INTERVIEW SERIES: MONITORING, EVALUATION AND LEARNING ABOUT DEFENCE CORRUPTION PREVENTION

Avgustina Tzvetkova
An interview with the former Deputy Defence Minister of Bulgaria 2009 – 2013
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Introduction

The defence sector is crucial to a country’s security, and yet it remains one of the sectors least open to public scrutiny. Defence corruption is dangerous, divisive, wasteful; and it contributes to complex security challenges such as organised crime and terrorism. It has a negative impact on Ministries of Defence and armed forces themselves. These establishments stand to gain from a corruption-free environment where operations are conducted with transparency and integrity. Corruption in defence weakens national security, misuses funds, encourages criminal activity and undermines professionalism.

Since its establishment in 2004, Transparency International UK’s International Defence and Security Programme (TI-UK DSP) has been working to reduce corruption in defence and security worldwide. We engage with governments, armed forces, security forces, defence companies, international organisations, civil society and others to advance this goal.

A major goal of ours is to disseminate good practice in defence anti-corruption reform wherever we find it so others can learn from it and design measures that are suited for their contexts. This interview analyses the experiences from the Republic of Bulgaria from 2009 to 2013. Many important anti-corruption reform measures were introduced by the Ministry of Defence in this period, even though they were not continued by the subsequent government. The purpose of this interview is to elucidate the various reforms that were implemented and to share lessons about implementing reform measures effectively. I hope you find it useful. We welcome your feedback.

Mark Pyman
Director, Defence and Security Programme
Abbreviations

BI    Building Integrity (NATO)
CPI   Corruption Perceptions Index (Transparency International)
CPN   Criminal Patronage Network
DRC   Democratic Republic of the Congo
EULEX European Union Rule of Law Mission in Kosovo
GEMAP Governance and Economic Management Programme (Liberia)
ISAF  International Security Assistance Force (Afghanistan)
KFOR  Kosovo Force (NATO-led)
MEC   Independent Joint Anti-Corruption Monitoring and Evaluation Committee (Afghanistan)
SIGAR Special Inspector General for Afghanistan Reconstruction
UNMIK United Nations Interim Administration Mission in Kosovo
WACSI West Africa Cooperative Security Initiative
The purpose of the interview was to understand the experience of someone leading change in a Ministry of Defence to effect large-scale reform against corrupt practices.

Can you start by telling us what your role was?

**AT:** I had worked on this issue for more than 5 years. In 2008, in my capacity as NGO representative, I developed a project focused on the lack of transparency in the Ministry of Defence. After the general elections in 2009 I joined the Ministry of Defence. For 6 months I was an Advisor to the Minister of Defence. For one month, I became Advisor to the Minister of Foreign Affairs, and after that I was appointed Deputy Defence Minister of Bulgaria. I resigned on 13th of March 2013, when the Government fell.

When you came into government, what were your first few actions on anti-corruption in defence?

**AT:** We immediately established an anti-corruption council in the MoD, and this anti-corruption council was unique because there was no such council in any of the other ministries in Bulgaria. We started only with a few directors and some of the military personnel, but afterwards we expanded the council and all commanders of the Armed Forces joined it. The chair of the council was the chief of the cabinet. And later when I became a deputy minister I chaired the council.

Was this council useful? Was it constructive?

**AT:** It was very constructive. The basic tasks of the council were to develop a system of measures aimed at fighting corruption, to exercise control over the implementation of these measures, and to put forward solutions for the improvement of legislation.

Were you trying to bring into the council all elements of the ministry or were you trying to create a council of allies who were champions of reform?

**AT:** All elements of the ministry. And in the beginning it was very tough to work in the council because when we started explaining to the people that we would work in a new way of making decisions transparently and accountably, no one believed us; and they watched us thinking, ‘this is the beginning of the new tune, which will start with new words and will be as the previous government; taking bribes and doing things in a non-transparent way.’ We tried not only to bring all elements of the ministry together, but also to work in a different way than the ministry had worked before.
How long did it take before this council started to believe that this was a permanent new way of working?

AT: At least a year and a half.

In the council, did you find that it was an active discussion if people did not agree with you?

AT: First, they were silent. After that they were involved in the discussion. Some of them quit. They changed their positions because they were not able to follow the new management and the new rules of transparency and accountability.

Looking back over the 3 years, was this council the right thing to have done, or would you have done something different?

AT: It is the right thing to have done. From the very beginning we decided to ask for the support of TI UK and also to participate in the Building Integrity NATO programme. The TI/NATO self-assessment questionnaire was very important and useful for us because it convinced the people within the council that it was possible to work in a different way and they started believing that this was something real. And after the NATO/TI peer review they were focused on recommendations and on changing the way of working and this was the most important thing – to have this report and to have the outside assessment of the corruption risks in the ministry. And I asked NATO to come two years later in April 2013 to make a second peer review on this to compare our improvement. I didn’t know that the government would resign before that. I suppose on Monday the NATO team will be in Bulgaria to do it because sustainability and continuity are very important.

One piece of your plan was to put this anti-corruption council in place. What were the other pieces?

AT: In the first place, we introduced transparency into formulating decisions as well as into the decision making process as a basic weapon against the hidden practices related to abuse of position-in-office for personal gain. All activities of the leadership of the Ministry of Defence were conducted under complete publicity, and this practice considerably contributed to improving the relations of the political leadership of defence with the needs and expectations of the public. Second, we developed the strategic documents of the defence policy and the modernisation of the armed forces under the conditions of clear accountability to the citizens regarding the ways of spending the defence budget. We improved the programmed defence planning and budgeting on the basis of the necessary defence capabilities as this process was conducted with maximal transparency by periodically preparing a progress report on the results of the implementation of the programs. After a public debate with the participation of representatives of nongovernmental organisations, civil society and scientific-academic circles, a White Paper on Defence and Armed Forces was adopted by the National Assembly. Fighting corruption was incorporated as a fundamental principle in the White Paper – with transparency as a key pillar.

Another basic document was the Plan for the Development of the Armed Forces, which marked the beginning of new defence management built on a modern base with clearly defined and attainable goals and priorities. A Long Term Investment Plan was adopted as well, as a logical continuation of the Plan for the Development of the Armed Forces. This plan established the prerequisites for a principled, consistent and transparent investment policy. We also amended the law on defence and armed forces and we changed the internal rules of procurement, information policy, and managing the disposal of excess defence assets and property.
So if we take those elements one by one, what was it that needed changing in the law?

AT: First of all, we put in the law that any contract over €50 million should be approved by the parliament. And the contracts over €10 million to €50 million should be approved by government, and after that, if the contract is over 50 million the government takes a decision and submits it for approval to the National Assembly. This mechanism guarantees complete civilian control over defence budget spending.

And then you changed a number of internal procedures. Talk me through them.

AT: In order to lay the foundations of new ethics in our relations with the public and the representatives of the business we developed an Ethical Code of Conduct for the military and civilian personnel of the Ministry. Also, we paid a special attention to explanatory processes as well as to specialised training in anti-corruption practices. In the Defence Staff College, we executed a pilot training course in anti-corruption that we planned to transform into a permanent part of the syllabus of instruction at the College.

We also developed an internal system of reporting and investigating both established and potential cases of conflicts of interest. We approved Rules for the Application of the Law on Preventing and Determining Conflicts of Interest.

We changed the internal rules because everything was confidential or secret and nothing was published on our website. To do this in the MOD you need internal rules signed by the Minister. Nothing is possible without the signature of the Minister. And he signed all measures that we had to follow to put all the tenders on the website, to put all the properties on the website, to put all the decisions of the anti-corruption council on the website.

So maybe you didn’t change the process, just that it had to be published?

AT: No, we also changed the process and the way the decisions were taken. Our goal was to build a lasting and effective system to counteract corruption.

What were those rule changes that you put in place?

AT: We changed the rules for the so-called “special procurement” for secret tenders. For the first time ever information about special tenders could be found on the website. All companies are informed and companies with a clearance certificate could take the application forms. Previous practice was completely different. Only some people in the procurement directorate - the chief procurement director, and his team decided which companies to invite to participate in the special tenders. They used so-called ‘market research’ to invite only 2-3 companies to participate in the tender. To change the corrupted practice we had to modify the internal rules and to overcome the corruption-prone ‘market research’. The council started to change these regulations in December 2009. Being a Secretary of the council, any change passed through me as an advisor to the Minister. I returned the draft of the amended rules many times because they put in the ‘market research’ again and again in different chapters and in hidden ways. I refused to sign these papers many times. In February I left the ministry and the new internal rules still were not ready.

They were trying still just to get special treatment for these 2 or 3 companies?

AT: Yes. And when in the end of March I came back to the ministry as a deputy minister I realised that the new internal regulations were not adopted yet and the ‘market research’ was in the draft again. It took more than 10 months finally to change the regulations. There was a big resistance
from the director and from the middle level administration.

*Is that partly because this was one of the principal corruption areas of the ministry, you were pressing on a very sensitive area for a key number of people?*

**AT:** Yes.

*You also mentioned procedures on property. What was the problem and what did you do?*

**AT:** The problem was that the people in the directorate hid the properties which would not be used anymore, and if someone declared an interest they started taking bribes for including the real estate in the list of surplus assets.

*These were surplus assets?*

**AT:** Yes, these were surplus assets. And we took the only possible solution to be transparent and to inform the public about the surplus assets of any kind. We created a strategy for the management of property which had become a surplus asset and published on the webpage the complete list of real estate.

*When you came in, did you have a policy of working with the people in position already or did you have a policy of removing many people from their current positions?*

**AT:** First we started to work with them, trying to change the way of working. Even after that we didn’t fire them, but they decided to resign because they understood that it was a really new way of working.

*Looking back was that the right strategy or would you have pushed them out earlier?*

**AT:** Maybe we should have pushed them out earlier.

*Are you just thinking of the top echelon, the top group of the ministry maybe the top 50 or top 100 people?*

**AT:** The ministry is only 708 people.

*What proportions of the senior officials were you able to convince of the new direction and what proportion do you think there was no chance of convincing?*

**AT:** I think that it was easier to convince the leadership, not the political leadership but the leadership in the ministry. But it was not possible to convince the middle level of the administration. They were extremely protective of some companies and they took some payment from them – but that was impossible to prove.

*Of the 750, how many would you regard as the senior people in the ministry?*

**AT:** 30. They were a mixture of civilian and military.

*And how many would you regard as being in the middle?*

**AT:** It’s hard to say. We had some 100 chiefs of divisions... less than 100, maybe 80.

*That means there were about 600 lower people in your administration?*

**AT:** Yes. The people in lower positions in the administration were good experts and very capable.

*You are giving us a very helpful picture. There are 30 senior people, 80 who are kind of middle level, and 600 who are experts and junior people. Most of the 30, after the 12 or 18 months of the council, were convinced that this was the right way to go. Of the 80, did you persuade just a few or half of them?*

**AT:** I think that is difficult to say but maybe half of them.

*Would it have been better if you had pushed more people out?*

**AT:** We started with 1400 people in the ministry and after the full structure review,
we started the reform from the top down and we made a 50% cut.

When you made those cuts, did you have the opportunity to push some of those people out who were corrupt even though you couldn’t prove it?

AT: Yes. Of the top leadership, maybe 5 of those 30 ended up not being convinced and they had to leave.

We’ve talked entirely about the ministry so far. What about the military?

AT: In Bulgaria we now have a fully integrated ministry. We do not have the military-side and the general staff; we have one ministry. We do not have any duplication. Before, we had two financial directorates, two logistic directorates, etc. Now we do not have this. This was a consequence of the full structure review.

In terms of attitude, were the military more in support of you than the civilians or less in support of you than the civilians, or was it just an individual question?

AT: It was just an individual question, no pattern.

Among the senior people, were there any common factors among the people who became your allies in really trying to help to make change, or was it, again, just particular individuals who were convinced individually?

AT: I think that the most important allies were some of the directors, the chief inspector and inspectorate and the chief auditor because we have an internal audit directorate. It was very important who the chief inspector was. The first one was not very supportive, but he retired. And the chief inspector now – who is co-chair of the council – is a very bright person and very devoted.

We’ve talked entirely so far about action within the ministry. Was it the reality that most of your work was indeed inside the ministry, or did you also need to do things externally – with other ministries or the public or parliament as part of these changes?

AT: First of all, the members of this council were also chiefs of services – air force, navy, land forces, joint force command, the chiefs of our military academy, military intelligence, military police – and it helped us a lot to work with them, and we also worked externally with NGOs, with the media, and also with others in the government. This is because we had to fulfil the metrics of the EU every month by making a list of measures that any ministry had done on anti-corruption policy and report it every month to the government.

What was it you were doing with NGOs and the media?

AT: We held some special press conferences with the media before and after the peer review. And also we informed the NGOs and published a bulletin after the council meetings. But I think that we had to focus more on working with NGOs and the media because we were not able to explain to them what we had done, what we had accomplished and having in mind that NGOs and the media are sometimes related to businesses or political parties, it’s very difficult to prove you’ve definitely changed your way of working. I would like to underline the cooperation with TI-UK DSP and BI NATO. The Self-assessment Questionnaire and the Governmental Index were of great importance for launching a real anti-corruption policy in the ministry.

What about the rest of government? Did any of the actions taken by the president and the cabinet help you with your work in defence or not? Or was there nothing they could do to help you?

AT: It was a problem and it even still is a problem for all ministries. It is the main issue concerning Bulgaria’s accession to
the Schengen area. Some of the countries – mainly the Netherlands – claim that corruption is still very high in Bulgaria. And because of this we have not been able to join the Schengen space. And this is something that is really not only important but a priority for the government of Bulgaria, for my government. And we had a special Anti-corruption Council to the Council of Ministers. The Deputy Prime Minister chaired the Council.

What were the principal forms that corruption was taking in the Ministry? What were the five or six sorts of corruption that were taking place?

AT: Signing big contracts for things that are not needed. Signing a big contract, for example, some Spartans aircraft. The contract for the aircraft was booked by one of the ministers in 2004, but a minister who came in later changed it. The contract was signed for 3 Spartans plus 3 more if there were enough funds in the state budget. And the second minister changed this, taking out ‘if there are funds’ and put the contract through one bank – to be managed by this bank – and the bank took more than 30 million Leva for it. Big deals! And many others. It is not possible to mention even a small part of them.

So the first thing was signing contracts for items that were not necessary. The second was corruptly changing the existing contract to increase the number. The third was putting the management of the contract through a single bank that was gaining benefit from that connection.

AT: And choosing a single source.

What about non-procurement areas of risk?

AT: Human resources is another big problem. We have identified as a critical area the selection of people to certain positions, in some cases involving payment of money in order to be selected. We received valuable advice from the NATO/TI joint assessment team on the selection of personnel holding key positions exposed to risk of malpractice. The Council on Anti-corruption made a decision, which was incorporated into the Action Plan, to introduce a system for identifying the sensitive positions in the Ministry of Defence with a view to reducing the corruption risk.

Did you also have that for promotions – that if somebody wanted to become General you had to pay?

AT: It’s difficult to prove that they paid, but they made some arrangements. It is not possible for Generals because they are proposed by the Chief of Defence and approved by the minister and the Council of Ministers and appointed by the president. But for the lower levels unfortunately there are many allegations for such practices.

On a scale from 0 to 10, where 0 was very bad corruption and 10 is as good a system as you can possibly imagine having in place, how far do you think you got by the time you left?

AT: Maybe halfway.

If the government had not had to resign, and if you then won the next election, would you be confident that with another 3 or 4 years you could get up to 9 or 10, or do you think, given all of the forms of resistance, 5 or 6 was the best you were ever going to achieve?

AT: Definitely 8 or 9.

In other countries, many people in your position have said to me, ‘this is such a tough thing to do,’ how would you encourage them?

AT: It’s difficult but it’s doable. I know that I didn’t take a penny. I know that I didn’t spend a dinner or lunch with anyone who is inviting me to negotiate for something outside the ministry. If someone can do this in 3 years, it means that everyone can do it, definitely.
What else?

AT: It was relatively easy for me to lead the work in the MOD because I had worked for so many years on anti-corruption, and it helped hugely having this project with TI-UK DSP in 2008 before we were elected, this helped me a lot. And you know when we entered the government nobody expected that half of the anti-corruption project team would be in the ministry. One of the first things we did was to invite TI-UK DSP. It was not only words, but real action and a need to change how things were done.

AT: In the Ministry of Defence you have to be tough, and you have to prove that the things that you are telling are the truth. Many people came and said the most transparent are the toughest. If you can do these things, it’s easy to convince the people in the leadership that it’s possible. Then you can make big changes.
Annexe: The Bulgaria MOD Action Plan 2009-2013

Action Plan

of the Ministry of Defence aimed at non-admitting the existence of any conditions of corruption at all levels of formulation and implementation of defence policy

Basis: Decision No. 628 of the Council of Ministers, dated 13 August 2009, as well as Order of the Minister of Defence No.OX-677, dated 10 September 2009

Goals: Increase in the effectiveness of defence policy through abolishing the conditions of corruption in the Ministry of Defence, introduction of new governance practices and establishing a medium for the development and endorsement of adequate values, morals and conduct of the defence personnel.

Contribution to the efforts of the government to achieve within a short time a complex and stable growth in meeting the requirements recommended in the Third Annual Report of the European Commission dated 22 July 2009.

Criteria of Achieving the Goal: The defence policy is effective with regard to the national security and defence of the country, and is implemented under the conditions of transparency, accountability and responsibility;

- The Ministry of Defence develops as a modern democratic institution in which the recognition of the human, political and civil rights is a source of unity and integrity;
- The defence personnel possess moral values and observe a code of conduct and professional standards, which strengthen the confidence and respect of society for the institution and for the national security and defence policy.

Table 1: Action plan of the Bulgarian MOD 2009

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<th>Basic activities</th>
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<th>Necessary effect</th>
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<td>Non-admittance of political corruption in defence governance</td>
<td>Improving the mechanisms of the political process of defence governance through: - Clearly stating the goals, approaches and ambitions of the government and of the Minister of Defence, and strictly observing the program for political governance; - Constant interaction with the deputies and the commissions to the National Assembly on the political issues of defence governance; - Establishment by the political functionaries in the cabinet of a standard of internal political morals of non-admitting party or private interest to dominate the decision-making</td>
<td>Chief of the Political Cabinet V. Ratchev</td>
<td>Effective and moral political governance of the defence policy. Abolishing the possibilities to use the defence policy resources in favour of a party or a private interest. Satisfying the</td>
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Improving the connection of the political defence governance with the expectations and needs of society through:
- Principled protection of the public interest in the sphere of defence and defence policy;
- Transparency of the political activities of the Cabinet;
- Systematic and honest accountability and responsibility for the activities and achieved results.

Undertaking measures to purge the legislation from conditions generating manifestation of political corruption, and guaranteeing the integrity of governance processes.

Establishing a system of principled relations with the non-governmental organisations and the academic institutions with a view to improving the quality of the decisions related to the defence policy.

Analysis and assessment of the corruption environment in the Ministry of Defence

| Analysis and assessment of the corruption environment in the Ministry of Defence | Determining the types of corruption possibilities in six spheres: |
| - Personnel management; |
| - Budgeting and financial management; |
| - Procurement management; |
| - Assigning defence functions to external organisations (outsourcing and public-private partnerships); |
| - Utilisation management; |
| - Economic activities. |
| Adviser Avg. Tzvetkova |
| Establishing conditions to objectively assess the status of the corruption environment in the Ministry, and applying a systematic approach aimed at improving the efficiency and morals in defence resource management |

Establishing a system for independent preventive audit of the defence policy decisions

| Establishing a system for independent preventive audit of the defence policy decisions | Developing a new model of preventive independent audit on important resource-consuming decisions in the sphere of the defence policy through: |
| - Analysis and assessment complying with “price- efficiency” criteria within the life cycle framework of the prepared decisions; |
| - Assessment of the objectivity and |
| Adviser T. Tagarev |
| Abolishing the possibility of making ungrounded voluntaristic decisions on defence policy. Increasing the political, |
| Reorganising the system of control over the implementation | Improvement of the mechanisms for control over the implementation and results of the defence policy, focusing on:  
State property management;  
- Management of potentially dangerous military sites;  
- Effectiveness of the existing defence infrastructure;  
- Status and use of the reserve of the armed forces;  
- Financial management and transparency of the public resources and full conformity with the law in their management;  
- Human resources management.  
Introducing methods of audits and complex assessment of the effectiveness, the implementation and the results from the activities conducted by the structural units and the individual policies of the Ministry of Defence.  
Developing a model of publicity of the results from the control.  
Integrating the audit and control procedures within the defence capabilities planning system.  
Developing a new system of measures to punish the violators while implementing the defence policy. | Chief Inspector of the MoD | Encouraging the active ex officio investigations into corruption conducted by all administrative bodies that have control functions.  
Increasing the capacity for independent and complex audit and control.  
Establishment of working feedback through which the policy in the individual spheres of defence can be improved. |
<p>| Conducting self-assessment, analysing | Elaborating a detailed work plan for the Self-Assessment Arrangement and Conduct Permanent Council. | Chief of the Political Cabinet V. Ratchev | Developing a departmental strategy against organised |
| Results and developing a system of measures aimed at non-allowing instances of corruption and mismanagement | Presenting a report to the Defence Council. Carrying out consultations regarding the required legislative, organisational, and functional reforms. Undertaking changes in the environment outside of the MoD – proposals for amendment of the legislation, regulating the relationships with external suppliers of goods and services to the MoD, organising the interaction with the non-governmental sector. Improving the planning and management procedures at the MoD in the following areas: - Political leadership; Capability planning; - Performance and results management; - Strategic defence management. Reforming the personnel policy and management model. Establishing a mechanism for lesson learning and formulating permanent standards of conduct, performance, and relationships. | Crime and corruption. |
| Developing an internal system for reporting and examining ascertained and potential cases of conflicts of interest at the Ministry of Defence | Preparing a list of critical areas with regard to conflict of interest. Introducing rules regarding the superiors’ and commanders’ work in order to ascertain and prevent conflict of interest. Endorsing a directive on conflict of interest with respect to companies where the Minister of Defence is principal. | Chief Inspector of the MoD Ensuring effective implementation of the legislation regarding the conflict of interest while taking into account the specifics of the defence policy and activities at the MoD. |
| Improving the possible ways for crime reporting | Modernizing the connections for anonymous corruption reporting. Adopting measures aimed at administrative protection of those reporting crime. | Adviser Avg. Tzvetkova Enhancing individual contribution and personal commitment to |</p>
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<td>Enhancing public awareness of procurement procedures.</td>
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<td>Regular reviewing, assessing, and optimising the strategy.</td>
<td>Chief of the Political Cabinet V. Ratchev</td>
<td>Maintaining the strategy in a state adequate to the environment and to the government’s objectives.</td>
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Transparency International UK's Defence and Security Programme works to reduce corruption in defence and security worldwide.

We engage with governments, armed forces, security forces, defence companies, civil society, and others to advance this goal.

We provide new tools, practical reforms, benchmarks, and research to enable change.

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