

TRANSPARENCY INTERNATIONAL - BULGARIA

Annual Activity Report for the Year 2015

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2015

ANNUAL ACTIVITY REPORT

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REPORT OF TRANSPARENCY INTERNATIONAL – BULGARIA FOR ACTIVITIES IN 2015

In 2015, Transparency International - Bulgaria celebrated 17 years since its founding. The organisation was established in 1998 as Transparency International's first national office in Southeast Europe. During this period, TI-Bulgaria has built a significant capacity to create and implement projects to counter corruption, promote good governance in the activities of public institutions, as well as managed to develop its reputation of a professional, politically impartial and active civic organisation.

In recent years, Transparency International - Bulgaria has gained a wide range of supporters and has worked with a large number of independent experts from various spheres of scientific and public life to implement its projects and initiatives. Established ties with national and international institutions were extended towards civil society structures and the media, and the association earned its name as a respectable and reliable organisation.

In 2015, Transparency International - Bulgaria continued to actively carry out activities to counter corruption at a national, regional, and international level. All implemented programs and initiatives of the association were focused on the realisation of its mission and main priorities, as well as the objectives and tasks laid out in the charter.¹

¹ **The mission of Transparency International - Bulgaria, deriving from its status as a Bulgarian representation of the greater body:** uniting the efforts of state institutions, local authorities, representatives of civil society, the private sector and the media in order to introduce systemic reforms and concrete actions against corruption in the country.

The main priorities in the work of the association: the initiation and implementation of projects and programs for combating corruption at both a national and regional level.

The main goals and tasks set out in the charter of the association:

- Conducting research initiatives on corruption issues by mobilising efforts of scientists, public figures and experts in the relevant fields;
- Collecting, presenting, and disseminating the necessary analytical information among state institutions and civil society organisations.
- Developing, testing and implementing various citizens' initiatives aimed at anti-corruption;
- Offering expert and technical assistance for various citizens' initiatives aimed at anti-corruption;
- Building and maintaining a contact network of international and national partner and donor organisations dealing with similar issues;

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The team at the Transparency International – Bulgaria office continued to successfully realise its full range of goals and objectives by planning and implementing specific projects and initiatives under two main programs.

THE NATIONAL PROGRAM aimed at:

- The application of effective models for independent expert monitoring and civil control over the legislation and processes of governance in relation to transparency principles and accountability
- Initiating advocacy campaigns in support of important public causes and issues related to preventing and tackling corruption, as well as the protection of individual victims of corruption;
- Increasing public awareness on the topic of integrity, transparency and accountability in the work of public institutions;
- Carrying out analytical activities on the problems related to anti-corruption and the enforcement of good management practices through mobilising the expertise of the organisation as well as of foreign experts in the field.

THE REGIONAL PROGRAM aimed at:

- The implementation of international projects in partnership with the Transparency International – Secretariat, along with the national representatives of the organisation.
- The exchange of experience and the creation of regional networks for the implementation of anti-corruption initiatives.

ACHIEVEMENTS OF THE ASSOCIATION IN 2015

- Developed and implemented methodology for the evaluation of the local integrity system. Based on the analytical approach of Transparency International (National Integrity System), the organisation developed an innovative tool for assessing the potential, role and contribution to the fight against corruption by institutions and leading public sectors at a local level. In

- Long-term cooperation with central and local authorities, experts in the state administration and non-governmental organisations with a similar focus in order to create a stable network of public coalitions working on fighting corruption.

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2015, the developed methodology served as a starting point for conducting a comparative assessment of institutions and social actors from all regions of the country, which play a key role in the fight against corruption.

- Developed Index of the Local Integrity System - 2015, a tool for the comparative assessment of contributions of key sectors and institutions in combating corruption at a local level. The index provides a comparative assessment of the 27 municipalities (district centres) included in the survey. It can serve as an investment guide for businesses at a regional level, as well as to indicate to local institutions what necessary reforms need to be made. In the long term, the Index will be useful for analysing the trend of development across the municipalities included in the survey.
- Implemented a civic initiative for monitoring the election process, focused on two main dimensions - the implementation of an advocacy campaign for broad civic participation in the referendum on the introduction of electronic voting, as well as monitoring of the election process. In this regard, the organisation conducted civil monitoring of local elections with the assistance of a wide network of civil society organisations. In the course of the initiative, the support of political parties was mobilised for the implementation of the Public Contract for honest and transparent governance by local powers. The document will be used for assessing the future actions of local authorities in relation to the implementation of anti-corruption policies, as well as the modernisation of local government institutions.
- Developed and published a monitoring report on the referendum and local elections, analysing problems linked to the preparation and conduct of elections as well as trends in the electoral process over the past decade. Developed a package of proposals for changes in the electoral legislation and in the practice of its implementation on the basis of the performed civil observation and the analysis of the obtained results. Implemented an advocacy campaign to promote the acceptance of proposals made by Transparency International - Bulgaria.
- Developed methodology for civil monitoring of the work of governing institutions at a local level, which served as a tool for observing the activities of such institutions in two specific areas - social care for disadvantaged children as well as ecology and flood prevention. The methodology enables civil control over two areas in which a series of problems have accumulated, but in which local civil society organisations do not have sufficient expertise in or built capacity to solve otherwise.
- Developed and applied an innovative model for monitoring, analysing and evaluating the work of institutions with powers in confiscating illegally acquired property. TI-Bulgaria is the first regional organisation to begin work in this field and share its experience with countries using different approaches. Based on analysis of the legal framework and the practices of applying confiscation procedures in three EU Member States, a methodology for

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independent civil monitoring of the activities of institutions within this field was developed. The methodology was applied in practice in Bulgaria, Italy and Romania. On the basis of the performed civil monitoring, problems and positive aspects of the procedures to confiscate property in the three countries were established by comparison. An important result of the monitoring is the developed 'ideal model' for the confiscation of property, which includes minimum common standards based on proven good practices of already applied models in the EU. Through the proposed minimum standards, the confiscation model has the potential to bring national procedures closer together, which will increase the effectiveness of this instrument in the fight against crime at both a national and European level.

- Expert-analytical activity related to the development of the capacity of central, regional and municipal administrations to provide administrative services and improve the functioning of regulatory regimes. On the basis of the developed analysis and publications which provide systemic information on measures to counter corruption, nearly 1000 employees from central and local administrative structures were trained. Some of the administrative structures, whose employees took part in the training seminars, were able to adopt good models and practices for work which contributed to the development of their overall corruption-fighting capacity.
- Held conferences at home and abroad, as well as training seminars, round tables and public discussions on specific issues to encourage institutional and public debate in connection with civic participation in referendums, a system of integrity for local public institutions, transparency and integrity of the electoral process, transparency of lobbying activities, and mechanisms for civil control over institutions with authority at a local level.
- Published information, publications and training materials that present the analysis and research of Transparency International – Bulgaria in connection to implemented projects and initiatives.

AREAS OF ACTIVITY

I. COUNTERING POLITICAL CORRUPTION. MONITORING COMPLIANCE WITH DEMOCRATIC STANDARDS IN THE ELECTORAL PROCESS. MONITORING THE FINANCING OF POLITICAL ACTIVITY

The troubling impact of corruption on political life, as well as on the overall governance model of the country, is one of the main topics of focus for the organisation since its inception to present day.

In 2001, Transparency International – Bulgaria monitored the transparency of an election campaign for the very first time (the 2001 presidential election), and

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created a methodology for measuring the level of transparency in the financing of political parties and election campaigns in 2003, using as a basis Transparency International's well-established Corruption Perceptions Index. For fifteen consecutive years, the organisation has been conducting research which it uses to develop and publish annual indices for transparency in the financing of political parties and campaigns in Bulgaria. The developed methodology and achieved results are the subject of attention not only from Bulgarian audiences, but also from other international organisations and national representations of Transparency International.

In recent years, the issue of transparency and accountability in the financing of campaigns has been displaced by other issues that have a significant negative impact on the electoral process - vote buying, various forms of control and illegal pressure on voters, as well as organisational preparation and improper conduct of the election. The accumulating problems in the election process provoked the Transparency International team to expand the scope of its observation and evaluation and since 2009, the main focus of observation has been two main problematic areas: 1) democratic standards, integrity and transparency in the election process; including limiting irregularities and abuses of citizens' voting rights; 2) transparency and accountability in relation to the financing of the election campaigns of candidates.

Project 'Modern possibilities for citizen participation in the electoral process: how to improve access'

The project was implemented in the period August 2015 - February 2016 thanks to the financial support of the Foundation 'America for Bulgaria.'

The holding of a national referendum on the introduction of remote electronic voting created an opportunity for Bulgarian voters to express their opinion as free citizens and directly influence the country's government. Recognising the critical importance of the forthcoming referendum on the strengthening of democracy in the country and aware of our responsibility, in the summer of 2015 the Transparency International team decided to launch an initiative aimed at informing citizens about the need for broad civic participation and control over the institutions that conduct the referendum. Along with its traditional observation of the election process, Transparency International - Bulgaria implemented its initiative, focusing its efforts in three areas:

- *information campaign for citizens*, which aims to inform them about the opportunities to exercise their right to participate in the referendum, the effects of the use of direct democratic mechanisms on the political life of the country, as well as arguments 'for' and 'against' the use of remote electronic voting;

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- *advocacy campaign for citizens*, which aims to motivate them to exercise their constitutional right to participate in the referendum as an instrument of direct democracy and to contribute to the consolidation of this democratic instrument's usage in Bulgarian political life
- *civil monitoring of the preparation process and conduct of the referendum and local elections*, which is primarily aimed at exercising public control over the institutions involved, as well as ensuring compliance with democratic standards in the processes.

The implementation of the initiative became possible thanks to the mobilisation of:

- *leading experts* in the field of social, political and legal sciences, which have experience and expertise in election observation, international election standards, direct democracy and the financing of election and information campaigns;
- *the creation of a wide coalition of NGOs across the country* who work actively at a local level and have built their authority among local communities;
- *volunteers*, who played a key role in the implementation of the information campaign and in the monitoring of the referendum.

The information campaign was carried out in several ways: providing information on the importance of the referendum as a tool for direct citizen participation in the decision-making process; providing voter information for the specific conditions for their participation in the scheduled referendum; providing more detailed information on the topic of the referendum - what is the foreign experience of other countries that have applied electronic remote voting, what are the arguments 'for' and 'against' the introduction of electronic remote voting in Bulgaria.

As a basis for further work, the team at Transparency International – Bulgaria conducted a comparative study on the application of e-voting platforms around the world, the effect achieved and the existing risks. In addition, an analysis was made of the communities that would be most directly affected by the decision to introduce electronic voting via the Internet.

Based on this activity, Transparency International – Bulgaria launched a wide information campaign, including:

- development of information materials that raise the awareness of Bulgarian citizens on the importance of the referendum as an instrument of direct democracy, as well as provide information on the preparation and conduct of the specific referendum;
- development of information materials that provide additional information on the arguments 'for' and 'against' remote electronic voting;

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- establishing contact with Bulgarian communities abroad and conducting a wide information campaign among them, which includes several stages: informing them on the conditions for registration and participation in the upcoming referendum; development of a package with informative materials and registration forms; development of informative materials with the assistance of the media related to the issues of the referendum;
- development of informative materials and disseminating them among Bulgarian citizens living in the country with the assistance of local and national media, as well as native non-governmental organizations;
- conducting a series of public discussions with the participation of experts from the organisation and citizens from 12 cities, during which more in-depth information was presented on the topic of the referendum and opportunities were given to support the citizens' initiative.

The implemented information campaign led to the involvement of 30 thousand Bulgarian citizens who work and live outside the country.

Within the framework of the initiative, Transparency International – Bulgaria also implemented a media campaign, which was implemented in several ways:

- development of video and audio campaign clips and distributing them on the national TV and radio network, as well as on social networks.
- participation of expert members of the campaign team in over 40 programs and publications in national and regional media, including BNT and BNT 2, Bulgaria on air, BIT, Channel 3, TV Europe, BNR, Darik Radio, Kmeta.bg, Top News, and many others.
- development and publication of analytical texts by experts at Transparency in leading analytical media platforms - Capital, Ofnews, Club Z, Reduta.bg.

The advocacy campaign was focused on three specific goals: 1) to mobilise Bulgarian citizens, both in the country and abroad, to use their constitutional right and participate in the referendum as an instrument of direct democracy; 2) to engage the institutions with action for adequate preparation for the referendum and for prevention of violations during the election process; 3) to engage the parties in developing policies to counter vote buying and to modernise local government institutions.

In implementing the initiative, Transparency International – Bulgaria is actively encouraging Bulgarian citizens both at home and abroad to take part in the national referendum on the introduction of remote electronic voting in the country.

As part of 'Vote on the Internet?' At the referendum, you decide!', Transparency International – Bulgaria organised a series of public meetings with representatives of the active local communities in 12 Bulgarian cities. The public meetings took place in the following cities: Burgas, Pleven, Shumen, Veliko Tarnovo, Blagoevgrad, Stara Zagora, Ruse, Haskovo, Varna, Plovdiv, Vratsa and

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Sofia., The purpose of the meetings was to clarify the arguments in favor of each of the two possible options: "for" or "against" voting on the Internet.

In connection with the participation of parties in local government elections, a public contract for honest and open governance was developed. The document was created by TI-Bulgaria as an expression of its desire to engage political parties not only with short-term actions to reduce problems in the election process and ensure clarity over campaign financing, but also long-term measures to combat political corruption at a local level, including modernising local government institutions and the development of structured management programs. Overall, 70 parties and independent candidates joined the agreement.

Monitoring of the election process

In early October 2015, Transparency International – Bulgaria took action to obtain official referendum observer status.² The organization mobilised the support of 167 volunteers and 25 NGOs to monitor the election process. The monitoring initiative was based on the following actions:

- creation of a wide advocacy network made up of volunteers and non-governmental organizations working locally in all regions of the country, and which are united under the name: National Network for Election Observation;
- participation in public discussions and meetings organised by non-governmental organisations, initiative committees and non-governmental organisations involved in the information campaign of the referendum;
- training of observers of the election process and the referendum, which is aimed at identifying violations and reporting them to institutions in order to limit their occurrence on the day of the referendum (held on 12 September 2015);
- monitoring the referendum in all of its key stages - the information campaign, organisational preparation and holding of the actual referendum on 25 October 2015;
- participation in various television and radio broadcasting platforms as well as discussions aimed at disseminating information about the referendum, mobilising public support for the initiative and encouraging broad civic participation in the referendum;
- evaluating the results of the implemented initiative, analysing the results of the observation and formulating recommendations for changes in legislation related to the holding of referendums and elections.

² See Decision of the CEC № 2533-MI / NR of 09.10.2015 on the registration of observers from Transparency International – Bulgaria for participation in the elections for municipal councilors and mayors and in the national referendum held on 25 October 2015: <https://www.cik.bg/bg/decisions/2533/2015-10-09>.

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Based on the performed activities and analysis of monitoring results, Transparency International – Bulgaria developed the report ‘The Voice of the Citizens’. The report contains findings from the observation, analysis of issues in the election process, conclusions and recommendations for changes in legislation and institutional practices involved in the preparation and conduct of the election process.

The conclusions and recommendations of the report were the subject of a forum involving representatives of political parties, institutions that hold influence in relation to the election process (including on the investigation of election violations), experts, journalists and representatives of civil society organisations. Within the discussion meeting titled ‘The election process in Bulgaria: solved and unresolved issues’ held on 26 November 2015 the results of the observation were presented, as well as proposals for changes in legislative and institutional practices, and an analysis of trends in the electoral process over the past decade.

In the period after the local elections, Transparency International – Bulgaria focused its efforts on promoting proposals for changes in the electoral legislation and was an active participant in a series of discussions on the topic. The organisation formulated an opinion in connection with the Electoral Code draft and sent a series of open letters and appeals to MPs, arguing for the need for timely adoption of adequate electoral legislation. Representatives of the organisation continue to monitor the work of the National Assembly in connection with the changes in the Electoral Code.

Project ‘Light on lobbying in Bulgaria’ – ‘Towards transparency, integrity and equality in lobbying in Bulgaria’

The project ‘Light on lobbying in Bulgaria’ has been implemented since the beginning of November 2013 with the financial support of the Crime Prevention and Control Program of the Directorate General for Home Affairs of the European Commission. It is part of Transparency International’s ‘Lifting the Lid on Lobbying’ initiative, which covers 19 European countries: Austria, Bulgaria, Cyprus, the Czech Republic, Estonia, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Poland, Portugal, , Slovakia, Slovenia, Spain, the Netherlands and the United Kingdom.

The project has several main goals:

- to assess the degree of transparency, integrity and equality of influence on decision-making processes in Bulgaria;
- to mobilise expertise for the formulation of recommendations that will lead to increased transparency, integrity and equality of influence on decision-making processes in Bulgaria;
- to stimulate expert debate and mobilise public efforts for the implementation of change in the relationship between politics and business, which is based on

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clear and applicable rules for transparent and equal relations in the process of decision-making in Bulgaria.

In 2014, the main focus of the work of TI- Bulgaria was based on the development of an expert assessment of the regulatory framework, policies and practices regarding lobbying in Bulgaria. In relation to this, an expert team of the organisation conducted a series of studies - legal analysis, expert interviews, case studies and other research methods were applied in the development of a national report on the state of lobbying in the country.

After nearly a year of research, a National Report titled 'Lobbying in Bulgaria: Interests, Influence, Policy' was published with a topography of the problems of 'lobbying' in Bulgaria and recommendations for more transparency, integrity and equality in the representation of interests. The report presents an in-depth assessment of the regulatory framework, policies and practices regarding lobbying in the country; the risks associated with the lack of control over lobbying; good practices and proposals to increase transparency, integrity and equality of influence on decision-making.

In June 2015, the policy paper 'Transparency, Integrity and Equality of Influence on Policy in Bulgaria' was published. The appendix '30 standards for clarifying the influence in public policies' was developed for it, which contains specific proposals for improving the regulatory framework in Bulgaria.

The analysis served as a starting point for launching an advocacy campaign focused on promoting good lobbying practices in the Member States of the European Union, as well as training for journalists to identify non-transparent lobbying practices in European Union decision-making processes.

On 22 and 23 June 2015, a National Conference on 'Transparency, Integrity and Equality of Policy Influence' was held. The focus of the conference was decision-making and lobbying on both the national and local level. The forum was attended by parliamentarians, representatives of central and local authorities in the country, representatives of business associations, of civil society organizations, and the media. Among the panelists were sociologists, political scientists, activists from local and national civil society organisations, representatives of the National Association of Municipalities, and an expert from the Transparency International Secretariat.

Transparency International is the author of the first information portal of its kind on lobbying in Bulgaria: <http://lll.transparency.bg/>. The Internet portal presents up-to-date information on the topic of lobbying in Bulgarian and English, as well as all materials developed as part of the initiative.

The accumulated expertise and potential for advocacy during the two-year implementation of the initiative enabled the Transparency International team to actively participate in public consultation processes in 2015, providing the opportunity to present proposals to public institutions in a structured way on specific topics:

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In 2015, the team of the organisation participated in the work of an interdepartmental working group for the development of Strategic Guidelines for Prevention and Counteraction to Corruption 2015 - 2020. By doing so, TI-Bulgaria was able to include issues related to the transparency of influences over legislative and managerial processes in the final document prepared by the working group, including the 'legislative dossier' instrument, the requirements for making impact assessments of each draft normative act, and ethical standards for parliamentarians and others.

In June 2015, experts of the organisation actively participated in the working group for drafting an amendment to the Law on Normative Acts. They also took part in the final phase of work on the project at the level of the Council of Ministers by providing an official opinion in the consultative procedure, during which they insisted on regulating the 'legislative dossier' instrument, for greater transparency within the working groups in the early stages of the legislative process. and requirements for broader stakeholder consultation.

Since July 2015, TI-Bulgaria has been a member of the Civil Council as part of the National Council for Anti-Corruption Policies and participates in the meetings of the National Council. This platform has been used several times to present ideas about the transparency and integrity of the influences over the legislative and governing process in Bulgaria. Since October 2015, the organisation has maintained close contacts with the Chairman of the National Council for Anti-Corruption Policies and the members of the Civil Council, in order to present a draft Law on the Transparency of Lobbying, which was developed by an expert team of Transparency. The law would provide a good basis for illuminating some of the influences on decision-making processes. Furthermore, it will improve institutional practices and introduce good models of declaring lobbying contacts based on the example given by the declaration of lobbying meetings made by senior officials of the European Commission.

Project 'Strengthening cooperation and advocacy for transparency and accountability in political life'

The project 'Strengthening Cooperation and Advocacy for Transparency and Accountability in Political Life', is a joint initiative of Transparency International - Turkey, TI- Bulgaria and 'GONG' Croatia, which started in late 2014 and will end in April 2016. It is implemented with the financial support of the joint program of the European Union and the Republic of Turkey 'Societal Dialogue Between the EU And Turkey - III Political Criteria Grant Scheme (CSD-III / PC)'.

The main goal of the initiative is to increase the transparency and accountability of political funding in the Republic of Turkey, both in terms of legislation and practice. The project aims to increase the capacity of the non-governmental sector to monitor and control political funding in the country by building a civic coalition for transparent and accountable funding of political activity.

The project activities are mainly related to:

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- establishment of a Civic Coalition for the transparency and accountability of political funding in Turkey;
- exchange of expertise between partner organisations from Turkey and Croatia;
- conducting an advocacy campaign to promote the cause of the initiative;
- dissemination of numerous promotional materials and engaging political parties and candidates in Turkey in a commitment to increase the transparency of political funding.

The main aim of Transparency International – Bulgaria in the framework of this initiative is the transfer of expertise and experience for civilian monitoring in the field of political financing. For TI-Bulgaria, this initiative provided another important opportunity to strengthen its reputation as a regional leader within the Transparency International network on civilian monitoring and advocacy for transparency and accountability in the financing of political activity - a topic on which the team has been working on since 2001.

In this regard, representatives of TI - Bulgaria took part in a series of workshops, public forums and press conferences in 2015 to share the experience of the organisation in the implementation of advocacy campaigns to increase transparency in political funding and the use of innovative tools for monitoring the financing of political parties and election campaigns, including the Public Contract for Fair and Transparent Elections. Experts of TI- Bulgaria participated in work meetings of the Civic Coalition, as well as in its official presentations to the media in Turkey in forums organised in the months of February, April and December 2015 in Turkey.

II. PUBLIC ADMINISTRATION REFORM. MONITORING THE ACTIVITY OF PUBLIC INSTITUTIONS

One of the most important areas of activity at TI- Bulgaria is the reforming of public administration. In this regard, the organisation's contribution to the analysis, monitoring and application of foreign expertise on prevention, anti-corruption and good governance should be noted. The topics of conflict of interest, civic participation and independent civic monitoring of the administration at all levels (local, regional and national) should also be highlighted. In the last few years, TI - Bulgaria has launched a new focus in the fight against corruption - confiscation of illegally acquired property. It is no coincidence that the organisation turned its attention to this problem. Its relevance at a national and pan-European level is explained by the fact that one of the most successful approaches to fighting corruption is to take away the economic benefits of corrupt practices. In 2014 and 2015, the organisation focused its attention on another aspect of the problem of combating corruption - the mechanisms for civil control over local government institutions and the regional structures of institutions with influence.

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Project 'Confiscation of Illegally Acquired Property in Europe - Increasing Transparency, Integrity, Accountability and Efficiency'

The project is a 24-month initiative of Transparency International, which was launched in June 2013 with the financial support of the European Commission, Directorate General for Home Affairs under the Crime Prevention and Counteraction Program. It is a natural continuation of the activities of TI-Bulgaria in relation to monitoring the adoption of the law for confiscation of illegally acquired property in favor of the state and the constitution of the Commission for confiscation of illegally acquired property. The project is implemented by Transparency International – Bulgaria, in partnership with Transparency International - Italy and Transparency International - Romania.

The main objective of the initiative is to increase transparency, integrity, accountability and efficiency in confiscation proceedings in Europe by exercising effective civilian control over the work of specialised bodies in this field. One of the main results sought was to improve cooperation between such institutions within the European Union.

The project activities were focused on several main areas:

- analysis of the legal framework and institutional practices and policies - national legal and sociological research in the three countries;
- development of expertise on monitoring and evaluation of the activity of the institutions with powers for confiscation of illegally acquired property;
- monitoring the work of the institutions with powers to confiscate illegally acquired property, in order to exercise effective civil control over the procedures for the confiscation of property;
- promoting cooperation between the bodies for confiscation of illegally acquired property at EU level, by provoking a public discussion on the issue and holding such discussions to present the results of the initiative in this area.

Based on the analysis of the legal framework in Bulgaria, Italy and Romania in 2014, three national reports were prepared and published, presenting three different models for the confiscation of illegal property. The national legal analysis served as a basis for the development of a common methodology and indicators for independent civil monitoring of the procedures for the confiscation of illegal property in the three countries.

The independent civil monitoring was carried out in the period May 2014 - January 2015. The focus of the monitoring in Bulgaria was the specialised bodies for confiscation of property - the Commission for Confiscation of Illegally Acquired Property and the Interdepartmental Council for Property Management. The results of the monitoring served as a basis for making specific recommendations for improving the legal framework and its implementation at a national level.

The comparative report 'Legislation meets practice: national and European perspectives in the confiscation and forfeiture of assets' was prepared and

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published. It is a comparative legal analysis of the legislations of Bulgaria, Romania and Italy on the focus area, the institutional framework for the implementation of confiscation of illegally acquired property, the results of monitoring and recommendations for overcoming problems in the confiscation procedures of the three countries. .

Based on the comparative analysis, the policy paper ‘Main aspects of confiscation and forfeiture of assets for the benefit of the state: national models and European standards’ was developed. The document contains specific recommendations for improving the regulations related to confiscation/acquiring procedures at EU level. It focused on establishing minimum common standards valid for all Member States, thus helping to increase the efficiency of national procedures and promoting cooperation at interinstitutional and intergovernmental levels. Given the importance of the topic within a European context, the two analytical documents were presented to institutions and organisations working at a European level. On 24 March 2015, the analysis was presented in Brussels as part of the discussion ‘Confiscation and Forfeiture of Illegal Assets: European Perspectives for Combating Serious Crime”, which was attended by representatives of the European Commission, the European Parliament, NGOs and the media.

The results of the conducted research and the prepared reports were the subject of an independent discussion ‘Seizure of illegal property: European perspectives for combating serious crime’. It was held in Sofia on 31 March 2015, with the participation of representatives of CONPI, investigative bodies of the prosecution, the Ministry of Interior, representatives of the academic community and experts working on the topic, non-governmental organizations and the media.

On 28 April 2015, the final conference ‘Confiscation of assets for the benefit of the state: models for combating crime in the European Union’ was held in Sofia, which presented the results of the initiative. The forum was attended by experts from more than 10 national offices of Transparency International from EU candidate countries, representatives of Bulgarian and foreign institutions with influence in the field, diplomats, experts, NGOs and journalists.

Local Integrity System Index Project

The Local Integrity System Index project is a three-year initiative of Transparency International - Bulgaria, which has been implemented since the beginning of November 2014 thanks to the financial support of the America for Bulgaria Foundation. The initiative is an expression of Transparency International – Bulgaria’s assessment that an effective fight against corruption in the country cannot be carried out without the participation of key institutions and social actors at a local level.

The initiative is implemented through three main types of activity:

- assessment of the capacity of local public institutions and other actors to implement sustainable anti-corruption policies; building an annual Local Integrity System Index;

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- strengthening the integrity of local communities: developing the capacity of local authorities to implement long-term sustainable anti-corruption policies;
- advocacy for reforms in local anti-corruption policies.

In 2015, the organisation focused its attention on conducting research on the institutions of the local integrity system and promoting the results. The study, as well as other project activities, was carried out in cooperation with a wide network of non-governmental organisations working in the respective regions which are partners of TI – Bulgaria in the implementation of the initiative.

In this regard, efforts were focused on:

development of the monitoring capacity of civil society structures - two training seminars were held for representatives of non-governmental organisations which were involved in the implementation of the initiative;

- building a wide network of civil society organisations and experts who participated in the project's research work - 26 local civil society organisations from all over the country and more than 75 experts were involved in the implementation of the research;
- research and analysis of the activities of local institutions and social actors, including:
 - a. over 80 in-depth interviews conducted with journalists from local and regional media and over 60 in-depth interviews with members of Municipal Councils and secretaries in the municipalities (regional centres);
 - b. more than 120 questionnaires completed by NGO representatives across the country;
 - c. Invitations sent to 519 parties, coalitions and initiative committees to join the Public Contract for Transparent and Fair Elections in the 2015 local elections campaign, in particular the evaluation of the Political Parties sector of the survey, with 70 candidates and coalitions supporting the Public Contract.

Following the study and analysis of the data obtained, six regional discussions were held to verify the intermediate results of the study. In September 2015 in the cities of Varna, Sofia, Burgas, Plovdiv, Vratsa and Veliko Tarnovo were organized discussions 'Index of the local integrity system 2015 - preliminary monitoring results', which were attended by experts from the research team and another 90 representatives of the surveyed institutions and structures.

As a result of the application of the monitoring methodology, an index of the local integrity system was compiled. It is the first annual comparative study of key institutions and social actors that construct the system of honest and responsible governance at a local level. The index shows a comparative picture of the corruption-fighting capacity, role and importance of the municipal council, mayor,

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municipal administration, political parties, judiciary, police, business, media and civil society in the 27 municipalities (regional centres) in Bulgaria.

The results of the 2015 survey were announced at a forum held on 9 December 9 2015 - International Anti-Corruption Day. The discussion was attended by mayors, chairmen of municipal councils, district governors, local public mediators, civil society experts and the media. The results of the Local Integrity System Index are also published on the initiative's independent page: <http://lisi.transparency.bg/>.

Project 'Civic Platform for Responsible and Accountable Management Project'

The project 'Civic Platform for Responsible and Accountable Management' is an initiative of TI-Bulgaria, which took place in the period of November 2014 - January 2016. It is implemented with the financial support of the NGO Support Program in Bulgaria under the Financial Mechanism of the European Economic Area 2009 - 2014. The initiative was created in response to the need to develop the capacity of civil society structures to systematically monitor the work of control institutions and to establish effective interaction between civil society and public institutions in two key areas:

- ecology and construction - environmental protection in connection with urban planning activities and the cleaning of riverbeds;
- social care for children at risk - social protection for children who are accommodated in institutions providing social care of the residential kind.

The main goal of the initiative was to encourage the involvement of non-governmental organisations in the process of policy formulation and decision-making at both local and regional level in these thematic areas across two regions of the country - Northwest and South Central Bulgaria.

The initiative was aimed at developing skills for effective civic monitoring of the work of institutions with controlling powers from the Northwest and South Central regions, as well as active citizen participation in the development of policies for transparent and accountable management of institutions that control the two thematic areas.

In 2015, an expert team of TI-Bulgaria developed a methodology for civil monitoring of the work of control institutions at a local level. As a tool for the implementation of this activity, a legal analysis of the work of the institutions at both a local and regional level in the two specific areas (social care for children at risk and ecology and construction) was developed.

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Given the fact that the developed methodology is a specific innovative tool for civic monitoring in these two areas, it was the subject of discussions with representatives of institutions in both areas, as well as with experts and NGOs working at a local level in the fields of child social care and environmental protection. In particular, two discussions were organised: 'Civil Platform for Responsible and Accountable Management in the Implementation of Urban Development Activities and Environmental Protection' (held on 20 March 2015) and 'Civil Platform for Responsible and Accountable Management in the Provision of Care for Children at Risk' (held on 21 March 2015).

On 23 and 24 April 2015, a training seminar was organised in Sofia on 'Civic monitoring for responsible management at a local level.' Experts of TI – Bulgaria trained representatives of local NGOs from the Northwest and South Central regions in the use of civil monitoring tools within the two surveyed areas.

Based on the developed methodology and the conducted training in the period April - November 2015, civil monitoring was carried out on the work of the institutions exercising control at both a local and regional level in the two specific areas:

- in the field of ecology, the focus was on flood prevention by maintaining the cleanliness of the rivers in the East Aegean Basin - the observation was carried out by local monitoring teams from the municipalities of Plovdiv, Pazardzhik, Smolyan and Haskovo, and supported by an expert team of TI-Bulgaria;
- in the field of social care, the focus was on social care for children at risk who are accommodated in family-type centres - the observation was carried out by local monitoring teams from the municipalities of Pleven, Vratsa, Vidin, and supported by an expert team of TI-Bulgaria.

One of the significant achievements in the joint work of the local monitoring teams and the experts of TI-Bulgaria, related to the development of specific knowledge, skills and abilities of local NGOs to implement civil monitoring over the activities of control institutions in both thematic areas. This achievement is especially important not only in the context of the aspirations for civil control in the two problem areas, but also due to the development of the working capacity of local non-governmental organisations, some of which work in the respective field but do not have the relevant knowledge to control (but is available to TI-Bulgaria as an organisation specializing in the prevention of corruption and the application of the principles of good governance).

As a result of the monitoring, a series of monitoring reports and programs with recommendations were developed, which outline in detail the achievements and problems in the work of institutions in both areas. This allowed for a summary assessment of the functioning of institutions in both regions in the studied thematic areas. As such, a structured proposal was developed for the main areas in which it is necessary to improve the control activity and the cooperation between the institutions and the structures of civil society. Among the series of analytical

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reports and recommendations, it should be noted the reports and programs that were provided to the institutions in both areas and which served as a basis for further project activities are:

- Report from the monitoring of the activities of institutions working at both a local and regional level in the field of ecology: flood protection and maintenance of river conductivity;
- Report from the monitoring of the activities of institutions working at both a local and regional level in the provision of social care for children at risk (social service residences- accommodation in family-type centers);
- Program for effective control and interaction between civil society and institutions at local and regional level in the field of ecology: maintaining the conductivity of river beds and flood protection;
- Program for more effective control at a local and regional level in the provision of residential-type social services for children at risk (family-type accommodation centres) and for promoting greater interaction between institutions and structures of civil society.

The developed analytical documents were the subject of discussions, during which a ground for interaction between institutions and civil society organisations working at a local level in both areas was created. On 16 December 2015, a discussion was held in Vratsa on 'Civic Platform for Responsible Governance and Effective Care for Children at Risk', and on 18 December 2015 another discussion was held in Plovdiv titled 'Civic Platform for Responsible environmental management: flood prevention in municipalities.'

The discussions sought consensus on the necessary actions that could lead to more adequate controls, and also presented the final product of the project's work: an internet-based platform that provides informative resources for the functioning of control institutions in both thematic areas, including monitoring results, good practices and opportunities for reporting issues. In this regard, the website page platformi.transparency.bg 'Civic Platform for Responsible and Accountable Management' was promoted. Following the completion of the initiative, this platform is used as a tool for ongoing discussion of citizens' proposals to improve the efficiency of the work of control institutions in both thematic areas,

'Development the skills and competencies of employees in administration for effective countering of corruption within the provision of administrative services and the functioning of regulatory regimes'

In 2014 and the beginning of 2015, an expert team of TI-Bulgaria performed expert analytical activities on a project implemented by the Administration of the Council of Ministers. The main goal of the initiative was to strengthen administrative control over the provision of administrative services and the

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functioning of regulatory regimes. The initiative structured in several main areas of activity:

- Preparation of an analysis of the corrupt practices in the provision of administrative services and the functioning of the regulatory regimes in central, regional and municipal administrations;
- Development of a handbook for the functions of control bodies in the field of anti-corruption within state administration, presenting detailed information on: the functions of the control bodies within the structures of the central state administration and the local authorities; the ways of submitting and viewing reports for issues and corruption; catalog of good practices for prevention and counteraction of corruption in local government;
- Development of a manual for the identification of corrupt practices in administration work, which presents information on: the procedures for establishing corrupt practices in the administration; up-to-date data from expert sociological surveys which assess the corruption risks and corruption-related attitudes of the employees in the administration; ways of reporting to relevant institutions, as well as methods and systems for monitoring the risk of corruption;
- Development of training materials that serve as a basis for conducting a series of training seminars for employees of the administration;
- Training of employees from the central and regional administrations.

Based on the conducted research, analysis and publications, the experts at TI-Bulgaria conducted 38 training seminars, during which nearly 1000 employees and heads of the inspectorates of the central state administration participated, as well as employees of municipalities from all regions of the country.

In January and February 2015, the experts at the organisation conducted the latest series of training seminars for employees of the central structures of state administrations and municipalities.

III. RAISING PUBLIC AWARENESS. CONDUCTING ADVOCACY CAMPAIGNS

Project 'Submit a report (II) - Involvement of citizens in combating corruption in Southern Europe'

The Centre for Legal Consultation of Victims of Corruption was established in 2006 at the initiative of Transparency International - Bulgaria.³ Since then, under the direction of the TI- Secretariat and national representative offices, over 15 centres have been created in countries across Europe, Asia and Africa.

³ Advocacy and Legal Advice Centre (ALAC).

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The current work of the Centre for Legal Consultation of Victims of Corruption in Bulgaria is carried out as part of the project 'Submit a report (II) - involvement of citizens in combating corruption in Southern Europe.' The initiative is implemented with the financial support of the European Commission, under the program "Crime Prevention and Counteraction", Home / 2012 / ISEC / AG, which aids the construction of new centres and exchange of experience with existing centres across southern Europe. The international project is being implemented in six countries - Bulgaria, Italy, Romania, Portugal, Slovenia and Cyprus.

The activities of the centre include the provision of practical legal assistance and expert advice for citizens who have suffered or become witnesses to corruption and wish to inform state authorities. For this purpose, they have been provided with access to the contact number 0800 11 224 (no costs apply), through which reports can be submitted for cases of corruption. Reports can also be submitted electronically by email (alac@transparency.bg) or by the continuously maintained website (<http://alac.transparency.bg/bg/signals-corruption.html>)

The centre aims to enable citizens to play an active part in the fight against corruption by providing free legal aid in support of their efforts to report corruption-related crimes by public institutions or their fellow employees. In this regard, the main focus of the activities of the centre in 2015 was filed reports from citizens about expected and conducted violations during the election process. The majority of the 141 received reports referred to violations and crimes against the political rights of citizens with relation to their participation in the election process. As in previous election campaigns (2009, 2011, 2012, 2013 and 2014), the centre's team assisted citizens by providing information on their rights as voters, sending reports to the relevant institutions, as well as processing and systematising the information from the reported violations, in order to support the work of the institutions and TI-Bulgaria for the prevention and reduction of violations in the election process.

In 2015, the organisation's efforts were focused not only on providing assistance to citizens and protecting their rights (by providing free legal aid), but also in several other areas:

- conducting public opinion polls and disseminating analysis of corruption in the country;
- conducting an information campaign among citizens aimed at informing them about the negative consequences of corruption and the means by which they can protect their rights;
- conducting an advocacy campaign before the institutions to encourage measures for reducing corruption;
- developing two sets of analysis and publishing policy papers, dedicated to the two aforementioned areas in which corruption is the most significant problem;

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- conducting a series of workshops and discussions focused on identifying weaknesses in the work of institutions and formulating proposals for effective approaches to combating corruption in these identified problem areas.

In the autumn of 2015, during the election campaign, a representative public opinion poll was conducted on 'Political corruption and vote buying: the main problems for citizens and attitudes towards counteraction.' It focused on three thematic areas (significant problems in the electoral process, readiness to counter political corruption and awareness of the financing of political activity), the results of which allowed for an up-to-date analysis of issues in the electoral process and for the development of an advocacy campaign to pressure institutions to take action against vote buying and manipulated voting.

The second line of work in 2015 was to conduct an in-depth analysis of issues in two of the most problematic areas in the country. Based on the data from the received reports, it was assessed that the focus should be on the analysis of the problems related to corruption in public procurement and violations of citizens' voting rights. In this regard, the following were developed:

- Policy paper 'Public procurement in Bulgaria: Mechanisms for implementing corrupt practices and issues in the work of institutions', which presents an analysis of the main environmental factors fuelling corruption in public procurement, the dimensions of the problem, the mechanisms for implementing corrupt practices, problems in the work of institutions in relation to the procurement award, implementation/control of institutional soft spots and recommendations for reducing corruption in public procurement;
- Policy paper 'Buying votes and manipulated voting in Bulgaria' - the main subjects of analysis are the forms of expression of these type of crimes against the political rights of citizens; mechanisms for exerting pressure and buying votes; issues in the work of the institutions in connection with the investigation and prosecution of vote buying, other crimes against citizens' voting rights (institutional soft spots), as well as recommendations for reducing corruption in the electoral process.

The third area of work in 2015 was related to conducting an advocacy campaign for more effective institutional work on investigating reports of irregularities in the election process, including the purchase of votes and manipulated voting. In this regard, informative materials were developed, including brochures promoting the work of the centre, the free telephone line for reporting corruption, and a video about the negative effects of corruption which was broadcast on national television and social networks.

Based on the results of the centre's work in 2015, the expert team of the organisation formulated a series of recommendations for changes in the electoral legislation related to necessary institutional measures in the preparation and conduct of elections as well as for implementation of a more effective policy for

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sanctioning crimes against the political rights of citizens. The recommendations were presented both in work meetings and public forums with the participation of representatives of the institutions. One such example is 'the election process in Bulgaria: solved and unresolved issues', an event which took place on 26 November 2015 in Sofia.

As part of the advocacy campaign in autumn 2015, TI-Bulgaria initiated a training seminar for observers which aims to develop the capacity of non-governmental organisations to monitor the electoral process and protect the electoral rights of citizens. On 12 September 2015, a training seminar was held in Sofia on 'Transparency and integrity of the electoral process and political representation', which was attended by representatives of 26 organisations working locally. The training was used as a starting point for the implementation of civilian monitoring of the electoral process and for identifying issues and trends in the electoral process in the country.

The monitoring of the electoral process was carried out with the assistance of a coalition of 26 NGOs from all over the country, and overall 167 volunteers. With their assistance, violations of the electoral rights of citizens were detected and the expert team at TI-Bulgaria was able to file each report received and seek assistance from the institutions responsible for the protection of victims and sanctioning of the crimes and offences committed.

On 26 November 2015, the forum 'the electoral process in Bulgaria: solved and unresolved problems' was held. In the framework of the discussion, data was presented from the work of the Centre for Legal Consultation of Victims of Corruption, including the results of the observation of local elections and analysis of trends in the electoral process over the last decade. Representatives of institutions with powers to prosecute for these crimes – the Prosecutor's Office, the Ministry of Interior – were present, as well as representatives of institutions with powers in the preparation and conduct of the electoral process – CEC, Court of Auditors, journalists, representatives of non-governmental organisations and experts.

National Anti-Corruption Resource Centre Project

Transparency International – Bulgaria continues to support the Anti-Corruption Centre, which was established with the financial support of the European Commission. The library of the centre contains a significant volume of books, periodicals and analytical resources reviewing the nature of the problem of corruption both nationally and globally. Along with the publications by experts, international institutions and other non-governmental organisations, the centre shall make available all publications by Transparency International in both English and Bulgarian – altogether an outcome of over 17 years of work.

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The built capacity of the centre allows the team to continue operating activities in three main areas:

- Processing and filling in the information archive which is also being completed by several other different sources for information. The archive is updated by the daily press review of the national press and electronic publications providing information on corruption cases and analysis dedicated to the topic. In addition, the archive is filled with publications, analysis and research published on the internet. Therefore, the archive is also being supplemented by conference materials provided by state institutions as well as by Bulgarian and international non-governmental organisations;
- The team at Transparency continues providing information on its library, processing submissions on a daily basis and accepting electronic requests for information from the library;
- The activity of the Anti-Corruption Resource Centre is supported by interns - students of political science, European studies and public administration at the Sofia University, NBU and foreign universities as well. Transparency International has an established practice of providing students with the opportunity to conduct an internship. Alongside informing them on how the organisation operates, the team strives to promote TI's fight against tolerating corruption. The trainees provide assistance both in the current work of the team and in the activities of the centre.

Monitoring of national print and electronic media

Our team carries out regular media monitoring of national print and electronic publications. Information about corruption cases, abuse of power and public resources, as well as analysis and comments on the various dimensions of the problem of corruption in various public spheres, is subject to necessary reorganisation. This allows information to be used within various project activities and to help identify problem areas in the fight against corruption.

PERMANENT ACTIVITIES

Presentation of the comparative research of Transparency International

As a national representation of the global anti-corruption organisation Transparency International, the Transparency International – Bulgaria team annually announces the results of comparative international research and analysis, some of which have established themselves as authoritative sources of information

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and assessments of corruption, economic and political development within the studied countries. These include:

- **The Corruption Perception Index**, measuring the level of political and administrative corruption according to the assessments of business representatives, economic and political risk analysts from around the world and surveyed experts from relevant countries. The study allows for comparative assessments on both a regional and sub-regional scale, which can provide businesses with a general indication of which countries carry a greater risk of corruption and, as a result, where the environment for the conduct of business is most suitable.
- **Global Corruption Barometer**, presenting an assessment of the level of corruption prevalent in the individual sectors and institutions within the studied countries. The study makes it possible to compare the degree to which corruption has spread in key sectors of social, economic and political life. Along with the ability to implement sector analysis, the barometer serves as a basis for the development of anti-corruption policies by highlighting priority areas. Alongside this, it serves as an indicator for businesses on the institutions and sectors of social, economic and political life, which face greater issues and, as a result, represent a more serious risk of corruption.
- **Global Corruption Report**, presenting an in-depth study of corruption in key sectors of public life.
- **Bribe Payers Index**, providing information on the readiness of companies from a given country to offer and pay bribes in the implementation of their export strategies abroad. The survey serves businesses as a guide to the willingness of their competitors working abroad or those intending to export to new markets to offer and pay bribes.

Public events and forums, organised by Transparency International - Bulgaria

Within the framework of implemented initiatives and projects in 2015, Transparency International – Bulgaria made a large number of public appearances. The main goal of the team is to increase media interest and coverage of all of its initiatives. The organisation actively works with a wide range of representatives from both national and regional print and electronic media networks. As a result of the establishment of lasting contacts with them, the events organised by Transparency were widely covered in the media. Amongst the forums organised in 2015 were:

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- Discussion 'Civic platform for responsible and accountable management in the implementation of urban planning activities and environmental protection', held on 20 March 2015 in Sofia;
- Discussion 'Civic platform for responsible and accountable management in the provision of care for children at risk', held on 21 March 2015 in Sofia;
- Forum 'Confiscation and Acquiring of Illegal Property: European Perspectives for Combating Serious Crime', held on 24 March 2015 in Brussels;
- Discussion 'Confiscation of Illegal Property: European Perspectives for Combating Serious Crime', held on 31 March 2015 in Sofia;
- Training seminar 'Civil monitoring for responsible management on a local level', held on 23 - 24 April 2015 in Sofia;
- Conference 'Confiscation of property in benefit of the state: models for combating crime in the European Union', held on 28 April 2015 in Sofia;
- Conference on 'Transparency, Integrity and Equality of Policy Influence', held on 22 and 23 June 2015 in Sofia;
- Training seminar 'Transparency and integrity of the electoral process and political representation', held on 12 September 2015 in Sofia;
- Discussion 'Index of the local integrity system 2015 - preliminary results of the monitoring', held on 11 September 2015 in Sofia;
- Discussion 'Index of the local integrity system 2015 - preliminary results of the monitoring', held on 16 September 2015 in Varna;
- Discussion 'Index of the local integrity system 2015 - preliminary results of the monitoring', held on 17 September 2015 in Veliko Tarnovo;
- Discussion 'Index of the local integrity system 2015 - preliminary results of the monitoring', held on 18 September 2015 in Vratsa;
- Discussion 'Index of the local integrity system 2015 - preliminary results of the monitoring', held on 23 September 2015 in Plovdiv;
- Discussion 'Index of the local integrity system 2015 - preliminary results of the monitoring', held on 24 September 2015 in Burgas;
- Discussion "'The election process in Bulgaria: solved and unresolved issues', held on 26 November 2015 in Sofia;
- Forum for presentation of the Index of the local integrity system - 2015, held on 9 December 2015 in Sofia;
- Discussion 'Civic Platform for Responsible Governance and Effective Care for Children at Risk', held on 16 December 2015 in Vratsa;
- Discussion 'Civic Platform for Responsible Governance in the Field of Ecology: Flood Prevention in Municipalities', held on 18 December 2015 in Plovdiv.

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New publications of the Transparency International Association

As a result of the conducted research, analysis and monitoring in 2015, the following publications were made:

- 'Legislation and practice: national and European perspectives in confiscation and acquiring of property for the benefit of the state";
- Policy paper 'Main aspects of confiscation and acquiring of property for the benefit of the state: national models and European standards';
- Policy paper 'Transparency, integrity and equality of influence on politics in Bulgaria';
- '30 standards for clarifying influence in public policies'
- 'Methodology for civil monitoring of the work of control institutions on a local level';
- Policy paper 'Public procurement in Bulgaria: Mechanisms for implementing corrupt practices and problems in the work of institutions';
- Policy paper 'Vote buying and manipulated voting in Bulgaria';
- 'The voice of the citizens' Report from the monitoring of the national referendum on the introduction of remote electronic voting (25 October 2015).

INFORMATION ABOUT THE ACTIVITY OF TRANSPARENCY INTERNATIONAL - BULGARIA UNDER ART. 40 OF THE NON-PROFIT LEGAL ENTITIES ACT

As a non-profit organisation, Transparency International – Bulgaria carries out its activities in support of the development of civil society. The main priority in the work of the organisation is the initiation and implementation of prevention projects and programs countering corruption at a national, regional and local level.

In accordance with the organisation's charter, its mission is to unite the efforts of state institutions, local authorities, representatives of civil society, the private sector and the media - carrying out systemic reforms and sanctions which prevent the spread of corruption in the country.

All implemented programs and initiatives of the organisation in 2015 were directly tied to the implementation of the priorities outlined above. All income received within the past year has been used in alignment with the requirements of Article 38 and the charter of the organisation, as well as in agreement with the organisation's efforts to support public activity for the development and continuity of civil society.

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Overall budget for 2015	807 187.81 lev.
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