

Anti-Corruption Strategy 2013–2020

INTRODUCTION

1. The Government Action Programme 2011-2015 prescribes the adoption of a new Anti-Corruption Strategy. This Strategy is a continuation of earlier anti-corruption strategies (2004-2008 and 2008-2012). The wider objective of the Strategy is to prevent corruption; the Strategy's more specific objectives are provided in clause 11.

DEFINITIONS

2. **Corruption** is misuse of office for personal gain. Corruption in its wider meaning is abuse of position-related trust.¹ Corruption is a societal phenomenon expressed in many forms, therefore it is misleading to consider corruption as mere violation of legal norms. Corruption can be encountered in the public and private sector as well as the third sector.
3. **Forms of corruption** are for example bribery, influence peddling, preferential treatment, influencing of decisions for own interests, embezzling property or other resources², blackmail, abuse or trade of inside information, unequal treatment for own interests, buying of votes, etc.
4. **Conflict of interests** is a situation where a person's economic or other interests may apparently or actually influence the proper performance of official duties. Conflict of interests must be acknowledged and borne in mind

¹ Sutherland, E. (1940). White-Collar Criminality. *American Sociological Review*, Vol. 5, No 1: 2–10.

² It is often difficult to differentiate between economic and corruption crimes; however in the current case a wider definition of corruption has been used which also includes embezzlement.

upon performance of official duties.³ Conflict of interests does not always mean corruption; however, it can lead to corruption (transaction with oneself or a related person).

5. **Transparency** means rules, actions and decisions that enable the public to easily get answers to questions of why, what and how much.⁴ Transparency enables the public authority's responsibility towards society and increases the trustworthiness of institutions. This, in turn, reduces corruption.⁵

SITUATIONAL ANALYSIS

6. According to a corruption survey⁶, Estonian residents have encountered the most corruption upon taking a roadworthiness tests (11% have been asked for a bribe), upon communicating with physicians (9%), the police (8%) and nursery schools (5%), and with schools and universities (5%). Entrepreneurs have also encountered most corruption upon roadworthiness tests (5%), but also regarding public procurements (4%). Although the survey does not provide exact information in terms of how and why those areas have the highest corruption rates, it does highlight the need to deal with those topics in depth and to identify the causes of such experiences. A bribe has been asked from a total of 18% of people, whereas 4% of people have given a bribe or a gift.
7. The corruption survey indicates that people's general attitude towards corruption has become more condemning. Still, non-Estonians clearly differ here: their corruption-awareness is lower, they are less condemning towards it and they are more prone to corrupt behaviour. For example, while 28% of

³ [Explanatory memorandum of Anti-Corruption Act.](#)

⁴ [Transparency International.](#) (25.04.2013).

⁵ Uslaner, E. M. (2001) [Trust and Corruption.](#) Paper presented at the Conference on Political Scandals, Past and Present at the University of Salford, June. (25.04.2013).

⁶ Sööt, Mari-Liis; Vajakas, Kärt (2011). [Corruption in Estonia: a survey of three target groups, 2010.](#) Criminal policy surveys, 13, Ministry of Justice.

Estonians would consent to paying a bribe in a hypothetical situation, 47% of non-Estonians would do so in a similar situation. Also, younger people (aged 15–30) would more readily pay a bribe: 67% of youths as opposed to 30% of people aged over 46.

8. The number of corruption crimes is declining. 274 corruption crimes were registered in 2008 when the previous Anti-Corruption Strategy entered into force as compared to 161 such crimes that were registered in 2012. The number of corruption cases has increased in educational institutions.⁷ As the statistics of registered corruption crimes primarily indicate the investigation capabilities and focus preferences of investigative bodies and include repeated crimes by same persons (e.g. one person having taken multiple bribes from different persons), an unambiguous input is not provided so as to set strategic objectives; still, it helps analyse the situation.
9. One of the success factors behind Estonia's low corruption level is the transparent decision-making process, yet there are areas where transparency could be increased. This is what the Anti-Corruption Strategy focuses on. Upon implementing the Strategy, areas will be determined where transparency could be increased and thus possibilities for corruption could be decreased.
10. Assessing the anti-corruption activity thus far, it can be noted that prevention of corruption is said to be important in both the public and private sector, yet frequently no actual resources are allocated. On the one hand, this is caused by an overly narrow understanding of corruption – often only acts defined to be illegal are considered to be corruption, – on the other hand, the reason is an unjustified belief that only punishment and control can ensure that rules are followed.⁸ A problem is also posed by low corruption-awareness of certain

⁷ These figures do not reflect cases of abuse of authority. See more at www.korruptisoon.ee/statistika.

⁸ Sööt, M.-L. (2012). The role of management in tackling corruption. *Baltic Journal of Management*, Vol. 7, No 3: 287–301.

societal groups, therefore the Strategy focuses on improving that awareness. Increase of awareness is considered one of the most successful anti-corruption measures.⁹

OBJECTIVES

11. Based on the foregoing, objectives of the Anti-Corruption Strategy (hereinafter the *Strategy*) are:
 - **promotion of corruption awareness;**
 - **improvement of transparency of decisions and actions; and**
 - **development of investigative capabilities of investigative bodies and prevention of corruption that could jeopardise national security.**
12. The Strategy's results will be assessed on the basis of:
 - (1) surveys, primarily the questionnaire survey "Corruption in Estonia: A survey of three target groups"; and
 - (2) international assessments and recommendations to Estonia (GRECO, OECD, UN, Transparency International).Criminal statistics will also be analysed when assessing the Strategy's performance. The following indicators will be used in assessing the achievement of objectives:
 - Estonia's position in the perceived corruption index of Transparency International. In 2012, Estonia's index value was 64 points, landing the country on the 32nd position. This Strategy sets the objective of gaining a

⁹ Nichols, P. (2012). The Psychic Costs of Violating Corruption Laws. *Vanderbilt Journal of Transnational Law*, Vol. 45: 145–210.

place in the group of the least corrupted countries (where the index value must be above 64 points);¹⁰

- Changes in corruption awareness, based on corruption survey questions (opinion of corruption and willingness to engage in corrupt behaviour). For example, 34% of residents, 35% of entrepreneurs and 10% of public sector employees would behave in a corrupt manner in a hypothetical situation – the Strategy’s objective is to reduce those indicators;
- Share of enterprises where transparency of business activities is a part of planned management policy, based on the responsible entrepreneurship index – a target level is not determined as the Strategy will only begin to measure this;
- Residents’ assessment of the state’s capability to prevent corruption. According to the Eurobarometer survey (2012), 32% of Estonian residents think that the government’s anti-corruption efforts are effective.¹¹ The Strategy sets the objective of increasing the government’s capability to prevent corruption which is reflected *inter alia* by the people’s assessment to the state’s activity;
- Residents’ assessment of the spread of corruption in various institutions (e.g. political parties, state public servants, the police, healthcare, courts, etc.) according to the Global Corruption Barometer of Transparency International¹². The objective is to improve the relevant opinion of Estonian residents (i.e. the authorities not being perceived as corrupt);¹³

- Investigative bodies dealing with corruption-prone areas as determined by risk analysis – no quantitative indicators are determined, yet *inter alia* both the share of registered crimes and the share of confiscations in the total number of corruption-related court adjudications will be analysed¹⁴.

MEASURES¹⁵

Higher awareness of corruption

13. According to the corruption survey, the levels of corruption awareness and corruption-willingness as well as the corruption disapproval of Estonians and non-Estonians differ, whereas the views of non-Estonians cause more concern. Also, younger people are more tolerant of corruption. The reason for their higher corruption-willingness may be *inter alia* the fact that little attention has been paid to the subject of corruption in general education schools. Russian journalists know less about corruption than their Estonian colleagues and there is also less investigative journalism available in Russian. With an improvement of the situation in that area, the people’s corruption awareness would increase as well. **In order to increase people’s corruption awareness and shape their attitudes**, training videos (incl. with Russian subtitles) and guidelines will be prepared for use in social education classes; corruption-related information will be translated into Russian and distributed in Russian-speaking channels¹⁶; and corruption awareness and skills for

¹⁰ It must be noted here that the index value is also influenced by the level of democracy and political culture, economic development, business culture, etc., therefore it is difficult to achieve the objective with the Anti-Corruption Strategy’s measures alone.

¹¹ [Special Eurobarometer 374](#). Corruption 2012.

¹² <http://www.transparency.org/gcb2013/country?country=estonia> (17.09.2013).

¹³ According to the 2013 survey, 41% of Estonian residents consider enterprises to be corrupt, 38% consider the state public service to be corrupt, 33% consider the Parliament to be corrupt, 26% consider courts to be corrupt, 24% consider the health services to be corrupt, 17% consider the police to be corrupt and 13% consider the education system to be corrupt.

¹⁴ There were 161 corruption crimes registered and 205,211 Euros worth of criminal proceeds from such crimes were confiscated in 2012. See also Sööt, M-L. (2013). Corruption crimes. Salla, J. (editor) [Criminal Statistics Yearbook 2012](#) and Klopets, U. (2013). [Criminal proceeds confiscation in the year 2012](#). Ministry of Justice.

¹⁵ More detailed description of the activities is provided in the Strategy’s implementation plan.

¹⁶ E.g. <http://rus.delfi.ee/>, www.seti.ee, <http://www.ruskoeradio.fm/>, <http://r4.err.ee/>.

presenting corruption cases will be increased among journalists (incl. Russian-speaking journalists)¹⁷.

14. According to the corruption survey, corruption awareness in the public sector is higher than in the private sector and among other people, and the public sector is also less willing to behave in a corrupt manner in a hypothetical situation. Until now, the main focus in shaping the ethics-related attitudes of the public sector has been on public servants, and less attention has been paid to politicians; no attention has been directed towards healthcare employees, school and nursery school managers. Training courses and study videos have been prepared for disseminating ethics-related knowledge, helping to behave properly in a situation of conflict of interests; also, an electronic [Handbook of Conflict of Interests](#) has been prepared, based on real-life cases. **In order to shape attitudes towards corruption and increase corruption awareness in the public sector**, training courses for ethics and conflict of interests will be conducted, *inter alia* for members of councils and the Riigikogu, involving also the political parties; the Handbook of Conflict of Interests will be supplemented and made easily usable electronically; guidelines for prevention of conflict of interests will be prepared, intended for specific target groups; and corruption prevention will be added to the competence programme for school managers. Based on the corruption survey, training courses related to conflict of interests and ethics will be conducted for the target groups most in need of them.

15. According to the corruption survey, entrepreneurs most tolerant towards corruption are primarily representatives of trade and service enterprises and representatives of smaller enterprises in general. The Ministry of Justice together with the Chamber of Commerce and Industry have conducted a few seminars for entrepreneurs, intended to increase their corruption

¹⁷ For example, consideration could be given to establishing a prize awarded to the Russian-speaking media for identification or skilful presentation of corruption cases, to be issued by Transparency International Estonia.

awareness, and Transparency International Estonia has disseminated the principles of business ethics and corruption prevention among entrepreneurs; yet, not much success has been achieved. This is partly due to inefficient communication means; however, more attention needs to be paid to hedging corruption risk as a potential management and activity risks of an enterprise. Managers of legal persons with state and local government holdings, and the Russian-speaking circle of entrepreneurs have been left without any attention at all. **In order to increase the awareness of entrepreneurs and to draw attention to topics related to corruption prevention**, information and discussion seminars will be conducted, incl. in Russian; corruption-related issues will be added to the [Responsible Entrepreneurship Index](#); methods will be disseminated that help enterprises assess their corruption risks and improve their prevention systems; and management training courses will be conducted¹⁸, including for managers of private law legal persons founded by the state and local governments.

Higher transparency of public sector decision-making and activities

16. Based on the corruption survey and the implementation analysis of the previous [Strategy](#), measures for improving transparency will focus mainly on the following areas: transparency of legislative drafting and political decision-making process, transparency of decisions and financial transactions of the state and local governments; public procurements; financial benefits; work of law enforcement and national defence authorities¹⁹ and courts; healthcare. Highlighting of those areas does not mean that no attention would be paid to other corruption-sensitive areas determined in the course of implementing the Strategy.

¹⁸ For example, consideration could be given to including the ability to hedge corruption risks as a part of the ISO management system certification.

¹⁹ Law enforcement and national defence authorities are considered here to be the Prosecutor's Office, the Police and Border Guard Board, the Tax and Customs Board, and national security authorities.

17. Parties to legislative drafting and the political decision-making process are officials, politicians, entrepreneurs, stakeholders and also private individuals. Transparency of those processes is increased if the public understands who has had a say in influencing a law or a decision and how the final decisions have been made. **In order to increase the transparency of legislative drafting and the political decision-making process**, officials' skills of involving interest groups, incl. negotiating skills will be enhanced; principles will be developed for communication between legislative drafters (incl. politicians) and entrepreneurs (lobby rules); necessary elements for the criminal offence of influence peddling will be clarified; and the impact of the Political Parties Act will be regularly analysed.

18. According to the opinion of a large share of entrepreneurs, corruption of local governments hinders entrepreneurship (31% in Tallinn, 29% in Tartu and 12% elsewhere think so).²⁰ Although the processing of detailed plans and building permits may be a labour- and time-intensive process, local governments are accused of being too slow in deciding and managing those matters.²¹ The sources of local government corruption are considered to be the lack of transparency in their activities, their weak internal audit system, conflicts of interests in public procurements²², and preferential treatment in transactions²³. The corruption survey also indicates that people frequently experience corruption regarding nursery school and school services offered by local governments. **In order to increase the transparency of financial transactions and work procedures of local governments**, local governments

²⁰ Estonian Chamber of Commerce and Industry. Survey of entrepreneur-friendliness of local governments, 2012.

²¹ *Ibid.*

²² Perling, M (2012). Causes for corruption in local governments, and ways to prevent them. [Preventing corruption in local government](#). Issued: Transparency International Estonia, prepared by: Asso Prii and Käärt Kaljuvee.

²³ Mikli, A. (2012) Corruption risks in local governments.

will be aided in establishing corruption-preventing work procedures;²⁴ more effective implementation of their internal audit system will be ensured; the information system Transparent Estonian Local Government (LEO) will be launched, reflecting transactions with private law legal persons as well; and transparency will be increased regarding services related to waiting lines (e.g. waiting lines for nursery school placement, detailed plans, building permits).

19. In the corruption survey, a quarter of Estonia's entrepreneurs were of the opinion that the corruptibility and partiality of officials hinders the development of their enterprise (especially entrepreneurs in Tallinn and Virumaa supported this opinion). The entrepreneurs believe that corruption is more widespread at the state level as compared to local governments: 74% of entrepreneurs consider corruption to be widespread on the state level and 64% consider it widespread in local governments. Similar distribution is also made evident by the Eurobarometer survey which indicated that 76% of people consider corruption to be widespread at the state level and 70% consider it widespread in local governments.²⁵ The corruption risk entailed in motor vehicle registration and roadworthiness tests is a separate topic altogether (according to the corruption survey, 11% of residents have been asked for a bribe upon roadworthiness tests and 6% have been asked for a bribe upon the granting of a driver's license and upon registering a vehicle), and although the situation improved thanks to the Road Administration's activities in the course of the previous Strategy, there is still reason to continue the risk management and supervision of those areas (crime statistics state that there are corruption cases in those areas every year). All this proves the need to focus on transparency of decision-making processes of the state and primarily the executive power authorities. **In order to increase the transparency of state authorities and to support the culture of corruption prevention**, self-assessment methods will be developed and implemented; risk management of the traffic register and the roadworthiness tests will be

²⁴ E.g. introducing the [self-assessment questionnaire](#) to local governments.

²⁵ [Special Eurobarometer 374](#). Corruption 2012.

continued; and the information system Transparent Estonian State (LER) will be established, providing the public with information concerning financial transactions of state authorities and other governmental organisations.

20. Public procurements are one of the most corruption-prone areas, due to large amounts of public money and high discretionary power of decision-makers entailed.²⁶ The Estonian corruption survey indicates that frauds in public procurements and schemes designed with the objective of appropriating the property of the state or a local government are considered relatively widespread, both at the state level and in local governments. For example, 49% of entrepreneurs think that fraud in public procurements is relatively widespread at the state level and 44% think that the same applies to local governments. **In order to prevent corruption and increase the transparency of public procurements**, all procurements will be managed electronically; access to procurements' base documentation will be made simpler; risk analysis-based supervision over public procurements will be increased; and corruption resulting from conflict of interests will be reduced by disclosing the interests of persons responsible for the procurement and the interests of members of tender evaluation committees.

21. Authorities distributing support benefits²⁷ are subjected to higher than average corruption pressure; on the other hand, some of the beneficiaries are also tempted to abuse funds received. At the same time, a balance must be found between trust and inspection. The financing of foundations must be transparent as well. **In order to increase the transparency of benefit-granting decisions**, corruption-preventing procedures will be strengthened in organisations distributing benefits, including the competence and corruption-

²⁶ E.g. Abbink, K. (2004). Staff Rotation as an Anti-Corruption Policy: An Experimental Study. *European Journal of Political Economy*, Vol. 20: 887–906; OECD. (2007). Bribery in Public Procurement. Methods, Actors and Counter-Measures. France: OECD Publications; Gabriel (2012). [Corruption crimes in relation to public procurement](#).

²⁷ E.g. Enterprise Estonia, KIK, PRIA, KULKA, MISA, Innove, KredEx, Unemployment Insurance Fund. See also: <http://www.strukturifondid.ee/kuidas-leida-toetusvoimalusi/>.

detecting skills of those conducting internal audits; co-operation will be increased between authorities distributing benefits; information systems will be developed so that the data of applicants would be cross-usable²⁸; and if necessary then supervisory competence of final beneficiaries will be increased.

22. Due to the nature of their work, employees of law enforcement authorities and judges are subjected to higher than average corruption risk;²⁹ they are also at higher risk of becoming the subject of other improper influencing.³⁰ **In order to prevent corruption and influencing in law enforcement authorities and courts**, corruption-preventing work procedures will be established: developing guides of conduct to prevent conflict of interests and corruption risks;³¹ organising management training courses for top and mid-level managers, including the subject of corruption prevention; and establishing a system for reporting influence attempts or threats.

23. In any area, corruption opportunities are mainly driven by shortage of services or goods and large amounts of money. There is relatively acute lack of services in the healthcare area (waiting lines); at the same time there is a multitude of public money in the domain (contracts with service providers, expensive medicines and equipment). Therefore, the area of healthcare in Estonia and also in other countries is extremely prone to corruption.³²

²⁸ The only cross-use currently available - via the SFOS information system - relates to data of authorities distributing EU funds.

²⁹ See Gerber, T. P. & Mendelson, S. E. (2008), Public Experiences of Police Violence and Corruption in Contemporary Russia. A Case of Predatory Policing? *Law & Society Review*, Vol. 42, Issue 1: 1-44; Kent, A. & Chandler, D. (2008), People of Virtue. Nordic Institute of Asian Studies. Studies in Asian Topics, No 43

³⁰ Pors, M (2011). [Influencing Estonian judges and prosecutors](#). University of Tartu.

³¹ A role model could be the Prosecutor's Office which adopted a new ethics code on 12.04.2013 and established an Ethics Council. There are plans for developing action guidelines for conflicts of interests.

³² In addition to the Estonian [corruption survey](#), see also: the Hungarian Gallup Institute, 1999; [Transparency International](#) focus areas.

Corruption risks concerning Estonian healthcare were identified in 2011³³, and the activities of this Strategy are based on that survey and on unimplemented activities of the previous Strategy. **In order to increase the transparency of healthcare**, the digital booking service will be developed further (making free and paid visits differentiable and enabling patients to see the vacant spots in waiting lines all over Estonia, and also ensuring better functionality of the service, making it more user-friendly from the viewpoint of both physicians and patients); and health care providers will be motivated to join the service. Also, the state portal will be developed further so that health-insured individuals could monitor the amount of health insurance contributions paid for them. In order to avoid the issuing of unjustified health certificates, the grounds for being absent from procedural acts will be agreed and data exchange between information systems³⁴ will be ensured. In order to prevent conflict of interests, guidelines for preventing a conflict of interests will be developed and the study programmes and study means of healthcare employees (incl. medical students) will be enhanced.

Developing the investigative capabilities of investigative bodies and preventing corruption that could jeopardise national security

24. Attention to the capability of investigative bodies to investigate corruption was paid already in the previous Strategies. Specialised prosecutors were assigned in prosecutor's offices and the investigative competence of the Security Police was increased. By now, a central anti-corruption unit has been established in the Police and Border Guard Board.³⁵ The situation has thus markedly improved. Still, procedural and analytical capabilities of the police and other law enforcement authorities must be developed further.

³³ University of Tartu: RAKE. (2011) [Survey mapping healthcare fraud and corruption risks](#).

³⁴ Healthcare Information System (TIS), Courts Information System (KIS) and Criminal Proceedings Register (KRMR).

³⁵ The unit was established on 01.09.2011; since 2012 the unit bears the name Corruption Crimes Office of the Central Criminal Police.

25. **In order to increase the analytical capability in investigating corruption crimes**, both the police and the prosecutor's office must have enough officials specialising on corruption crimes. In order to increase the capability of identifying criminal proceeds, the Police and Border Guard Board must supply sufficient numbers of experts in the field. Also, risk analysis methods will be used (incl. taking into account the occurrence of corruption in the private sector) and regular risk assessments will be performed; also, the E-arrest information system will be developed further. Co-operation will be increased at national and international levels, incl. organisation of an international conference on corruption, focused on sharing best practices and learning new investigative methods.

26. **In order to prevent corruption that could jeopardise foreign and domestic national security and economic security**, special attention will be paid to corruption in law enforcement authorities and national defence structures. Measures will also focus on preventing corruption related to large-scale foreign investments and public procurements as well as corruption related to strategic decisions, in the areas of infrastructure, energy, transport, ICT, defence industry and medicine.

Surveys and analyses

27. An integral part in planning and assessing anti-corruption policy is played by sociological studies which will be provided for by conducting **surveys mapping the extent of and attitudes towards corruption, surveys explaining fraud and corruption risks of various areas, and analyses of the impact of anti-corruption policy, measures and laws**.

IMPLEMENTATION AND ASSESSMENT

28. The anti-corruption policy will be managed and the Strategy's implementation will be co-ordinated by the Ministry of Justice. The Strategy will be implemented by all ministries and government authorities, primarily the Ministry of Education and Research, the Security Police Board, the Ministry of Economic Affairs and Communications, the Police and Border Guard Board, the Prosecutor's Office, the Ministry of Finance, the State Chancellery, the Chancellery of the Riigikogu, the Ministry of Internal Affairs and the Ministry of Social Affairs.
29. The Strategy will be implemented and assessed in co-operation with non-governmental organisations, organisations of entrepreneurs (e.g. the Chamber of Commerce and Industry, the Employer's Confederation, the Service Industry Association, the Responsible Business Forum), local governments and their representative organisations, patient representation organisations, associations of healthcare employees and service providers, associations of education employees, etc.
30. Until now, there have been shortcomings in domain-specific corruption prevention. Every area (environment, healthcare, etc.) should apply corruption prevention measures, and the area's ministry should be responsible for implementing those measures. The Anti-Corruption Act assigns state authorities and local governments the responsibility for ensuring awareness about corruption prevention and inspecting the respecting of relevant duties in the authorities (§ 3 (3)). **In order to manage the anti-corruption policy more successfully, a person co-ordinating corruption prevention will be assigned in every ministry to act *inter alia* also as the contact person regarding the strategy's implementation, ensure the implementation of the Anti-Corruption Strategy's activities in his or her ministry and its area of government, implement the anti-corruption policy, and also propose new measures and activities.** Initially, co-ordinators will be assigned in ministries responsible for implementing the activities of the

Strategy's implementation plan, and when the development plan is supplemented with other relevant ministries, co-ordinators will be assigned in those ministries as well. Contact details of the coordinators are noted in Appendix 2 to the Strategy.

31. In order to gain an overview of the implementation of activities planned in the Strategy, the Strategy's implementation status will be assessed continuously. For that purpose, **domain-specific anti-corruption networks will be established:** a network of healthcare authorities, law enforcement authorities and local governments (if necessary then other networks as well). Representatives of those networks will meet once or twice a year to discuss the developments in their areas as well as issues that must be solved. The meetings will be summoned by the Ministry of Justice.

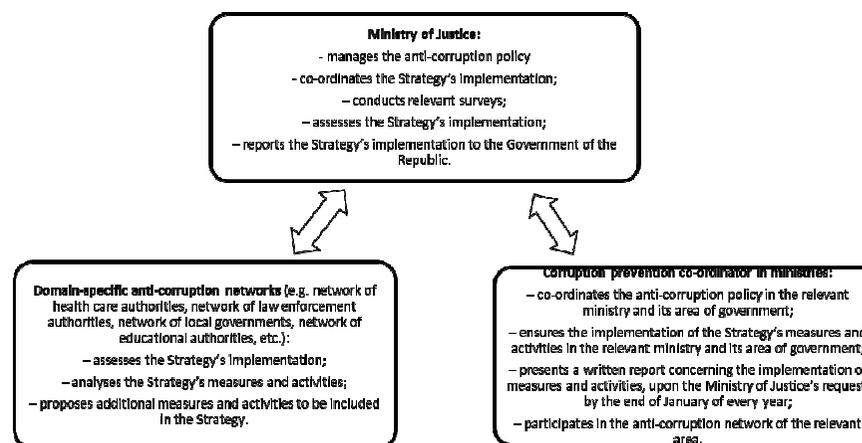


Figure 1. Managing the implementation of the Anti-Corruption Strategy 2013-2020

32. Upon request of the Ministry of Justice, the authorities related to implementing the Strategy will present the Ministry of Justice with written information concerning their measures and activities. Based on the information submitted, the Ministry of Justice will prepare an implementation report of measures and activities and will assess the effectiveness of the Strategy's implementation. A short report on the strategy's implementation will be presented to the Government of the Republic in March of every year, containing an overview of activities, implementation problems and costs. A comprehensive report concerning the Strategy's implementation will be presented to the Government of the Republic in March 2017, containing a more in-depth assessment of the strategy's impact on the relevant area and target groups.

33. For the purpose of preparing a final report concerning the Strategy's implementation, the authorities related to implementing the Strategy will provide the Ministry of Justice upon its request with their summaries of the implementation of measures and activities of their area for the entire period, doing so by 1.02.2021 at the latest. The Ministry of Justice will prepare a summary report concerning implementation of measures and activities, together with an assessment of the effectiveness the Strategy's implementation, and will present this to the Government of the Republic by 31.05.2021 at the latest.

34. The development plan's activities together with a list of the relevant responsible persons and the budget will be presented in the implementation plan. The cost of the Strategy's first five years is 6.1 million Euros. Every year, the Government of the Republic will be presented with the Strategy's implementation plan for the next four years. Proposals for supplementing the development plan and the implementation plan will be presented to the Government together with the report concerning the implementation of the development plan. The implementation plan's activities must be reflected in work plans of the ministries and other government authorities.

35. Preparation and implementation of the Strategy will be guided by development plans of other areas and by relevant international documents, primarily [the Guideline for Development of Criminal Policy until 2018](#), [Guidelines for Development of Legal Policy until 2018](#), [basics of Estonian national security policy](#), [the Government of the Republic Action Programme](#), [the proposal to prepare the development plan of Estonian information society until 2020](#), [the principles of the European Commission's anti-corruption policy](#), and [GRECO recommendations to Estonia](#).

36. The parties that participated and advised in preparing the Strategy are listed in the Strategy's Appendix 3 "List of parties that participated in preparing the Anti-Corruption Strategy 2013–2020"³⁶.

³⁶ The Strategy was prepared by Mari-Liis Sööt, Manager, Analysis Service, Criminal Policy Department, Ministry of Justice.