OBJECTIVE I	PREVENTION OF CORRUPTION IN THI	E PRIVATE SECTOR AND TH	HE NON-PROFIT SEC	CTOR
Impact  Measure	The proceedings of corruption offences will become more professional, the rate of identification of such offences will increase and the offences will be prevented. Publicly available annual reports will ensure that the activities of non-profit organisations are transparent and prevent any possible risk of corruption. Codes of Ethics will help non-profit organisations to focus on corruption issues and thus increase their awareness of corrupt practices. The Network of Estonian Non-profit Organisations will participate in the development of the structural funds' fundamental documents, work in monitoring committees and ensure the transparency of the implementation and operation of the structural funds. Through increased awareness of the private sector, corrupt practices will be anticipated and the number of offences committed due to ignorance will decrease. Better media coverage will help to increase the public's awareness of corruption and draw the attention of law enforcement bodies to potential corruption cases.  Prevention of corruption offences and improvement of the capacity as regards criminal proceedings of corruption offences			
Activity	Indicators	Additional expenditure <sup>1</sup>	Term	Bodies responsible for implementation
1.1. Development of the leniency program	The leniency program has been developed and complies with the conditions specified in clause 1.1.	Operating expenses of the Ministry of Justice	2008	Ministry of Justice
1.2. Agreeing on the principles of commencing the proceedings of competition offences	The conditions stipulating when and on the basis of which information criminal proceedings are to be commenced for investigating possible competition offences have been established.	Operating expenses of the Public Prosecutor's Office	2008	Public Prosecutor's Office
1.3. Organising the training of public prosecutors and officials of the Competition Authority with the right to carry out proceedings	Training has been conducted.	Operating expenses of the Public Prosecutor's Office	2008-2012	Public Prosecutor's Office Competition Authority
Measure	Reduction of the risk of corruption in t		_	
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
2.1. Arrangement of the system of financing non-profit organisations and creation of a system of publication	A system for disclosure of funds allocated to non-profit organisations from the state budget and budgets of local governments has been created within the conception for establishment of a common system of financing non-profit organisations from the state budget resources: the public at large has an overview of support granted to non-profit organisations.  The inclusion of civil law partnerships, natural persons and other persons receiving funds from the state budget	Operating expenses of the Ministry of the Interior	2008	Ministry of the Interior
2.2. For a non-profit organisation to receive funding	and budgets of local governments in the disclosure system is considered.  Non-profit organisations have Codes of Ethics which are observed.	75,000	2010	Ministry of the Interior

from the state budget and the local government's budget, the existence of the organisation's Code of Ethics (e.g. a published decision of the non-profit organisation concerning its accession to the Code of Ethics of Non-profit Organisations <sup>2</sup> ) and compliance with the Code of Ethics serve as eligibility criteria. Notification of non-profit organisations, state agencies and local governments about these criteria.	Non-profit organisations, state agencies and local government agencies are aware of new rules and implement these.  The existence of a Code of Ethics is taken into account when allocating funds.			
2.3. Publication of non-profit organisations' annual reports in the Non-profit Associations and Foundations Register	The non-organisations that until now have submitted their annual reports to regional structural units of the Tax and Customs Board are submitting their reports to courts maintaining registers, and the reports are public.	Operating expenses of the Ministry of Justice	2010	Ministry of Justice
Measure	Engagement of non-profit organisation		of resources received from	
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
3.1. Non-governmental organisations representing the civil society are engaged in the monitoring of the use of structural assistance, their members participate in monitoring committees and, if necessary, other committees and working groups related to the monitoring of structural assistance.	The partnership agreement has been signed; non-profit organisations participate in the relevant committees and working groups.	Resources of structural funds (Ministry of Finance)	2008	Ministry of Finance (Ministry of the Environment Ministry of Research and Education Ministry of Economic Affairs and Communications)
Measure	Increasing the awareness of corruption			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
4.1. Development and organisation of a series of seminars for entrepreneurs, incl. notification of entrepreneurs of the principles of the OECD anti-	A seminar is held at least once a year and it conforms to the principles specified in clause 1.2.	120,000	2009	Ministry of Justice
bribery convention3	Informative articles have been published	250,000		Ministry of Economic Affairs and

program, incl. organisation of an international conference for entrepreneurs	organised for entrepreneurs and legal service providers.  An international conference has been held after the adoption of the leniency program.			
4.3. Training of journalists (incl. those working in counties) with the aim of promoting investigative journalism	Training has been conducted.	180,000	2009-2012	Transparency International – Estonia
4.4. Analysis of the problem of corruption in the media	The analysis has been carried out and it answers the question whether corruption exists in the media, and if it exists, what are its scope and form.  Instructions have been given for prevention of problems, if necessary.	120,000 (planned as a special-purpose allocation in the budget of the Ministry of Justice)	2008	Transparency International – Estonia
4.5. Mapping of the spread of corruption and fraud in the private sector	A survey has been carried out to ascertain the scope and forms of corruption in the private sector.	300,000	2009	Ministry of Justice
OBJECTIVE II		REST, AND REINFORCING	THE ANTI-CORRUPTION	N ATTITUDE AND ETHICAL BEHAVIOUR OF
Impact	will diminish. Surveys will enable the impa and guidelines to be given for the future.	act of anti-corruption actions, e	ethics training courses an	ceptibility of public sector personnel to corruption d policy to be assessed, changes to be observed
Measure	Arrangement of the legal regulation for			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
5.1. Elaboration of the new Anti- Corruption Act comprising both the amended regulation of prevention of conflicts of interests and the new arrangement of declaring economic interests	The new Anti-Corruption Act has been adopted, which also provides for a functioning system of declarations.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice
5.2. Creation of the database of declarations of economic interests	The database of declarations has been introduced and is used.	300,000	2009-2010	Ministry of Justice
Measure	Increasing the awareness of public sec			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
6.1. Updating the study materials of ethics: adding new video materials, preparing case studies based on the situation in Estonia, adding cases involving conflicts of interests	Study materials have been updated.	Resources of structural funds (the programme "Central Training" of the priority line of action "Enhancing Administrative Capacity" within the	2008-2012	State Chancellery

		operational programme for human resources development)		
6.2. Compiling, presentation and dissemination (incl. at the websites korruptsioon.ee; avalikteenistus.ee; aktiva.ee) of a handbook concerning conflicts of interests specific to Estonia	The handbook has been compiled and presented.	200,000	2010	State Chancellery Ministry of Justice
6.3. Organising ethics training to different groups of public sector personnel (incl. public servants)	The open ethics training has been targeted at all the employees of the public sector:  1) employees of state agencies and constitutional institutions; 2) officials of the agencies of local governments; 3) employees of agencies administrated by state agencies and local government agencies; 4) members of rural municipality and city councils; 5) members of non-profit organisations; 6) employees of companies where the state or a local government has a shareholding; 7) other target groups, if necessary.  Regular training courses are conducted.	Resources of structural funds (the programme "Central Training" of the priority line of action "Enhancing Administrative Capacity" within the operational programme for human resources development)	2009-2012	State Chancellery
6.4. Start-up of regular activities of the Ethics Council	1) The Council has been formed, convenes on a regular basis and offers solutions to ethical problems occurring in the public service.  2) The main values and ethics of the public service are reinforced through the Ethics Council.	Operating expenses of the State Chancellery	2008	State Chancellery
Measure	Conducting corruption and ethics surv			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
7.1. Conducting a repeated survey of the corruption level in Estonia	The repeated survey has been conducted (and non-profit organisations have been included in the sample), disclosed and published in the series of publications dedicated to criminal policy studies.	400,000	2010	Ministry of Justice

7.2. Conducting a repeated survey mapping the roles and attitudes of officials	The repeated survey has been conducted and published.	300,000	2009	State Chancellery
7.3. Analysis of the need for and suitability of the whistleblower protection system: mapping the public and private sector organisations	The analysis answers the question which agencies and business sectors probably need guidelines and where the development of guidelines for reporting corruption should be rendered mandatory.	30,000	2009	Ministry of Justice
OBJECTIVE III	PREVENTION OF CORRUPTION IN LOC	CAL GOVERNMENTS		
Impact	transparent and legitimate.	I governments and monetary t	ransactions (public procureme	n of corruption in local governments. ents, etc.) effected by local governments are
Measure	Improvement of the availability of infor			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
8.1. Analysis of the susceptibility of contractual assignment of duties to corruption	The analysis answers the question of quality control of service providers to whom duties have been assigned under a contract: whether, by whom and how the background of providers of outsourced public services, the quality and consistent availability of these services, the selection of the service provider, etc. are verified.	40,000	2009	Ministry of Justice
8.2. Establishment of a common reporting format for disclosure of local governments' expenditure	The uniform format has been established and local governments are disclosing their expenses.	Operating expenses of the Ministry of the Interior	2010	Ministry of the Interior
8.3. Creation of a common electronic application for publication of local governments' documents and supervision over compliance with the requirement	The common website format has been created.  Disclosure of information is being monitored, and disclosure has become more systematic and even across local governments.	Operating expenses of the Ministry of the Interior	2010	Ministry of the Interior
Measure	Improvement of local governments' co			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
9.1. Development of the draft Local Government Financial Management Act	The draft Local Government Financial Management Act has been submitted to the Riigikogu.      The auditing of local governments' annual reports has been rendered mandatory.	Operating expenses of the Ministry of Finance	2009	Ministry of Finance

9.2. Rendering internal auditing mandatory in local governments	The relevant legislation has been adopted and internal auditing is mandatory in all local governments.      Several options have been developed for supporting internal auditing (e.g. auditing services are rendered jointly to several local governments or by a county-level organisation).	Operating expenses of the Ministry of the Interior	2010	Ministry of the Interior
9.3. Establishment of a system of local governments' internal audits by legislation	The Local Government Organisation Act has been amended.      Common rules of internal auditing of local governments have been developed and are binding on all local governments.	Operating expenses of the Ministry of the Interior The implementation costs to be incurred by local governments will be analysed in the course of drafting.	2010	Ministry of the Interior
OBJECTIVE IV	PREVENTION OF CORRUPTION IN THE			
Impact	An overview exists of the scope of corr awareness of health care providers and the risk of corruption.	recipients increases, the n	umber of corruption cases of	
Measure	Obtaining information about the scope			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
10.1. Thorough mapping of the corruption problem in the health care sector and updating of the Anti-Corruption Strategy (drafting a separate action plan, if necessary), considering also the experiences of the international network combating fraud in the health care sector (NHS <sup>4</sup> )	The survey has been carried out and the areas most susceptible to corruption have been mapped.  Supplementary measures have been added to the Anti-Corruption Strategy.	300,000	2009	Ministry of Social Affairs  Ministry of Justice
Measure	Increasing the awareness of corruption	and ethics in the health ca	re sector	
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
11.1. Conducting ethics training courses for health care providers	Training has been conducted.	200,000	2010	Ministry of Social Affairs
11.2. Development of guidelines for prevention of conflicts of interests specific to the health care sector and organisation of information dissemination in the health care sector	The guidelines have been developed and introduced to health care specialists and patients (informative materials).  The Estonian Code of Medical Ethics has been amended (if necessary).	300,000	2011	Ministry of Social Affairs
11.3. Training supervisory officials in the sphere of ascertaining corrupt practices	Training has been conducted.	100,000	2011	Ministry of Social Affairs

11.4. Development of the system of reporting corruption cases in the health care sector	The notification system has been developed and is operational.	100,000	2011	Ministry of Social Affairs
Measure	Increasing transparency in the provision			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
12.1. Amendment of Regulation No. 85 of the Ministry of Social Affairs dated 22 June 2004 so as to prevent fraud in the issue of certificates	The Regulation has been amended and it establishes explicitly the cases when absence from a procedural act is permissible.	Operating expenses of the Ministry of Social Affairs	2009	Ministry of Social Affairs
12.2. Introduction of digital medical records and development of solutions for health care information system (SMS messages, digital reminders of appointments)	Digital procedural records are used.	2,000,000	2012	Ministry of Social Affairs
12.3. Creation of the electronic waiting list system	The electronic registration system has been created and health care institutions and family physicians have joined the system.  Opportunities of cross-usage between the databases of the Health Care Board, the Health Insurance Fund and the Tax and Customs Board have been created.	900,000 <sup>5</sup>	2011	Ministry of Social Affairs
OBJECTIVE V	PREVENTION OF CORRUPTION IN FOL	JNDATIONS ESTABLISHED	BY THE STATE AND LOCAL	GOVERNMENTS
Impact	Better overview of foundations established resulting in better transparency of the four	d by the state and local governedations.	nments, and of the purposeful	ness and lawfulness of their activities,
Measure	Collection of more detailed information	about foundations establis	hed by the state and local g	overnments
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
13.1. Arranging for the receipt of a consistent overview of foundations established by the state and local governments	The public at large has an annual overview which comprises information about the foundations of the state and local governments: 1) founders of the foundations; 2) objectives of the foundations; 3) financing activities (amounts distributed and received); 5) purpose of amounts granted; 5) obligations assumed.	Operating expenses of the Ministry of Finance	2010	Ministry of Finance

	The Foundations Act and other legislation have been amended, if			
	necessary.			
Measure	Reinforcement of control over foundati	ons established by the state	e	
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
14.1. Vesting ministries with the explicit right to audit foundations (incl. management of foundations) by the new State Assets Act	The ministries have the right to audit foundations under the new State Assets Act.      The number of audits of foundations has increased and the quality of the audits has	Operating expenses of the Ministry of Finance	2009	Ministry of Finance
	improved.  3) The findings of audits are used for directing and assessing the lawfulness of the activities of foundations, and for rendering the activities more transparent.			
14.2. Specification (in the State Assets Act) of the obligations of Ministers in the exercise of founder's rights in foundations where the state is a shareholder	The State Assets Act specifies the obligations of founders of foundations, incl. setting, inspecting and assessing the attainment of goals.	Operating expenses of the Ministry of Finance	2009	Ministry of Finance
OBJECTIVE VI	PREVENTION OF CORRUPTION IN THE OF VEHICLES	GRANT OF THE RIGHT TO	DRIVE AND IN ROADWORT	THINESS TESTING AND REGISTRATION
Impact	Increased supervision over driver training the risk of corruption. The automated iden in ascertaining the identities of persons.			registration of vehicles will help to reduce niners and preclude possible human errors
Measure	Increasing supervision over driver train	ning and application for the	right to drive	
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
15.1. Engaging the police in supervisory activities: entry into a cooperation agreement between ARK and the Police Board	The parties have entered into the cooperation agreement.	Operating expenses of the Ministry of Economic Affairs and Communications	2008	Ministry of Economic Affairs and Communications
15.2. Introduction of biometric identification devices	The devices have been introduced and the system of biometric identification is operational.	Biometric face recognition: 80,000 Biometric fingerprint recognition: 4,000,000	Biometric face recognition: 2009 Biometric fingerprint recognition: 2012	Ministry of Economic Affairs and Communications
Measure	Increasing supervision over roadworth			
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
16.1. Introduction of electronic surveillance devices in roadworthiness testing centres	The surveillance devices have been installed.	According to the agreement between ARK and a roadworthiness testing centre, the owner of the	2009	Ministry of Economic Affairs and Communications

16.2. Installation of video cameras in smaller local offices, in the areas where preregistration inspection is carried	The video cameras have been installed and enable pre-registration inspections to be monitored.	centre must place the investments needed for acquisition and installation of the mandatory devices prescribed in Regulation No. 170 of the Ministry of Economic Affairs and Communications dated 10 August 2004.	2008	Ministry of Economic Affairs and Communications	
out  16.3. Registration of departures in the ARIS traffic register information system	More precise control is ensured: inspection data and the photo of each vehicle are recorded in a laptop after the inspection of each vehicle.	Operating expenses of the Ministry of Economic Affairs and Communications (provided for in the ARIS-2 project)	2008	Ministry of Economic Affairs and Communications	
Measure	Increasing the awareness of the inspectors of driving schools and roadworthiness testing centres				
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation	
17.1. Conducting the training of inspectors of driving schools and roadworthiness testing centres	Training has been conducted.	80,000	2008	Ministry of Economic Affairs and Communications	
OBJECTIVE VII	PREVENTION OF CORRUPTION IN THE	FINANCING OF POLITICAL	PARTIES		
Note	accordance with the decisions of the Riigil	f the Ministry of Justice within political parties and to agree kogu.  nendations contained in the theount as binding on Estonia.	the scope of its operating expupon the capacity of that body ird evaluation report of the GF	penses (wages of advisers). The Riigikogu v. Budgetary resources must be planned in RECO Anti-Corruption Working Group of the	
Impact	timely disclosure of donations and annual		to prevent violations of financ	cing rules and problems relating to the	
Measure	Establishment of clearer restrictions co		ng of political parties		
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation	
18.1. Establishment of restrictions concerning election advertising of political parties, which are clearer and carefully thought out	Restrictions are more flexible and prevent the problems that arise from the current regulation.  The establishment of restrictions concerning the scope and size of advertising has been considered.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice	

Measure	Measure Improvement of control over the financing of political parties				
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation	
19.1. Vesting the body exercising control over the financing of political parties with the right to commission follow-up audits	The control authority is entitled to commission follow-up audits.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice	
19.2. Augmenting the authority of the body exercising control over the financing of political parties	The control authority can exercise substantive supervision over the financing of political parties.	The expenses can be assessed after the following has been established: 1) what is the control authority; 2) how many people would be engaged in the work of the control authority. [E.g. ca 1.5 million kroons if two advisers are employed in Riigikogu's Select Committee on the Application of Anti-Corruption Act]	2009	Ministry of Justice (The measures require amendments to the Political Parties Act the preparation of which is the responsibility of the Ministry of Justice. The Riigikogu has the duty to form the control authority of political parties and to agree upon the capacity of that body.)	
19.3. Making the annual reports, reports on election-related expenses and the register of donations of political parties public in a timely and accurate manner	Particular due dates for disclosure have been established and adherence to the due dates is monitored by the control authority.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice	
19.4. Analysis of the sufficiency of penal law measures relating to violations of the rules of financing political parties	The penal law measures relating to violations of the rules of financing political parties correspond to the severity of the violations.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice	
19.5. Analysis of the Money Laundering and Terrorist Financing Prevention Act and possible extension of the Act to non-profit organisations (political parties)	The analysis of the Money Laundering and Terrorist Financing Prevention Act has been carried out.  Necessary amendments have been introduced to the Act.	Operating expenses of the Ministry of Finance	2009	Ministry of Finance	
19.6. Establishment of clear financing rules regarding organisations associated with political parties	Requirements have been established which apply, besides political parties, to non-profit organisations and foundations in which the political party is a member,	Operating expenses of the Ministry of Justice	2009	Ministry of Justice	

OBJECTIVE VIII Impact	or to other legal persons whose activities are directly or indirectly aimed at the attainment of the objectives of political parties.  IMPROVEMENT OF THE EFFICIENCY OF THE LEVEL OF PROFICIENCY OF THE LEVEL OF THE	tion offences will increase. Pr ted.	oceedings concerning cor	ruption offences are based on actual risk
Measure	Specialisation in corruption offences in	Additional expenditure		Dadica responsible for implementation
Activity	Indicators		Term	Bodies responsible for implementation
20.1. Appointment, in each prefecture, of a group of investigators specialised in corruption offences and offences related to office, and formation of separate units for investigation of these offences, if necessary	There are at least five officials specialised in the investigation of offences related to office and corruption offences in Northern and Eastern Police Prefectures, and at least two investigators in the Western and Southern Police Prefectures.  Separate units have been formed in prefectures for investigation of corruption offences and offences related to office.	Operating expenses of the Ministry of the Interior	2008	Ministry of the Interior
20.2. Development of an incentive system for officials conducting the proceedings of serious criminal offences	The remuneration of officials conducting the proceedings of corruption offences is higher than the remuneration of those handling mass offences and at least equal to the remuneration of those handling other serious concealed offences.	Operating expenses of the Ministry of the Interior	2009	Ministry of the Interior
20.3. Training preliminary investigators and prosecutors in the spheres of corruption of legal persons in public law and corruption in the private sector, as well as surveillance activities in the investigation of corruption offences <sup>7</sup> . Exchange of best practices between investigative authorities (incl. the Security Police)	Specialised investigators have attended at least two training sessions in the relevant area annually.  Joint training of prosecutors specialised in corruption offences, investigators and judges has been conducted under the direction of the Public Prosecutor's Office.	200,000	2009-2012	Ministry of the Interior Public Prosecutor's Office
Measure	Strengthening of the capacity to carry	out proceedings concerning	corruption offences	,
Activity	Indicators	Additional expenditure	Term	Bodies responsible for implementation
21.1. Carrying out risk and hazard analyses and agreeing	Risk analyses have been carried out in authorities conducting proceedings,	Operating expenses of the administrative agencies	2008-2012	Public Prosecutor's Office Police Board

upon joint lines of action between Prosecutor's Offices and investigative authorities at the beginning of each year on the basis of these analyses	which enable corruption-related surveillance activities to be planned.  Common lines of action are agreed at the beginning of each year.			Security Police Board
21.2. Clearer regulation of liability for violation of the rules of public procurements (amendment of § 300 of the Penal Code)	The regulation of liability is clearer and § 300 of the Penal Code has been amended.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice
21.3. Arrangement of the regulation of covert collection of personal data	Clear principles of covert collection and storage of personal data have been established.	Operating expenses of the Ministry of Justice	2009	Ministry of Justice

<sup>1</sup> Operating costs have already been taken into account in the budgets of ministries (e.g. the salaries of advisers) and no additional funds will be requested from the state budget for covering these costs.

<sup>&</sup>lt;sup>2</sup> The Code of Ethics of Non-profit Organisations was adopted at the general assembly of the Estonian non-profit organisations in 2002: <a href="http://www.ngo.ee/eetikakoodeks">http://www.ngo.ee/eetikakoodeks</a>.

<sup>3</sup> Convention on Combating Bribery of Foreign Public Officials in International Business Transactions: HTTP://WWW.KORRUPTSIOON.EE/6448.

http://www.cfsms.nhs.uk

<sup>&</sup>lt;sup>5</sup> In connection with the creation of the electronic waiting list system, the Ministry of Social Affairs already has applied for 12 million kroons for 2009; 15 million kroons for 2010 and 2011; and 17 million kroons for 2012. The amount of 900,000 kroons indicated here is meant for the creation of the opportunities of cross-analyses and IT solutions.

<sup>&</sup>lt;sup>6</sup> The third evaluation round of GRECO comprises the system of control over political funding and the application of the Criminal Law Convention on Corruption. The visit of GRECO to Estonia took place from 19 to 23 November 2007 and involved meetings with the representatives of several institutions. The report of Estonia will be defended from 31 March to 4 April 2008 at the plenary meeting of GRECO in Strasbourg, after which the report will be made public. See also http://www.coe.int/t/dg1/Greco/Default\_en.asp.

<sup>&</sup>lt;sup>7</sup> Training is needed in the spheres of accounting, public procurements, the law of obligations act, the law of property act, planning and supervision of construction activities, surveillance (recruitment of persons, covert collection of information), etc. regular case studies and analyses of the experiences of other countries should be carried out.