

# Rising of Anticorruption Training System





# Central Anti-Corruption Bureau



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"This project has been funded with support from the European Commission. This publication reflects the views only of the author, and the European Commission cannot be held responsible for any use which may be made of the information contained therein" Centralne Biuro Antykorupcyjne Al. Ujazdowskie 9 00-583 Warszawa www.cba.gov.pl

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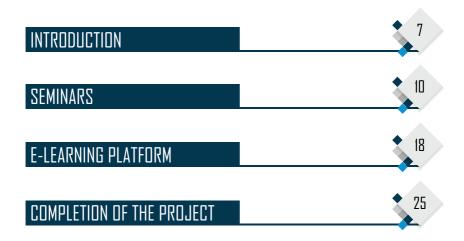
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Warsaw 2015







Harm caused by corruption in terms of loss and damage associated with bribery are becoming – in the rapidly developing world – more widely understood by the public. It is becoming obvious that we should make every effort to eliminate corruption. The public authorities should support the development of skills and tools to prevent crime by ensuring training and professional development for officials in agencies and public institutions. They should cooperate with the educational sector, pursuing private educational goal of extending knowledge and qualifications in order to eliminate non-desirable effects of criminal activities, including corruption.

In order to reduce the risk of corruption, organisations should ensure that their officials, officers and employees receive appropriate anticorruption training. One of any organisation's most effective tools against corruption is well-trained staff who is sensitive to the risk of corruption, who can identify the red flags and who can also address them.

Working with many partners, developing complex information systems, analysing data from different sectors, promoting community involvement, developing means of effective communication with the public sector and implementing and evaluating different programmes – all of these actions require specific and often new skills.

Given the above, the Central Anti-Corruption Bureau (in Polish: *Centralne Biuro Antykorupcyjne*) requested the European Commission to award the grant as part of the programme titled *Prevention of and Fight against Crime*. The Commission decided in 2012 to award the Central Anti-Corruption Bureau (CBA) grants for the implementation of the "Rising of Anticorruption Training System" scheme.

The co-beneficiary of the programme was the Special Investigation Service of the Republic of Lithuania (STT), and the partner of the project was the Corruption Prevention and Combating Bureau (KNAB) of the Republic of Latvia.

The programme's budget has been planned for a total amount of 720,000 euros. The European Union has earmarked for subsidizing the programme with 90% of the budget in the amount of 648,000 euros.

While carrying out the programme, the Central Anti-Corruption Bureau decided to implement the anti-corruption training system in two different ways. Firstly, through traditional means – meetings, discussions, preparation of materials etc. Secondly, through a specially dedicated course using IT tools – the anti-corruption e-learning platform.

The main goals of the "Rising of Anticorruption Training System" programme are as follows:

- practical cross-border - improvement пf cooperation \_ development пf mutual understanding between experts from both domestic and foreian institutions and oroanisations,
- innovative approach to corruption prevention,
- development of the training system at both national and international level,
- better knowledge and willingness of experts to prevent and combat corruption.

The programme's implemented activities covered not only six anti-corruption training sessions and the creation of an e-learning platform, but also the preparation of training sessions, i.e. selecting relevant topics of interest to anti-corruption experts and qualified trainers. Additionally, the project helped to develop a valuable forum to share experiences, exchange ideas and discuss best practices.

The training courses were attended by approximately 200 people from Poland and abroad, including officials (law enforcement agencies, the judiciary, civil servants, NGOs, academics) from the Member States and third countries. The programme's important goal was the professional preparation of the above-mentioned experts from the Member States, candidate countries and other states to fight corruption while performing official duties.

Table 1: Total number of foreign participants

No.	Country	Number of participants			Additional remarks			
				III	IV	٧	VI	]
1.	Austria	-	-	2	2	2	1	ВАК
2.	Azerbaijan	1	1	1	1	1	1	General Prosecutor's Office
3.	Bulgaria	-	-	2	1	1	1	SANS
4.	Croatia	1	1	1	2	1	1	USKOK, MoJ
5.	Czech Republic	-	-	-	-	-	1	Police
6.	Denmark	-	2	-	-	-	-	Special Prosecutor's Office
7.	Estonia	2	2	2	2	4	4	Police, KAPO
8.	Hungary	-	-	-	1	1	-	NPS
9.	Latvia	4	4	4	4	4	4	KNAB
10.	Lithuania	7	6	7	7	7	7	STT, external experts
11.	Macedonia	-	1	1	1	1	1	Mal
12.	Moldova	1	1	1	1	2	2	NAC
13.	Montenegro	-	1	-	-	-	-	DACI
14.	Norway	2	-	-	-	-	-	OKORIM
15.	Romania	-	-	2	2	2	3	AGD, SRI
16.	Slovak Republic	-	-	-	-	-	2	NAKA
17.	Slovenia	-	-	1	1	1	1	Police,
18.	Ukraine	-	-	-	-	-	1	NABU
	TOTAL	18	19	24	25	27	30	143

The measures should be implemented within 36 months. The entire project envisaged two components:

- conducting the cycle of 6 international training conferences on anti-corruption topics addressed to representatives of public administration, academia, and institutions involved in combating corruption,
- building an e-learning platform (creating anticorruption educational tools and a communication instrument for officials, entrepreneurs and society as part of a three-component system: corruption in public administration, corruption in business, the social impact of corruption).

In addition, an important factor for the project partners resulting from the project implementation was to strengthen the international cooperation, the exchange of experiences and good practices and to discuss during the training sessions current threats of corruption. The result of the meetings was the strengthening of contacts between the institutions involved in the project, especially in the field of anti-corruption measures. In addition, an important element of the project – resulting from the exchange of experiences – was corruption prevention.

What was characteristic of the workshops was the free discussion spirit and openness to dialogue during the panel sessions. Thus, the participants had the opportunity to hold discussions during the presentations and debate about problems and about the resulting dissimilarities on an ongoing basis.

The participants themselves were responsible for selecting the main topic of seminars. They also decided on the topic of the next workshop. This formula of the meetings was primarily aimed at preparing and discussing problems of corruption in the sectors most prone to corruption in the countries of the participants who took part in regular meetings. This led to strengthened cooperation with the partners and resulted in, among other things, the signing of the 2014 agreement by the Central Anti-Corruption Bureau with the Austrian Federal Anticorruption Bureau (BAK) and in the 2015 agreements on cooperation between the Central Anti-Corruption Bureau and the Special Investigation Service of the Republic of Lithuania (STT) and the National Anticorruption Centre of Moldova (NAC). As part of the training. Mr Paweł Woitunik, Head of the Central Anti-Corruption Bureau met the Director of the Austrian Federal Anti-Corruption Bureau (BAK). Mr Andreas Wieselthaler and the Deputy Director of the National Anticorruption Centre of Moldova. Ms Cristina Tarna. During the project's last, i.e. 6th training session, the Central Anti-Corruption Bureau invited a representative of the newly formed National Anti-Corruption Bureau of Ukraine (NABU) who delivered an interesting presentation on the process and the circumstances of founding of the NABU, as well as on its future plans.

During the project's implementation, the Central Anti-Corruption Bureau kept identifying, on an ongoing basis, the programme's new participants from the region who, by their involvement, brought the appropriate added value in order to enhance knowledge and share experience of the representatives of foreign services and organisations in combating and preventing corruption. This project has contributed to establishing a network of contacts between participants in training seminars based on the exchange of experiences and good practices in combating corruption and corruption prevention activities.

### SEMINARS

### 1st SEMINAR SESSION (23-27 September 2013)

The topic of the first seminar was to discuss the project's goals and targets and to present the tasks carried out by the services and agencies involved in the fight against corruption. The primary objective was to get acquainted with the competencies and organisational structure of various services and offices and their location in a given country in the context of combating and preventing corruption.

The seminar was attended by the representatives of different services and offices from Lithuania (Special Investigation Service – project's co-beneficiary), Latvia (Corruption Prevention and Combating Bureau – project's partner), Azerbaijan (General Prosecutor's Office), Croatia (Ministry of Justice, Independent Anti-corruption Sector), Estonia (Police and Border Guard Board, Central Criminal Police - Corruction Crimes Bureau), Moldova (National Anticorruption Centre) and Norway (The National Authority for Investigation and Prosecution of Economic and Environmental Crime). On behalf of the Polish team, the seminar was attended by officers of the Central Anti-Corruption Bureau. prosecutors from the Regional Prosecutor's Office in Warsaw, representatives of the Ministry of the Interior and lecturers from the Police Academy

in Szczytno, as well as police officers from the Poviat Police Headquarters in Lublin (the Poviat Police Headquarters in Lublin is at the same time another project's beneficiary, supported by the European Commission, in which the Central Anti-Corruption Bureau is a project's partner.

The opening of the seminar session was attended by Mr Paweł Wojtunik, Head of the Central Anti-Corruption Bureau, and by Mr Robert Hernand, Deputy Prosecutor General of the Republic of Poland.

> Photo 1: Opening of the 1st Seminar Session – Head of the Central Anti-Corruption Bureau, Deputy Head of the Prosecutor General (Poland) and the representative of the Special Investigation Service of the Republic of Lithuania



Among the guests invited by the Polish side, there was a representative of the Police Academy in Szczytno who delivered a presentation on the general concept of corruption in terms of ethics and discussed the issue of combating corruption by the Polish National Police.

different presentations provided In bv the representatives of foreign services and offices. in addition to the characteristics of their roles and responsibilities in combating and preventing corruption, different legal systems related to the corruption control and legal provisions enabling the prosecution of corruption were also presented. The presentation delivered by ØKOKRIM's representative on the anti-corruption measures undertaken in Norway which put this country on one of the first positions of the Corruption Perceptions Index by Transparency International drew a lot of interest among the audience. The presentation's keynote was: By combating crime, ØKDKRIM (Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime) helps to protect important values in the Norwegian society.

2nd SEMINAR SESSION (25-29 September 2013)

The keynote of the next meeting as part of the project was broadly defined legislation – from law-making through its practical implementation and application, to the analysis of specific examples of corruption cases.

The conference was attended by officers of special services for combating corruption in Lithuania (Special Investigation Service), Latvia (Corruption Prevention and Combating Bureau), Azerbaijan (General Prosecutor's Office), Croatia (Ministry of Justice, Independent Anti-corruption Sector), Denmark (State Prosecutor for Serious Economic and International Crime), Estonia (Police and Border Guard Board, Central Criminal Police – Corruption Crimes Bureau), Macedonia (Ministry of Interior, Sector for Internal Control and Professional On the other hand, an external expert, Assoc. Prof. Dr. Arturas Petkus from the Mykolas Romeris University in Vilnius, shared different ways of perception of corruption with the seminar's participants, as well as anti-corruption education of children and young people based on training programmes developed from a scientific point of view.

The Central Anti-Corruption Bureau, as the host of the meeting, shared with participants their achievements in the fight against corruption, in particular highlighting the educational and preventive measures taken by the Central Anti-Corruption Bureau.

The goal of the first seminar session was to make oneself acquainted with the topic, based strictly on the exchange of information on the scope of competences and responsibilities of the different services. That allowed the participants to identify the subject areas that are of interest to the representatives of different services and offices taking part in the meeting.

Standards). Moldova (National Anticorruption Centre). Monteneoro (Directorate for Anticorruption Initiative) and the Central Anti-Corruption Bureau from Poland. The meeting was also attended by representatives of Lithuanian universities: Mykolas Romeris University - the Institute of Criminal Law and Procedure, the Law Institute of Lithuania - Legal System Research Department and Vytautas Magnus University – the Public Law Department, Among the quests participating in the seminar from the Polish side, there were also representatives of the Ministry of the Interior, prosecutors from the Regional Prosecutor's Office in ŁódO, police officers from the Poviat Police Headquarters in Kraków and Rzeszów and lecturers from the Police Academy in Szczytno.

Photo 2: Panel sessions during the 2nd Seminar Session on the "Rising of Anticorruption Training System"

Among those taking part in the international meeting was the prosecutor from the Prosecutor's Office

in łódź who delivered a presentation entitled Legal aspects of bribery legal characteristics and case study. The topic presented by the prosecutor was particularly interestina since it was delivered from the perspective of the Prosecutor's Office the quardian of the rule of law and the institution supervising procedures conducted inter alia hy the Central Anti-Corruption Rureau and the National Police in Poland. The presentation instantly caught the delegates' attention as they had an opportunity to compare the role and tasks of the Polish Prosecutor's Office and those of the Prosecutor's Office in Azerbaijan, A Senior Prosecutor of the General Prosecutor's Office of Azerbaijan gave a presentation on the anti-corruption legal solutions in Azerbaijan. In addition, a representative of the Department of Control Proceedings of the Central Anti-Corruption Bureau, in his report entitled "The participation of the Central Anti-Corruption Bureau in preventing conflicts of interest and disclosing corruption cases by controlling asset declarations". shared his insights with participants, which also drew a lot of interest among foreign delegates.

The presentations delivered by participants focused on presenting the main aspects of the keynote of the second seminar session in practice and on the gained experiences. The presentation delivered by a representative of the Police Academy in Szczytno, an outstanding practitioner in the field of fight against corruption of many years' standing, drew a lot of interest among the audience. The presentation concerned "Fight against corruption and money laundering among politically exposed persons. New challenges for the business sector".

#### 3rd SEMINAR SESSION (2-6 June 2014)

The main topic of the meeting: the threats and anti-corruption activities in the field of public procurement. The third seminar session was attended by representatives of services from 11 countries, i.e. the project partners from Lithuania (Special Investigation Service) and Latvia (Corruption Prevention and Combating Bureau), as well as participants from Austria (Federal Bureau of Anti-Corruption), Bulgaria (State Agency for National Security), Romania (Anticorruption General Directorate), Azerbaijan (General Prosecutor's Office), Croatia (Ministry of Justice, Independent Sector for the Suppression of Corruption), Slovenia (General Police Directorate, Economic Crime Division – Corruption Sector), Macedonia (Ministry of Interior, Sector for Internal Control and Professional Standards), Moldova (National Anticorruption Centre) and Estonia (Police and Border Guard Board, Central Criminal Police, Corruption Crime Bureau). Photo 3: Opening of the 3rd Seminar Session by the Head of the Central Anti-Corruption Bureau (CBA), Director of the Austrian Federal Bureau of Anti-Corruption, Director of the Regional Branch of the Supreme Audit Office (Poland) and the representative of the Special Investigation Service of the Republic of Lithuania

Among the guests who took part in the seminar were also the following persons: Mr Andreas Wieselthaler, Director of the Austrian Federal Bureau of Anti-Corruption, and Ms Cristina Tarna, Deputy Director of the National Anticorruption Centre of Moldova.

The seminar was attended by a researcher acting as an expert, Assoc Prof Dr Arturas Petkus from the Mykolas Romeris University in Vilnius, the Institute of Criminal Law and Procedure, who gave a lecture on *The impact of European Union law regulations on the public procurement proceedings in the EU Member States.* Ms Egle Kavaliounaite-Ragauskiene, PhD, Director of the Legal System Research Department from the Law Institute of Lithuania, delivered a presentation on *Identification of risk factors in public procurement procedures.* 

The participants in this international meeting had an opportunity to make themselves acquainted with the presentation by Andrzej Panasiuk, PhD, Director of the Warsaw Office of the Supreme Audit Office (NIK) who familiarised the participants with the role and tasks of the Polish Supreme Audit Office (NIK) in the field of public procurement control from the perspective of the supreme governmental organ "guarding public finances".

The Polish team invited Mr Marcin Klimczak, Director of the Investigation and Economic Expertise Department at PricewaterhouseCoopers Poland (PwC Poland) to take part in the third seminar. PricewaterhouseConners is a company providing advisory services in the field of audit, tax and legal advice. The main objective of participation of a PWC representative in the seminar session was to present the topic of identifying and managing corruption risks in public procurement within the European Union. The main goal was therefore to present this issue from the perspective of the private sector.

The seminar was also attended by Mr Michał Dembi ński from the British-Polish Chamber of Commerce who presented *The British experience in the application of the Bribery Act* and Ms Kinga Reinholz, Head of the Department of Control for Contracts cofinanced from EU funds of the Public Procurement Office (Poland).

The officers from the Central Anti-Corruption Bureau from Poland provided a presentation on *The corruption-generating provisions of the Public Procurement Law and the limits of its liberalization* and *The methods of corrupt practices in public procurement contracts in the IT area.* The topics presented by the Central Anti-Corruption Bureau representatives resulted from many years of experience in the field of public procurement contracts which represent some of the greatest challenges within the CBA's control, operational and investigative activities. Of equal importance is the disclosure system of corrupt practices in the field of computerization of Poland's public sectors – an issue which, according to forecasts, is on the list of

#### 4th SEMINAR SESSION (20-24 October 2014)

The keynote of the meeting was *The Map of Corruption*, namely the ways of collecting, processing and storing data on corruption in different countries. The aim of the fourth seminar session was to discuss the differences and similarities in this area, as well as to find a common denominator.

Apart from officers of the Central Anti-Corruption Bureau, Poland was represented by a representative of the Stefan Batory Foundation (an NGO registered as a Public Benefit Organisation). the objective of which is to promote the development of democratic civil society – a society of people aware of their rights and responsibilities. engaging in the life of their local community, their country and the international community. The address was based on the presentation and discussion of national publications illustrating the state of corruption in Poland.

This meeting gave the opportunity to the Central Anti-Corruption Bureau officers to share their experiences in the field of collecting data with the audience – in cooperation with other Polish law enforcement authorities – in order to create the most authentic assessment of the state of corruption in national economy sectors most prone to corruption. The aim was to publish the so-called *Map of Corruption* for the years 2010, 2011, 2012 and 2013. The next point on the agenda was to present the methodology and the results of final cooperation the sectors which will be most prone to corruption in Poland in the future. The discussed topics gave the opportunity to agree on the leading topic for the next (fourth) seminar session.

between the Central Anti-Corruption Bureau and other law enforcement agencies, which resulted in the *Anticipated Corruption Threats in Poland* for subsequent years.

The representatives of other institutions, present at the seminar, delivered presentations cantered specifically on the statistics – on the scale of corruption in their countries, on the fight against corruption and on the analytical systems functioning in the institutions they represented. The representative of Estonia delivered an interesting presentation on determining the risk of corruption at the level of public organisations and local authorities using mass data analysis. The speech given by Moldova's representative drew a lot of interest

Photo 4: The 4th Seminar Session on "Rising of Anticorruption Training System"

among the audience; the presentation focused on the effectiveness of statistical analysis in mapping the phenomenon of corruption on the example of the experience of the National Anticorruption Centre of Moldova (NAC). The following issues were also covered: fighting against corruption in Azerbaijan in the context of creating the map of corruption, implementing anti-corruption policy in Croatia, the latest achievements of the Hungarian National Protective Service and the methodology of corruption risk identification in Romania.

The meeting was also attended by academics from Lithuania: Assoc. Prof. Dr. Arturas Petkus from Mykolas Romeris University in Vilnius, the Institute of Criminal Law and Procedure, with the presentation on *Mapping the Pillars of National Integrity Systems*. Ms Egle Kavaliounaite-Ragauskiene, Director of the Legal System Research Department from the Law Institute of Lithuania with the study of corruption in the private

#### 5th SEMINAR SESSION (25-29 May 2015)

The character of the  $5^{\rm th}$  training conference was unique because the topic of this training seminar was to exchange experiences in the field of broadly defined operational and investigative work. The meeting was aimed at enhancing international cooperation, exchanging experiences and good practices in the field of operational and investigative activities as the main pillars of the fight against corruption, in both domestic and international arenas.

The discussed topics and the issues debated by the participants in the meeting required the organisation of the events in a venue with limited access to outsiders. That is why the first part of the 5<sup>th</sup> training seminar was organised at the Training and Conference Centre of the Central Anti-Corruption Bureau, where problems and differences in operational and investigative activities performed by officers participating in the seminar could be discussed freely in a circle of professionals engaged in the active operational and investigative work. sector, Mr Petras Ragauskas from the Institute of International Relations and Political Science of the Vilnius University, with a presentation on the map of corruption in the media.

The seminar was attended by representatives of: Lithuania (Special Investigation Service), Latvia (Corruption Prevention and Combating Bureau), Austria (Federal Bureau of Anti-Corruption), Azerbaijan (General Prosecutor's Office), Bulgaria (State Agency for National Security), Croatia (Ministry of Justice, Anti-Corruption Sector), Estonia (Police and Border Guard Board, Central Crime Police Corruption Crime Bureau), Macedonia (Secretariat of the State Commission for Prevention of Corruption), Moldova (National Anticorruption Centre), Romania (Anticorruption General Directorate), Hungary (National Protective Service), and Slovenia (General Police Directorate, Criminal Police Directorate).

One of the most interesting presentations was the one delivered by the officers of the Central Anti-Corruption Bureau who presented Poland's largest-ever computerization scandal [the so-called IT-racket]. The address gained wide recognition and acclaim, and participants had many comments and questions to ask. The process of collecting and processing information and data, the operational and investigative activities aimed at gathering the appropriate material evidence, the opening of the inquiry and conducting an investigation in cooperation with the Prosecutor's Office cave a picture of a long and arduous work carried out by the Central Anti-Corruption Bureau officers, resulting in the identification of perpetrators and holding them accountable for corruption between the public and orivate sectors in the IT area. It should be noted that while discussing this presentation, the seminar participants had the opportunity to familiarise themselves with the role of the Central Anti-Corruption Bureau officers investigating this case

and their cooperation with other services abroad, including the FBI.

Another remarkable presentation was delivered by Austria's representative who familiarised the audience with the multimedia material depicting preventive anti-corruption measures and fighting corruption in Austria. The way the presentation was prepared, as well as its innovative message met with great interest on the part of the participants. Equally important was the speech given by an officer of the Operation and Investigation Department of the Central Anti-Corruption Bureau who spoke about some of the powers and regulations related to the operational and investigative activities from a purely technical and legal perspective, on the basis of the Act on the Central Anti-Corruption Bureau.

Among the invited speakers was also, among others, the FBI special agent seconded in the FBI section of the US Embassy in Warsaw. The FBI special agent presented the FBI experience in implementing the provisions of the Foreign Corrupt Practices Act (FCPA). According to the results of the evaluation questionnaire, the presentation of the Federal Investigation Bureau agent was one of the most interesting speeches during the fifth seminar session. However, the speech given by a representative of the Asset Recovery Office of the Criminal Bureau of the

#### 6th SEMINAR SESSION (7-11 September 2015)

The topic of the last (sixth) training seminar was the criminal and strategic analysis and international cooperation as a support in conducting operational and investigative activities in the countries participating in the project.

The conference was attended by representatives of law enforcement agencies from: Lithuania (Special Investigation Service), Latvia (Corruption Prevention and Combating Bureau), Austria (Federal Bureau of Anti-Corruption), Azerbaijan (General Prosecutor's Office), Bulgaria (State Agency for National Security), National Police Headquarters turned out to be equally interesting. The speaker discussed the competences and experiences of the Polish Asset Recovery Office performing vital tasks, including in the area of anticorruption activities, securing the property acquired through criminal activity.

The active participation of experts specialising in operational and investigative activities ensured a dynamic discussion about the latest developments, methods and effective solutions used in their daily duties.

The conference was attended by representatives of law enforcement agencies from: Lithuania (Special Investigation Service), Latvia (Corruption Prevention and Combatino Bureau), Austria (Federal Bureau of Anti-Corruption), Azerbaijan (General Prosecutor's Office), Bulgaria (State Agency for National Security), Croatia (the Office for the Suppression of Corruption and Organised Crime), Estonia (Police and Border Guard Board, Central Crime Police, Corruption Crime Bureau and Internal Security Service). Macedonia (Secretariat of the State Commission for Prevention of Corruption), Moldova (National Anticorruption Centre) Romania (Anticorruption General Directorate), Slovenia (General Police Directorate, Criminal Police Directorate) and Hungary (National Protective Service)

Croatia (the Office for the Suppression of Corruption and Organised Crime), Czech Republic (Police of the Czech Republic, Criminal Police and Investigation Service), Estonia (Police and Border Guard Board, Central Crime Police, Corruption Crime Bureau and Internal Security Service), Macedonia (Secretariat of the State Commission for Prevention of Corruption), Moldova (National Anticorruption Centre), Romania (Anticorruption General Directorate, Intelligence Service), Slovenia (General Police Directorate, Criminal Police Directorate) and Slovakia (National Anticorruption Unit). Due to the partly sensitive topic of the seminar, the first part of the meeting was held at the Training and Conference Centre of the Central Anti-Corruption Bureau, during which operational issues and interesting operational matters were discussed in which the important role was played by the use of criminal analysis and contacts with foreign partners.

For the first time, the conference was attended by a representative of the newly created Ukrainian anticorruption service – the National Anticorruption Bureau of Ukraine (NABU) with the Department of Analysis and Information Processing. The NABU's representative delivered a presentation on the Ukrainian anti-corruption services, their statutory functions and competences, the conditions and circumstances of its foundation, the difficulties encountered by the NABU, areas in need of improvement, recruitment of employees, and the nature of work. In addition, the speaker outlined the NABU's position in the structures of public authority in Ukraine. He also described the tasks to be undertaken by other institutions - either already existing or planned to be founded - aimed at fighting or preventing corruption in Ukraine.

The presentation given by a representative of the Special Investigation Service of Lithuania gained wide recognition. Its topic cantered on the impact of analytical activity on the on-going investigations and on the detection of corruption in the pharmaceutical sector, based on a presented case study.

The international meeting was also attended by a representative of the Ministry of Finance dealing with the issue of money laundering. She presented the experience of the Polish Financial Information Department in the field of criminal analysis and international cooperation as tools to support operational and investigative activities in detecting corruption offenses, on the basis of relevant case studies. During the conference, a current officer of the International Police Cooperation Bureau of the National Police Headquarters took the floor in order to present the practical aspects of international cooperation from the Polish Police perspective.





### **E-LEARNING PLATFORM**

As stated in article 2 paragraph 1 item 1 of the Act on the Central Anti-Corruption Bureau, the tasks of the Central Anti-Corruption Bureau include the prevention of corruption and corruption-related crimes. In practice, a very wide interpretation of the concept was adopted when it comes to the tasks of the Central Anti-Corruption Bureau. The notion of corruption prevention is also understood as informational and educational activities aimed at promoting the knowledge about corruption risks, as well as shaping proper attitudes and behaviours giving no consent for corruption. In order to follow the spirit of the time and in order to fulfil the educational mission in an accessible and attractive way, the Central Anti-Corruption Bureau has decided, with the financial support of the European Commission's Prevention of and Fight against Crime Programme, to launch an e-learning platform containing training sessions aimed at corruption prevention.

The first conceptual work on its foundation began in 2012, along with the submission of a grant application to the European Commission. The following assumption were made:

- the platform will operate for 30 months,
- during that time, 4.5 thousand people will be trained.

The e-learning platform of the Central Anti-Corruption Bureau was launched on 21 May 2014. This is the first generally accessible internet platform in Poland containing anti-corruption training sessions. The access to this internet platform is contingent upon the new user's passing through the registration process. The username and the password are defined by the user – they enable people to log into the system.

The training sessions were meant to address the broadest possible group of recipients, so that the knowledge about the corruption threats and the fight against corruption could reach the whole spectrum of society. Given the above, it was decided that the internet platform should offer three thematic courses to its users, addressed to groups specially considered by the Central Anti-Corruption Bureau, namely:

- corruption in public administration dedicated to officials,
- corruption in business addressed to entrepreneurs,
- the social impact of corruption on society as a whole, with particular emphasis on young people.

The first module, devoted to corruption in public administration, presents information on the legal and institutional instruments aimed at fighting corruption; it systematises and broadens the already existing knowledge about the anti-corruption legal provisions and methods. During this training session, the trainee, , will learn what each and every employee of the public administration should do and can do in order to reduce corruption in their professional environment.

#### Welcome to Central Anti-Corruption Bureau's training platform.

In order to meet social expectations, the Central Anth-Corruption Bureau is going to launch first in Poland public internet e-learning platform which is going to contain anti-corruption trainings dedicated to representatives of public administration, business, and youth. We hope that this initiative will help increase the level of social awareness and perception of corruption, as well as encourage discussions on the topics of the specificity of corruption and its scale, the effectiveness of domestic legislation, and the current anti-corruption policy.

When creating the e-learning training we have made our best effort to present the knowledge in an approachable, visually attractive, and user friendly manner. We divided the content into 3 thematic blocks, such as: corruption in public administration, corruption in business, as well as social consequences of corruption, however, having the multilateral aspect of corruption in mind, we strongly recommend participating in all of the modules. Each of them ends with a test, passing of which will result in not only the satirifaction of the participant, but also in an appropriate certificate.

Participation in the first module will provide you with the information on legal and institutional instruments used to fight against corruption. You will also be able to systematize and broaden your knowledge on anti-corruption laws and methods of preventing corruption. You will also learn what each employee of public administration should and can do to limit this phenomenon.

Thinks to participation in the second component, devoted to systemic and institutional anti-corruption solutions functioning in the legal and economic spheres, you will learn about the analysis of economic consequences for the state and the society in cases when corruption takes place at the junction of administrative and private sectors.

From the third module, you will learn how corruption may influence the budget deficit or if its scale may be related to unemployment and crisis. The activity of institutions set up to fight against corruption, together with the role played by the non-governmental organizations, will also be presented.

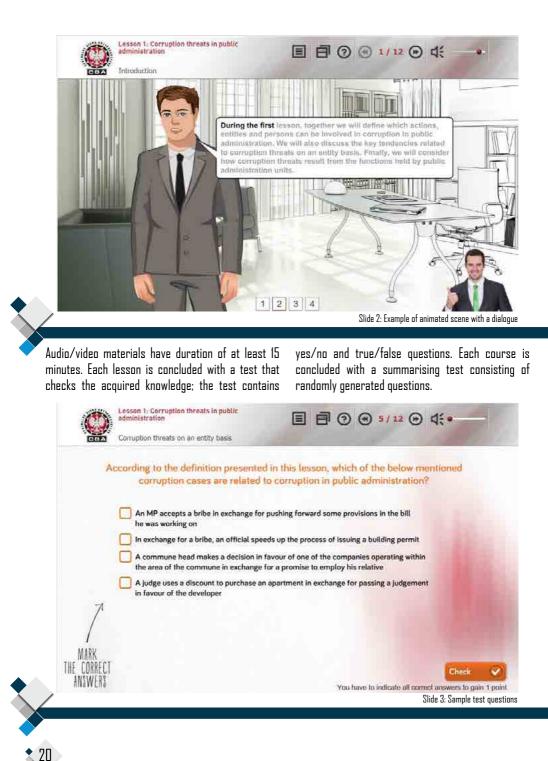
Remember that you don't have to limit your choice to only one component!



The second component, dedicated to the systemic and institutional anti-corruption solutions functioning in legal and economic transactions, introduces the analysis of the economic impact for the state and society in the case of corruption at the interface between government and the private sector.

The third module presents the effects of corruption on the budget deficit and the relation between the scale of this phenomenon and the unemployment and the crisis. The activity of the institutions established in order to fight corruption and the role which NGDs can play in this field are also presented. Each module consists of 20 lessons, covering from 5 to 10 thematic issues. It takes about 45 minutes to complete each lesson. The entire course – consisting of 3 modules – is available in two language versions: Polish and English.

Every lesson contains a static text and dialogues, animated scenes, audio/video materials and contents provoking discussion and interaction.



Upon successful completion of the course, a personal certificate of completion can be generated with an individual number. This number is used to confirm the

authenticity of the certificate on the platform, without having to log in.



Slide 4: Sample certificate

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The substantive content of courses has been developed by a well-established academic expert specialising in corruption-related issues. The final shape of the courses was attained with an active participation of the Central Anti-Corruption Bureau representatives.

Before the training courses were published, their content was presented to the Central Anti-Corruption Bureau for approval and comments.

The platform facilitates communication and exchange of information between registered users on a forum that is moderated by an external expert in the field of preventing and combating corruption. The moderator responds to content-related questions asked by the users and, from time to time, organises a live chat on the topic proposed by him. The issues which have been raised so far in the discussions:

- How much does the corruption cost us is it possible to live without corruption?
- The 2014-2019 Government Programme for Counteracting Corruption – Will the Programme's

goals help to reduce the scale of corruption in public administration?

- Whistleblowing a fad or an authentic ability to curb corruption in the enterprise?
- How to increase individual civic activism in Poland in terms of response to corruptive practices and behaviours?

Each time, all Polish coordinators of the 2014-2019 Government Programme for Counteracting Corruption and Polish NGOs dealing with issues of anti-corruption were informed about the live chats prior to their launch.

In order to disseminate information about the e-learning platform, different promotional measures were undertaken in order to inform the audience about the launch of the project. For this reason, in the first place, a brief note was sent to the media with the description of the project, with the help of the press officer of the Central Anti-Corruption Bureau. In addition, the Head of the Central Anti-Corruption Bureau sent letters to ministries, other

central institutions, and universities informing and inviting teachers, researchers, and students to take part in the courses. The information about the launch of the platform was also sent to all central oovernment agencies and institutions, provincial offices and the marshals' offices in the provinces. Before the beginning of the school year, local education authorities were provided with letters of request to disseminate the information on the CBA's initiative among secondary schools. Similarly, before the start of the academic year, the information about the platform and the courses was sent to the rectors of the universities lecturing on national security. The information campaign was also conducted during a conference with the participation of the Central Anti-Corruption Bureau representatives and during inperson anti-corruption training sessions for officials. as well as during the meetings with the coordinators of the 2014-2019 Government Programme for Counteractino Corruption.

The campaign proved successful and led to great interest in the platform – the rapid increase in the number of new users and a large number of participants completing the courses.

In the first 17 months after the launch of the platform, more than 31 thousand people signed up for the training and 25.2 thousand people completed the training. Components:

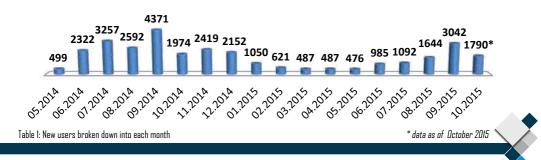
Corruption in Public Administration completed by 24.5 thousand people,

- Corruption in Business completed by 3.9 thousand people,
- The Social Impact of Corruption completed by 5.6 thousand registered participants.

The individual modules were very popular among many users and so 8.8 thousand of them c chose to complete more than one component.

	Number of people who completed the course
Corruption in Public Administration	24,520
Corruption in Business	3,991
The Social Impact of Corruption	5,604
In total	34,115

Since the launch of the platform, there has been a rising interest in it, manifested by a rapid increase in the number of new users. From the second month of its operation until January 2015, i.e. during 8 months, a four-digit number of new users registered monthly. It was not until February 2015 when one could observe a declining interest in the platform which translated into fewer new users. In any case, one cannot talk about the downtime on the platform; as of June 2015, the number of newly registered users started to grow again, reaching in September 2015 over 3 thousand new users, i.e. the third largest result in the history of the platform. The increase in the number of new users broken down into each month is shown in the chart below.



From among public institutions, the employees of the Ministry of Finance (5,562 registered users) and the National Health Fund together with the local National Health Fund branches (2,988 users) were among the most frequent users. Units of local administration were very actively taking part in the platform training, including the Marshal Office of the Lower Silesia Region (573 people), the Lubuskie Regional Office (359 persons), the Marshal Office of the Świetokrzyskie Region (340 people), the Podlaskie Regional Office (257 people), the Podlaskie Regional Office (257 people), the Polish Agency for Enterprise Development (499 people) and the National Fund of Environmental Protection and Water Management (424 persons).

The English version of the platform has also enjoyed great success despite the specificity of the platform content resulting from the Polish cultural background and economic conditions. The component entitled *Corruption in Public Administration* was completed by at least 62 people, *Corruption in Business* – by 25 people, and *The Social Impact of Corruption*" – by 40 people, while the number of registered users fluctuated between 1,000 and 1,100.

	Number of people who completed the course
Corruption in Public Administration	62
Corruption in Business	25
Social Consequences of Corruption	40
In total	127

International users who can be identified on the basis of their official e-mail address used in the registration process came from the following institutions:

the Ministry of Interior of the Slovak Republic, the Latvian Corruption Prevention and Combating Bureau, the Austrian Federal Bureau of Anti-Corruption, the British Serious Fraud Office, the Swedish Prosecution Authority, the Bulgarian Ministry of Interior, the Ministry of Justice of Georgia, the Ministry of Justice of the Republic of Croatia, the Montenegrin Directorate for Anti-Corruption Initiative, the Hungarian Ministry of Interior, the Estonian Internal Security Service, the Government Office of the Slovak Republic, the Czech Unit for Combating Corruption and Financial Crime, the Hungarian National Protective Service, and the Romanian Ministry of Internal Affairs.

The information about the capabilities and availability of training sessions on e-learning platform is constantly presented during all training courses conducted by the officers of the Central Anti-Corruption Bureau, as well as at all national and international conferences involving the Central Anti-Corruption Bureau representatives. The platform features and capabilities were also presented at the 66<sup>th</sup> Plenary Session of the Council of Europe Group of States Against Corruption (GRECD) (8-12 December 2014) in Strasbourg and were included in the Newsletter No. 03/2014 of the European Partners Against Corruption/European Anti-Corruption Network (EPAC/EACN) which was sent to all members of this organisation.

Today we can say that the functioning of the platform has proven a big success. This can be confirmed not only by the number of registered users and people who completed the courses (this number has exceeded the expected targets several times), but also by the interest from the foreign partners to whom the platform was presented at meetings both in Poland and abroad. For this reason, a description of the conceptual framework of the platform was prepared especially for them in English – this description was distributed to interested parties.

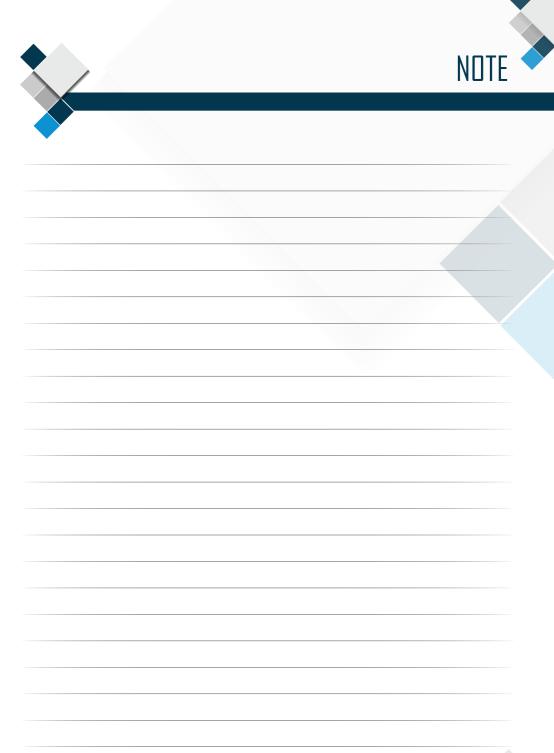
High popularity and the positive reception of the platform among its users prompted the Central Anti-Corruption Bureau executives to continue the platform after the completion of the project under which it was created. The plan is not only to continue to maintain the platform, but also to develop it, including the updating of training sessions in response to changing regulations, as well as developing new functionalities and further expanding its services.

In accordance with its goals, the entire project ends in December 2015 (8 December 2015) with the closing conference dedicated to the Heads/Directors of the international anti-corruption authorities who were involved in the project. The closing meeting will constitute an excellent opportunity to take stock of the project achievements, to discuss the its results and the undoubted added value of the seminars, the challenges that occurred during the initiative implementation and to draw conclusions for the future.

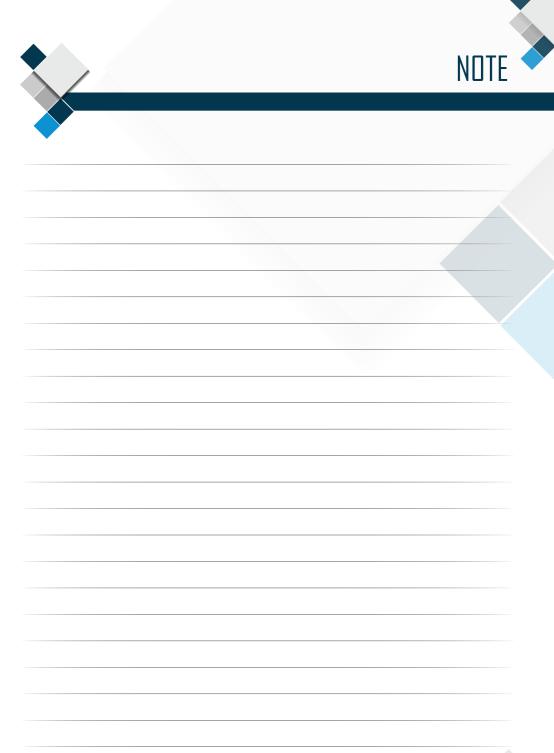
The project was implemented with success and has become a valuable forum for the exchange of experiences and the source of international contacts of anti-corruption bodies from Central, Eastern and Southern Europe, as well as from the Eastern Partnership countries. The project has helped to strengthen cooperation and develop new professional contacts. Training a group of nearly 150 international participants, as well as 50 Polish nationals from the Central Anti-Corruption Bureau, the Police, the Prosecutor's Office and NGOs has been successful and has contributed to the improvement of knowledge and skills of numerous experts from various domestic and foreign institutions. The results of the project implementation and the opinions confirm the widespread view: the constant need for continuous training and upskilling are still relevant in today's world, especially in the case of officials and officers involved in combating and preventing corruption – the phenomenon of highly dynamic and transformative nature which can take different forms – new and more difficult to identify.

The Central Anti-Corruption Bureau hopes that the project entitled Rising of Anticorruption Training System is only the beginning of anti-corruption training undertaken jointly with foreign partners, which will be feasible with the support of various financial instruments, and which will constitute an important factor for the implementation of these extracurricular and costly initiatives. The development and modernisation of the CBA anticorruption e-learning platform is essential. The platform, as an innovative initiative, is in line with the need to adapt educational methods to technological and civilisational changes, to be a source of inspiration for wider and wider social groups in order to form a responsible and conscious civil society.

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