ANTICORRUPTION AGENDA FOR ARMENIA

Recommendations

This document introduces the recommendations by Transparency International Anticorruption Center (TIAC) to the Republic of Armenia National Assembly and the Government with the purpose to launch effective fight against corruption and to record success.

Changes expected as a result of the fight against corruption

Since 2003, the Republic of Armenia has announced "fight against corruption" while joining a number of international treaties and networks, developing and implementing three Anticorruption strategies and hundreds of actions. However, according to the indices and indicators of the international organizations and the data of domestic surveys or observations, corruption has not reduced in our country.

The spring of 2018 was marked with revolution in Armenia, the driving force of which was the strive and thirst of citizens for justice, and their accumulated complaint towards the corrupt and arrogant authorities. The result of the snap elections to the Yerevan City council in September and snap elections to the Parliament in December of the same year, in addition to the sociological survey data, showed the trust of the overwhelming majority of the citizens towards the political power leading the revolution, thus also ensuring their expectations from the given power – to establish justice in Armenia, including eradication of corruption.

However, under conditions of complete absence of the political will to eliminate corruption, the former government initiated numerous steps in this direction through implementing a number of events and recording certain progress, in particular, in terms of creating grounds for the Anticorruption policy. Needless to say, that the expectations from the new authority are incomparably bigger, and therefore its Anticorruption program should be more ambitious and large-scale.

The fight against corruption by the new government should set a goal – to achieve the following changes in the next five years:

1. **ensuring large-scale engagement of citizens and institutions in fight against corruption,**
2. **zero tolerance for corruption,**
3. **creating transparency and accountability mechanisms at all the levels of the governance,**
4. **maximal restriction of opportunities for discretionary decisions in all the branches of the authorities, and strengthening of supervision,**

5. **ensuring proper resources, capacity and toolkit for the authorized institutions to prevent and disclose corruption,**
6. **inevitability of punishing corrupt people.**

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Institutional model of fight against corruption

One of the primary and urgent action in fighting corruption is the decision-making on an Anticorruption institutional model (universal or separated), as this will define the Anticorruption strategy and developing of actions.

It is worth noting, that throughout years, grounds for a separated institutional model were established in Armenia, where the preventive functions were aimed at creating an integrity system for public officials and servants, mainly through the Ethics Commission on High-ranking officials, and disclosing corruption was reserved for the law-enforcement bodies, mainly the Special investigative service.

Currently, the idea of introducing a universal model in Armenia is being discussed often, assuming that merging the preventive and disclosing functions can be more effective. We think that promoting the universal model with the reasoning of the ineffectiveness of the previous one is groundless, as under the conditions of absence of political will in the previous government, any model and institution was destined to fail. On the contrary, we can state, that in fact no model worked in Armenia, and no related institution could actually solve the set problems, as on the one hand it was deprived of a proper toolkit, and on the other, it operated under conditions of systemic corruption.

It is worth stating, that the experience of various countries in the world is diverse, and there is no pattern, which would be conditioned by the selection of the model. To make a correct decision on the institutional model of anticorruption, it is necessary to take into consideration the political, economic, governance, legal, organizational, performance and public trust factors[1], as well as to assess under what structure they can best implement functions of corruption prevention (formation of a legitimate public service, prevention of the conflict of interest, analysis of asset and incomedeclaration), disclosing corruption manifestations (operative intelligence, investigation, pre-investigation), education and public support, coordination and monitoring of Anticorruption measures[2]. It is necessary to take into

[1] https://www.oecd.org/corruption/acn/39971975.pdf
[2] https://transparency.am/files/publications/1536231168-0-179733.pdf

consideration the international experience, which recommends to be based on the social-economic, demographic, formed traditions and realities of the given country[3]. At the same time, it is desirable to listen to the opinion of experts, significant part of which considers risky the consequences of selecting the universal model and its results – short-term.

It is recommended to make the political decision about the institutional model as soon as possible and, accordingly to initiate the formation of the relevant structures and development of their capacities, as well as adoption of the Anticorruption strategy and the action plan.

TIAC recommends separating corruption prevention and disclosure, and to have a specialized independent body for prevention of corruption, based on the requirements of Article 6 of the UN Convention against corruption, and an independent law-enforcement body specialized in corruption matters, based on the requirements of Article 36 of the same Convention.

Taking into consideration that TIAC advocates the model of separated functions of prevention and disclosure, the institutional measures recommended below are mainly introduced within the context of the given model, although referral should be made to the same matters under any model, taking into consideration the respective peculiarities of powers and functions.

Corruption prevention

Commission for Prevention of Corruption

In 2017, the RA "Law on the Commission for Prevention of Corruption", and in 2018 the RA "Law on public service" were adopted, which enshrined the grounds for legitimacy of public officials and servants for prevention of corruption, including in terms of forbidding actions and decisions in conflict of interest, and studying asset and incomedeclarations. In 2018, during the post-revolution period, the process of forming the Commission for prevention of corruption was paralyzed, as a result of which the norms stipulated by the mentioned laws are not properly implemented until now.

Along with that, in the post-revolutionary mess haphazardly and through very questionable processes they started to form the competition council of members to the Commission for prevention of corruption. In particular, in May of 2018, in a suspicious and not transparent manner the election of the representatives to the RA Chamber of advocates and to the RA Public council was conducted, initially seeding distrust towards the competition council and towards its decisions, as well as challenging legitimacy of the Commission for prevention of corruption elected by it. It is worth

[3] https://www.oecd.org/corruption/acn/specialisedanti-corruptioninstitutions-reviewofmodels.htm

mentioning that the format of electing the competition council of the members of the Commission for prevention of corruption and public participation in it was adopted by the previous government for the purpose of imitating public participation, and the manner of its formation and the staff are very questionable. The selected mode of competition (testing, interview and voting by the NA) in fact does not identify the true consistence of the candidates to the member of the Commission with the defined requirements. Testing is typical to career-making and knowledge-based servants and, as a rule, competition of public servants selected with the given mode is organized by the servants of the body who have professional knowledge, clear idea and skills in the given field. Whereas the competition council formed by the NA does not have professional understanding and knowledge about the field of combating corruption. At the same time, members of the future Commission for prevention of corruption do not need career service and knowledge-based or merit-based selection process, as they are not public servants, but are rather public officials of a group of autonomous positions. Similarly, the selection of the members to the State Commission for Protection of Economic Competition and Public Services Regulatory Commission is not organized with the same process, but rather it is introduced through the process of introducing candidates by the ruling power.

It is recommended to review the RA "Law on Commission for prevention of corruption" as soon as possible, in particular the order of selecting the Commission members, and to eliminate the fake format of public participation, while reserving the selection of the Commission member to the members of the Parliament formed by the national election just as a political selection.

As soon as possible, the government should initiate formation of the Commission for prevention of corruption or another prevention body with a new format, while ensuring establishment of the integrity system, including formation of ethics commissions and institutions responsible for integrity matters, proper prevention and regulation of public officials' and servants' inconsistency with the requirements, other limitations and conflict of interest, enforcement a new system for property, income and interests declaration.

It is also worth not excluding further initiation and review of professional discussions about more specific functions of the corruption prevention body, taking into consideration other reforms and expedience in the public field. E.g., in case of adopting a policy of mass declaration of income, collection of declarations on asset and incomeis possible to reserve to tax bodies; the system of public service legitimacy can be spread in the enlarged fields of public service.

Public service

Public service or public sector, in accord with the provisions of the UN Convention against corruption, is considered as the most important component for prevention of corruption. To ensure its legitimacy, proper management and clear legal regulations are of core value.

By the 2018 RA new "Law on public service" certain radical changes were made in the structure of the formerly functioning public service. In particular, the terms 'public official' and 'public servant' were made clear; specific principles of public service were introduced; groups of public officials were classified and types of public service were clearly defined. A new system of integrity was introduced in the public service; its principles and emanating from them code of conduct and requirements of the codes were defined; the grounds were established for the requirements to the public officials' and servants' integrity norms and inconsistency, for institutes of organizers on the matters of integrity to be created in each body and ethics commissions implementing regulation of conflicts of interest and other limitations. Nevertheless, a uniform body for the full regulation of public services was not created. The office of the civil service of the RA Prime Minister's staff is seen as the main structure regulating the public service, whereas legal acts adopted by the Deputy Prime Minister which regulate the activity of civil service do not regulate the full public service. As a result, regulation of the types of public services are implemented by separate laws; the institute responsible for the reforms in the common public field is missing.

In Armenia, they still continue to perceive public service in a "narrow" scope, i.e. it includes only state and community bodies organizing professional activity implementing public and community administrative powers. Whereas in the "wide" sense, organization of the public service requires to consider in it also education, healthcare, cultural and other non-commercial organizations and services of public importance and consuming public resources. At the same time, trade organizations with public and community participation should also be included in the system of public services.

Besides the aforementioned, the RA "Law on public service" has serious gaps in a number of radical matters. Namely, classification of positions in the political, discretionary, autonomous and administrative groups creates a mess, their logic and their contradictions within the context of certain types of services (e.g. diplomatic, national security, military, etc.). Making classification clear is very important, in particular from the perspective of corruption risk management, as for the political and discretionary officials, related to the scope of their responsibility and decisions made by them, stricter and more differentiated legitimacy norms, limitations and requirements should be defined than for other officials in public service.

It is recommended to enhance the concept of public service and to implement full regulation, including for servants in educational, healthcare, cultural institutions, for leading officials of trade organizations with public participation. It is necessary to unite regulations of public service and to have one responsible body to ensure them. It is necessary to review and clarify classifications of positions.

Asset and income declarations

Although during the previous years, the processes of asset and income declaration of official persons were improved and the system of electronic declaration made the declaration process accessible for the official declarants, the system of declaration has significant drawbacks and is not "aimed" at disclosing prima facie risks of "illegal enrichment". The data subject to declaration are not sufficient to disclose inconsistencies or problems by the authorized body, and a number of data are not transparent for the public.

In the asset and income declaration they continue to maintain the value threshold of AMD 8 million for the so-called "expensive property". Donations and assistances are declared in the income section and it is not visible what kind of presents the declarant official person and his/her family member received. Credits received by the official person and outstanding balance of other loans are not declared. At the same time, they do not disclose the names/surnames of physical and legal persons who give donations to officials, those who pay income, the location of the property, which do not ensure or guarantee proper public supervision over enrichment and prevention of corruption and effectiveness of disclosure.

There are a number of threshold limitations, which enable hiding the real property of an official person through registering it under the names of other family members. So, in case of a spouse it stipulates registering the property (real estate and movable property) without price limitation, and the property of a family member living together, or a minor, or a person being under guardianship and trusteeship is declared, if the total price of the transaction has exceeded AMD 50 million or equivalent foreign currency; in case of movable property – AMD 8 million or equivalent foreign currency. Another differentiated approach is being applied in case of declaring the financial means of a family member. So, only the financial means of a high-ranking official's spouse are subject to declaration and making public, and the financial means of family members living together, the minor and a person being under guardianship and trusteeship are not declared at all.

The system of asset, income and interests declaration is fragmented. Leading officials of trade organizations with public participation and non-commercial organizations, members of the local council, which ensure quite a big share of the activity of public sector, have been left out of the

declaration system. On the other hand, declaration of official persons' asset and income is repeated in other structures and results in ineffective use of resources. In parallel with the system of official persons' declaration, during the elections to the National Assembly and to the local self-governing bodies almost a similar system of declaration works for the candidates, for another period, moreover, without proper supervision.

By RA Law "On public service" from March 23, 2018, in the asset and income declaration data certain value thresholds for declarant official persons' family members have been removed, and the scope of data subject to declaration in terms of the declarant official person and his/her all family member have been united; a new institute of declaring interests have been stipulated for the declarant official persons. These new improved regulation of declaration should have come into force since January 1, 2019, however they were not implemented because of postponing the formation of the Commission for prevention of corruption and not being ready for the new declaration system.

It is recommended to enhance the scope of declarant official persons; to unite under one body the systems of asset, income and interest declaration of public officials and servants, candidates to the parliament and to the local council, and parties; to review the scope of data subject to declaration, to remove groundless declaration thresholds while creating an opportunity to disclose "illegal enrichment" inconsistencies during the analysis. It is necessary to make more transparent the list of data subject to publication (names/surnames of donators, names/surnames of income payers, the location of the property, etc.) while ensuring effectiveness of corruption prevention and disclosure by the public.

Inconsistency requirements and other limitations of public officials and servants

One of the tools to identify inconsistency requirements and other limitations of public officials and servants is the declaration of interests defined by the RA "Law on public service", which, however, has a number of drawbacks. Namely, declaration of interests does not cover all the public official groups, data included in them are insufficient to identify real owners, contracts concluded with family members, close and marriage relatives, as well as other persons and violations of other limitations. Value thresholds for the declaration of interests are defined, which are not justified. The declaration of interests does not include data about the contract concluded by the public official as a state representative, nor about being employed by another employer or organization "within one year after leaving the office". A number of other limitations and bans to the public official and servant are not regulated, e.g. engagement of holders of a political office in the boards of trustees of educational institutions. Under the declaration of interests, the "Law on public service" stipulates declaration of

information about public and community procurement contracts of organizations with participation of a person holding a public position and his/her family member, whereas the same law does not stipulate limitation or ban on participation by a public official or servant in a procurement process of companies with the participation of persons holding public positions in the given organization and their family members in the procurement process funded by the state or community budget.

It is recommended to amend the requirement to inconsistency and other limitations on public officials and servants in the declarations of interests, while creating an opportunity to disclose prima facie violations, which will enable the corruption prevention body to have practically applicable toolkits, and to develop enforcement procedures for those responsible for the matters of legitimacy/integrity and sector-related ethics commissions of public service. It is necessary to do parallel changes in the related other legal acts and to synchronize the limitations.

Ban on entrepreneurial activity

The RA legislation bans the public officials to engage in entrepreneurial activity, whereas there are officials who come from the private sector and along with holding public positions continue their entrepreneurial activity, sometimes registering the companies on their family members' names.

Currently, there is no legal requirement in Armenia to disclose the true owners of the companies (including persons having political impact). Until 2020, the disclosure of true owners was envisaged within the scope of Armenia's' membership in Extractive Industries Transparency Initiative, for mining companies. Such a recommendation has been made in the reports of the OSCE/ODIHR elections observation missions for the mass media. Disclosure of true owners is also important to ensure Armenia's membership in the Global Forum on Transparency and Exchange of Information for Tax Purposes[4]. Currently, a mechanism of disclosing true owners is stipulated by the 2018-2020 action plan of the Open Government Partnership initiative.

Although the disclosure of the owners by itself does not guarantee accuracy of information, and there are a number of complications by the state bodies in terms of checking their property, making these data public is an important tool from the perspective of insuring public service from impact of business interests through public supervision. In this respect, it is very important for public to have free access to information about true owners, as well as an opportunity for a feedback to inform about data inconsistency.

[4] http://www.oecd.org/tax/transparency/

Another tool to prevent entrepreneurial activity is the accreditation management institute, which is not properly regulated in Armenia and in fact does not function.

It is recommended, as quick as possible to adopt the legislation related to registration and publication of true owners, to create the respective legal grounds and technical systems. The data at the State register of Legal entities should be freely accessible to public.

It is necessary to improve the accreditation management institute while safeguarding exclusion of entrepreneurial activity by the public servants. It is recommended to reserve public official's and servant's functions of the accreditation manager of the organization's share only to a specialized structure of the financial market, while excluding any role by a family member or physical person or non-commercial organization.

Institute of whistleblowers

For the disclosure of corruption cases, as well as for the prevention of corruption it is important to establish the whistleblowers' institute. Although in 2017 the RA "Law on protection of whistleblowers" was adopted, in fact it is not applied or there is no proper information about that, which would promote the establishment of this institute and would engage citizens in the fight against corruption. Sufficient conditions are not created for the protection of the whistleblowers. More specifically, the protection of whistleblowers reporting through private sector, 'closed' institutions and mass media is not guaranteed. Channels stipulated for the protection of related persons are not completely clear.

It is recommended to speed up the creation of the public platform for whistleblowing and to ensure its proper functioning, as well as to take active steps to establish the practice of whistleblowing in Armenia. To improve the legislation, with the purpose of ensuring protection of whistleblowers.

Disclosing and prosecuting corruption

A unified specialized independent law-enforcement body

For effective fight against corruption, in the law-enforcement practice a serious obstacle is the absence of a specialized law-enforcement body which investigates corruption crimes. At present, a number of law enforcement bodies are engaged in disclosing corruption crimes, however there is not uniform Anticorruption professional body, which would have the power to conduct operative-intelligence, investigative and pre-investigative functions and, at the same time would have national representation.

It is recommended to create a uniform specialized law-enforcement body to investigate corruption crimes, which would have the power to conduct operative-intelligence, investigative and pre-investigative functions and, would engage only in corruption-related crimes and would have national representation. Serious resources should be invested to develop the capacities of the Anticorruption law-enforcement body, as well as the necessary toolkit (including accessibility of database on public servants) to ensure proper investigation of corruption cases.

Scope of corruption crimes

The current list of corruption crimes is approved by the RA Prosecutor General's order N3 from January 19, 2017, which includes almost 70 types of crimes. However, one of the important steps for true fight against corruption is recognition and definition of corruption crimes on the level of law.

It is recommended to define the scope of corruption crimes by the RA Criminal Code.

Return of stolen assets

According to the 2015 assessment by the *Global Financial Integrity* research organization, in 2013-2004, USD 9.8 billion[5] was illegally taken outside Armenia. One of the priorities of the fight against corruption is to identify the schemes and mechanisms of corruption cases that took place during the power of previous authorities, as well as return of the illegally obtained assets (including the ones taken outside Armenia).

The Republic of Armenia legislation, namely RA Criminal procedural code and the Criminal code, give minimum tools for search and return of assets, stipulating seizure of property, arrest of property, levying property and confiscation of property. Nevertheless, there are a number of problems, which can hinder implementation of initiatives aimed at returning the assets. Namely, there is no policy on returning the assets, the form of civil confiscation is incomplete, there are no structures which would deal with the search of stolen assets, corpus delicti of illegal enrichment is incomplete, entrepreneurial activity by the high ranking officials is not criminalized.

It is recommended to adopt and implement a policy aimed at returning the stolen assets, which, along with other regulations, should review the statute of limitation, should define the monetary thresholds/dates/conditions in case of which the former and present officials can submit information about legitimacy of their transactions, income and property.

[5] https://www.gfintegrity.org/report/illicit-financial-flows-from-developing-countries-2004-2013/

It is recommended to introduce the institute cooperation agreements with persons charged with less grave crimes or convicted for them, with the purpose of safeguarding inevitability of criminal charge of those to blame and solving of the grave crimes.

Judicial system

In the legislative and executive bodies, under conditions of the current political will, on the way to eradicating corruption in Armenia the main obstacles are the corrupt judicial system and the judges. For the reforms in the Armenia's justice system various measures have been developed, which are important to be reviewed within the context of fight against corruption.

Within the scope of judicial-legal reforms, it is recommended, as a priority, to realize the measures, which are called to safeguard the judges' independence, transparency and publicity of their appointment, transparency of assigning court cases, as well as to limit the opportunity for discretionary decisions. It is necessary to run judicial statistics, enabling supervision over the persistence of the judges' verdicts. Judges trying bank/loan cases, should make public the data of their loan-giving banks and other physical and legal persons with who they have concluded a borrowing or loan contracts, as well as the names of donators considered not interconnected persons. Corruption cases should be dealt by specialized in corruption cases judges having prestige, who should be new, elected transparently and publicly.

General education

Anticorruption general education

From the perspective of forming knowledge and intolerance towards corruption, it is very important to ensure citizens' Anticorruption education starting from school age. The current books of social science contain one chapter with very limited contents named corruption and trafficking, which is taught at high school, only one year and is far from seeding proper knowledge in schoolchildren of that age about corruption.

It is necessary to review the contents of sections related to corruption in Social science textbooks, and to teach the subject at all the grades of high school.

Training of public servants

Although the country is taking certain steps for the training of public servants on corruption-related matters, this action needs to be made more active within the context of national fight against corruption.

It is recommended to increase the number of trainings for public servants, specifically focusing on conflict of interest and whistleblowing, targeting risky aspects and positions, via developing respective programs and conducting courses.

Coordination, monitoring and supervision over the Anticorruption policy

Coordination and supervision over the Anticorruption policy

In terms of coordination and supervision over the Anticorruption policy, currently there is certain institutional chaos.

The functions of the Anticorruption council include **supervision** over implementation of international Anticorruption commitments and the Anticorruption strategy, **coordination** of the implementation of the Anticorruption strategy, international commitments and sector-related programs, discussion of the monitoring results, etc.[6]

Within the RA Government staff, there is an Anticorruption programs monitoring unit, which serves the Anticorruption council and, along with other functions, conducts **supervision** over the process of implementing priority tasks and the action plan of the given year of the RA Government related to its fields of activity[7].

The following powers were reserved to the Commission stipulated by the RA "Law on Commission for Prevention of Corruption" from 2017: **strategy development** for corruption prevention; implementation of expert analyses of draft programs (including sector-related) of strategies and measures related to the fight against corruption; development of an opinion on draft normative legal acts related to the fight against corruption; development of educational programs on educational and public awareness raising matters related to the fight against corruption, as well as inclusion of Anticorruption courses in the training programs for official persons and public servants, development and allocation of educational-methodological guidebooks for the implementation of educational programs.

[6]RA Government Decree N 165, from 19.02.2015, Appendix 2.2
[7] RA Government Decree N 165, from 19.02.2015, Appendix 2.21

Along with this, **the function of developing an Anticorruption strategy,** as well as the function of coordinating international commitments are reserved to the RA Ministry of Justice.

It is evident, that the existence of such separated institutions related to the formation of Anticorruption policy does not contribute to the development of a good quality Anticorruption policy.

Within the context of gaps in the organization of the Anticorruption policy it is also worth mentioning that international commitments undertaken by Armenia are seen as separate, not connected recommendations, nor are they a component part of the national Anticorruption policy, strategy and action plan.

It is recommended to reserve the function of Anticorruption policy, its coordination and supervision to the specialized independent Corruption prevention body, which is also based on the requirement of the UN Convention against corruption. Under these conditions, approval of that strategy and the action plan will be reserved to the RA Government using the platform of the Anticorruption council for organization of interested discussions. Under similar conditions, it is necessary to make changes in the formation of the Anticorruption council and in the ideology of its activity in general.

International Anticorruption commitments are necessary to be seen in the context of the national Anticorruption strategy, and the implementation of the recommendations be included in the action plan of strategy implementation, while synchronizing with other related activities.

Anticorruption council

After the revolution in 2018, the RA Anticorruption council did not function and its staff was not reviewed, based on the new realities. The council does not include representatives from all the state bodies, which in this or that manner participate in the process of developing and implementing the Anticorruption strategy. During the recent years, the former sessions of the Council were of formal nature and mostly served as a platform for the presentation of certain studies or reports by the civil society, and for discussions about them. No decisions were made about specific Anticorruption policy directions and changes in them.

It is worth mentioning that like in case of Corruption prevention commission, artificial and imitating public participatory components are introduced in the formation of this structure as well. So, it mandatorily includes representatives from civil society dealing with business related matters, whereas since 2016, they failed to fill allocated to them seats with respective organizations. In that structure, one seat is mandatorily allocated to a non-governmental organization, which never spoke publicly

against corruption or never took actions aimed at fighting against corruption. Another mandatory seat is allocated to the representative of Anticorruption coalition, in which almost 28% of represented 98 organizations is either liquidated, or has temporarily stopped its activities, and there is absolutely no data about the activity of several dozens of organizations.

It is recommended to reorganize and relaunch the RA Anticorruption council, while ensuring proper coordination of the policy against corruption in the country, including within donors.

To recognize as members of the Anticorruption council all the heads and deputy-heads of public agencies, which are engaged in the Anticorruption strategy action plan, as responsible implementers, as well as representatives of political powers represented in the parliament.

It is recommended to eliminate formal and fake formats of public participation. To envisage representation of non-governmental organizations in the council, being based on their specialization, experience and publicly manifested adherence to principles against corruption. At the same time, to envisage flexible and inclusive ways, while ensuring transparency of the council's activities (e.g. broadcasting of sessions) and accessibility for all the interested parties (e.g. open format of the sessions).

Monitoring of the state of corruption and Anticorruption policy

Although in the RA Government staff there is an Anticorruption monitoring unit, in Armenia they never conducted monitoring of the state of corruption, nor the results of Anticorruption measures. The state makes decisions, forms policy and implements measures without having an idea about the state of corruption, effectiveness of previous measures or public needs. There are not monitoring indices/indicators based on which it would be possible to assess effectiveness of the programs/actions. The work of the Anticorruption programs monitoring unit of the RA Government staff is extremely weak and unclear.

It is recommended to develop institutional capacities for the assessment of the state of corruption and Anticorruption programs monitoring in the specialized body for prevention of corruption, and only to reserve the functions of the secretariat to ensure routine operation of the Anticorruption council to the Anticorruption programs monitoring unit of the RA Government staff.

To put into action the approach of policy development based on monitoring and assessment.

General mobilization of institutions in fight against corruption

In Armenia corruption had systemic nature and was spread in all the structures, spheres and at all levels. In certain spheres and institutions there functioned and rooted specific schemes and mechanisms. Irrespective of the declared current political statements against corruption, those schemes are stable and viable, as at their bases they often have legislative and institutional gaps and insecure regulations, which still exist.

The three Anticorruption strategies adopted by the Armenian Government since 2013 were focused on certain spheres, while implementing a number of disjointed actions, adopting a number of laws and thus expecting reduction of corruption. This approach was mostly aimed at showing RA Government's will to fight against corruption and to receive financial assistance. Under the circumstance of political will formed after the revolution in Armenia, it is not allowed to focus on certain aspects and postpone fight against corruption in others thus distorting the state's decisive and common approach to eliminate that fallacious phenomenon.

One of the most important preconditions to eradicate corruption is not only mass engagement of specialized structure, but all the institutions as well in the fight against corruption and, accordingly the destruction of sector-related corruption schemes. In this respect, special importance is attached to the processes of general nature related to public service and property, such as public finances, public procurement, employment, payment system, etc. Although it is possible that there is the problem of insufficient capacity at the institutions, such a task is valuable in terms of mobilization of structures, reflection, assessing the situation, inclusiveness, starting discussions and finding solutions.

It is recommended that at all the bodies implementing public governance conduct corruption risk assessment and reveal the schemes currently and formerly functioning in the given system while making recommendations to prevent the revealed problems and to solve legislative gaps. Self-assessment mechanism and participatory processes can be used for this purpose through engaging all the interested parties in the field in the discussions.