative support, including 1 experts and 2 assistants, as well as office space for the meetings of the Council (four times per month). In addition, The Council of Ethics became operational in April 2005 when the Code of Ethics was published. After one year of operations a number of needs have been identified that would need to be addressed to enhance their effectiveness.

### 2.1.3 Expected impact on Target Groups/Beneficiaries

	<b>Outputs</b>	<b>Expected impact</b>	<b>Target Group</b>
<b>Specific objective :</b>	To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials.	The project is expected to have an overall impact on the level of corruption in Turkey and on public confidence in the public administration. There will be increased knowledge of public officials on the Council and Code of Ethics.	Public Officials
Output 1:	The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate	Law 5176 of 8 June 2004 assigns a wide range of responsibilities to the Council of Ethics. The project will help the Council of Ethics to use its limited resources more effectively and thus to accomplish its tasks accordingly to the law and in line with international standards. For example, individual complaints made to the Council of Ethics and ex-officio investigations will be dealt with in a more efficient way. The quality of guidance and training provided to the public administration is increased.	Public Officials Council of Ethics Members and Staff
Output 2:	A training package is available to support the application of the code of ethics for public officials	Training of Ethics Commissions and provincial administrations in public ethics and prevention of corruption will be available. The project will help produce such materials and thus provide a practical tool to implement the code of ethics.	Public Officials

Output 3:	At least 10 trainers have been trained and are able to deliver ethics training	This will help make the human capacities available to deliver sustainable training by applying the training package developed and ensure ownership of the project itself and its outcomes. The trained trainers will ensure efficient training both for the central and local administration during the implementation of the project and after completion of the project.	New Identified Trainers
Output 4:	The governors, deputy governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials	The governors, deputy governors and members of ethics commissions in the 81 provinces will be fully aware of the code of ethics and will be in a position to promote its application and implement the code accordingly and develop an ethical culture within their administration in line with international standards in their respective administration	Governors, deputy governors and members of ethics commissions from 81 provinces.
Output 5:	Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials	The ethics commissions in the central institutions will be fully aware and trained with regard to the code of ethics and will be in a position to promote its application in their respective administration.	Public Officials Members of the ethics commissions and senior managers
Output 6:	At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public	The preparation of these research studies will not only be very helpful for the Council of Ethics, the Ethics Commissions and the provincial administrations but will help put the question of ethics on the agenda and into the curricula of research and training institutions. Their publication will also help raise public awareness in general with respect to ethics and prevention of corruption aspects.	Public Service Institutions, Public
Output 7:	The development of codes of conduct for elected office holders and the judiciary will have been supported	The preparation and adoption of such codes by elected officials and the judiciary will help improve public confidence and help reduce corruption in political life and the justice system. Experience and knowledge accumulated by the Council of Ethics, especially on European and international standards, will be transmitted to the Parliament and the judiciary.	Elected office holders Members of the Judiciary

Output 8:	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available	This will provide an opportunity to adjust the application of codes of ethics and other measures and thus make them more effective with a general impact on the level of corruption in the long term	Members of the ethics commissions and senior managers
Output 9:	Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured	This will have an impact on the effectiveness of anti-corruption measures and improve the capacities of all institutions involved in such measures. Meetings with the anti-corruption institutions will help transfer experience and will continue to take place after completion of the project.	Public Service Institutions, Public

## 2.2 Concrete outputs

	<b>Outputs</b>	<b>Deliverable outputs</b>
Output 1:	The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate	<ul style="list-style-type: none"> <li>▪ Quality of staff/members of the Council of Ethics and its Unit</li> <li>▪ Working procedures/tools</li> </ul>
Output 2:	A training package is available to support the application of the code of ethics for public officials	<ul style="list-style-type: none"> <li>▪ 4 Training Events</li> <li>▪ Up to 100 persons trained</li> <li>▪ Training package available and finalises</li> <li>▪ Computer-based training tool</li> </ul>
Output 3:	At least 10 trainers have been trained and are able to deliver ethics training	<ul style="list-style-type: none"> <li>▪ 10 trainers trained</li> <li>▪ Sustained knowledge on Training ensured and are able to deliver ethics training</li> </ul>
Output 4:	The governors, deputy governors, district governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials	<ul style="list-style-type: none"> <li>▪ 25 Training Events are held</li> <li>▪ Up to 900 representatives from 81 provinces trained in the application of the code of ethics for public officials</li> </ul>
Output 5:	Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials	<ul style="list-style-type: none"> <li>▪ 10 Training Events are held</li> <li>▪ Up to 250 representatives of central institutions trained in the application of the code of ethics for public officials</li> </ul>
Output 6:	At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public	<ul style="list-style-type: none"> <li>▪ 10 research studies available and disseminated</li> <li>▪ Publications and recommendations are being discussed and taken into consideration by respective institutions</li> </ul>
Output 7:	The development of codes of conduct for elected office holders and the judiciary will have been supported	<ul style="list-style-type: none"> <li>▪ Proposals for codes of conduct for elected officials and the judiciary</li> </ul>

Output 8:	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available	<ul style="list-style-type: none"> <li>▪ Studies on the effectiveness and recommendations for future prevention strategies are identified and delivered to respective institutions</li> <li>▪ New prevention plans/systems are identified</li> </ul>
Output 9:	Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured	<ul style="list-style-type: none"> <li>▪ Improved coordination</li> <li>▪ Institutional exchange of best practices and recommendations takes place and introduce necessary reforms</li> </ul>

### 2.3 Multiplier effects

The promotion of ethics is just one of many measures that need to be undertaken to prevent corruption. Prevention, in turn, is one of several components of a comprehensive anti-corruption strategy. Experience shows that anti-corruption strategies are more likely to be successful if they consist of political commitment and leadership, comprehensive anti-corruption legislation, the enforcement of legislation, corruption prevention programmes within public institutions, and public awareness and the involvement of civil society.

Through this project, the training materials and the training of trainers in principle allow for these activities to be extended in terms of time and coverage, and will increase and facilitate the sustainability of the shared and disseminated information in the field of prevention of corruption and ethics in overall.

Should codes of conduct also be adopted for elected officials and the judiciary, similar actions could be replicated for these groups as well. Moreover, they will be serving as the prevention tools and infrastructure to prevent corruption and bribe in public administration.

Formal rules for officials of the public administration of Turkey have been in force since the mid-1960s. However, the establishment of the Council of Ethics for the Public Service and the subsequent adoption of a code of ethics<sup>11</sup> now offer an opportunity to create a culture of ethics in the public administration in line with the requirements of good governance. The Council and the Code of Ethics also have the potential to become building blocks of a strategy for the prevention of corruption in Turkey.

The authorities of Turkey have identified currently three short-term priorities with regard to the anti-corruption policy:

- Fully commit at all levels to the fight against corruption, including by strengthening all institutions involved, as well as coordination between them.
- Ensure implementation of the Regulation on Principles of Ethical Behaviour for Civil Servants and extend its provisions to elected officials, judiciary, academics and military personnel
- Limit the scope of parliamentary immunity in line with European practice.

The present project will build upon the progress made to meet these priorities. It also will help Turkey implement the GRECO recommendations and make progress towards accession to the European Union. The lessons learned from this project could also be of benefit for other countries.

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<sup>11</sup> Regulation on the Principles of Ethical Behaviour of Public Officials, published in the Official Journal on 13 April 2005, no. 25785.

## **2.4 Sustainability**

The project will not create new structures but will support the Council of Ethics and the public service to better carry out the functions that they have been tasked with by law, and at the same time strengthen their capacities as administration structures in preventing corruption and increasing the application of ethical rules in overall administration.

It is hoped and expected that this project will prove the value of the Council of Ethics and will convince the authorities to make more substantial resources available in the future aimed at implementing the relevant ethical rules, and preventing corruption within the administration.

The activities are designed to be sustainable in that the training materials can be updated and used in the future also without external assistance. This will also be build during the project implementation and through its end by strictly considering project ownership elements and tools deriving from the beneficiaries. It is expected that once the issue of ethics is on the agenda of the academia and training institutions they will carry on with such research and training activities.

With regard to the trainers, they can be made use of also in the future. There is of course the risk that these trainers will over time assume other functions and no longer be available. Thus, additional training of trainers may be required in the future. In addition the project will be oriented towards the effective establishment and maintenance of institutional memory that will be created, and on these grounds will operate to maintain and leave behind information and sustainable tools that shall be of use in the future.

It is furthermore expected that the activities regarding codes of conduct for elected representatives and the judiciary will develop their own dynamics in the future, although the need for future support should not be excluded.

The activities regarding anti-corruption measures in general are expected to have policy implications beyond the question of public ethics and may lead to the design of a more comprehensive anti-corruption programme in the future. This will lead toward the establishment of identified areas where anti-corruption measures shall be focussed and enhanced in the future.

## 2.5 Logical framework

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
<b>Overall objective:</b>	To contribute to the prevention of corruption in Turkey in accordance with European and other international standards		<ul style="list-style-type: none"> <li>▪ Studies on the effectiveness of anti-corruption measures</li> <li>▪ GRECO reports</li> <li>▪ EU/EC reports</li> </ul>	
<b>Specific objective:</b>	To ensure the effective implementation of the Code of Ethics for public officials and the adoption of such codes by other categories of officials	<p>Level of compliance with the Code of Ethics for Public officials in terms of:</p> <ul style="list-style-type: none"> <li>▪ Number of complaints received and investigated</li> <li>▪ Number of training activities carried out in different institutions</li> </ul> <p>Activities carried out by Ethics Commissions</p> <p>Adoption of a Code of Ethics by the Judiciary</p> <p>Adoption of a Code of Ethics by the Parliament</p>	<ul style="list-style-type: none"> <li>▪ Study on the effectiveness of the Code of Ethics</li> <li>▪ GRECO (Group of States Against Corruption) reports</li> <li>▪ Project reports</li> </ul>	<ul style="list-style-type: none"> <li>▪ Continued political commitment to implement the Code of Ethics</li> <li>▪ Political commitment to undertake measures against corruption and to implement GRECO recommendations</li> <li>▪ Important role of the Council of Ethics recognised by line agencies, ministries and provincial administrations, and receiving high-level Government support</li> <li>▪ Proposals for laws and regulations properly dealt with and processed by Government and Parliament</li> <li>▪ The Prime Ministry</li> </ul>

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
				will allocate the necessary staff to the Secretariat of the Council of Ethics to facilitate project implementation.
<b>Output 1:</b>	The staff of the Council of Ethics are trained and have the necessary working tools and procedures to better exercise their mandate	<ul style="list-style-type: none"> <li>▪ Number of meetings held by the Council of Ethics</li> <li>▪ Number of complaints treated and investigations completed</li> <li>▪ Quality of work plan</li> <li>▪ Quality of reports prepared by the Council of Ethics</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> <li>▪ Study on the effectiveness of the Code of Ethics</li> </ul>	The Council of Ethics will have the necessary resources and commitment to translate its knowledge into action
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Review the working procedures of the Council of Ethics of Public Officials and its secretariat and make and implement proposals for improvement</li> <li>▪ Train the staff of the secretariat in the management of complaints received and implementation of Ethics Principles in line with international standards</li> <li>▪ Train the staff of the Council in the investigation of complaints</li> <li>▪ Support 2 study visits of members and the staff of the Council of Ethics to study the experience of similar bodies in other European Union countries</li> </ul>			

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
<b>Output 2:</b>	A training package is available to support the application of the code of ethics for public officials	<ul style="list-style-type: none"> <li>▪ The draft training package is available by month 6</li> <li>▪ The final package is available by month 10 and the training CD by month 12</li> <li>▪ Quality of the training package</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> </ul>	The training package is accepted by relevant institutions and used for training activities
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Translate and review materials on ethics training available in other countries</li> <li>▪ Develop a coherent training package/curriculum for ethics training based on the provisions of the Code of Ethics</li> <li>▪ Following a testing of the training package (under outputs 4 and 5), finalise and the training package and make it available to different institutions for in-service training</li> <li>▪ Produce and disseminate a training CD suitable for computer-based training</li> </ul>			
<b>Output 3:</b>	At least 10 trainers have been trained and are able to deliver ethics training	<ul style="list-style-type: none"> <li>▪ Quantity and quality of training activities carried out by trainers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> <li>▪ Study on the effectiveness of the Code of Ethics</li> </ul>	Trainers will remain available for training activities
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Select 10 to 15 trainers from training institutions of the public administration</li> <li>▪ Train these trainers in the application of the training package</li> <li>▪ Support these trainers in the delivery of initial training activities (under</li> </ul>			

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
	outputs 4 and 5)			
<b>Output 4:</b>	The governors, assistant governors and members of ethics commissions of the 81 provinces have been trained in the application of the code of ethics for public officials	<ul style="list-style-type: none"> <li>▪ Number of training activities carried out</li> <li>▪ Follow up activities by provincial officials</li> <li>▪ Number of complaints received and investigated</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> <li>▪ Study on the effectiveness of the Code of Ethics</li> </ul>	Representatives of the provincial administrations make use of the skills acquired and follow up with ethics activities in their respective institutions
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Organise up to 10 training events for governors and assistant governors</li> <li>▪ Organise up to 15 training events for members of ethics commissions in provinces and municipalities</li> </ul>			
<b>Output 5:</b>	Officials of central institutions and organisations responsible for ethics (members of the ethics commissions and senior managers) have been trained in the application of the code of ethics for public officials	<ul style="list-style-type: none"> <li>▪ Number of training activities carried out</li> <li>▪ Follow up activities by ethics commissions and senior managers</li> <li>▪ Number of complaints received and investigated</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> <li>▪ Study on the effectiveness of the Code of Ethics</li> </ul>	<ul style="list-style-type: none"> <li>▪ Officials from different institutions make use of the skills acquired and follow up with ethics activities in their respective institutions</li> </ul>
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Organise up to 6 training events for members of ethics commissions and officials responsible for in-service training in different institutions of the public administration</li> <li>▪ Organise up to 4 training events for senior officials of central level institutions of the public administration (under secretary,</li> </ul>			

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
	general director, president, general secretary and deputy general secretary levels)			
<b>Output 6:</b>	At least 10 research studies are available on the risks of corruption in relation to unethical behaviour and have been discussed in public	<ul style="list-style-type: none"> <li>▪ Quantity and quality of research studies</li> <li>▪ Number of public workshops and feedback received</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> </ul>	<p>The relevant authorities contribute to the research studies and actively participate into workshops.</p> <p>The results of the research studies will be follow up and feed into improved corruption prevention measures</p>
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Commission at least 10 research studies on ethics issues and corruption in general.</li> <li>▪ Organise the publication of the results of these studies</li> <li>▪ Support the Council of Ethics in the organisation of up to 5 public workshops on the results of these studies</li> </ul>			
<b>Output 7:</b>	The development of codes of conduct for elected office holders and the judiciary will have been supported	<ul style="list-style-type: none"> <li>▪ Availability of proposals for codes of conduct for elected officials and the judiciary</li> <li>▪ Number of workshops held</li> </ul>	<ul style="list-style-type: none"> <li>▪ Studies on the effectiveness of anti-corruption measures</li> <li>▪ Project reports</li> </ul>	<ul style="list-style-type: none"> <li>▪ Proposals for codes of conduct will be adopted</li> </ul>
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Organise workshops on codes of conduct for elected office holders and the judiciary to identify possibilities for the development of</li> </ul>			

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
	<p>such codes</p> <ul style="list-style-type: none"> <li>▪ Support the development of such codes through workshops, advice</li> </ul>			
<b>Output 8:</b>	The effectiveness of codes of conduct and other anti-corruption measures in Turkey will have been evaluated and recommendations for future prevention strategies are available	<ul style="list-style-type: none"> <li>▪ First study available by month 8</li> <li>▪ Further studies available by month 22</li> <li>▪ Quality of studies and recommendations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> </ul>	The results of the research studies will be followed up and feed into improved corruption prevention strategies
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Carry out studies evaluating the effectiveness of anti-corruption measures implemented in recent years, including criminal law measures, the public information act, the Code of Ethics</li> <li>▪ Based on these studies, make proposals with regard to future anti-corruption strategies</li> <li>▪ Organise up to 2 national conferences on the prevention of corruption in Turkey</li> </ul>			
<b>Output 9:</b>	Coordination of measures to promote ethics with other anti-corruption measures in Turkey ensured	<ul style="list-style-type: none"> <li>▪ Availability of proposals for improved coordination</li> <li>▪ Number and quality of meetings held with the technical commissions and other institutions responsible for anti-corruption measures in Turkey</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project reports</li> <li>▪ GRECO reports</li> <li>▪ EU/EC reports</li> </ul>	Proposals for improved coordination will be followed up
<b>Activities:</b>	<ul style="list-style-type: none"> <li>▪ Support the organisation of regular meetings (once every six months) with the technical commission assisting the Inter-ministerial Anti-</li> </ul>			

	<i>Description</i>	<i>Indicators</i>	<i>Means of verification</i>	<i>Assumption</i>
	corruption Commission ▪ Develop proposals for improved management, coordination and monitoring of anti-corruption strategies in Turkey			

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