



## ANNEX C1bis: Twinning Light Fiche

**Project title:** Improving the capacities of the AFCOS System bodies in the field of irregularities management

**Beneficiary administration:**

Ministry of Finance, Directorate for budget inspection and combating irregularities and fraud

Department for Combating Irregularities and fraud (AFCOS office)

**Twining Reference:** MN 20 IPA FI 01 22 TWL

**Publication notice reference:** EUROPEAID/174951/DD/ACT/ME

**EU funded project**

***TWINNING TOOL***

## **LIST OF ABBREVIATIONS:**

<b>AFCOS</b>	Anti-Fraud Coordination Service
<b>CFCU</b>	Directorate for Finance and Contracting of the EU Assistance Funds
<b>DEU</b>	Delegation of the European Union
<b>EC</b>	European Commission
<b>EU</b>	European Union EUIF EU Integration Facility
<b>IO</b>	Irregularity Officer
<b>IPA</b>	Instrument for Pre-accession Assistance of the European Union
<b>IPARD</b>	Agency of Agriculture and Rural development
<b>ISP</b>	Indicative Strategy Paper for Montenegro (2014-2020)
<b>IMS</b>	Irregularity Management System
<b>MF</b>	Ministry of Finance
<b>MNE</b>	Montenegro
<b>NAO</b>	National Authorising Officer
<b>NAOSO</b>	National Authorising Officer Support Office
<b>OLAF</b>	European Anti-fraud Office
<b>PACA</b>	Primary administrative or judicial finding
<b>PIU</b>	Project Implementation Unit
<b>SAA</b>	Stabilization and Association Agreement

## 1. Basic Information

1.1 Programme: Annual Action Programme for Montenegro 2020 Objective 1 (IPA/2020/042-142) - Direct management

**For UK applicants:** Please be aware that following the entry into force of the EU-UK Withdrawal Agreement<sup>1</sup> on 1 February 2020 and in particular Articles 127(6), 137 and 138, the references to natural or legal persons residing or established in a Member State of the European Union and to goods originating from an eligible country, as defined under Regulation (EU) No 236/2014<sup>2</sup> and Annex IV of the ACP-EU Partnership Agreement<sup>3</sup>, are to be understood as including natural or legal persons residing or established in, and to goods originating from, the United Kingdom<sup>4</sup>. Those persons and goods are therefore eligible under this call.

1.2 Twinning Sector: Finance, Internal market and economic criteria

1.3 EU funded budget: Max 100.000 euro

1.4 Sustainable Development Goals (SDGs): Sustainable Development Goal 6: Peace and Justice and strong institutions.

## 2. Objectives

### 2.1 Overall Objective:

To ensure effective and efficient protection of the EU's financial interests in Montenegro.

### 2.2 Specific objective:

To improve the capacities of the AFCOS system bodies in the field of irregularities management

### 2.3 The elements targeted in strategic documents i.e. National Development Plan/Cooperation agreement/Association Agreement/Sector reform strategy and related Action Plans:

Relations between Montenegro and European Union are governed by the Stabilization and Association Agreement (SAA) signed on 15 October 2007 and entered into force on 1 May 2010. The SAA provides a legal framework for political dialogue, regional cooperation, economic relations and the use of the Community financial assistance. As an instrument of the

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<sup>1</sup> Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community.

<sup>2</sup> Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11 March 2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action.

<sup>3</sup> Annex IV to the ACP-EU Partnership Agreement, as revised by Decision 1/2014 of the ACP-EU Council of Ministers (OJ L196/40, 3.7.2014).

<sup>4</sup> Including the Overseas Countries and Territories having special relations with the United Kingdom, as laid down in Part Four and Annex II of the TFEU.

Stabilization and Association Process, the European Partnership aims to provide additional, adapted support to the Montenegrin authorities with a view to achieving the European perspective of their country. The activities envisaged by this Project focus on meeting the criteria for full membership in the EU and correlate with the priorities defined in the Montenegrin Negotiation Position for Chapter 32-Financial Control and the activities envisaged by the Montenegrin Program for Accession 2019-2020. The objectives of this Twinning light project are coherent with national development objectives defined in the Indicative Strategy Paper for Montenegro (2014-2020).

Montenegro applied for EU membership in December 2008. The candidate status was officially granted to Montenegro on 17 December 2010. In December 2011, the European Council launched the accession process with a view to opening negotiations in June 2012. The accession negotiations with Montenegro started on 29 June 2012. Chapter 32 – Financial control was opened on 24 June 2014. This Chapter is related to the adoption of standards, methods, and international principles of internal financial control across the entire public sector, as well as the control of spending from the EU funds.

Financial control includes four main areas: public internal financial control (PIFC), external audit, protection of the EU's financial interests, and protection of the euro from forgery. Main objectives of this Chapter are: financial stability of the Member States, prevention of misuse of financial means, contribution to a more efficient, successful and accountable spending, which offers an important mechanism for fighting corruption.

Montenegro's accession program to the European Union 2021-2023 (PPCG) is a comprehensive strategic document that gives an overview of the current state of play in the country and defines the framework and pace of reforms that are needed for Montenegro's further alignment with the EU's legal system.

Article 28 of the Framework Agreement between the European Commission and the Government of Montenegro, signed on 15 November 2007, and Article 51 of the Framework Agreement between the European Commission and the Government of Montenegro, signed on 26 February 2015, underline the need for establishing control and reporting mechanisms regarding prospective irregularities amongst member countries, candidate countries and potential candidates using EU assistance.

In May 2019, the Government of Montenegro adopted the Strategy for Combating Fraud and Irregularities Management for Protection of Financial Interests of the European Union for the period 2019-2022, and accompanying Action plan. Above mentioned Strategy, as well as other relevant documents, were prepared through Twinning light project "Capacities development for the Anti-Fraud Coordination Service (AFCOS)", Twinning number: MN 15 IPA OT 03 18 TWL. The project was aimed to strengthen the role and capacities of the Montenegrin Anti-Fraud Coordination Service (AFCOS office) to efficiently coordinate the legislative, administrative and operational activities of its network members, with the final goal to improve the capacities of the Montenegrin administration to protect EU financial interests.

The purpose of the adoption of this Strategy was to ensure a high quality and efficient protection of EU financial interests to the same extent as protection of own resources. This should be achieved through coordination of activities on the establishment of a normative, institutional and operational framework, as well as by defining the risks, objectives and measures that will contribute to a more efficient and effective fight against fraud and

corruption. Additionally, it should be achieved through the promotion of cooperation between relevant institutions, both nationally and internationally.

This Twinning light project will be important instrument for enhancing the performance of all institutions and individuals who have to deal with irregularities and fraud. It will also contribute at improving knowledge regarding detection and reporting of irregularities, as well as at improving the AFCOS system in general.

### **3. Description**

#### **3.1 Background and justification:**

Membership in the European Union is a strategic goal of Montenegro. In line with this goal, comprehensive reforms are being carried out in order to establish the best institutional and legislative framework and achieve measurable results on the European path. Montenegro applied for membership in the European Union on December 15, 2008, and in December 2010 became a candidate for membership. On the way to the European Union, for Montenegro and other countries with the same goal, funds from the pre-accession assistance program (IPA) are available, which aim at providing financial and technical assistance to potential and candidate countries in the process of preparation for full EU membership.

In June 2012, Montenegro started negotiations for membership in the European Union. As a beneficiary country of funds from the IPA pre-accession assistance program, Montenegro is obliged to provide a legislative framework for the protection of its financial interests in the pre-accession period. In accordance with the requirements of the European Commission (EC), each candidate country should establish the so-called AFCOS system (Anti-Fraud Coordination Service) responsible for the suppression of irregularities and frauds that may arise from using the funds of the European Union (EU), as well as for the provision of more efficient and qualitative protection of its financial interests. This system is functioning in all candidate countries and EU member states, since 2001, and it consists of the so-called AFCOS office and AFCOS network. The AFCOS office cooperates with OLAF (European Anti-Fraud Office - Anti-Fraud Office of the European Commission) and with other AFCOS offices in the EU member states on the fight against frauds and irregularities that may arise from using the EU funds.

On 5 December 2013, the Government of Montenegro adopted a Decision on Establishing a Coordinating Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for protection of the European Union Financial Interests (AFCOS network). In this way, the preconditions for the protection of the EU's financial interests in Montenegro were established. From an organizational point of view, the structure in charge of the protection of the EU's financial interests takes the form of a network of bodies (AFCOS-system) through which legislative, administrative and operational activities are coordinated in direct cooperation with the European Anti-fraud Office (OLAF).

On 26 February 2015, the Government of Montenegro signed a Framework Agreement with the European Commission on the Arrangements for Implementation of Union Financial Assistance to Montenegro under the Instrument for Pre-Accession Assistance (IPA II). The Agreement underlines the need for establishing control and reporting mechanisms regarding prospective irregularities amongst member countries, candidate countries and potential

candidates using EU assistance (Article 51). Following this, on 16<sup>th</sup> of April 2015 the Government of Montenegro adopted a Strategy for Combating Fraud and Irregularity Management for the period 2015-2017, which was followed by a new Strategy for period 2019-2022, adopted on 30<sup>th</sup> of May 2019 (including the Action Plan for the period 2019-2020). The latter one is the main strategic document in which the priorities related to the protection of the financial interests of the EU are highlighted, as well as the measures by which they are realized. The Strategy defines the scope of work and responsibilities of the AFCOS system bodies, as well as measures and activities for strengthening the mechanisms for the protection of the EU's financial interests in Montenegro.

The service responsible for coordination of the AFCOS system is the Department for Combating Irregularities and Fraud (so called AFCOS office). It was established within the Ministry of Finance and is operationally independent from any single body within the AFCOS system.

The AFCOS system in Montenegro includes the following:

- a) accredited bodies of IPA II management and control system (Irregularity Reporting Structure);
- b) bodies dealing with fighting against fraud, corruption and any other forms of illegal activities in the system (AFCOS network);
- c) Ministry of Finance – AFCOS office, as body responsible for the protection of European Union financial interests in Montenegro, which coordinates the AFCOS system and is the main OLAF contact point.

Recently the competences and responsibilities of the AFCOS Office have been considerably extended. In addition to its role of a coordination body within the AFCOS system and the main contact point to OLAF, it has taken over the task of reporting irregularities to OLAF on behalf of the NAO and of managing the Irregularity Management System (IMS)<sup>5</sup>. The latter includes opening and maintaining accounts, installing security certificates, training system users, and providing individual support to users. At the same time, implementation agencies that have so far reported irregularities on paper prints and therefore have no experience in using the AFIS interface will play a key role in reporting of irregularities, as they are expected to have the role of creator of the reports.

### 3.2 Ongoing reforms:

Montenegro is working intensively towards meeting European standards and creating of the conditions for closing of this chapter 32 - Financial control. The focus of the activities in the forthcoming period will be on further harmonization of legal and strategy documents, implementation of regulations and strengthening of administrative capacities. Montenegro ensures an effective and efficient coordination of anti-fraud activities to guarantee the fulfilment of future obligations arising from Article 325(3) of the TFEU and application of the

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<sup>5</sup> Note for the attention of National Authorizing Officers and Heads of Anti-Fraud Coordination Service of IPA II Beneficiaries in the Western Balkans ( Ref. Ares (2018)6087846-27/11/2018)

provisions of Regulation (EC) No 2185/96 concerning on-the-spot checks and inspections carried out by the Commission, in particular the obligation of assistance to Commission inspectors. Montenegro provides a track record on cooperation with the Commission on reported irregularities and investigation cases involving EU funds. The Negotiator for Chapter 32 as well as the Head of the Working Group are from the Ministry of Finance, while the contact person for the Working Group 32 is selected by the European Integration Office.

As a part of Public Finance Management Reform Programme 2022-2026 (PFM 2022-2026), the AFCOS Office planned the development of a new Strategy for Combating Fraud and Irregularity Management for the protection of EU's financial interests for the period 2023-2026. The Strategy would be integrated by an Action Plan for further strengthening of the legal framework and capacity building of the AFCOS office and the AFCOS system. This would include, among others, the adoption of a Communication Strategy (to improve communication between AFCOS bodies and with the public), the development of a methodology for risk analysis in the field of irregularity management and a training catalog for the period 2023-2025. Also, an Indicative Training Plan for the period 2023-2025 will be developed with the aim of improving the capacity, knowledge and expertise of all structures responsible for the management of EU funds.

### **Protection of the EU's financial interests**

The area of the protection of the EU's financial interests, as a part of chapter 32- Financial control, covered by the Convention on the protection of the European Communities' financial interests (Official Journal C 316 of 27 November 1995) and its Protocols is regulated by the criminal legislation of Montenegro, specifically by the following legislation:

- Criminal Code, first adopted on 17 December 2003 and last amended on 30 July 2013 (Official Gazette of the Republic of Montenegro, No 70/2003, 13/2004, 47/2006 and Official Gazette of Montenegro, No 40/2008, 25/2010, 32/2011 and 40/2013);
- Criminal Procedure Code, first adopted on 27 July 2009 and last amended on 27 July 2010 (Official Gazette of Montenegro, No 57/2009 and 49/2010);
- Law on Liability of Legal Entities for Criminal Offences, first adopted on 27 December 2007 and last amended on 29 May 2012 (Official Gazette of the Republic of Montenegro, No 2/2007, 13/2007 and 30/2012),
- Law on International Legal Assistance in Criminal Matters, first adopted on 26 December 2007 and last amended on 9 July 2013 (Official Gazette of Montenegro, No 4/2008 and 36/2013).
- Law on Prevention of Corruption ("Official Gazette", No. 53/14)
- Rulebook on detailed procedures following the whistleblower's report on the danger of public interest, indicating the existence of corruption ("Official Gazette", No. 77/15)
- Law on Ratification of the Framework Agreement between Montenegro represented by the Government of Montenegro and the European Commission on Rules for Implementation of Union Financial Assistance to Montenegro under the Instrument for Pre-Accession Assistance (IPA II), (Official Gazette of Montenegro - International Agreements No. 5/15 .2015.)

- Decree on organization of the indirect management of the implementation of EU financial assistance under the Instrument for Pre-Accession Assistance (IPA II), (Official Gazette of Montenegro 50/15 of 08.09.2015, 039/16 of 29.06.2016, 033/18 of 14.05.2018)
- Decree on the Government of Montenegro ("Official Gazette of Montenegro", No. 80/08)
- Decree on the organization and manner of work of the state administration ("Official Gazette of Montenegro", No. 118/20, 121/20, 001/21, 002/21)
- Decision on Establishing Coordination Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for Protection of the European Union Financial Interests (AFCOS network) (Official gazette of MN, No 60/2013), based on the Decree of the Government of Montenegro (Official gazette of MN, No 80/08).
- Decision amending the Decision on Establishing Coordination Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for Protection of the European Union Financial Interests (AFCOS network), (Official Gazette of Montenegro No. 06/2015 of 10.02.2015)
- Guidelines for managing irregularities ( adopted on 26 March 2021)

Provisions of the Criminal Code, Law on Liability of Legal Entities for Criminal Offences and the Law on International Legal Assistance in Criminal Matters are partially aligned with the relevant articles of the Convention on the protection of the European Communities' financial interests. In that respect, the focus is primarily on criminal offences: fraud, evasion of taxes and contributions, founded obtaining and using loans and other benefits.

### 3.3 Linked activities:

Twinning light project “**Capacities development for the Anti-Fraud Coordination Service (AFCOS)**”, Twinning number: MN 15 IPA OT 03 18 TWL:

The project aimed to strengthen the role and capacities of the Montenegrin Anti-Fraud Coordination Service (AFCOS office) to coordinate efficiently the legislative, administrative and operational activities of its network members with the final goal to improve the capacities of the Montenegrin administration to protect EU financial interests. This was done through two components: Strengthening the institutional set up and the legal framework of AFCOS and AFCOS network (Component 1) and Increasing capacities and public awareness on anti-fraud issues (Component 2). The implementation of the project, whose total value amounted to 200,000 euros, began on September 12, 2018 and ended on March 11, 2019.

In June 2019, a TAIEX Expert mission took place in Montenegro with the objective to improve and develop skills in using IMS application for better reporting of irregularities and frauds.

In the upcoming period, as mentioned above, a new Strategy for Combating Fraud and Irregularity Management for the protection of EU's financial interests for the period 2023-2026 will have to be developed. This will be done as a part of the Public Finance Management Reform Programme 2022-2026. According to the national legislation, the current Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022 has to be evaluated, in accordance with the “*Methodology for policy*”



*development, drafting and monitoring of strategic planning documents*”<sup>6</sup>. This evaluation, in addition to providing assessment of relevance, coherence, efficiency, effectiveness, impact and sustainability of the current Strategy, will also provide recommendations for further improvement of the new Strategy 2023-2026. Before final adoption of the latter one, an impact assessment and a public consultation will have to be launched.

#### 3.4 List of applicable *Union acquis*/standards:

1. Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999;
2. Council Regulation (EURATOM, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities
3. Commission Regulation (EC) No 1681/94 of 11 July 1994 concerning irregularities and the recovery of sums wrongly paid in connection with the financing of the structural policies and the organization of an information system in this field
4. Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union
5. Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law
6. Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO')
7. Decision (EU) 2019/1798 of the European Parliament and of the Council of 23 October 2019 appointing the European Chief Prosecutor of the European Public Prosecutor's Office
8. Regulation (eu) no 231/2014 of the European Parliament and of the Council of 11 March 2014 establishing an Instrument for Pre-accession Assistance (IPA II)
9. Commission Implementing Regulation (EU) No 447/2014 of 2 May 2014 on the specific rules for implementing Regulation (EU) No 231/2014 of the European Parliament and of the Council establishing an Instrument for Pre-accession assistance (IPA II)
10. Regulation (EU) 2021/1529 of the European Parliament and of the Council of 15 September 2021 establishing the Instrument for Pre-Accession assistance (IPA III)

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<sup>6</sup>English version (not the latest approved) can be found on site: <https://javnepolitike.me/wp-content/uploads/2020/11/Methodology-for-policy-development-drafting-and-monitoring-of-strategic-documents-2018.pdf>.

Montenegrin version (the latest version approved) can be downloaded on site: <https://javnepolitike.me/wp-content/uploads/2020/11/Metodologija-razvijanja-politika-draft3-preview-22SEP20.pdf>

11. Practical Guide to contract procedures for European Union external actions (PRAG);
12. Regulation (eu) no 236/2014 of the European Parliament and of the Council of 11 March 2014, laying down common rules and procedures for the implementation of the Union's instruments for financing external actions
13. Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No 1605/2002
14. Commission delegated regulation (EU) No 1268/2012 of 29 October 2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union

### 3.5 Components and results per component

**COMPONENT I** - Capacity building on efficient use of Irregularity management system for the AFCOS Office and the Structure for reporting irregularities

Result 1: Reporting on Irregularities improved

The following indicative sub-results should be achieved:

Sub-Result 1.1: Staff trained on reporting through IMS system

Sub-Result 1.2: EU Member States experience regarding common irregularities exchanged

Sub-Result 1.3: Knowledge on conflict of interest, red flags and public procurement rules of accredited bodies managing and using funds from the pre-accession program improved

**COMPONENT II** - AFCOS network capacity building on fraud, corruption and other illegal activities

Result 2: Bodies dealing with fighting against fraud, corruption and any other forms of illegal activities trained

The following indicative sub-results should be achieved:

Sub-Result 2.1 Knowledge on fraud and corruption upgraded

Sub-Result 2.2. Experience of EU Member States on fraud cases exchanged

**COMPONENT III** – Evaluation of Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022<sup>7</sup>

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<sup>7</sup> In accordance with the “*Methodology for policy development, drafting and monitoring of strategic planning documents*” - published by General Secretariat of the Government, Department for Coordination, Alignment and Monitoring of the Implementation of Strategy Documents defining Public Policies.

English version (not the latest approved) can be found on site: <https://javnepolitike.me/wp-content/uploads/2020/11/Methodology-for-policy-development-drafting-and-monitoring-of-strategic->

Result 3: Assessment of the relevance, effectiveness, efficiency, sustainability, and impact of the Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022

The following indicative sub-results should be achieved:

Sub-Result 3.1. Recommendations for preparation of the new Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2023-2026, by advising on main areas and actions of intervention

3.6 Expected activities:

**COMPONENT I** - Capacity building on efficient use of Irregularity management system for the AFCOS Office and the Structure for reporting irregularities

Result 1: Reporting on Irregularities improved

**ACTIVITIES:**

Sub-Result 1.1. Staff trained on reporting through IMS system

A.1.1.1. Introduction to Irregularity management and Legislative framework; indicative list of types of irregularities to be described as suspected fraud; most common suspected irregularities; definition of PACA<sup>8</sup> and the date of PACA; calculation of the exact amount affected by the irregularity and registration of debt; classification of an irregularity as suspected fraud; errors and irregularities caused by administrative acts; irregularity and fraud risk management etc.

A.1.1.2. Electronic reporting; Irregularity Management System (IMS); maintenance of IMS user accounts; exporting cases from IMS; creation of statistical analysis using information from IMS; Irregularity register etc.

Sub-Result 1.2. Experience of EU Member States regarding common irregularities exchanged

A.1.2.1. Common irregularities in the implementation of service contracts

A.1.2.2. Common irregularities in the implementation of procurement contracts;

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[documents-2018.pdf](https://javnepolitike.me/wp-content/uploads/2020/11/Metodologija-razvijanja-politika-draft3-preview-22SEP20.pdf). Montenegrin version (the latest version approved) can be downloaded on site: <https://javnepolitike.me/wp-content/uploads/2020/11/Metodologija-razvijanja-politika-draft3-preview-22SEP20.pdf>

<sup>8</sup> Primary administrative or judicial finding means a first written assessment by a competent authority, either administrative or judicial, concluding on the basis of specific facts that an irregularity has been committed, without prejudice to the possibility that this conclusion may subsequently have to be revised or withdrawn as a result of developments in the course of the administrative or judicial procedure.

A.1.2.3. Common irregularities in the implementation of work contracts;

A.1.2.4. Common irregularities in the agricultural sector;

A.1.2.5. The European Anti-fraud Office (OLAF), mission and mandate, administrative investigations of OLAF on the territory of one country;

A.1.2.6. The European Public Prosecutor's Office (EPPO), PIF Directive<sup>9</sup>, EPPO - OLAF cooperation

A.1.2.7. Administrative controls and on the spot controls, case studies of administrative investigations

Sub-Result 1.3. Knowledge on conflict of interest, red flags and public procurement rules of accredited bodies managing and using funds from the pre-accession program improved

A.1.3.1. Red flags

A.1.3.2. Conflict of interest, undisclosed conflict of interest, collusive bidding, declaration on conflict of interest;

A.1.3.3. Infringement of public procurement rule, fraud indicators, contract and public procurement fraud, labour charges and consultancy services fraud.

**COMPONENT II - AFCOS network capacity building on fraud, corruption and other illegal activities**

Result 2: Bodies dealing with fighting against fraud, corruption and any other forms of illegal activities trained.

**ACTIVITIES:**

Sub-Result 2.1. Knowledge on fraud and corruption upgraded

A.2.1.1. Training on Fraud and fraud risk, the possibilities of fraud detection based on digital documents;

A.2.1.2. Training on tax fraud, method of identification and case studies;

A.2.1.3. Training on crime and corruption, cooperation between law enforcement and implementing bodies and authorities (law enforcement challenges in investigating fraud cases), prosecution of offences against EU financial interests.

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<sup>9</sup> The Directive on the Fight against Fraud to the Union's Financial Interests by means of Criminal Law (PIF Directive)

## Sub-Result 2.2. Experience of EU Member States on fraud cases exchanged

A.2.2.1. Direct cooperation of judicial and EU bodies in resolving specific cases with a view to identifying irregularities;

A.2.2.2. Cooperation between AFCOS and OLAF investigators -examples of final court judgments in cases of suspected fraud;

A.2.2.3. Cooperation between AFCOS and AFCOS bodies/procedure regarding potential fraud.

## **COMPONENT III – Evaluation of Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022**

**Result 3: Assessment of the relevance, effectiveness, efficiency, sustainability, and impact of the Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022**

**Sub-Result 3.1. Recommendations for preparation of the new Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2023-2026, by advising on main areas and actions of intervention**

A.3.1.1. Definition of an evaluation roadmap, with the main criteria and questions to be replied during the evaluation (the so-called road map of evaluation)

A.3.1.2. Organization of meetings, seminars, interviews with the main stakeholders (representatives of the IPA structure bodies, representatives of the bodies responsible for suppression of fraud, corruption and any other type of irregularity - AFCOS network-, employees of the AFCOS office);

A.3.1.3 Presentation and discussion of main results;

A 3.1.4 Finalization of the evaluation report

## 3.7 Means/input from the EU Member State Partner Administration:

One of the experts may act as the Project Leader responsible for general coordination.

### 3.7.1 Profile and tasks of the Project Leader

#### Qualifications and skills of PL:

- University level education or equivalent professional experience of 7 years in public administration;
- Minimum 3 years of professional experience in thematic areas related to this contract and pertaining to irregularity management and combating irregularities and fraud;

- Computer literacy;
- Working level of English language (oral and written);
- Experience in project management;
- Presentation, communication and organizational skills.

Specific requirements:

- Experience in cooperation with OLAF regarding irregularities and fraud;
- Minimum 3 years of experience in institution building in the field of combating irregularities and fraud;
- Experience in working within the public administration/s in the EU Member States, candidate or potential candidate countries in the areas relevant to this service contract;
- Experience in development and delivery of trainings is an asset;
- Knowledge of legislation related to the protection of EU financial interests;
- PIF Convention (Convention on the protection of the European Communities' financial interests);
- Knowledge of Montenegrin is considered as an asset.

Tasks of the Project Leader:

- Overall management and coordination of the project, in cooperation with Beneficiary Country Project Leader;
- Cooperation with main beneficiary and representatives of bodies in AFCOS system in undertaking all activities;
- Undertaking all activities specified under the project and achieving the mandatory results;
- Ensuring sound implementation of envisaged activities;
- Providing professional advice to main beneficiary and representatives of bodies in AFCOS system during the project implementation period;
- Ensuring backstopping and financial management of the project in Member State Project reporting.

3.7.2. Profile and tasks of other short-term experts:

Qualifications and skills of the Short-term expert 1:

- University level education or equivalent professional experience of 7 years in public administration
- At least 3 years of experience in implementing EU legislation on combating irregularities and fraud with purpose of protection of EU financial interests
- Computer literacy
- Working level of English language (oral and written)
- Presentation, communication and organizational skills
- Experience in development and delivery of trainings

### Specific requirements:

#### Experience in:

- Knowledge of legislation related to the protection of EU financial interests;
- PIF Convention (Convention on the protection of the European Communities' financial interests);
- Irregularity and fraud management;
- Reporting irregularities via Irregularity Management System (IMS);
- Cooperation with OLAF;
- Monitoring & evaluation.
- Awareness raising and/or public relations and communicating with the media representatives
- Knowledge of Montenegrin will be considered as an asset

### Tasks of the Short-term experts:

- Conducting training needs analysis, preparing training materials and conducting trainings regarding managing irregularities and fraud
- Preparing information materials (e.g. brochures, leaflets)
- Close cooperation with the main beneficiary and representatives of bodies of the AFCOS system in undertaking relevant activities
- Providing professional advice to the main beneficiary during the project implementation period.
- Minimum of 3 years of professional experience in monitoring and evaluating government strategies/programmes/projects in the area related to the protection of EU financial interests

## **4. Budget**

Twinning light project budget: Max 100.000 €

## **5. Implementation Arrangements**

### 5.1 Implementing Agency responsible for tendering, contracting and accounting:

#### DELEGATION OF THE EUROPEAN UNION TO MONTENEGRO

Contact person:

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## 5.2 Institutional framework

Beneficiaries of the project are bodies involved in the Montenegrin AFCOS system. It consists of three levels: Ministry of Finance – Department for Combating Irregularities and Fraud (AFCOS office), IPA structure and Bodies responsible for suppression of fraud, corruption and any other type of irregularity within the system.

### Main beneficiary of this Twinning light project:

1. Ministry of Finance – Department for Combating Irregularities and Fraud (AFCOS office) which is a coordinating service in AFCOS system and a contact point to the European Anti-Fraud Office (OLAF). Currently there are three employees working in the AFCOS office.

### Other beneficiaries:

2. IPA structure – Appointed Irregularity Officers as representatives of bodies that are managing and using EU funds and are accredited by EU as Bodies responsible for Operational Program.

3. Bodies responsible for suppression of fraud, corruption and any other type of irregularity within the system – Appointed persons that represent bodies involved in combating fraud, corruption and other types of irregularities.

Institutions having their representatives in AFCOS network, in addition to representatives of IPA structure in National Fund and AFCOS office in the Ministry of Finance are: Ministry of Justice; Ministry of Interior; Police Administration; Public Procurement Administration; Tax Administration; Customs Administration; State Audit Institution; Supreme State Prosecution; Directorate for Anti-Corruption Initiative; Administration for Inspection Affairs; Administration for Prevention of Money Laundering and Terrorist Financing. (On 5 December 2013, Montenegro passed the Decision on Establishing Coordinating Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for protection of the European Union Financial Interests (AFCOS network).<sup>10</sup>

## 5.3 Counterparts in the Beneficiary administration:

### 5.3.1 Contact person:

### 5.3.2. Project Leader counterpart:

Ms Nataša Kovačević

Head of Department for Combating irregularities and fraud /AFCOS office

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<sup>10</sup> Decision is still in force but it will be changed after adoption of Decree on Institutional Framework for the Functioning of AFCOS System in Montenegro, and Decision on Establishing AFCOS advisory body.



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## 6. Duration of the project

8 months

## 7. Sustainability

This Project will contribute to the implementation of activities envisaged by the Montenegrin Programme for Accession 2019-2020, particularly Chapter 32 - Financial Control, the main objectives of which are: financial stability of the member states, prevention of misuse of financial means and contribution to a more efficient, successful, and accountable spending, which offers an important mechanism for fighting corruption. Regular training in the field of irregularity management is necessary for the effective performance of duties of AFCOS system body officials and for the functioning of the European Union Funds management and control system. There is a need for a more regular organization of trainings, which have to be focused on establishing and functioning of the AFCOS system (primarily for new employees) but also on irregularities management at a more advanced level (prevention, detection, treatment, reporting, recovery, sanctioning) for experienced employees.

An analysis of training needs of AFCOS system bodies staff in the field of irregularity management was conducted as a part of the before mentioned TWL Project “Capacities development for the Anti-Fraud Coordination Service (AFCOS)”. The results confirmed the need for trainings in the field of irregularities management, with special regard on the proper use of IMS system at all reporting levels (creator, manager, and observer), in order to be able to produce higher quality reports on irregularities.

This Twinning Light initiative will strengthen and expand the results achieved by the previous project. The improved capacities, knowledge and inter-institutional cooperation of AFCOS System bodies will have an immediate positive impact in the field of irregularities management. If the staff rotation remains at acceptable level, sustainability will be guaranteed by the regular use of new competences in the daily implementation of activities of the AFCOS system.

## 8. Crosscutting issues

**The Project will ensure that all the cross-cutting issues are appropriately incorporated,** particularly equal participation of women and men will be secured throughout the design and implementation process. An appropriate balance will be sought on all bodies and activities of the Project. Institutions benefiting from Project are equal opportunity employers.

Special attention to minorities and vulnerable groups will be integral part of any activity of the Project. The Project will take into the consideration the principle of equitable representation. There will be regular monitoring to ensure these issues are given due prominence.

The activities envisaged under the present Project should not negatively affect the environment.

During the design and implementation phase, the Project production of printed material will be kept to the strictest minimum and therefore have positive influence on environment.

## **9. Conditionality and sequencing**

No conditionality identified.

## **10. Indicators for performance measurement**

Target audience of this mission will be around 30 officials from the Ministry of Finance, AFCOS office and Directorate for Finance and Contracting of the EU Assistance Funds (CFCU), Directorate for management structure – NAOSO; Officials from Ministry of Agriculture and Rural development - IPARD agency; Officials from Public Works Administration; Appointed Irregularity Officers in IPA bodies and Representatives from AFCOS network.

**COMPONENT I** - Capacity building on efficient use of Irregularity management system for the AFCOS Office and the Structure for reporting irregularities

Result 1: Reporting on Irregularities improved

### **INDICATORS:**

Sub-Result 1.1: Staff trained for reporting through IMS system by IIIQ 2023

Sub-Result 1.2: Experience of EU Member States regarding common irregularities exchanged by IIIQ 2023

Sub-Result 1.3: Knowledge on conflict of interest, red flags and public procurement rules of accredited bodies managing and using funds from the pre-accession program improved by IIIQ 2023

### **TARGET:**

Minimum 7 trainings/ workshops in the field of irregularities management for AFCOS Office and Structure for reporting irregularities with minimum 20 employees trained.

Minimum 25% reduction of errors when submitting an Irregularity report via IMS.

Minimum 25% reduction of time needed for submitting Irregularity report via IMS.

Minimum 25% reduction of Irregularity reports that are sent back to Implementing agencies for correction and improvement

Minimum 20 officials attended lectures and seminars on Member states experience regarding common irregularities encountered in implementation of IPA funds, as well as improved overall knowledge on Member states “good practise” when it comes to irregularities and their management

Minimum 20 officials attended lectures and seminars on conflict of interest, red flags and public procurement rules

**COMPONENT II** - AFCOS network capacity building on fraud, corruption and other illegal activities

Result 2: Bodies dealing with fighting against fraud, corruption and any other forms of illegal activities in the system trained

**INDICATORS:**

Sub-Result 2.1: Knowledge on fraud, corruption, whistle blowers upgraded by IV Q 2023

Sub-Result 2.2: Experience of EU Member States on fraud cases exchanged by IV Q 2023

**TARGET:**

Minimum 2 trainings and workshops in the field of fraud prevention, corruption and whistle blowers for AFCOS Network staff with minimum 10 employees trained.

Increased number of meetings related to the suspected fraud cases and fraud prevention, among representatives of the IA, NAO, General Director of Directorate for Management Structure, PIUs and relevant institutions of AFCOS Network.

Increase in decisions, opinion, i.e. recommendations for proceedings by representatives of AFCOS Network to the IAs and other relevant IPA structures.

Increase in output and quality of document produced by AFCOS Network bodies.

Minimum 10 officials attended lectures and seminars on Member states experience regarding fraudulent behaviour and fraud cases encountered in implementation of IPA funds.

Improved cooperation between institutions of AFCOS Network (especially implementing agencies and DMS with Bodies dealing with fighting against fraud, corruption and any other forms of illegal activities).

Awareness raised and knowledge improved in the field of fraud prevention and corruption.

**COMPONENT III** – Evaluation of Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022 in accordance with Methodology for policy development, drafting and monitoring of strategic planning documents - published by Department for Coordination, Alignment and Monitoring of the Implementation of Strategy Documents defining Public Policies

Result 3: Assessment of the relevance, effectiveness, efficiency, sustainability, and impact of the Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022

## **INDICATORS:**

Sub-Result 3.1: Recommendations for preparation of the new Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2023-2026, by advising on main areas and actions of intervention by III Q 2023

## **TARGET:**

Analysis of the current Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022 prepared

Recommendations for the new Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2023-2026 prepared

## **11. Facilities available**

The Beneficiary will provide the Member State experts with the necessary working premises for the implementation of the activities. The premises of Ministry of Finance are located at Stanka Dragojevicica 2 and Mihaila Lalica 1, 81000 Podgorica, Montenegro, with technical and logistical support, including meeting rooms, office space and facilities available for training and seminars. If, for any reason, it is not possible to reserve/provide available meeting rooms and facilities for training and seminars within the Ministry of Finance, the project budget will envisage renting appropriate facilities for the needs and scope of the project.

## **ANNEXES TO PROJECT FICHE**

### **Annex 1. Reference to relevant Government Strategic plans and studies**

1. Methodology for policy development, drafting and monitoring of strategic planning documents (English version and Montenegrin version – the latter one being the most recent version adopted by the Government of Montenegro): links provided on pages 10 and 11.
2. Indicative Strategy Paper for Montenegro 2014-2020
3. Montenegro's Programme of Accession to the European Union 2022 – 2023/Reference to Negotiation paper Chapter 32 – Financial Control
4. Strategy for combating irregularities and fraud for the period 2015-2017 and the accompanying Action Plan
5. Strategy for combating irregularities and fraud for the period 2019-2022 and the accompanying Action Plan
6. Guidelines on irregularity management

### **Annex 2. List of relevant Laws and Regulations**

1. Criminal Code, first adopted on 17 December 2003 and last amended on 30 July 2013 (Official Gazette of the Republic of Montenegro, No 70/2003, 13/2004, 47/2006 and

- Official Gazette of Montenegro, No 40/2008, 25/2010, 32/2011 and 40/2013);
2. Criminal Procedure Code, first adopted on 27 July 2009 and last amended on 27 July 2010 (Official Gazette of Montenegro, No 57/2009 and 49/2010);
  3. Law on Liability of Legal Entities for Criminal Offences, first adopted on 27 December 2007 and last amended on 29 May 2012 (Official Gazette of the Republic of Montenegro, No 2/2007, 13/2007 and 30/2012),
  4. Law on International Legal Assistance in Criminal Matters, first adopted on 26 December 2007 and last amended on 9 July 2013 (Official Gazette of Montenegro, No 4/2008 and 36/2013).
  5. Law on Prevention of Corruption ("Official Gazette", No. 53/14)
  6. Rulebook on detailed procedures following the whistleblower's report on the danger of public interest, indicating the existence of corruption ("Official Gazette", No. 77/15)
  7. Law on Ratification of the Framework Agreement between Montenegro represented by the Government of Montenegro and the European Commission on Rules for Implementation of Union Financial Assistance to Montenegro under the Instrument for Pre-Accession Assistance (IPA II), (Official Gazette of Montenegro - International Agreements No. 5/15 .2015.)
  8. Decree on organization of the indirect management of the implementation of EU financial assistance under the Instrument for Pre-Accession Assistance (IPA II), (Official Gazette of Montenegro 50/15 of 08.09.2015, 039/16 of 29.06.2016, 033/18 of 14.05.2018)
  9. Decree on the Government of Montenegro ("Official Gazette of Montenegro", No. 80/08)
  10. Decree on the organization and manner of work of the state administration ("Official Gazette of Montenegro", No. 118/20, 121/20, 001/21, 002/21)
  11. Decision on Establishing Coordination Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for Protection of the European Union Financial Interests (AFCOS network) (Official gazette of MN, No 60/2013), based on the Decree of the Government of Montenegro (Official gazette of MN, No 80/08).
  12. Decision amending the Decision on Establishing Coordination Body for Monitoring and Managing Policy for Prevention and Suppression of Irregularities for Protection of the European Union Financial Interests (AFCOS network), (Official Gazette of Montenegro No. 06/2015 of 10.02.2015)

**Other relevant documents (available on the internet):**

- *Procurement and Grants for European Union external actions -A Practical Guide; 2020*
- *Practical guide for Identifying conflicts of interests in public procurement procedures for structural actions, A practical guide for managers- OLAF, 2015;*
- *Identifying and Reducing Corruption in Public Procurement in the EU, OLAF (Study), 2013*
- *Public Procurement Guidance For Practitioners, DG for Regional and Urban Policy (Guide), 2015*
- *Fraud in Public Procurement "A collection of Red Flags and Best Practices", OLAF, 2017*
- *Compendium of Anonymised cases, OLAF, 2011*

- *Detection of forged documents in the field of structural actions – A practical guide for managing authorities, European Commission, OLAF, 2013;*
- *Handbook -The role of Member States' auditors in fraud prevention and detection for EU Structural and Investments Funds Experience and practise in the member States, European Commission, OLAF, 2014;*
- *Handbook on “Reporting of irregularities in shaared management” OLAF, 2017*

**Annex C1b: Simplified Logical Framework**

	<b>Description</b>	<b>Indicators (with relevant baseline and target data)</b>	<b>Sources of verification</b>	<b>Risks</b>	<b>Assumptions (external to project)</b>
<b>Overall Objective</b>	Improved knowledge of AFCOS System bodies staff in the field of irregularities management in order to ensure effective and efficient protection of the EU's financial interests in Montenegro.	AFCOS system enhanced and fully adjusted for efficient protection of the EU financial interests with regard the widening of competences and roles of the AFCOS system bodies.	Final Twinning light Report  Documentation produced under the project  List of participants on trainings	Loss of critical competencies or key people in the project  Producing results consistent with project specifications  Delay because of Covid-19 situation	AFCOS System bodies staff trained  Anti-fraud capacities, competences and mutual cooperation of AFCOS office, Structure for reporting irregularities and bodies responsible for suppression of fraud, corruption and any other type of irregularities within the system and IPA structure

<p align="center"><b>Specific (Project Objective)</b></p>	<p>Improvement of inter-institutional cooperation of AFCOS system bodies in the field of irregularities management with fully trained staff aimed at achieving high quality reports of irregularities and protection of EU financial interests.</p>	<p>AFCOS System body staff trained and well prepared for prevention, detection and reporting of irregularities and potential fraud cases.</p>	<p>Final Twinning light Report</p> <p>Documentation produced under the project</p> <p>List of participants on trainings</p>	<p>Loss of critical competencies or key people in the project</p> <p>Producing results consistent with project specifications</p> <p>Delay because of Covid-19 situation</p>	<p>Anti-fraud capacities, competences and mutual cooperation of AFCOS office, Structure for reporting irregularities and bodies responsible for suppression of fraud, corruption and any other type of irregularities within the system and IPA structure</p>
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<p style="text-align: center;"><b>Mandatory results/outputs by components</b></p>	<p>COMPONENT I</p> <p>Result 1: Reporting on Irregularities improved</p> <p>Sub-Result 1.1. Staff trained for reporting through IMS system</p> <p>Sub-Result 1.2 Experience of EU Member States regarding common irregularities exchanged</p> <p>Knowledge on conflict of interest, red flags and public procurement rules of accredited bodies managing and using funds from the pre-accession program improved</p>	<p>Minimum 7 trainings and workshops in the field of irregularities management for AFCOS Office and Structure for reporting irregularities staff with minimum 20 employees trained. (Result 1; Sub-Result 1.1.; Sub-Result 1.2)</p> <p>Minimum 25% reduction of errors when submitting an Irregularity report via IMS. (Result 1; Sub-Result 1.1.)</p> <p>Minimum 25% reduction of time needed for submitting Irregularity report via IMS. (Result 1; Sub-Result 1.1.)</p> <p>Minimum 25% reduction of Irregularity reports that are sent back to Implementing agencies for correction and improvement</p>	<p>Final Twinning light Report</p> <p>Documentation produced under the project</p> <p>List of participants on trainings</p>	<p>Loss of critical competencies or key people in the project</p> <p>Producing results consistent with project specifications</p> <p>Delay because of Covid-19 situation</p> <p>Less participants than it is planned</p>	<p>Timely and adequate resources for co-financing available</p> <p>Willingness of cooperation within all relevant Ministries and Institutions</p>
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		<p>(Result 1; Sub-Result 1.1.)</p> <p>Minimum 20 officials attended lectures and seminars on Member states experience regarding common irregularities encountered in implementation of IPA funds, as well as improved overall knowledge on Member states “good practise” when it comes to irregularities and their management (Sub-Result 1.2)</p> <p>Minimum 20 officials attended lectures and seminars on conflict of interest, red flags and public procurement rules (Sub-Result 1.2)</p>			
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	<p>COMPONENT II</p> <p>Result 2: Bodies dealing with fighting against fraud, corruption and any other forms of illegal activities in the system trained</p> <p>Sub-Result 2.1 Knowledge on fraud and corruption, upgraded</p> <p>Sub-Result 2.2. Experience of EU Member States on fraud cases exchanged</p>	<p>Minimum 2 trainings and workshops in the field of fraud prevention for AFCOS Network staff with minimum 10 employees trained. (Result 2; Sub-Result 2.1; Sub-Result 2.2)</p> <p>Increased number of meetings related to the suspected fraud cases and fraud prevention, among representatives of the IA, NAO, General Director of Directorate for Management Structure, PIUs and relevant institutions of AFCOS Network. (Result 2; Sub-Result 2.1)</p> <p>Increase in decisions, opinion, i.e. recommendations for proceedings by representatives of AFCOS Network to the IAs and other relevant</p>			
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		<p>IPA structures. (Result 2; Sub-Result 2.1)</p> <p>Increase in output and quality of document produced by AFCOS Network bodies. (Result 2; Sub-Result 2.1)</p> <p>Minimum 10 officials attended lectures and seminars on Member states experience regarding fraudulent behaviour and fraud cases encountered in implementation of IPA funds (Result 2; Sub-Result 2.1; Sub-Result 2.2)</p> <p>Improved cooperation between institutions of AFCOS Network (specially Implementing agencies and DMS with Bodies dealing with fighting against fraud, corruption and any other forms of illegal activities). (Result 2;</p>			
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	<p>COMPONENT III</p> <p>Result 3: Assessment of the relevance, effectiveness, efficiency, sustainability, and impact of the Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2019-2022</p>	<p>Sub-Result 2.1; Sub-Result 2.2)</p> <p>Awareness raised and knowledge improved in the field of fraud prevention and corruption. (Sub-Result 2.1; Sub-Result 2.2)</p> <p>Recommendations for the new Strategy 2023-2026 prepared (Result 3; Sub-Result 3.1.)</p>			
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	Sub-Result 3.1. Recommendations for preparation of the new Strategy for Combating Fraud and Irregularity Management for protection of EU's financial interests for the period 2023-2026,				
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<p style="text-align: center;"><b>Activities</b></p>	<p>COMPONENT I</p> <p>A.1.1.1. Seminar on Introduction to Irregularity management and Legislative framework; indicative list of types of irregularity to be described as suspected fraud; most common suspected irregularities; definition of PACA and the date of PACA; calculation of the exact amount affected and registration of debt; classification of an irregularity as suspected fraud; errors and irregularities caused by administrative acts; irregularity and fraud risk management etc.</p> <p>A.1.1.2. Training on Electronic reporting;</p>		<p>Final Twinning light Report Documentation produced under the project</p> <p>List of participants on trainings</p>	<p>Producing results consistent with project specifications</p> <p>Delay because of Covid-19 situation</p> <p>Less participants than it is planned</p>	<p>Full commitment of the parties involved</p> <p>Good communication among bodies in AFCOS system</p> <p>Good communication and cooperation between Project Leader and Short term experts</p>
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	<p>Irregularity Management System (IMS); maintenance of IMS user accounts; exporting cases from IMS; creation of statistical analysis using information from IMS; Irregularity register etc.</p> <p>A.1.2.1. Seminars on Common irregularities in the implementation of service contracts</p> <p>A.1.2.2. Seminars on Common irregularities in the implementation of procurement contracts,</p> <p>A.1.2.3. Seminars on Common irregularities in the implementation of work contracts</p> <p>A.1.2.4. Seminars on Common irregularities in the agricultural sector</p> <p>A.1.2.5. Seminars on European Anti-fraud Office (OLAF),</p>				
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	<p>mission and mandate, administrative investigations of OLAF on the territory of one country</p> <p>A.1.2.6. Seminars on European Public Prosecutor's Office (EPPO), PIF Directive, EPPO - OLAF cooperation</p> <p>A.1.2.7. Seminars on administrative controls and on the spot controls, case studies of administrative investigations</p> <p>A.1.3.1. Seminar on Red flags</p> <p>A.1.3.2. Seminar on Conflict of interest; undisclosed conflict of interest; collusive bidding; declaration on conflict of interest</p> <p>A.1.3.3. Seminar on Infringement of public procurement rule;</p>				
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	<p>fraud indicators; contract and public procurement fraud; labour charges and consultancy services fraud</p> <p>COMPONENT II</p> <p>A.2.1.1. Seminar on Fraud and fraud risk, the possibilities of fraud detection on the basis of digital documents</p> <p>A.2.1.2. Seminar on Tax fraud, method of identification and case studies</p> <p>A.2.1.3. Seminar on Crime and corruption, cooperation between law enforcement and implementing bodies and authorities (Law enforcement challenges in investigating fraud cases)</p> <p>Prosecution of offences against EU financial interests</p>				
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	<p>A.2.2.1. Seminars on Direct cooperation of judicial and EU bodies in resolving specific cases with a view to identifying irregularities</p> <p>A.2.2.2. Seminars on Cooperation between AFCOS and OLAF investigators -examples of final judgments in cases of suspected fraud</p> <p>A.2.2.3. Seminars on Cooperation between AFCOS and AFCOS bodies/procedure regarding potential fraud</p> <p>COMPONENT III</p> <p>A.3.1.1. Definition of an evaluation roadmap, with the main criteria and questions to be replied during the evaluation</p>				
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	<p>A.3.1.2. Organization of meetings, seminars, interviews with the main stakeholders;</p> <p>A.3.1.3 Presentation and discussion of main results;</p> <p>A 3.1.4 Finalization of the evaluation report</p>				
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