

***BOSNIA AND HERZEGOVINA  
FEDERATION OF BOSNIA AND HERZEGOVINA  
ZENICA- DOBOJ CANTON  
GOVERNMENT***



***ANTI-CORRUPTION STRATEGY OF ZENICA-DOBOJ CANTON  
GOVERNMENT  
2017 - 2019***

*Zenica, November 2017*

## Foreword

The Anti-corruption Team of Zenica-Doboj Canton Government decided to develop the Anti-Corruption Strategy of Zenica-Doboj Canton Government 2017-2019 so as to produce and put in effect the first comprehensive anti-corruption policy in the Zenica-Doboj Canton administrative area. By doing so, the Team wanted to point to the main strategic objectives and programmes of the Zenica-Doboj Canton Government clearly and precisely in prevention and combating corrupt activities. The Zenica-Doboj Canton Government is strongly committed to prevent and combat all forms of corrupt activity, particularly those which may occur within all Zenica-Doboj Canton institutions, i.e. all cantonal administrative authorities, cantonal administrative organisations, legal entities falling under competence of the Government or cantonal administrative authorities/administrative organisations based on statutory or ownership rights. Apart from the Strategy, an Anti-corruption Action Plan of Zenica-Doboj Canton Government 2017-2019 constitutes its integral part, operationalising strategic objectives and programs to activities with precisely defined implementation deadlines, implementing institutions, benchmarks and required resources. In developing the strategic policy of Zenica-Doboj Canton Government, the Anti-Corruption Team of Zenica-Doboj Canton Government consulted the Agency for Prevention of Corruption and Coordination of Fight against Corruption of Bosnia and Herzegovina, international organisations in Bosnia and Herzegovina, non-governmental sector and all competent institutions in the Zenica-Doboj Canton. Most of the suggestions and reviews were accepted and included into strategic documents.

Finally, we particularly express our gratitude to the Anti-Corruption Civic Organizations' Unified Network in Bosnia and Herzegovina ACCOUNT for providing direct technical assistance in development of the Anti-Corruption Strategy of Zenica-Doboj Canton Government 2017-2019.

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# INTRODUCTION

## ***Reasons for adoption of the Anti-Corruption Strategy of Zenica-Doboj Canton Government 2017-2019***

“Corruption shall mean any abuse of power entrusted to a public servant or a person holding a political position at the State, entity, cantonal levels and the level of Brčko District of Bosnia and Herzegovina, city or municipal levels, which may result in private gain. It may also include, in particular, any direct or indirect soliciting, offering, giving or taking of bribe or any other inappropriate gain or privilege or possibility thereof, which destroys the adequate exercise of any duty or conduct that are expected from the bribe recipient. ”<sup>1</sup>

Taking into account that, according to reports of international organisations, Bosnia and Herzegovina is a society where the corruption is widespread, the Zenica–Doboj Canton Government (hereinafter: the ZDC Government) is aware of the fact that such situation also affects the situation in ZDC. Many reports and surveys put Bosnia and Herzegovina society in an unenviable position with respect to the corruption rate and readiness of institutions of Bosnia and Herzegovina to combat this socially deviant phenomenon. It can be noted, for example, in the 2016 BiH Progress Report of the European Commission, stating that the corruption is still widespread in many areas, and that it continues being a serious problem. In spite of demonstrated political commitment to address the issue, no specific results have been achieved. Also, the 2011 reports of the United Nation Office on Drugs and Crime (UNODC) “Corruption in Bosnia and Herzegovina; Corruption as experienced by Population“, showed that eight of ten citizens of Bosnia and Herzegovina have been in interactions with public administration in a year. The same survey states that 2-7% citizens bribed a public servant, and that only 2-8% citizens who experienced bribery, decide to report such offence. In addition, also the 2013 UNODC Report “Business, Crime and Corruption in Bosnia and Herzegovina: The impact of bribery and other crime on private enterprise“ , suggests that among all enterprises which contacted public servants during 12 months, before the survey, 10.4% of them bribed civil servants. It means that the enterprises gave a bribe six times a year, on average, or approximately, one bribe every eight weeks.

In March 2017, ZDC Government, on recommendation of the Agency for Prevention of Corruption and Coordination of Fight against Corruption of Bosnia and Herzegovina (APIK), first adopted the ZDC Government Anti-Corruption Action Plan 2017-2019. Being aware of the fact that it was necessary to first or simultaneously adopt the anti-corruption strategy and then the action plan operationalising strategic objectives and programs from the Strategy, the ZDC Government, however, decided to follow the mentioned adoption order of the strategic anti-corruption framework based on recommendations of the main anticorruption institution in BiH, APIK. The strategic anti-corruption framework is the first strategic framework adopted in the territory of Zenica-Doboj Canton. Apart from the aforementioned actual and practical reasons for the strategic anti-corruption framework adoption, Zenica-Doboj Canton is also formally (legally) required to develop

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<sup>1</sup> Law on the Agency for Prevention of Corruption and Coordination of Fight against Corruption of Bosnia and Herzegovina (Official Gazette of BiH“, 103/09 and 58/13)

the strategic anti-corruption framework. Specifically, the Law on APIK requires that cantonal authorities, too, adopt their strategic anti-corruption frameworks.

### ***General framework, subject-matter and territorial scope of Anti-Corruption Strategy of Zenica-Doboj Canton Government 2017-2019***

The general legal framework used by the ZDC Government to develop the strategic anti-corruption framework are international documents and national strategic frameworks, both on higher levels and on the level of Zenica-Doboj Canton.

All relevant international conventions ratified by the state of Bosnia and Herzegovina were analysed within the international legal framework, which also create certain obligations for ZDC. First of all, the United Nations Convention against Corruption, which comprehensively addresses regulation of anti-corruption approaches, and, in particular, the Criminal Law Convention on Corruption and Civil Law Convention on Corruption of the Council of Europe were analysed. It is important to point out that in the Strategy development, in addition to the aforementioned, other international instruments and recommendations were also analysed.

Apart from the relevant legislation within the national legal and strategic framework, principles and obligations stemming from the national 2015–2019 Anti-Corruption Strategy related to ZDC were specially taken into account, as well as those from the 2016-2019 Federation BiH Anti-Corruption Strategy. A special anti-corruption document considered in development of the Strategy was the Anti-Corruption Action Plan of the ZDC Government 2017-2019 (adopted in March 2017). In the Action Plan development, the ZDC Government Team followed the principles from anti-corruption strategic framework of higher governance levels in Bosnia and Herzegovina. While developing the Anti-Corruption Action Plan and Anti-Corruption Strategy of the ZDC Government, recommendations and suggestions from APIK, and anti-corruption network in BiH, ACCOUNT, as well as from the Transparency International BiH, as being two leading non-governmental networks/organisations in the field of fighting corruption, were considered. All ZDC institutions (cantonal administrative authorities, cantonal administrative organisations, legal entities falling under the competence of the Government or cantonal administrative authorities/administrative organisations based on statutory or ownership rights) were involved in setting the strategic priorities, objectives and programs. All ZDC institutions were involved in setting strategic priorities, objectives and programs providing significant information about highest risks of corruption within their competence. In addition, obligations from the 2015-2018 Reform Agenda for Bosnia and Herzegovina were also considered. Bearing in mind that this ZDC strategic framework is the first strategic anti-corruption strategic framework of the Canton, during its development, previous monitoring and evaluations of strategic anti-corruption frameworks of the state and Federation level were analysed to avoid challenges they faced in implementation of anti-corruption policies. Reasons for such comprehensive approach is commitment of ZDC Government to systemically and comprehensively fight corruption through preventive and repressive measures.

As aforementioned, the Strategy and Action Plan have been developed with the participatory and holistic approach both in identification of different areas for occurrence of corrupt behaviour and in terms of proposing possible solutions and specific activities for its prevention and combating. In development of the Strategy and Action Plan, the ZDC Government Anti-Corruption Team consulted and engaged all ZDC institutions in their development, by their stating different areas where corruption occurs within their respective institutions, and specifying actions to prevent corrupt activities. By doing so, we ensured that all entities which were supposed to implement anti-corruption actions in ZDC had been consulted in designing of implementable actions.

While developing the Strategy and the Action Plan, we made sure that responsibilities for implementation of actions be divided to all public entities. In other words, we strived to achieve an integrated approach to resolution of problems.

The Strategy primarily refers to the cantonal administration authorities, cantonal administration organisations, legal entities falling under competence of the Government or cantonal administrative authorities/administrative organisations based on statutory or ownership rights. By its holistic approach the Strategy involves also other institutions having anti-corruption competence in ZDC and other anti-corruption stakeholders in Bosnia and Herzegovina, such as APIK, FBiH Government Anti-Corruption Team and anti-corruption teams from other cantons in the Federation of BiH. Apart from them, private sector, academia, media, non-governmental organisations and all citizens of ZDC have also been involved.

The time framework of the Anti-Corruption Strategy of ZDC Government is 2017-2019.

### ***General objective of the Anti-Corruption Strategy of ZDC Government 2017-2019***

Taking into account that corruption is widespread in Bosnia and Herzegovina, including the field of administration in the Zenica-Doboj Canton which significantly undermines public confidence in public authorities, the systemic approach to prevention and combating corruption is considered to be indispensable. Having such approach it is necessary to define strategic priorities and objectives which should be achieved in the given period of time. Strengthening capacities of all ZDC institutions, the Strategy primarily strives to establish prerequisites for effective corruption prevention in all fields of operation of public institutions. That regard the ZDC Government, via the ZDC Government Team, is striving to continuously strengthen capacities of all institutions to establish a transparent, responsible and effective corruption prevention system. Furthermore, they wish to establish the system in all institutions where, if the corruptive conduct has occurred, likelihood of its detection and punishment by the responsible entities will be significantly increased. Therefore in the Strategy development process they strived for it to be based on the principles of the so-called 'integrated anti-corruption strategy' whose mandatory principles are to be based on facts, transparent, impartial, professional, inclusive, comprehensive, impact-oriented and flexible (UNODC 2004).

Also, the purpose of the Strategy is to direct fight against corruption to areas falling under exclusive or shared competence of the Canton (health, education, social policy and other). Bearing in mind the aforementioned, the general objective of the Anti-Corruption Strategy of ZDC Government 2017–2019 is the following:

***Through the Government Anti-Corruption Team, the ZDC Government will strive to ensure efficient and effective prerequisites for systemic anti-corruption approach in all areas of responsibility of Zenica-Doboj Canton, and in that process it will cooperate with the Agency for Prevention of Corruption and Coordination of Fight against Corruption of Bosnia and Herzegovina, FBiH Anti-Corruption Team and relevant representatives of non-governmental sector.***

## **Specific objectives**

The mentioned general objective of the Anti-Corruption Strategy of ZDC Government 2017–2019, requires specific goals such as:

1. *Establishment of efficient and effective systemic and sectoral anti-corruption preventive system within the Zenica-Doboj Canton;*
2. *Improvement of capacities of judicial institutions and law enforcement agencies in efficient and effective detection and processing of corruption-related criminal offences;*
3. *Development of awareness of detrimental effect of corruption and cooperation with civil society;*
4. *Establishment of coordinating mechanisms for monitoring and implementation of anticorruption actions within institutions of Zenica-Doboj Canton.*

## **Principles governing the Strategy and Action Plan design**

When the Anti-Corruption Strategy and Action Plan of ZDC Government 2017-2019 were developed, the principles were taken into account required for designing strategic objectives, programs and activities. Apart from designing of strategic objectives, programs and activities their implementation also must be based on the same principles. The key principles of the Strategy and Action Plan design are:

1. **Principle of legality**—assumes that all strategic priorities, objectives and programs required for implementation of the Strategy and Action Plan will be based on constitutional responsibilities of the Zenica-Doboj Canton and in accordance with the law or precedent legal acts.
2. **Principle of inclusion**- assumes that all contributing actors to implementation of the Strategy and Action Plan will be involved in combating corruption in the Zenica-Doboj Canton, including public authorities, private sector, academia, non-governmental sector and the public in general.
3. **Principle of fairness**—assumes that the strategic approach to the fight against corruption, including also implementation of activities whose implementation falls under responsibility of specific institutions, with clear implementation deadlines, progress indicators and assets required for their implementation should be based on the objective indicators.
4. **Principle of transparency**- implies that due to the public interest and vulnerability of society to the corruption, the public should be informed about all actions in implementation of anti-corruption efforts, for the purpose of strengthening public confidence in the public institutions.
5. **Principle of reliability on facts**-implies that any anti-corruption action will be based on facts, to ensure that effects of implemented actions correspond to the challenge which the ZDC public institutions face.
6. **Principle of cost-effectiveness**—anti-corruption actions and strengthening of integrity of ZDC institutions should constitute an integral part of regular daily execution of institutional powers, thus the expenses for execution of daily duties should be reduced to minimum.



7. **Principle of effectiveness**—to achieve strategic anti-corruption goals in the most successful manner it is necessary to have in mind during strategic activity planning that actual results should be achieved with optimum consumption of time.

### **Situation analysis**

When the ZDC strategic anti-corruption framework was developed, internal and external factors were taken into account which may improve implementation of anti-corruption measures. In that regard, strengths and weaknesses of ZDC were particularly analysed, as well as opportunities and threats existing in the social, political, organisational, legal and economic environment of the Canton. Strengths and weaknesses, opportunities and threats may have a significant impact on successful or unsuccessful implementation of the strategic anti-corruption framework.

#### **Strengths**

Actual and full readiness of ZDC Government to establish a comprehensive system to fight corruption, was particularly identified as the primary prerequisite for successful fight against corruption. It is important to note that in the administrative and political field of ZDC a stable ruling majority has been in place from its establishment, which provides for full support to fight against corruption. Also, the fact is that the ZDC Government Team, established in October 2016, has been implementing its duties and obligations for which it was appointed very actively. For example, the Team has established cooperation with APIK, ACCOUNT and Transparency International in BiH. Moreover, a number of trainings were held for coordinators of anti-corruption actions in all institutions in ZDC, and all institutions were informed about their obligations from the Anti-Corruption Action Plan, bearing in mind that the Strategy was only an upgrade of the Action Plan adopted in March 2017. It is noteworthy is that according to the Team's instructions, most of the ZDC institutions (over 90%) have adopted their own operational anti-corruption plans, compliant to the Anti-Corruption Strategy and Action Plan of the ZDC Government. The Government Team representatives, as well as other ZDC civil servants, have been continuously building their anti-corruption capacities and participated in a number of trainings.

#### **Weaknesses**

The ZDC Government Team, being the central institution for the Strategy and Action Plan implementation, was appointed from the ranks of civil servants and representatives of academic and on-governmental sector, as a temporary authority, and the ZDC Government Team members have also their regular work duties. Such situation limits commitment of the ZDC Government Team members in fulfilment of their Team obligations, which may pose a major weakness because the corruption issue requires full commitment. An informal approach to anti-corruption actions and often shifting responsibilities among employees in public institutions, and lack of readiness of individuals within public administration to accept new obligations and activities, are phenomena to which were underlined by surveys, therefore these facts have to be taken into consideration in designing of anti-corruption activities.

Insufficient resources for anti-corruption actions may often be a problem in implementation of anti-corruption tasks, and due to the social situation in general such fact may be a weakness. Also, although the corruption has been a problem in Bosnia and Herzegovina for years now, the systemic approaches are a relative novelty in the Zenica-Doboj Canton, and it resulted in a limited

number of employees who can fully respond to proactive and systemic approaches in the field of fight against corruption. Therefore it is necessary to continuously develop capacities of employees in public institutions toward available anti-corruption mechanisms.

Holistic and inclusive approaches including all actors in fight against corruption is the only way to achieve good results. The public also gives special contribution to fight against corruption, however it is clear that the public confidence in public institutions is on a very low level. In that regard such challenge was identified in the process of designing of the Strategy and Action Plan. Thus it is necessary to proactively inform the public about all causes and consequences of corruption, and at the same time, develop also positive examples, persuading the public that defeating corruption is possible. This is the reason why timely information through the media is extremely important in the anti-corruption efforts.

### ***Opportunities***

Corruption as a problem which Bosnia and Herzegovina society faces is highlighted and international institutions have demonstrated full readiness to help governments on all governance levels in that regard, including the Zenica–Doboj Canton. In that respect financial and technical assistance is continuously being provided, which may be of crucial importance in prevention and combating the corruption as certainly complex and negative phenomenon. The experience the Agency for Prevention of Corruption and Coordination of Fight against Corruption has gained to date is an opportunity which may be highly beneficial for implementation of the first strategic framework in the ZDC territory. Coordination and cooperation with the central anti-corruption authority is also an obligation from the Law on Prevention of Corruption and Coordination of Fight against Corruption.

Also, taking into consideration that it concerns implementation of the first strategic anti-corruption framework in ZDC, commitment of non-governmental organisations to support anti-corruption efforts of the public institutions is very important, for their years long experience in anti-corruption activities may also support efforts of ZDC institutions in fighting corruption.

### ***Threats***

Due to the overall geo-political circumstances, migrant crisis, social situation, natural disasters and other phenomena, maybe Bosnia and Herzegovina will not be in the focus of attention as much as it is necessary to provide adequate support to anti-corruption reforms. Without such support and to a certain extent, the positive pressure, anti-corruption measures and actions may be slowed down. Also, significant support from the non-governmental sector depends on donor assistance, and in spite of their willingness to help public institutions, their support may be slowed down if they do not have adequate funds.

### ***Strategic objectives and their implementation programs***

If we view the fight against corruption as the fight for better and high-quality living of the population, the strategic objectives of the ZDC Government defined by this Plan, are obligations on the part of public institutions within their scope of responsibilities. Such approach, of course, does not exclude possibility or obligation to proactively cooperate with other governmental and non-governmental authorities and organisations, regardless of the governance level, in implementation of some activities.

Four main strategic objectives have been defined related to four comprehensive courses of actions in fighting corruption. They are: corruption prevention, corruption combat, raising awareness of the civil society and effectively established coordination mechanisms and supervision of anti-corruption actions. To adequately implement and supervise the implementation of all specified objectives, they were further elaborated through strategic programs which were additionally elaborated through specific activities operationalised in the Action Plan. All actions have their precise deadlines by which they have to be implemented, with specified implementing authorities, activity benchmarks and resources required for their implementation. Specific strategic objectives in the Strategy, although they were formally outlined for the purpose of easier implementation, are very mutually interrelated and successful fight against corruption depends on actual implementation of all four specific objectives. The ZDC Government has truly undertaken to launch all required long-term and planned activities in fight against corruption in all segments of its operation and responsibilities. Within its responsibilities it mostly focuses on the corruption prevention, with special sectoral approach.

### ***Establishment of efficient and effective systemic and sectoral anti-corruption system in Zenica-Doboj Canton***

The ZDC Government has recognised that **corruption prevention** has to be in the focus of attention, regardless how important its enforcement is. Fighting corruption, in spite of being repressively efficient, does not achieve overall success if it does not include the comprehensive preventive policy. Development, promotion and implementation of prevention in anti-corruption efforts are a special strategic objective in the Strategy. The strategic objective no. 1 is the most comprehensive objective by number and scope of strategic programs and actions contained therein. In addition to preventive actions for all institutions, this strategic objective is also focused on special areas, or responsibilities of ZDC, at risk of corruption, such as public procurement, subsidies and allowances, health, education and public finance.

Article 5 of the United Nations Convention against Corruption states the need (policy and practice in corruption prevention), that State Parties develop and implement effective, coordinated anti-corruption policies promoting participation of society and reflecting the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability. The Article requires that the State Parties take specific measures rather than adopting specific regulations.

Taking into account that these very important anti-corruption mechanisms are the basis for elimination of corrupting causes, it is very important that obligations from this strategic objective are taken systematically and timely.

### ***Prevention of corruption for all institutions***

Considering that the Strategy and Action Plan constitute the first strategic anti-corruption framework in ZDC, the focus is on establishment of a comprehensive preventive system for all cantonal administrative authorities, organisations, legal entities falling under competence of the Government or cantonal administrative authorities/administrative organisations based on statutory or ownership rights. Only by joint and harmonised approach of all ZDC institutions an adequate and systemic approach may be adopted toward minimising occurrence of corruption in the institutions.

### ***Internal anti-corruption documents and transparency in regulation adoption***

As this is the first strategic anti-corruption framework in the Zenica-Doboj Canton whose implementing authorities are all cantonal administrative authorities, cantonal administrative organisations, legal entities falling under competence of the Government or cantonal administrative authorities/administrative organisations based on statutory or ownership rights, primary and special attention has been paid to designing of internal anti-corruption policies within every ZDC institution. It is exactly the planning approach where all institutions will know their obligations with respect to implementation of the Strategy and Action Plan will be a guarantee and main prerequisite ensuring implementation of anti-corruption actions. Also, strengthening of institutional integrity is, according to practice in BiH to date and Guidance and other documents of the Agency, particularly effective, when it is done based on the individual assessment of each institution.

Undermining integrity should be understood in wider context than corruption and corrupt behaviour, although existence of institutional and personal integrity is efficient prevention of corruption and corrupt behaviour. However, generally speaking, any corrupt behaviour of undermining of integrity, but any type of undermining of integrity is not necessarily corruption or corrupt behaviour, but it may also be any type of non-ethical and unprofessional conduct or any other irregularity at work. This is exactly why every institution knows best the fact where the risk of integrity undermining lies and should be truly committed to minimising conditions for risk of corruption.

In a well-functioning democratic society, the public should be informed about all relevant activities of the public authorities. To achieve that, the public must have free access to governmental data and information, analysed them and be in a position to share them with other citizens. The likelihood of corruption or that it will remain undetected increases if the decision-making process is not public. Increasing transparency in the decision-making process, through improvement of normative framework and practice, is an important segment in prevention of corruption and prerequisites for participation of the entire society in the corruption prevention. According to reports of civil society organisations, the decision-making process in BiH is still insufficiently public, and problems occur in passage of legal regulations (lack of public discussions or insufficient involvement of stakeholders), covert influence on decision-making (lobbying), lack of analysis and partial explanations.

Complex BiH constitutional structure and responsibilities often lead to the fact that regulations of lower governance levels are not harmonised with respective regulations of higher governance levels, or specific regulations stipulating responsibilities of some governance levels.

Strategic programs:

1. To strengthen institutional capacities in development and implementation of internal anti-corruption policies and improvement of institutional integrity;
2. To establish the practice of transparent and harmonised regulation-passing process.

### ***Employment, ethics and integrity in public institutions***

Influenced by bad social and economic situation in Bosnia and Herzegovina, the public sector is still the most desirable employer for the public. Various surveys suggest a high level of corrupt behaviour in employment of persons in public sector. Transparency International BiH states that

result of their Legal Aid Centre confirm that the corruption in employment is one of the biggest problems the public faces, and that most of the reports received in 2016 refer to employment in civil service and educational institutions. Article 7 of the Convention against Corruption, *inter alia*, stipulates that employment processes should be transparent and fair. It is necessary to introduce transparent employment processes and avoid situations leading to the risk of corruption in the society.

High ethical standards and integrity of public officials and civil servants are the best, simplest and least demanding obstacle to the corruption also in terms of used resources. The institutional integrity largely depends on ethical and professional behaviour of its employees, which has a significant impact on public confidence in operation of institutions. Ethical principles, as required by conventions adopted by UN and Council of Europe, should be incorporated in laws and ethical codes. Adoption, implementation and monitoring of ethical codes and conduct codes by all institutions, strengthen professionalism and integrity of public institutions.

Strategic programs:

1. Ensure transparent and fair employment processes in public institutions in Zenica-Doboj Canton;
2. Strengthening of ethics and integrity of employees in public institutions in Zenica-Doboj Canton.

### ***Proactive transparency and establishment of a system for detection of corruptive behaviour by employees in public institutions***

Pursuant to Article 10 of the United Nations Convention against Corruption, the public administration shall take such measures as may be necessary to enhance transparency, which includes allowing members of the general public to obtain information on the organization, functioning and decision-making processes, simplifying procedures in order to facilitate public access to the competent decision-making authorities, and publishing information. The principles of Article 10 of the Convention rely on the principles of proactive transparency that implies practice of public institutions to independently publish information of public importance in their possession. Lack of transparency and easily accessible tools for communication between citizens and authorities may lead to estrangement of citizens from authorities and loss of confidence in them. It is for this reason that only proactive and continuous openness of authorities can promote cooperation and communication with the public.

If the prevailing practice in the institutional environment is that corruptive behaviour is hardly detected or not detected at all, the possibility of occurrence of corruptive behaviour is increased. Authorities are not often aware on a system plan approach what areas and work processes are most vulnerable to corruptive behaviour, and they rather rely on a random approach. To that end, it is necessary to identify areas that are most susceptible to corruption so that they could be given extra attention in detecting the manifestations of this socially negative phenomenon. At any rate, continuous and random checks of high-risk areas are important in terms of preventing corruptive behaviour of employees in public institutions.

Strategic programmes:

1. Establish proactive transparency of institutions and more effective tools of communication with the civil society in the ZDC;
2. Improve mechanisms of detecting corruptive behaviour in the ZDC institutions.

## ***Anti-corruption trainings and mechanisms for protection of persons reporting corruption and internal reporting of corruptive behaviour***

Complexity of the phenomenon of corruption also requires properly built capacities of those who ought to implement anti-corruption mechanisms, primarily all the employees in the public institutions. In that respect, employees in public institutions need to be informed about the causes of corruption and corrupt behaviour, various manifestations of corruption, and raise awareness of the harmfulness of corruption and all the available tools for the prevention and fight against corruption. Employees in the public institutions, civil servants in particular, have attended various trainings dealing with fight against corruption. However, such trainings were not organized on a planned level and they were not tailored to the specific needs of civil servants. On that subject, ever since its establishment the Anti-Corruption Team of the ZDC Government, primarily in cooperation with non-governmental organizations and other partners, has conducted planned trainings for civil servants, especially for coordinators of anti-corruption actions in all the ZDC institutions. In order to continue strengthening the capacity of employees in the ZDC institutions, planned and continuous trainings will resume as per specific pre-determined needs of employees.

Advocating and public promotion of good and responsible behaviour of employees in the public institutions of the ZDC have not been carried out systematically. Unless responsible behaviour of employees is not promoted and recognized by their superiors, i.e. if the persons who behave responsibly and those who do not have the same status, the employees will not be motivated to act responsibly. The ZDC Government is committed to recognizing and publicly advocating the efforts and responsible behaviour of employees, the purpose of which is to encourage all the employees to have that attitude towards the institutions where they work.

By establishing mechanisms for a proper reporting of corruption and protection of persons reporting corruption, the persons who become aware of corruption are motivated to report such instances to the appropriate authorities. One of the strategic commitments of the ZDC Government is to establish appropriate mechanisms for the protection of persons reporting corruption. Nevertheless, the Cantonal Government is aware of the need to harmonize its legislation and legislative competences with those of higher bodies of government and it shall adhere to those principles to adjust the protection of persons reporting corruption.

Strategic programmes:

1. Increase of knowledge and awareness of employee regarding anti-corruption measures and mechanisms;
2. Promotion and public advocacy of responsible behaviour of the employees as well as establishment of an appropriate system of protection of persons reporting corruption.

### ***Disciplinary procedures against employees***

Appropriate sanctions for employees in the institutions for unprofessional, unethical and corrupt behaviour can significantly deter potential persons from engaging in corruption activities. Despite being an important tool, disciplinary procedures are not utilized in full capacity. There are cases in which the persons who were responsible for infringements of discipline were not punished appropriately, which may stimulate future unprofessional, unethical and corrupt behaviour in the institutions. Moreover, failure to properly punish such persons discourages persons who perform

their jobs responsibly, properly and professionally. Identification of the actual problem requires an analysis of the current situation, followed by effective establishment of disciplinary procedures.

Strategic programme:

1. Establishment and maintenance of efficient and effective disciplinary procedures in the institutions of the ZDC Government.

### **Public procurements**

Public procurements occupy a significant share in the GDP of every country. According to estimates, on average they make up 15 to 30% of the total public consumption and an effective conduct of public procurements is an important issue for every country. Public procurement has also been recognized as an area extremely prone to corruption, which may have direct economic effects such as: expensive but low-quality purchase, procurement of goods, services and works not economically justified or based on actual needs, etc. In Bosnia and Herzegovina, the ZDC included, institutions spend significant funds for public procurement contracts.

A consistent application of the letter and spirit of the Public Procurement Law of BiH would certainly reduce possible risks for occurrence of corrupt behaviour in this area, and it can be concluded that non-implementation of legal arrangements in this area poses a higher risk than the Law itself. In order to ensure full-scale application of the law in the area of public procurement, it is necessary to continuously enhance the skills of the persons conducting public procurement activities in the institutions. There is proof that the mistakes made by some employees in the public procurement processes often severely impair integrity of the institutions conducting public procurements and undermine confidence of the public in the institutions.

Transparency of procurements and planning of public procurements are principles that play a major role in preventing corruption and, in that respect, the ZDC institutions need to have maximum transparency in terms of openness of public procurements. Openness about public procurement plans considerably facilitates preparation of all prospective bidders to access the public procurement process.

Appropriate and effective methodology can be used to make an assessment of risk of occurrence of corruption in the particular stages of public procurement. The sheer complexity of the public procurement process is the very reason why it is not always clear where the largest risks in this procedure lie. Monitoring and assessment of public procurements is a very important mechanism in detecting and preventing corruption in this area.

Strategic programmes:

1. Increasing the knowledge of employees in the ZDC institutions about public procurement procedures;
2. Increasing the transparency in planning and conducting public procurement procedures;
3. Ensure mechanisms for proper mapping of risks in public procurements and monitoring of the implementation.

## ***Subsidies and benefits***

One of key characteristics of functioning of the ZDC institutions, at least with regard to budgetary expenditure, is that a considerable portion of the expenditures involves funding of needs of vulnerable and socially handicapped categories of the population. Lack of clear, objective and transparent criteria for awarding subsidies and benefits undoubtedly increases corruption risks during the allocation of those funds that make up a substantial portion of the ZDC budget. Implementation of allocated subsidies in Bosnia and Herzegovina has been associated with a particular risk: namely, there have been instances in which certain subsidies are misspent and it is considered that effective and quality control of such funds is needed. It is necessary to ensure proper mechanisms for both a fair and transparent allocation of funds and an effective control of spending of those funds.

Furthermore, the issue of concessions in Bosnia and Herzegovina has been recognized as an area that has not been properly regulated, with ample room for corruption. The issue of concessions is an area that the ZDC Government plans to regulate and harmonize with higher government levels.

Strategic programmes:

1. Increase the transparency of allocating subsidies and benefits and establish effective allocation control systems;
2. Improve the system of awarding concessions and harmonization of legislation in the area of concessions.

## ***Health sector***

According to relevant research and the public perception, the health sector in Bosnia and Herzegovina is one of the areas that is most susceptible to corruption risks. Moreover, the entire society is particularly sensitive about and vulnerable to the corruption in the health care, particularly taking into account that this sector is of vital importance to the citizens. A large number of anonymous reports by citizens allege corruption in the health care. The ZDC Government is aware of the poor financial position of health professionals, bearing in mind that health professionals are also competitive on the markets of the European Union countries. The ZDC Government will work with the trade unions to find more funds in order to increase the salaries of health professionals, primarily the doctors.

Corruption risks and corruption in this area may emerge at all levels: unjustified absences of medical staff from work (in most cases to handle some private affairs), giving money under the table for a treatment that is supposed to be exempt from payment, creation of a list of essential medications that accords preferential treatment to certain suppliers, public procurements indicating corruption ties between suppliers and the institutions conducting procurement. Taking into consideration the complexity of the health sector and the cantonal competences, activities aimed at prevention and fight against corruption in this sector are given special consideration in the strategic framework for the fight against corruption.

Lists of essential medications, processes of prescription of medications and issuance of orthopaedic aids are all segments in which the Cantons have competence. To that end, it is necessary to ensure all the necessary transparency of these processes, as well as the responsibility of decision-makers for the processes. In view of the complexity of the problem it is necessary to make comprehensive analyses of the state in those segments by appropriate health institutions and health professionals and, based on a detailed account of facts



established, recommend and implement measures for prevention of corruption and its detection in the processes of drafting of lists of essential medications, prescribing and use of medications and issuance of orthopaedic aids.

Conflict of interest as a separate challenge in the work of health professionals is something that can have a major influence on the quality of health services and develop a negative image of the health sector among the public. Conflict of interest is particularly present in cases involving doctors who also work privately: the risk is that doctors can refer patients to private health institutions although patients are entitled to the same service in a public health institution. On that note, it is necessary to make a systematic analysis of the area of conflict of interest and give certain recommendations to be implemented. Internal controls within the health institutions are of crucial importance for prevention and detection of corruptive practices in rendering of health services. Health institutions have already formed certain bodies that deal with prevention of corruption in their institutions. A positive example is the Ethics Committee of the Zenica Cantonal Hospital, and its work needs to be supported and intensified. It is necessary to identify work processes and areas in the health institutions where urgent measures and actions are needed.

There is no doubt that unlawful sick leaves exceeding 42 days have an economically adverse effect on the budget for the institutions (public and private alike) at the ZDC level. There have been instances in which employees abused this right for various reasons, with varied consequences on the institutions. However, this is possible because people are sent to sick leave by doctors. It is therefore necessary to properly regulate this aspect through continuous checks. Furthermore, a proper way should be used to include sending of patients to spa treatments. Cooperation with private health institutions is necessary, but that cooperation needs to rely on transparent and objective criteria.

One of pressing issues of citizens when trying to exercise their rights to health care is often reflected in unjustified long waiting lists for health care. Such situations can often lead to corruptive practices, which requires a systematic approach to this issue in order for the citizens to have equal access to health care. One of the ways is to ensure effective internal mechanisms for reporting corruption. When making an analysis of the situation, aside from internal experience of health professionals, anonymous mechanisms need to be used to include beneficiaries of health services in order to form an objective picture about the waiting lists and identify areas where that occurs most frequently. Over the past years the hiring procedure in the health sector were subjected to corruption scandals, particularly taking into account that the hiring procedure is not regulated in a transparent and precise manner.

Education of the health professionals about the prevention of and methods of fight against corruption and raising awareness about the harmfulness of such a phenomenon within the health sector is a continuous task of the health institutions.

Strategic programmes:

1. Enhance the process of drafting of a list of essential medications as well as the process of issuance of medications and orthopaedic aids;
2. Standardize the prevention of the conflict of interest in the health sector and increase internal controls;
3. Prevent the possibility of misuse of health sector funds;
4. Use proper mechanisms to regulate the waiting lists and enhance the processes of reporting corruptive behaviour in the health institutions;
5. Standardize the hiring procedures in the health institutions and raise awareness among the health professionals about the phenomenon of corruption.

## ***Education***

Education as an area is very important for the promotion of and raising awareness about corruption as well as knowledge of the ways to fight corruption. Corruption is more easily rooted and maintained in countries where citizens are not well educated and awareness of a civil society is low. Public awareness of the corruption, its forms, causes and consequences is an additional factor that helps this socially unacceptable phenomenon spread. Many citizens believe that they have no influence on the occurrence of corruption in society; they do not know how to resist corruptive practices or how they can join the fight against corruption.

It is therefore extremely important that education institutions of all levels (primary, secondary and higher education) implement activities aimed at introducing plans and programmes focusing on ethics and integrity. The experience of some countries, as well as a scientific research of the phenomenon of corruption, have made it clear that by itself repression is not sufficient for this phenomenon to be reduced to a minimum level in which society can function (Getoš, et al. 2011). One of the basic ways to oppose corruption is prevention. Achieving long-term and sustainable results in the prevention of and fight against corruption is inextricably linked to education and upbringing that strengthen moral values of society as an obstacle to the corruption development. Education is central to prevention of corruption.

Efficient regulation of the conflict of interest in the domain of remedial courses and private lessons in primary and secondary schools has been recognized as an area that needs to be regulated. It is clear that an abuse of remedial courses strongly undermines the confidence of young people in the educational system and the system of values. For that very reason the teaching and pedagogical staff should provide moral guidance to the students and not the other way around. This is why, among other things, it is very important that corruption be prevented in the domain of educational institutions. Furthermore, higher education is very important because highly qualified staff should be immune to corruptive behaviour to the largest extent possible.

The system of advancement is another area that has been particularly recognized as vulnerable to corruption in the higher education, and it accordingly needs to be regulated by applying measurable and outcome-based criteria. The public needs to be informed about prevention of corruption in educational institutions and the promotion of such behaviour with a view to strengthening the public confidence in the ZDC educational system.

Taking into consideration that one of the competences of the ZDC Ministry of Education includes organization and administration of driver's tests and that this area carries a high risk of corruption, this segment too will see activities aimed at improving the mechanisms for the prevention of corruption.

Strategic programmes:

1. Introduce plans and programmes on ethics and integrity in the educational programmes;
2. Regulate the conflict of interest in primary and secondary schools and improve the mechanisms for prevention of corruption in the higher education;
3. Prevent the possibility of corrupt activities in the process of taking of driver's tests.

## ***Public finances***

There is a general consensus that Bosnia and Herzegovina has not yet attained a sufficient level of transparency of public budgets. Budget is a key instrument with the help of which a government

implements its policies in action. Annual budget is normally a very complex document that most of the public finds hard to understand, and it is for this reason that the government should be the one to help the citizens understand the budget. Consequently, what is most important is not that the budget is available to the public; it is equally important that the budget is accessible and understandable to the public. Availability of information about the importance and basic characteristics of a budget considerably increases the transparency of public institutions about the budget in a simple manner. The ZDC Government publishes budget for citizens that is available to the public. The goal of "Budget for citizens" is for the public to get a better insight into and understanding of the way in which the Cantonal Government plans, distributes and spends funds from the budget. Considering that the money in the Cantonal budget originates from taxpayers, it is our duty to dispose of it the best interest of the community and to inform the public about correct and understandable data about the sources of gathered revenues and their spending. The ZDC Government will continue publishing "Budget for citizens" and promoting it so that the public could become acquainted with its contents.

Transfers, incentives and aids from the ZDC budget amount to substantial funds on the annual level. Without pre-defined criteria for the allocation of transfers, incentives and aids as well as control of their spending, this form of allocation of public funds to legal and natural persons carries a high risk of corruption.

Allocation of transfers, incentives and aids from the budget needs to be harmonized with the strategic planning processes, while the competent institutions need to possess sufficient capacities to implement the plans.

Strategic programmes:

1. Continuous promotion of proactive transparency of the budget;
2. Establish effective criteria and control of allocation of transfers, incentives and aids;
3. Enhance the capacities of bodies dealing with transfers, incentives and aids.

***Continuous strengthening of capacities of judicial institutions and law enforcement agencies to detect and prosecute corruption offences***

Law enforcement agencies – police agencies, prosecutor's offices and inspection bodies – play a special role in fighting corruption offences. Police agencies and prosecutor's offices play this role particularly when one takes into account that such behaviour is pernicious for the society and state to the extent that it has been prescribed as an offense in the criminal legislation in BiH. Repression cannot substitute other forms and instruments of social control, but when prevention is missing or does not produce sufficient results, repression is an irreplaceable segment of the overall anti-corruption mechanisms achieving the protective and social-ethical dimension of the fight against corruption (positive social values are promoted, while punishment indicates wrongful conduct). Criminal prosecution of perpetrators of corruption and monitoring the implementation of these actions is also a part of a successful anti-corruption system. All the stakeholders in these processes must act professionally and be free from any influences. Combating corruption requires certain knowledge and skills that need to be constantly developed and improved. The ZDC Government is aware of the limits of its competences, particularly in the field of judiciary, and it shall not influence this branch of government in any way save to the extent of analysing certain information and indicators.

## ***Detecting and prosecuting corruption offences***

All the ZDC institutions have the competences as well as an obligation to establish mechanisms for detecting corruptive behaviour within an institution. However, it has been observed that corruptive behaviour is rarely detected within institutions and, as a result, it is rarely prosecuted and punished. All the institutions need to conduct a proper review of mechanisms for detecting, prosecuting and punishing corruption. The methods and procedures contributing to detecting and prosecuting of acts of corruption need to be sufficiently effective and efficient in prosecuting corruption offences. Acts of corruption are by their nature concealed, the victim is most often abstract (society as a whole), and the perpetrators themselves are often non-typical perpetrators of criminal offenses. Such characteristics are often the reason why such criminal offenses are not detected. In that connection, it is important to ensure necessary processes that can efficiently and effectively combat corruption offences. Furthermore, it is not realistic to expect that corruption offences would be actually prosecuted without adequate human resources.

Adequate combating and prosecution of corruption are not possible without a successful and coordinated cooperation of all stakeholders responsible for detecting corruption offences. That primarily refers to law enforcement agencies and prosecutor's offices, as well as continuous strengthening of their capacities to fight corruption.

Cooperation with non-governmental sectors, in addition to government institutions, may be useful if one has knowledge that corruption offence would in fact take place. On that note, it is necessary to strengthen the cooperation between non-governmental organizations, law enforcement agencies and judicial institutions. Enhanced cooperation with the non-governmental sector increases the public confidence to report corrupt behaviour. Moreover, the non-governmental sector has special capacities to promote the fight against corruption and to encourage citizens and increase their knowledge about the phenomenon of corruption.

Strategic programmes:

1. Analyse and improve legislation and human resources in detecting and prosecuting corruption;
2. Promote cooperation between law enforcement agencies and judicial institutions in terms of combating corruption and resume specialized trainings;
3. Promote cooperation with the non-governmental sector and encourage the citizens to report acts of corruption.

## ***Inspection affairs***

Inspections are a very important means in detecting and preventing corruption in public institutions. The mandate of inspection authorities in the ZDC includes inspections of administrative-oversight, professional and other activities falling within the competences of the Canton and relating to energy industry, mining, commerce, catering industry, tourism, agriculture, forestry, water resources management, veterinary medicine, labour relations, industrial safety, health care, sanitary inspection, pharmaceutical inspection, roads and road traffic, construction and environmental protection and other duties set forth in the law. Taking into consideration that certain areas are more vulnerable to corruptive practices in comparison to others, it is necessary to take a planned approach and proactively detect and oversee such areas. Only a comprehensive and fact-based approach, an assessment of risky areas and implementation of inspections can, among other things, detect corruptive behaviour. Inspections need to be intensified and their number increased.

As inspections are very important for the detection and prevention of corruptive activities, it is necessary that inspection services have proper capacities, especially in terms of staff, with a sufficient number of inspectors. In order for inspection authorities to be fully effective in inspections and audits, they must be fully immune to corrupt behaviour as the lack of integrity among inspection authorities not only prevents detection of corruptive practices but leads to their increase.

Strategic programmes:

1. Increase the number of inspections in risky areas;
2. Enhance the capacities and integrity of the inspection bodies in the ZDC.

***Establishment of mechanisms for raising awareness about the harmfulness of corruption as well as mechanisms of cooperation with civil society***

The role of civil society in anti-corruption efforts is important for a successful fight against corruption on several levels. The role of civil society in anti-corruption efforts has been recognized in international documents on fight against corruption. Aside from necessary active participation of public and private sector in combating corruption, the significance of the civil society organizations as direct representatives of public interests is immeasurable. The importance of civil society and their capacities in the area of prevention and fight against corruption can be very useful to the ZDC Government, considering that the Strategy and the Action Plan constitute the first strategic framework for fight against corruption. The capacities of relevant civil society organizations can be of crucial importance in terms of both implementation and promotion of the Strategy and the Action Plan.

As the Strategy and the Action Plan constitute the first and comprehensive strategic framework for fight against corruption, involving a large number of implementing authorities, it needs to be continuously promoted in public. Successful implementation of many activities also depends on the citizens and civil society organizations, and the framework needs to be continuously promoted towards those entities. In addition, as other civil society entities are interested in the drafting and implementation of strategic documents, particularly anti-corruption documents, those entities need to be included in such processes. Civil society organizations, with their experience and importance, can influence the quality of methodology of drafting of strategic documents and, more importantly, they can influence the quality and design of the methodology of monitoring instruments the results of which can direct future anti-corruption strategic planning.

As anti-corruption actions are currently in the focus of many donors of civil society organizations, it is necessary to establish mechanisms of cooperation with civil society organizations, in particular to portray the ZDC as an administrative space open for cooperation. In addition, such types of project assistance are very useful in terms of implementation of the envisaged activities, also ensuring that certain project activities of various civil society organizations do not overlap and thus waste resources. It is for this reason that organization of meetings with donors and civil society organizations requires a planned approach.

Strategic programmes:

1. Promote the importance of an strategic anti-corruption framework and involve civil society organizations in the processes of drafting and monitoring of the strategic anti-corruption framework;
2. Promote cooperation with civil society organizations that carry out anti-corruption actions.

## **Establish effective prerequisites and mechanisms for implementation and coordination of the Strategy and reporting on their implementation**

The main institutional body for the implementation of the Strategy and activities from the accompanying Action Plan is the ZDC Government Anti-Corruption Team. The primary competences of the Government Team include drafting of the Action Plan proposal, giving guidelines and recommendations for the implementation of the Action Plan, gathering data on the implementation of activities from the Action Plan and the data consolidation, making analyses and sending semi-annual reports to the ZDC Government in that regard, coordination between all the entities covered by the Action Plan, coordination with the Agency, other legal entities, bodies and organizations that are obliged to take action in combating corruption and judicial bodies, as well as other activities to be determined in the Action Plan. Members of the Government Team are persons who are professionally employed in various institutions and it is therefore necessary to formalize all the responsibilities and tasks within the Team. In that regard, it is also necessary to develop all the necessary tools for monitoring the implementation of anti-corruption actions as well as the methods of checking their accuracy. In addition, taking into consideration that a large number of institutions is important for anti-corruption actions, it is necessary to designate a person that would coordinate anti-corruption actions internally within each institution: in other words, it is necessary to appoint coordinators of anti-corruption actions. Coordinators of anti-corruption actions need to be persons who have demonstrated exceptional personal and moral qualities in the course of their work in a particular institution, who know the overall functioning of their institution very well and who enjoy a high degree of confidence of their superiors and other employees in the institution. Only employees with such qualities can facilitate quality coordination of anti-corruption actions. A coordinator has an obligation to report to his/her superior about anti-corruption obligations of the institution and monitor the implementation of individual tasks from an operational plan on a monthly basis, drafts communication material to inform his/her institution about the obligations under the Action Plan and the operational plan, establishes and maintains sectoral and other cooperation with other levels of government in situations involving divided competences, keeps records of the operational plan implementation as per benchmarks and reports to his/her superior about the progress and challenges on a monthly basis.

As the ZDC Government Anti-Corruption Team and coordinators of anti-corruption actions are primary entities for the implementation of anti-corruption actions, it is necessary to continuously strengthen their capacities. To that end, the coordinators of anti-corruption actions and all the members of the Government Team have been continuously undergoing trainings on tools for the prevention and fight against corruption. As the activities and competences of the Government Team are very broad and complex, the Government needs to secure funds to support the Team in implementing its competences.

The ZDC Government, through the Government Team, needs to be constantly and continuously informed about the implementation of anti-corruption actions in order to be able to promptly react to risks that can hinder the implementation of anti-corruption obligations. Having that in mind, it is necessary to gather all the information about the conducted anti-corruption actions in a comprehensive and systematic manner. In addition to gathering of information, it is the task of the ZDC Government Anti-Corruption Team to analyse all the implemented anti-corruption actions and assess their value and impact on positive changes. The public needs to be timely informed about all the anti-corruption actions through communication channels. Despite of positive results, anti-

corruption efforts, unless properly communicated to the civil society, need not be positively accepted. For that reason the public needs to be informed about all the efforts in a timely fashion. Public opinions and views about the implemented anti-corruption efforts and the needs for their improvement can be of use for the institutions carrying out the activities. Two-way communication channels with the public need to be improved. Taking into consideration that this is the first strategic framework for fight against corruption as a complex phenomenon, it is necessary to ensure that such a strategic framework is flexible for changes, i.e. if it is observed that some activities have not been properly planned, they should be subject to changes. The public and the other stakeholders need to be duly informed about any and all changes to the strategic framework of the ZDC Canton Government.

In order to carry out the activities and measures effectively, it is necessary to utilize the knowledge and experiences of bodies of higher level of government that have been dealing with the prevention of and fight against corruption for a number of years. Experiences of the Agency and the Anti-corruption Team of the Government of the Federation of BiH will be of great use to the ZDC Government. In addition, other institutions that fight this socially negative phenomenon as part of their regular duties have considerable experience and they too need to be consulted.

Strategic programmes:

1. Establish mechanisms for the implementation of competences of the ZDC Government Anti-Corruption Team and appointment of coordinators of anti-corruption actions;
2. Strengthen capacities of the ZDC Government Anti-Corruption Team and the coordinators of anti-corruption actions for the implementation of their competences;
3. Continuous and proper reporting of interested parties about the implementation of anti-corruption actions;
4. Introduce the practice of revising the anti-corruption strategic framework of the ZDC Government;
5. Promote cooperation with all the institutions in BiH that have anti-corruption competences.

**PRIME MINISTER**  
Miralem Galijašević