

# Office of the Government of the Czech Republic

Minister for Human Rights, Equal Opportunities and  
Legislation and Chair of the Government Anti-Corruption  
Coordination Council



## **The Anti-Corruption Action Plan for 2016**

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Prague, December 2015

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## Introduction

*The Anti-Corruption Action Plan for 2016* (hereinafter only “Action Plan”) is an anti-corruption document of the current Government of the Czech Republic derived from *The Government Anti-Corruption Conception for the Years 2015 to 2017*. This Action Plan follows *The Anti-Corruption Action Plan for 2015*.

Besides corruption risk assessment within the legislative process (preventive legislative institute enshrined in the Government Legislative Rules), one-year Action Plans are the main instrument in the fight against corruption. Their aim is to define a set of specific anti-corruption measures arising from Government policy documents and the international commitments of the Czech Republic, or to respond to the current situation in society. As they are implemented yearly, the Action Plans adequately reflect the current needs in the fight against corruption. The primary role in drafting anti-corruption measures that extend beyond the scope of the Government’s commitments arising from political documents or the Czech Republic’s commitments in relation to international organisations is played by the representative Government Anti-Corruption Coordination Council (hereinafter only “the Council”) and its working commissions or rather Chairman’s working commissions .

The Anti-Corruption Action Plan for 2015 defined a large number of particularly legislative anti-corruption measures to which pertinent government departments were obliged to. A detailed evaluation of the Anti-Corruption Action Plan for 2015 will be carried out by 31 March 2016. In general, however, most of the legislative tasks arising from the Action Plan and enshrined in the Plan of Legislative Work of the Government for 2015 have been submitted and approved by the government. In accordance with the basic focus of the governmental fight against corruption (i.e. public administration with an emphasis on state administration), the aim of this Action Plan is to ensure that legislation which has been approved and subsequently entered into force is implemented in practice in the most optimal manner possible. This Action Plan also proposes new legislative and non-legislative measures. These measures are rooted in one of the above mentioned Government’s anti-corruption documents. However, the interdependence of these documents logically assumes that anti-corruption measures that have already been put into practice will be carefully monitored and evaluated in the future. The continuity and subsidiarity of anti-corruption documents are the unifying thread of the coordination of the fight against corruption at the governmental level.

For the successful implementation of the anti-corruption measures defined in the Action Plan it is essential that they will be incorporated into the Plan of Legislative Work of the Government for 2016, the Plan of Non-legislative Tasks of the Government for 2016 and in Resolutions of the Government of the Czech Republic. Last but not least, what is of exceptional importance is the work of the individual departments (and the Government as such) on compliance with the commitments arising from the above mentioned anti-corruption documents.

Despite a series of still existing partial problems (that particularly lie in shifts in the deadline for the adoption of key anti-corruption legislative proposals), there has been noticeable progress in the implementation of effective anti-corruption measures. This trend is confirmed by, amongst others, evaluations carried out by international organisations (the Open Government Partnership - OGP, the Council of Europe’s Group of States against Corruption – GRECO, the Organisation for Economic Cooperation and Development – OECD) or NGOs (e.g. via the Corruption Perceptions Index – CPI).

# 1. Efficient and Independent Executive

Act No 234/2014 Coll., on the Civil Service, came into force on 1 January 2015. The basic aims of the Act are depoliticisation (transparent selection procedures, continuity of service regardless of political changes, more rigid process for the approval of service post systemization), stabilisation (career development system, mechanisms to motivate government employees to remain in service) and professionalization (civil servant examination and service evaluation, civil servant training system). At the same time, most of the implementing legislation necessary for the effective application of the Civil Service Act was also adopted.

Most of the tenders for senior positions will be held in 2016 and civil servants will also take examinations in specified fields of service. The successful implementation of the Civil Service Act is one of the Government's key commitments. Effective institutional mechanisms are currently in place within the competence of the Civil Service Section of the Ministry of the Interior and State Secretaries of the individual service authorities which create realistic assumptions to ensure that the provisions of the Civil Service Act and its implementing legislation are applied in a manner that enables state administration to operate properly. One supportive measure which will greatly help to boost transparency in appointments to senior positions in the civil service is the **publication of professional résumés of senior officials** from the level of the department directors), who succeed in tenders during 2016 on the websites of the relevant service authorities (with the exception of the intelligence services). Professional résumés will be published without the consent of the senior official in question if that data, in accordance with Section 5(2)(f) of Act No 101/2000 Coll., on Personal Data Protection, constitutes "*personal data on a public figure, official or employee of public administration that reveals information on their public or administrative activity, their functional or working position*". Other data may only be published with the consent of the senior official. This measure will mean the completion of the transparent selection process of senior officials in state administration, i.e. state employees who will participate on a long-term basis in key decisions affecting the lives of the citizens of the Czech Republic.

In connection with the efficiency and implementation of the Civil Service Act, the rights and obligations of civil servants and local government officials need to be thoroughly compared. In 2016 the Ministry of the Interior will **start work on the preparation of non-legislative material (an analysis) focused on comparing the individual aspects of the work, rights and obligations of civil servants and local government officials.**

In 2015 the draft **Act on Public Prosecutor's Office** was submitted for the interdepartmental comment procedure in accordance with the Plan of Legislative Work of the Government for 2015 and the Anti-Corruption Action Plan for 2015. In terms of its parameters, this draft mostly complied with the requirements contained in the Anti-Corruption Action Plan for 2015. The most contentiously debated measure is the establishment of the **Special Public Prosecutor** (hereinafter only "SPP"), particularly with regard to the attraction/delegation of individual cases, possibility of recurrent term of office of the head of SPP, and the lack of supervision over the SPP by the Supreme State Prosecutor. The submitter of the draft has not managed to ensure its approval by the Government by the designated deadline and it is unclear whether this will happen by the end of 2015. However, the minimal requirements for this law as contained in the Anti-Corruption Action Plan for 2015 continue to apply.

**The draft Act on Public Prosecutor's Office** arises from the governmental policy and anti-corruption documents as well as from the international commitments of the Czech Republic (European Commission, GRECO), and so the Ministry of Justice must focus closely on this task in 2016. If the Act on Public Prosecutor's Office is approved by Parliament, the next phase will involve the process of establishment of the SPP, abolition of both High Public Prosecutor's Offices, including transferring the High Public Prosecutors to another (not district) public prosecutor's offices, and setting up a suitable selection procedure for the positions of the leading public prosecutors. Although this Action Plan does not define more detailed parameters for the individual

organisation and technical processes, the Council will devote close attention to this mechanism at the appropriate time.

According to Art. 5 of Directive of the European Parliament and of the Council No 2014/42/EU on the freezing and confiscation of instrumentalities and proceeds of crime in the European Union, Member States are obliged to adopt the necessary measures to allow the total or partial confiscation of assets belonging to a person convicted of a crime which may directly or indirectly lead to material gain, if the court, based on the circumstances of the case, including specific facts and the available evidence, such as the fact that the value of the assets is disproportionate to the lawful income of the convicted person, considers that the assets in question are the result of criminal activity (**extended confiscation**). The Ministry of Justice will ensure this Directive to be transposed by the designated deadline.

One of the discussed international issues is a question of **proving international corruption and its cross-border punishment**, which has become part of Czech law. The relevant departments, i.e. the Ministry of Justice and Ministry of the Interior, together with law enforcement authorities are recommended to create the requisite material and staff capacities for investigation of this type of crime. It also seems appropriate to organize a conference on this topic or establish closer cooperation with international organisations (particularly the OECD).

The following are persistent and ongoing tasks remaining from the previous action plan that fall under the competence of the Minister for Human Rights, Equal Opportunities and Legislation:

- **monitoring the standards of departmental internal anti-corruption programmes (RIPP) and the possible submission of a draft update to the Framework RIPP** based on current legislative changes and needs. During 2016 consultation and methodological support will continue to be provided to administrative authorities by the Regulation Impact Assessment Department of the Office of the Government of the Czech Republic. The standards of strategies to manage corruption risks will be monitored in the individual departments and, where necessary, updates to the departmental internal anti-corruption programme will outline basic rules and guidelines for these strategies in order to ensure consistency in the individual departments.
- **checking the stricter application of Regulation Impact Assessment (RIA) and particularly corruption risks assessment as part of RIA within the legislative process.** The corruption risks assessment is a preventive legislative instrument within the governmental fight against corruption; therefore, efforts to make use of this institution effective will continue. Bilateral cooperation between the submitters and the Regulation Impact Assessment Department of the Office of the Government of the Czech Republic is essential.

**The publication of consolidated lists of advisors and advisory bodies on the websites of the various ministries and their subordinate units** has proven to be effective mean of increasing transparency in the public sector, and so this general task will continue to apply in 2016.

Legislative and non-legislative anti-corruption measures	Responsible Authority
Commence preparation of non-legislative material (an analysis) to compare the various aspects of the work, rights and obligations of civil servants and local government officials	Ministry of the Interior
The drafting and potential implementation of the Act on	Ministry of Justice

Public Prosecutor's Office	
Transposition of the directive ensuring confiscation of the proceeds of crimes	Ministry of Justice
Creation of material and staffing capacities for proving international corruption and for cross-border punishment	Ministry of Justice/Ministry of the Interior
Publication of the professional résumés of senior officials from the level of the department directors (with the exception of the intelligence services)	Individual departments and their subordinate bodies
Monitoring the standards of RIPP in the various departments and eventual draft update of the Framework RIPP, including the provision of consultation and methodical support	Minister for Human Rights, Equal Opportunities and Legislation
Checking the stricter application of RIA and CIA within the legislative process	Minister for Human Rights, Equal Opportunities and Legislation
Publishing consolidated lists of advisors and advisory bodies on official websites	Individual departments and their subordinate bodies

## 2. Transparency and Free Access to Information

The Czech Republic's commitments towards the OGP international initiative will be formulated in 2016 with the aim of increasing transparency in the public sector and improving free access to information. These commitments will be formulated in collaboration with the OGP by the appropriate ministries and during public consultations particularly by the professional community. **The new commitments of the Action Plan for the Open Government Partnership for the Years 2016–2018** will become binding when approved by the Government. Nevertheless, the Interim Self-Report from the Czech Republic's Action Plan for the Open Government Partnership for the Period 2014 to 2016 which was approved by Government Resolution No 809 on 12 October 2015, shows progress in the implementation of previous commitments, i.e. besides the adoption and implementation of the Civil Service Act, also the streamlining of the free access to information and open data system. The substantial level of completion has been stated for all these commitments.

The next step is to **provide access to public administration data and information** to citizens via Internet in accordance with the international requirements regarding open data. Measures need to be developed to support the publication of as much open data as possible. The availability of sufficient open public administration data could result in analyses and applications aimed at increasing transparency in public institutions, making state institutions more efficient, and improving public services. The essential prerequisite for the implementation of the principles of open data in the Czech Republic is the completion of the legislative process through the Act on Free Access to Information, a task which has begun in accordance with the Anti-Corruption Action Plan for 2015. Following the adoption of the relevant legislative amendment, the Ministry of the Interior will hold public consultations to discuss the draft list of mandatory published data sets and to supplement that list (if necessary), to ensure that the sets comply as far as possible with the Ministry of the Interior's open data guidelines and standards. These public consultations will also include discussion and the creation of data schemes specifying the structure of the data sets, i.e. the minimum range and structure of information published for the ministries, central authorities and other mandatory entities in accordance with the proposed legislation. An indispensable prerequisite for the use of open data is its traceability which is supported by the National Open Data Catalogue ("NODC") operated by the Ministry of the Interior on the Public Administration Portal. The Ministry of the Interior will continue to develop the NODC with the aim of maximizing its utility value for public authorities, as well as for users from the general public. Constant methodological support for access to open data from a central point will also be required for the public administration servants. The existing Standards for the Publication and Cataloguing of Open Data must continue to be upheld and further developed within the Ministry of the Interior to incorporate feedback from users of the guidelines and recommendations as well as international trends and the results of European activities. Work must also continue on systematic training in methodologies and standards focused on the publication of open public administration data to make it as easy as possible for data providers to open and publish their data in open and linked data format.

The **implementation of a project of electronic Collection of Laws and Collection of International Treaties** and electronic legislative process will continue in 2016, with the aim of ensuring that legislation is available and comprehensible and improving and streamlining the law-making process thus making it more transparent. The related legislation approved by the Government on 26 October 2016 is expected to be adopted in 2016. The proposed legislation will make the assessment of corruption risks in the explanatory report of draft legislation announced in the Collection of Laws and International Treaties compulsory.

In 2015 Parliament was presented with the **governmental draft amendment to Act No 159/2006 Coll., on Conflict of Interests**, as amended, which complies with the requirements stipulated by the Anti-Corruption Action Plan for 2015, i.e. the introduction of the duty to file reports on activities, property, income, donations and liabilities on the date of appointment to office, streamlining the control mechanism, tightening sanctions, computerisation of the entire agenda and increasing the

number of former public officials restricted in moving from the public to the private sector (revolving doors). It is set to enter into force on 1 January 2017, in relation to the central register of notices of public officials that is to be prepared by the Ministry of Justice in 2016. The Working Commission of the Chairman of the Council for Conflict of Interests will address various measures to ensure the proper implementation of the Conflict of Interests Act as of the date on which the amendment to the Act becomes effective, i.e. particularly all aspects associated with creating the central register of notices of public officials.

Parliament was also presented with the **draft amendment to Act No 424/1991 Coll., on Association in Political Parties and Political Movements**, as amended, and **amendments to the election laws**. The funding of political parties and election campaigns has been repeatedly criticized by NGOs and international organisations (particularly GRECO). This amendment responds to these alleged shortcomings by outlining practical measures which will clearly boost transparency in operation of political parties and political movements. Amongst other measures, it is proposed that an Authority for the Supervision of the Funding of Political Parties is set up with the primary task of checking that political parties and political movements comply with their designated obligations. During 2016 the Council Chairman's Working Commission for Transparency of Public Administration will particularly monitor the constitution of the new office, which should be a fundamental guarantee for strengthening public confidence in political association and political competition.

Also at the legislative stage in Parliament is the **amendment to the law amending certain acts on proving the origin of assets** which was one of the key anti-corruption measures contained in the Anti-Corruption Action Plan for 2015. If this law is drafted, the Working Commission of the Chairman of the Council for Transparency of Public Administration will monitor the legislative process and, if the draft is approved, it will also supervise its practical implementation.

In relation to the Government Policy Statement and the Anti-Corruption Action Plan for 2015 it is essential to resolve the issue of **binding rules regulating the nomination of state representatives to commercial corporations and state enterprises**. The commitment to adopt statutory legislation is still in force for 2016.

Although the regulation of lobbying is not explicitly covered in the governmental policy documents, the Government Anti-Corruption Conception for the Years 2015 to 2017 mentions the need to increase the transparency of the legislative process with the aim of minimising the chance of covert lobbying for vested interests. The need to introduce rules governing lobbying in the Czech Republic is constantly highlighted by NGOs involved in the fight against corruption. Attention has also recently been focused on this topic by the Council of Europe, which has prepared possible recommendations for Member States concerning the legislative regulation of lobbying in the context of public decision-making. The newly established Working Commission of the Chairman of the Council for Lobbying will therefore examine this matter closely. One of the outcomes of its activities will be a **basic conceptual document (thesis) outlining the options and bases of the future regulation of lobbying in the Czech Republic**, including possible sub-measures or a legislative solution as such which will subsequently be evaluated by the Council.

In connection with ensuring the increase of the transparency and quality of the legislative process, measures were taken aimed at ensuring the **wider availability of the Electronic Library of the Legislative Process (eKLEP)** in 2015. This will officially provide the public with access to legislative and non-legislative materials (that influence law-making) as well as to opinions issued by the Government Legislative Council. The technical implementation of this measure does not have to be fully completed until the end of 2015, which is why it is also included in this Action Plan.

**Corruption in health care** is an extremely serious problem in economic and moral terms. There are corruption risks on all sides of the chain involving patient – health care provider (or pharmacy) – health insurance company – private sector – health care department. Therefore, the **Ministry of**



**Health**, following consultation with all the relevant stakeholders, is going to **submit a sector analysis** in 2016 that would identify apparent and latent corruption risks in health care, with specific anti-corruption measures proposed to resolve the individual relationships in this chain in the future. This analysis will then also serve as the basis for the submission of a systematic and comprehensive solution to eliminate corruption in public health care.

The Ministry of Health or the expert group appointed for the purpose will then **test out the methodology and authorization of health insurance companies with their so called positive medicament lists**.

A very sensitive and high-risk area is the relationship between health care providers and manufacturers of pharmaceuticals and medical devices. Such cooperation between experts and industry creates the potential for a conflict of interests. It is therefore essential to demand that these relationships be transparent and auditable. **The Ministry of Health is supporting and will continue to support the Transparent Cooperation scheme of the Association of Innovative Pharmaceutical Industry** which calls for the publication of the scope and terms of cooperation between health care experts and pharmaceutical companies. This information will be available on a public website from the middle of next year. Health care workers participate in this project on a voluntary basis although the Ministry of Health will strive for as many participants involved in this Europe-wide initiative as possible. The primary aim of this pan-European initiative, which is modelled on the American Sunshine Act, is to clarify the extent and effectiveness of cooperation between health care professionals/institutions and pharmaceutical companies and to disclose the amount of related payments (as is now the case in France or the Netherlands ).

Other partial measures will include continuing to rigorously prosecute doctors who illegally dispense drugs in their surgery, as well as enhancing the supervisory powers of the State Institute for Drug Control in this area, considering a ban prohibiting doctors from doing business in pharmacy (e.g. as a silent partner) and a ban on competition after finishing medical practice.

Legislative and non-legislative anti-corruption measures	Responsible Authority
The Czech Republic's commitments arising from the Action Plan for Open Government Partnership for 2016–2018	Minister for Human Rights, Equal Opportunities and Legislation
Providing access to public administration data and information <ul style="list-style-type: none"> <li>• completion of the legislative process for the publication and cataloguing of open data,</li> <li>• public consultations concerning specific data areas and data sets to be included in the Government Regulation as mandatorily published in open data format,</li> <li>• the development of the National Open Data Catalogue – creation of version 2 which will be an extension of the existing version and will provide a far better user interface and standard of services for public administration users, the general public and other entities,</li> </ul>	Ministry of the Interior

<ul style="list-style-type: none"> <li>The development of standards for the publication and cataloguing of open data, particularly in relation to developments in the international standards and guidelines; continuing to provide training in the standards and processes involved in the publication and cataloguing of open data.</li> </ul>	
Publication and cataloguing of open data in accordance with the issued standards	Individual departments and their subordinate bodies
Continuing in the implementation of the eCollection (eSbírka) and eLegislation (eLegislativa) project and pushing for draft legislation in relation to this project	Ministry of the Interior
Creation of a central register of notices of public officials assuming that the Conflict of Interests Act is approved	Ministry of Justice
Monitor the establishment of the Authority for the Supervision of the Funding of Political Parties, assuming that the amendment to the Act on Association in Political Parties and Political Movements is approved	Working Commission of the Chairman of the Council for Transparency of Public Administration
Implementation of a law to amend certain acts in relation to proving the origin of assets, assuming it is approved	Ministry of Finance
Draft legislation regulating the nomination of state representatives to commercial corporations and state enterprises	Ministry of Finance
Proposition of future legal regulation of lobbying	Minister for Human Rights, Equal Opportunities and Legislation
Widening public access to the Electronic Library of Legislative Process (eKLEP)	Minister for Human Rights, Equal Opportunities and Legislation
Sector analysis focusing on corruption in the health care sector	Ministry of Health
Testing out the methodology and authorising health insurance companies for their so called positive medicament lists	Ministry of Health
Supporting the Transparent Cooperation scheme of the Association of Innovative Pharmaceutical Industry	Ministry of Health
Rigorously prosecuting doctors who illegally dispense drugs in their surgery, as well as enhancing the supervisory powers of the State Institute for Drug Control in this area	Ministry of Health
Considering a ban prohibiting doctors from doing business in pharmacy (e.g. as a silent partner) and a	Ministry of Health

ban on competition after finishing medical practice	
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### 3. Efficient Management of State Property

Inefficient management of state assets has an adverse impact on the Czech economy and the public's faith in the processes of state institutions. Therefore, close attention needs to be given to defining preventive measures aimed at reducing corruption risks in the management of public funds. The primary motivation for all the following measures is to save on inefficiently invested state funds and to redirect these resources to the relevant chapters of the state budget.

Following the adoption of the Public Procurement Act which should become effective no later than by 18 April 2016, it will be necessary to put the Act into practice. Attention will be focused on interpreting the individual provisions to prevent any purposeful circumvention of certain provisions and also to eliminate any uncertainty concerning which procedures are desirable. This will involve the Ministry for Regional Development adopting and updating all the implementing regulations and drawing up guidelines so that both contracting authorities and tenderers would know how to act in the individual phases of tenders. The adopted guidelines will focus on the use of best practice in public procurement, such as standards to define the subject of the contract, setting assessment criteria, technical and qualification requirements, contractual terms and, last but not least, specifying the manner in which public procurement is managed and audited. By setting the best standards for defining the subject of the contract, assessment criteria, technical and qualification requirements and contractual terms in accordance with the fundamental procurement principles (transparency, equality, non-discrimination, proportionality) will be effectively also ensured compliance with the 3E principles (economy, effectiveness and efficiency).

In relation to the implementation process of the Public Procurement Act in practice, attention must also focus on the **computerisation of public procurement**. Contracting authorities and candidates will be provided with methodical support in using the National Electronic Tool (NEN) in connection with the changes in Public Procurement Act. The ongoing task of creating the Strategy for Public Procurement Computerisation for the Years 2016–2020 also relates to this.

As regards the **adoption and implementation of anti-corruption measures within the framework of ESI funds**, subsequent to the task set forth in the Anti-Corruption Action Plan for 2015 and within the framework of the monitoring process data will be collected for the evaluation of the Strategy for Combating Fraud and Corruption in Disbursement of Funds under the Common Strategic Framework in the Years 2014–2020 involving an assessment of the means of achieving their objectives, the effectiveness of those objectives and compliance with the designated principles. The evaluation itself, based on these data, will be submitted in 2017.

Non-legislative materials still contain outstanding tasks concerning the preparation of the **Public Purchases Methodology** and **State Proprietary Policy Strategy**. These documents need to be compiled with emphasis on their practical utility value in the mid to long term, with a clear anti-corruption focus that takes account of the recommendations of international organisations (e.g. the updated OECD recommendations on state-owned enterprises from the latter half of 2015) and the principles of good practice.

In order to **reveal unclear ownership structures in business corporations** it is necessary for the Ministry of Regional Development to work with the Ministry of Finance and Ministry of Justice to find a suitable way of determining the ownership structure of companies in tenders using the options currently provided by the Act on Public Registries of Legal Entities and Natural Persons. These needs stem from the Government Council opinion which recommends that the Government *“resolve the issue of the real owners of legal entities in accordance with the new European Parliament and Council Directive 2015/849/EU, on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, through the amendment to Act No 304/2013 Coll., on Public Registries of Legal Entities and Natural Persons, associated with the amendment to Act No 253/2008 Coll., On Certain Measures against Legalization of Proceeds from Criminal Activities, as amended.”* It seems the most appropriate here is to consider and apply the

particular institutions of the Act on Public Registries of Legal Entities and Natural Persons within the framework of the public procurement process. Such a solution would meet the requirements concerning transparency and would also not be more than an administratively burdensome solution that could only be used in the aforementioned cases. The ban on the state trading with business corporations with an unclear ownership structure as such, however, in response to the Government Council opinion, will be resolved jointly within the framework of the European Union that is not expected to be adopted until 2018.

In 2016, with the adoption of the **Register of Contracts Act**, this instrument will need to be put into practice and smoothly implemented in order to ensure that it serves its purpose and protects against overpriced contracts, unnecessary purchases or disadvantageous asset sales and enables the efficient management of state-owned property to be controlled not only by the responsible administrative authorities, but also by the general public.

A bill that is currently at the legislative stage in Parliament is the **amendment to Act No 166/1993 Coll., on the Supreme Audit Office**, as amended, which is one of the significant anti-corruption measures enshrined in the Anti-Corruption Action Plan for 2015. One of its principal objectives is to check all public budget expenditure.

An ongoing task from the Anti-Corruption Action Plan for 2016 is the **adoption of the new Internal Management and Financial Control in Public Administration Act**. This task is currently being fulfilled by the draft Management and Control of Public Finances Act, submitted to the Government by the Ministry of Finance. This is a reworking of the previous draft law on this issue which was rejected by the Government Legislative Council. Therefore, the anticipated date of this law coming into force was postponed to 2017. With a view to the fight against corruption this law needs to be drawn up and adopted in a manner that reflects the changes introduced by the new Public Procurement Act and which enables effective control of public administration management while complying with the 3E principles.

A new measure included in the Action Plan is the adoption and implementation of the **Act on the Central Registry of Accounts**. The purpose of introducing the Central Registry of Accounts is to enable authorised public authorities to use a single point to determine in which credit institution a particular person has or had an account, either as the account owner or with access to the account, and to contact the relevant institution on the basis of that information. The fact that account-related information is available quickly and in one place will increase efficiency when collecting taxes and imposing measures against assets as part of the work of law enforcement authorities. This information will also be used, particularly by intelligence services, to implement measures to combat the funding of terrorism as is currently being proposed at the EU level.

Following established good practice it is appropriate to continue with **publishing tenders for the sale and lease of state-owned property** and the implementation of such tenders in a transparent and unquestionable manner. Therefore, public auctions should be used where possible for the liquidation of assets. This will result in greater transparency of these transactions and will increase public control over the management of state assets. Work will also continue on the implementation of this measure in line with established good practice.

The degree and efficiency of compliance with new or existing and updated anti-corruption measures in the economic management of state assets will continue to be assessed at meetings of the Council together with the Working Commission of the Chairman of the Council for Efficient Management of State Property.

<b>Legislative and non-legislative anti-corruption measures</b>	<b>Responsible Authority/cooperating Authority</b>
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Putting the Public Procurement Act into practice	Ministry of Regional Development/Office for the Protection of Competition
Strategy for Public Procurement Computerisation for the Years 2016–2020	Ministry of Regional Development
Gathering data for the evaluation of the Strategy for Combating Fraud and Corruption in Disbursement of Funds within the framework of the Common Strategic Framework in the Years 2014–2020	Ministry of Regional Development
Continued unification of public procurement methodology and ensuring unified interpretation of the Public Procurement Act	Ministry of Regional Development
Creation of the Public Purchases Methodology	Ministry of Finance/Ministry of Regional Development
Creation of the State Proprietary Policy Strategy	Ministry of Finance
Ensuring of revelation of unclear ownership structures	Ministry of Regional Development/Ministry of Finance/Ministry of Justice
Creation and operation of the Register of Contracts	Ministry of the Interior
Implementation of the new Act on the Supreme Audit Office, assuming it is approved	Supreme Audit Office
New Internal Management and Financial Control in Public Administration Act	Ministry of Finance
Adoption and implementation of the Act on the Central Registry of Accounts	Ministry of Finance
Continuing the publication of tenders for the sale and lease of state-owned property; use of public auctions where possible for the liquidation of assets	Individual departments and their subordinate bodies

## 4. Development of Civil Society

In its policy statement the Government pledged to **adopt legislation to protect whistleblowers**. The lack of legislation particularly guaranteeing employment law protection to those who report unlawful conduct in the public interest has long been criticised by international organizations and NGOs. In 2015 there were implemented mostly so-called “soft” measures<sup>1</sup> aimed at ensuring that a bill would be submitted in 2016 which would guarantee a functional and efficient mechanism to protect whistleblowers. Experts from the Working Commission of the Chairman of the Council for Whistleblowing will also be involved in preparing the bill.

In 2015 there was media coverage of several cases relating to suspected **corruption in sport**. This type of corruption is closely connected with the education of young people, making it an exceptionally dangerous social phenomenon. The Anti-Corruption Action Plan for 2015 assigned a task to the Ministry of the Interior which consisted of **preparing a sector analysis focusing on manipulation of match results and associated corruption in sports**. The individual sports associations were sent a questionnaire aimed at revealing corruption within their sphere of competence. The results of the analysis will serve as the basis for specific measures in 2016. As the beneficiaries of public funding, sports associations and sports clubs must be subject to a greater degree of control. For this purpose an expert group will be set up that will consist of representatives from the relevant departments, NGOs and sports associations. A coordinated approach by the relevant stakeholders is the only way to ensure a systematic solution of corruption in sports environment.

Emphasis on quality of education and its subsequent furthering is an important factor in the development of civil society. This is also evidently true in the case of **anti-corruption training for teachers**, that is why the Ministry of Education, Youth and Sports has included this topic in the **courses provided by the National Institute for Further Education**, while **greater emphasis will also be placed on anti-corruption lessons in framework educational programmes**.

The Ministry of the Interior’s Prevention of Corrupt Behaviour subsidy scheme is one of the few subsidy programmes to support the advocacy of NGOs. This is another reason why this subsidy scheme which focuses primarily on supporting the provision of free anti-corruption legal counselling, has been entirely retained. According to representatives from the NGO sector, it would be expedient to **extend the existing subsidy scheme to include analytical work**.

Legislative and non-legislative anti-corruption measures	Responsible Authority/Cooperating Authority
Bill concerning protection of whistleblowers	Minister for Human Rights, Equal Opportunities and Legislation
Implementation of measures arising from the sector analysis focusing on manipulation of match results and associated corruption in sports	Ministry of the Interior/Ministry of Education, Youth and Sports
Including anti-corruption training into courses provided by the National Institute for Further Education and placing greater emphasis on anti-corruption lessons in framework educational programmes	Ministry of Education, Youth and Sports

<sup>1</sup> With the exception of Government Regulation No 145/2015 Coll., on Measures Associated with Reporting Suspected Unlawful Conduct in Public Office effective from 1 July 2015.

Expansion of the "Prevention of Corrupt Behaviour" subsidy scheme also to analytical work	Ministry of the Interior
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