



The Government of
the People's Republic of Bangladesh

UNCAC

A Bangladesh Action Plan for Compliance

November 2009



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Foreword

The Government of the People's Republic of Bangladesh acceded to the United Nations Convention against Corruption (UNCAC) in February 2007. This is an important step to promote good governance and fight corruption. Bangladesh's accession underlines the government's commitment to comply with international benchmarks for preventing and combating corruption as set out in the Convention. It also demonstrates its willingness to enhance cooperation with other State Parties on law enforcement and asset recovery.

Shortly after accession, between October 2007 and January 2008, a comprehensive analysis of existing national laws, institutions and procedures was undertaken to identify gaps in the country's compliance with the Convention. The results were shared with national stakeholders and the public in the form of the Bangladesh Compliance and Gap Analysis (BCGA) and this report was subsequently presented at the second meeting of the Conference of States Parties to the Convention in Bali, Indonesia, in January 2008.

Based on the findings of the BCGA, the government decided to develop and implement an action plan for compliance to provide operational guidance and a systematic framework for relevant institutions on the implementation of the UNCAC provisions. The "Bangladesh Action Plan for Compliance" serves several purposes: it sets out national priorities and the specific activities necessary to achieve these goals, as well as the agencies for their implementation; it provides a framework for the Government of Bangladesh to report on progress towards the implementation of UNCAC at the third Conference of States Parties in Doha, Qatar, in November 2009; it contains guidance on the anti-corruption reform programs of the Government and other concerned stakeholders; and, finally, it will provide a benchmark for the evaluation of anti-corruption measures over the coming months and years, and, as such, support the government, civil society and the general public in Bangladesh to monitor progress in the fight against corruption.

The action plan is the result of extraordinary coordination and cooperation among a wide range of government institutions and other public agencies in Bangladesh. The development of the plan was led by the Ministry of Law, Justice and Parliamentary Affairs (MoLJPA), with the support of the Cabinet Division, Ministries of Foreign Affairs, Home Affairs, Finance and Establishment as well as the Anti-Corruption



Commission, Bangladesh Bank and the Office of the Attorney General. The process was coordinated by the Joint Secretary (Drafting) Ms. Nasreen Begum of MoLJPA who acted as focal point for the entire exercise under the close supervision and proper guidance of the Secretary of MoLJPA Mr. Kazi Habibul Awal.

The development of the Action Plan was supported by the Institute of Governance Studies (IGS) of BRAC University and German Technical Cooperation (GTZ) to whom we express our sincere thanks. It was formally approved on 25th October 2009 by the inter-ministerial validation meeting to oversee the process of implementation.

The Plan provides an excellent basis for the Government and other stakeholders to further increase their efforts to prevent and combat corruption and achieve compliance with the Convention.



Barrister Shafique Ahmed

Minister

Ministry of Law Justice and Parliamentary Affairs.

Acronyms

ACC	Anti-Corruption Commission
BCGA	Bangladesh Compliance and Gap Analysis
BIG	Basel Institute on Governance
BPATC	Bangladesh Public Administration Training Centre
CID	Central Intelligence Department
CoSP	Conference of States Parties
CPTU	Central Procurement Technical Unit
DGFI	Directorate General of Forces Intelligence
FIU	Financial Intelligence Unit
GoB	Government of the Peoples' Republic of Bangladesh
GTZ	German Technical Cooperation
ICAR	International Centre for Asset Recovery
IGS	Institute of Governance Studies
JATI	Judicial Administration Training Institute
MLA	Mutual Legal Assistance
MLPA	Money Laundering Prevention Act
MLPO	Money Laundering Prevention Ordinance
MoE	Ministry of Establishment
MoF	Ministry of Finance
MoFA	Ministry of Foreign Affairs
MoHA	Ministry of Home Affairs
MoLJPA	Ministry of Law, Justice and Parliamentary Affairs
NBR	National Board of Revenue
NCC	National Coordination Council
NGO	Non-Governmental Organisation
NIS	National Integrity Strategy
PPRP	Public Procurement Reform Project
PPSC	Public-Private Stakeholders Committee
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime

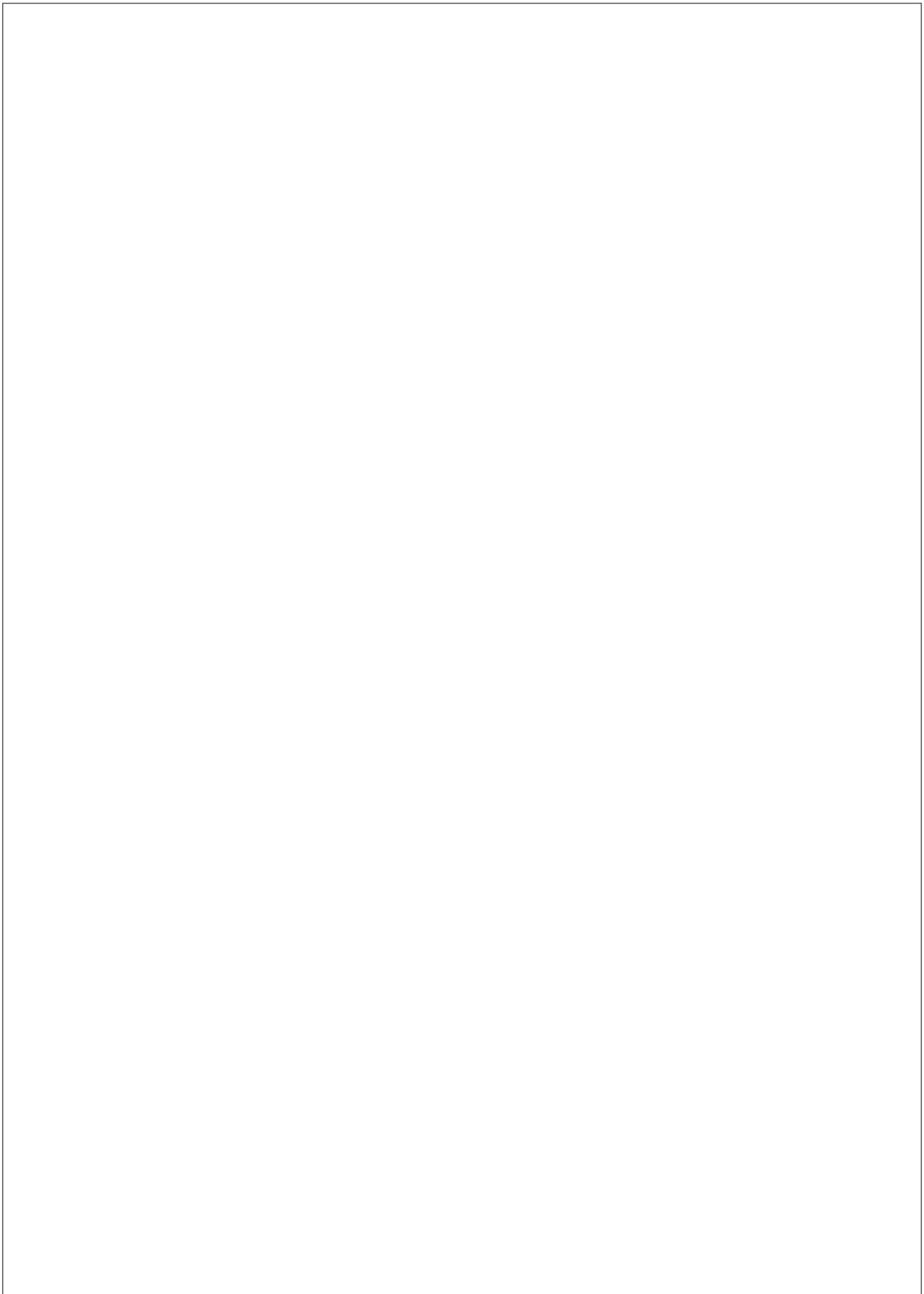


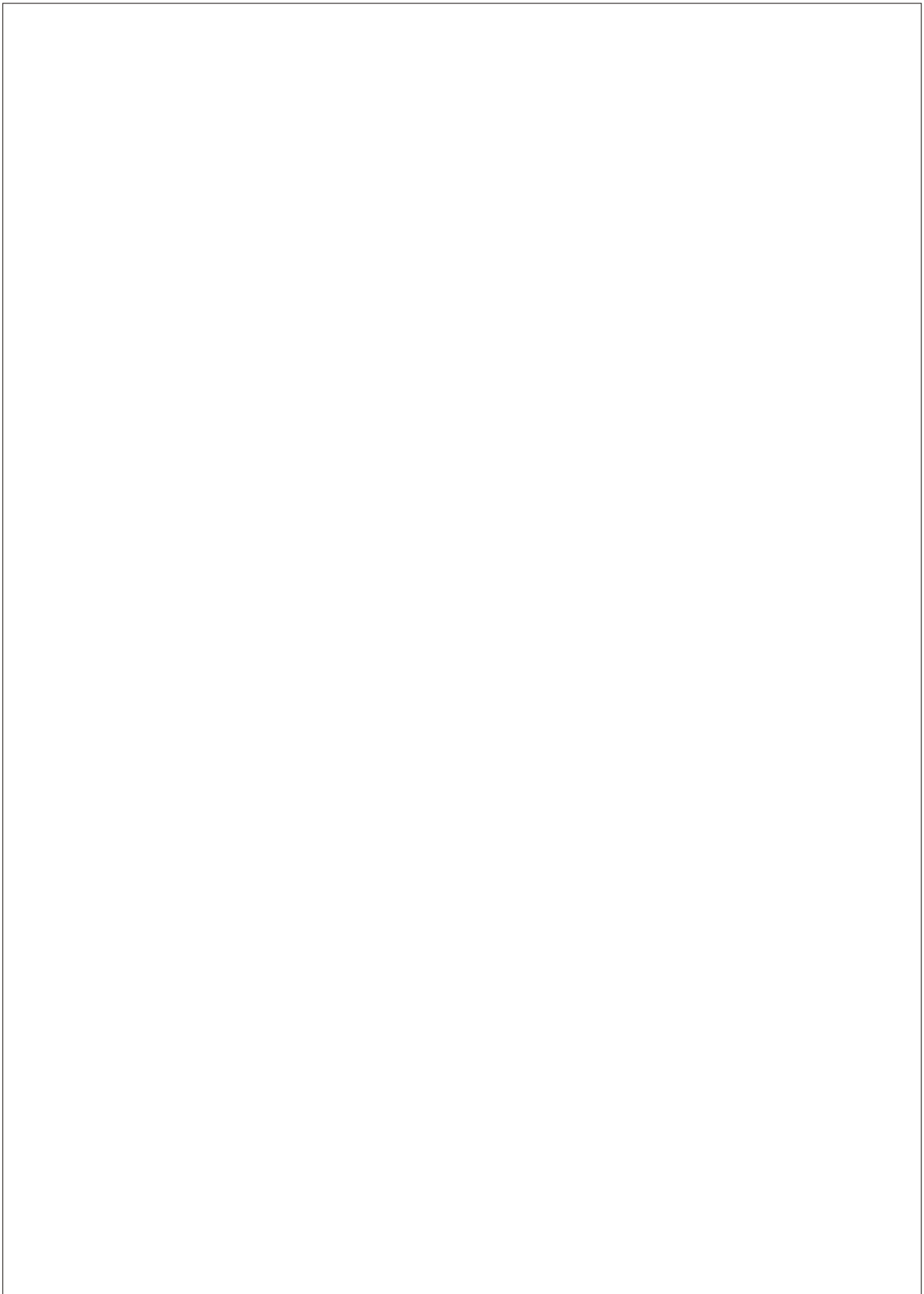
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Section 1

1. Introduction
2. State of Implementation of UNCAC in Bangladesh
3. Action Plan for Compliance: Objectives, Process and Methodology
4. Thematic Areas and Issues



1. Introduction

The United Nations General Assembly adopted the United Nations Convention against Corruption (UNCAC) on October 31, 2003. It provides a set of internationally agreed principles to reduce corruption and to address multiple issues including prevention, criminalisation, law enforcement, international cooperation, asset recovery, and technical assistance. As of 1 July 2009 136 countries became States Parties by way of ratification, acceptance or accession.

The UNCAC became the first international legal instrument with global reach to help prevent and criminalise corruption, and to recover ill-gotten assets through international cooperation. Many analysts have portrayed it as a revolutionary step in international criminal law and a groundbreaking tool to promote good governance. The strengths of the UNCAC are found in the criminalisation of corruption in public and private sectors, emphasis on prevention, enhancement of the role of civil society and the importance attached to access to information, reinforcement of anti-money laundering measures, encouragement of mutual legal assistance among State Parties, and support to asset recovery. This document expresses the practical steps that Bangladesh plans to undertake to implement the UNCAC.

2. State of Implementation of UNCAC in Bangladesh

Bangladesh acceded to the UNCAC in February 2007. Meanwhile, the Government of Bangladesh (GoB) has undertaken significant steps as outlined below:

- Completed and submitted the Self Assessment Checklist in October, 2007.

- Published the Bangladesh Compliance and Gap Analysis (BCGA) report in January, 2008.

- Took active role in the Second Conference of States Parties at Bali, Indonesia, in January 2008.

- Revised the BCGA report in July 2008.

- Enacted legislation to give effect to the UNCAC requirements (e.g. Money Laundering Prevention Act, 2009).

One of the important steps undertaken was to compare existing regulations and practices with UNCAC provisions and identify gaps and capacity needs in domestic legislation, practices and institutional realities. This was carried out with the help of the BCGA.



The First Bangladesh Compliance and Gap Analysis

In April 2007, an Inter-Ministerial Committee was formed led by the Secretary of the Ministry of Law, Justice and Parliamentary Affairs (MoLJPA) to conduct the BCGA. The study was carried out in partnership with the Institute of Governance Studies (IGS) at BRAC University Bangladesh, the German Technical Cooperation (GTZ) and the Basel Institute on Governance (BIG) in Switzerland. They provided technical and financial support to the GoB.

The objective of the BCGA was to provide an overview of UNCAC provisions and the compatibility and compliance of the national laws and practices and to identify key challenges for Bangladesh in implementing the Convention.

Between October 2007 and January 2008 a number of activities were undertaken, including the completion and submission of the UN Self Assessment Checklist on the UNCAC and the formation of a research team. An orientation and methodology workshop was held and desk based research undertaken. Focus group discussions and interviews with technical specialists in the Government ministries and departments were conducted. In January 2008 the GoB presented the first BCGA to the second Conference of States Parties in Bali, Indonesia and thereby put the findings in the public domain.

Structure & Content of the Bangladesh Compliance and Gap Analysis

The BCGA contains six chapters: (i) introductory remarks (ii) prevention (iii) criminalisation and law enforcement (iv) international cooperation (v) asset recovery and (vi) conclusions. Each chapter consists of a narrative report and a matrix focusing on a number of key priority areas of particular importance for Bangladesh.

With regard to preventive measures the study highlights that Bangladesh has a comprehensive legal regime and essential institutions in place. However, implementation of these laws in practice still lacks consistency. Training and capacity development with regard to the integrity of public officials, sound procurement practices, and management of public finances are identified as key priorities. A more coherent reward structure for public officials to promote greater integrity has also been identified as a useful tool to professionalise the public service.

The BCGA found that the existing laws of Bangladesh are largely in compliance with the UNCAC requirements on criminalisation. Through the adoption of the Anti-corruption Commission (ACC) Act, 2004

Bangladesh had already entrusted wide-ranging powers to the ACC. Since the enactment of the Money Laundering Prevention Act (MLPA) in April 2002 considerable efforts have been made to prevent money laundering. The following steps have been taken: enhanced supervision by the Bangladesh Bank, the introduction of 'know your customer' practices by banks, training programmes, and jurisdiction over money laundering offences by special courts.

Conference to the States Parties

Bangladesh participated (as an observer) in the first States Parties conference in Jordan in December 2006 and then acceded to the UNCAC on 27 February 2007. Having accomplished the BCGA, Bangladesh left a positive impression at the second Conference of the State Parties held at Bali, Indonesia in January 2008. Bangladesh has continued with its effort to implement the UNCAC and since the Bali conference has undertaken further activities in relation to its obligation under the UNCAC.


Needs Assessment

After the publication of the first BCGA a needs assessment workshop was organised to prepare a strategy for the future implementation of the principles and provisions of the UNCAC. The workshop took place in May 2008 and was attended by high level representatives from the MoLJPA, the ACC, Ministry of Home Affairs, Cabinet Division, Bangladesh Bank, the Office of the Attorney General, Ministry of Foreign Affairs, Foreign Aided Projects Audit Directorate, and civil society. The participants decided unanimously that the second phase of the work would be conducted under the leadership of the MoLJPA supported by the Inter-Ministerial Committee formed for the preparation of the first BCGA report. The workshop identified a number of issues, as shown below, which would require further support

- (i) updating of the report with legislative and other changes
- (ii) wider dissemination of the report
- (iii) capacity building/training of the relevant government officers
- (iv) enhancing Bangladesh's activities in the UNCAC working group meetings at the UN Office of Drugs and Crime (UNODC)
- (v) more emphasis on extradition and mutual legal assistance
- (vi) coordination among the stakeholders

The Second Edition of Bangladesh Compliance and Gap Analysis

Since January 2008, significant changes have occurred domestically with regard to anti-corruption efforts. Legislative changes introduced by the



Caretaker Government after the publication of the first BGCA in the key areas of corruption prevention and repression, such as public procurement, political finance, access to information, money laundering, and asset recovery, necessitated the updating of the BGCA in July 2008. As previously mentioned, the May 2008 Needs Assessment Workshop participants requested that the scope of the BCGA be expanded to include articles that were not addressed in the first edition.

Legislative Changes

After the publication of the gap report the government introduced significant legislative changes. These changes have already addressed a number of gaps that have been identified vis a vis the UNCAC requirements. Most notable ones being the Money Laundering Prevention Act, 2009; Anti-Terrorism Act, 2009; Representation of the People (Amendment) Act, 2009; Right to Information Act, 2009; The Code of Criminal Procedure (Amendment) Act, 2009 and the Public Procurement Rules, 2008. The government, through a Gazette Notification (UN SOC-6027/07, dated 27 April, 2008) issued by the Ministry of Foreign Affairs, nominated the Ministry of Home Affairs and the Attorney General's Office as the 'Central Authorities' to provide mutual legal assistance (MLA) under UNCAC.

Capacity Building of Government Officers

In August 2008 two preparatory workshops were held to (i) identify the specific training areas (ii) discuss selection of participants and (iii) develop a training module. The 'Training Module Workshops' were organised by IGS with financial support from UNDP. The first workshop was facilitated by experts from Bangladesh Bank, the Basel Institute on Governance, the World Bank, and IGS. The second workshop was attended by senior representatives from the various departments, such as, the Cabinet Division, the MoLJPA, the MoF, the Ministry of Home Affairs, the Ministry of Foreign Affairs, and the Office of the Attorney General. Decisions were taken with regard to content, methodology and selection of participants. Two 'Executive Trainings' on UNCAC for government officials were held in August and November 2008. The training sessions consisted of the following lectures and discussions:

- Prevention of corruption, including a presentation on the National Integrity Strategy (NIS) as well as public procurement and public finance management;
- Law enforcement;
- Asset recovery;
- Money Laundering, with a presentation of the Money Laundering Prevention Ordinance, 2008;

Mutual legal assistance and international cooperation: and
Financial intelligence unit.

A 'Training of Trainers' workshop was also held in January 2009 for participants from the government and civil society organisations.

National Integrity Strategy

The Government of Bangladesh believes that corruption is deep rooted and the UNCAC alone cannot establish good governance and integrity in a society. Therefore, the government, in line with Article 5 of UNCAC and the recommendations of the BCGA, developed a National Integrity Strategy (NIS). The draft NIS has been prepared by the Cabinet Division with technical assistance from IGS and financial assistance from the Asian Development Bank. The vision of the NIS is to enhance integrity from a holistic approach perspective. It is based on an understanding of integrity at personal, institutional and national level and contains strategies to enhance integrity of both the non-state (NGOs, media, private sector, family) and state institutions (executive, parliament, judiciary, ACC, among others). The NIS includes short and long-term measures that the relevant institutions have to undertake to increase the level of integrity. Starting in December 2007, it was formulated on the basis of nation-wide citizens' consultations and focus group discussions, desk-based research and feedback from state institutions. The draft strategy is under consideration by the government. The NIS complements the UNCAC action plan.

Public Procurement Reform Project

The government has also approved the implementation of the 'Public Procurement Reform Project' (PPRP) with the assistance of the World Bank for improving governance in public procurement. A Central Procurement Technical Unit (CPTU) within the Implementation, Monitoring and Evaluation Division (IMED) was established under the Ministry of Planning. The CPTU assists procuring entities in implementing the act and rules governing procurement and monitors the functioning of the public procurement system. Through its website the CPTU provides information on procurement laws, tender invitations of public entities and its monitoring activities. Other components of the project include implementation of public procurement reforms and improvement of procurement management capacity.

In order to institutionalise the participation of private sector and civil society a Public-Private Stakeholders Committee (PPSC) headed by Hon'ble Minister, Ministry of Planning has been formed. The PPSC

ensures external monitoring of procurement processes and encourages dialogue with various stakeholders including media, civil groups and eminent persons with the GoB.

Training on Asset Recovery and Mutual Legal Assistance

Bangladesh has created a Task Force on asset recovery, the Stolen Assets Recovery Task Force. The Task Force includes agencies such as the Bangladesh Bank, the Attorney General's Office, the Central Intelligence Department (CID), and the Directorate General of Forces Intelligence (DGFI), the Home Affairs, the Public Prosecutor, the National Coordination Council (NCC) and the National Board of Revenue (NBR). Officials of the involved institutions have participated in a series of training workshops conducted by the World Bank in conjunction with the International Centre for Asset Recovery (ICAR) of the Basel Institute on Governance. Participants started by attending a three-day orientation workshop, which provides an overview of the asset recovery process. From this initial group, selected participants go on to attend an intensive ten-day workshop, which included in-depth training in forensic investigation techniques, organising of electronic evidence, preparing MLA requests, as well as a practical exercise in tracing the proceeds of corruption.

The Action Plan for Compliance

The present Government appreciated the progress achieved so far and it strives to establish an "Effective System against Corruption" as one of five priorities to achieve its Vision 2021. The government has stressed its zero-tolerance for corruption and strengthening of anti-corruption programme through a neutral and strong Anti-corruption Commission (ACC). In this spirit, the government believes that proper implementation of the UNCAC will be an important step for effective prevention and combat of corruption. The following sections detail a brief on objective, process and methodology, contents and implementation arrangements of the Action Plan.

3. Action Plan for Compliance: Objectives, Process and Methodology

3.1 Objectives

The objective of the Action Plan is to establish an operational guidance for relevant institutions to implement UNCAC. The Plan is expected to fulfil Bangladesh's commitment to comply with UNCAC and provides a framework for monitoring of progress.

3.2 Process and Methodology

The process of formulation of the Action Plan was an extraordinary effort of coordination and cooperation among all concerned government ministries and institutions lead by the MoLJPA with support from IGS, BRAC University and GTZ. A participatory multi-stakeholder process was applied to agree on priorities and develop the plan. In February 2009, a planning team was formed at MoLJPA to lead the process of formulation of the Action Plan. The team comprised of the Focal Point, Ms. Nasreen Begum, Joint Secretary (Drafting), Associate Focal Point, Mr. Humayun Farhad, Deputy Secretary (Drafting), late Muhammad Belal Husain, Deputy Secretary (Drafting), Md. Rafiqul Hasan, Deputy Secretary (Drafting), Mr. Mohammad Mohiuddin, Deputy Secretary (Drafting) and Ms. Jannatul Ferdoush, Assistant Secretary (Drafting) from the MoLJPA. Mr. Manzoor Hasan, Director, Dr. Sanaul Mostafa, Facilitator, Mr. Saiful Bhuiyan, Project Associate, Ms. Fatema Samina Yasmin, Project Assistant from the IGS, BRAC University and Ms. Johanna Joerges from GTZ assisted the government planning team in the formulation of the plan.

In June 2009, representatives from relevant government ministries and agencies analysed the recommendations from the BCGA, prioritised the major issues and formulated recommendations in a national orientation workshop organised jointly by the MoLJPA and IGS with the Hon'ble Minister, MoLJPA as the chief guest. Following the orientation workshop between July and October 2009, the Focal Point and the team held three thematic Working Group Meetings to discuss specific activities, performance indicators, time line and responsibilities under the identified priority issues. The participants at the meetings included representatives from the Cabinet Division, the Ministries of Establishment, Home Affairs, Foreign Affairs, and Finance, the ACC, the Office of the Attorney General, and the Bangladesh Bank. With the input from the Working Group Meetings the revised draft Action Plan was then shared with an international expert to include international experience and best practices relevant to Bangladesh.

Finally, the Action Plan was presented at a validation workshop of key stakeholders where it received consensus and formal approval. The Action Plan will be presented and discussed with a wide range of national stakeholders and the general public. It is to be used as a basis for reporting on progress of UNCAC implementation at the third COSP in Doha, Qatar, in November 2009. It will also assist the government to report and evaluate further progress in implementing the anti-corruption measures over time.

4. Thematic Areas and Issues

The Action Plan for Compliance addresses four core issues as identified during the consultation process with different stakeholders:

- Changes in the legal framework
- Changes in practice
- Sharing of progress with UNODC
- Coordination, management and communication of UNCAC compliance

The findings from the BCGA and progress to-date suggest that Bangladesh needs to review its domestic legal instruments and possibly enact new laws or amend some existing anti-corruption related acts or rules. Furthermore, the Action Plan deals with the issue of how integrity and anti-corruption activities can be improved through changes in the enforcement of legislative instruments, it particularly addresses the prevention of corruption through measures for enhancing public sector integrity as a priority area for UNCAC compliance in Bangladesh. In addition, the Action Plan proposes that the government needs to develop a mechanism to inform the custodian of the UNCAC the UNODC - as well as the other State Parties about progress of UNCAC-oriented activities. Finally, the Plan addresses the need for coordination, management of implementation and communication in view of UNCAC compliance.

In order to address the identified issues, the Action Plan foresees the achievement of the following goal and objectives:

Goal: To achieve UNCAC compliance

Objective 1: UNCAC related domestic legislation (Acts) and bilateral agreements are updated and being implemented.

Objective 2: Rules and procedures, and administrative systems governing the integrity of public service are reviewed and under implementation.

Objective 3: The UNODC and COSP are aware of the progress of UNCAC compliance in Bangladesh.

Objective 4: The relevant public institutions are capable of managing the implementation of the provisions of UNCAC and communicate.

The objectives listed above are in turn expected to be achieved through the provision of operational results as listed below under each objective.

Objective 1: UNCAC related domestic legislation (Acts) and bilateral agreements are updated and being implemented (Change in Legal Framework).

- Result 1 : Anti-corruption legislations are reviewed and amended.
- Result 2 : Government Servants (Conduct) Rules, 1979 are in compliance with UNCAC Art 8.
- Result 3 : Government Servants (Discipline and Appeal) Rules, 1985 are in compliance with UNCAC Art. 8.
- Result 4 : A Civil Service Act is enacted and in compliance with UNCAC Art. 7 and Art.10.
- Result 5 : Domestic legal framework for whistle-blower protection is compliant with UNCAC Art. 8.4., Art. 32 and Art. 33.
- Result 6 : Legal basis for in-country cooperation strengthened in view of UNCAC Art. 38 and Art. 39.
- Result 7 : Domestic extradition legislation are in compliance with UNCAC Art. 44 and Art. 45.
- Result 8 : Legal basis for MLA in line with UNCAC Art. 43 and Art. 46 is in place.
- Result 9 : Proposal for legislative changes for improved public sector auditing and accounting system is available.

Objective 2: Rules and procedures, and administrative systems governing the integrity of public service are reviewed and under implementation (Change in Practice).

- Result 1 : Government Servants (Conduct) Rules, 1979, and Government Servants (Discipline and Appeal) Rules, 1985 are followed in practice.
- Result 2 : Wealth statements are examined in view of appropriateness and sanctions are in place in case of deviations in accordance with Art. 8.5 and Art. 20.
- Result 3 : High standard of morality and practice of ethical values are ensured within the public service.
- Result 4 : In compliance with Art. 7.1. (a) remuneration systems are based on principles of efficiency, transparency and objective criteria such as merit and aptitude, and adequate remuneration and equitable pay scales are practiced in compliance with Art. 7.1(b).
- Result 5 : The existing anti-corruption legislation are effectively implemented and periodically reviewed.

Objective 3: The UNODC and COSP are aware of the progress of UNCAC compliance in Bangladesh (Sharing of Progress with UNODC).

Result 1 : The notification requirements under UNCAC have been fulfilled.

Objective 4: The relevant public institutions are capable of managing the implementation of provisions of UNCAC and communicate (Coordination, Management, and Communication).

Result 1 : All institutions related to UNCAC implementation have access to required capacities (human resources, skills, materials and systems) to implement UNCAC.

Result 2 : The progress of the implementation of the Action Plan is regularly monitored, co-ordinated and reviewed.

Result 3 : The COSP is informed about UNCAC implementation in Bangladesh on a regular basis.

The Objectives 1, 2 and 4 and the Results under them all address inter alia Articles 5, 6, 7, 8, 9, 10, and 13. These articles focus on the prevention of corruption. In the Action Plan, measures are suggested to examine the need for changes in the existing legislations and amend them if necessary, and to implement the existing legislations and rules for the prevention of corruption. The role of the public officials as trustees of power while they discharge their duties and supervise other officials is duly mentioned. Together with the NIS, the Action Plan establishes a comprehensive set of measures against corruption.

Section 2

- 5. Action Plan
- 6. Implementation Arrangements
- 7. Monitoring, Review and Reporting



5. Action Plan

The Action Plan, as elaborated below, includes four sections. Section A focuses on 'Activities' to be undertaken to establish a legal framework which conforms with UNCAC and how they can be implemented. Section B deals with 'Activities' required in order to prevent corruption in public institutions. Section C lists 'Activities' required to update UNODC and the COSP on Bangladesh's achievements *vis-a-vis* UNCAC. Finally, Section D includes 'Activities' that the different stakeholders need to perform in order to implement all 'Activities' of the Plan in a concerted manner.

A. Changes in the Legal Framework

- a) Review and update of the anti-corruption legislations
- b) Review of Government Servants (Conduct) Rules, 1979
- c) Review of Government Servants (Discipline and Appeal) Rules, 1985
- d) Enactment of Civil Service Act
- e) Introduction of legal provisions for the protection of whistle-blowers
- f) Enhancement of in-country cooperation for law enforcement
- g) Review of extradition legislation
- h) Introduction of legal basis for Mutual Legal Assistance (MLA)
- i) Public sector auditing and accounting system

B. Changes in Practice

- a) Practice of accountability and performing supervisory roles
- b) Monitoring of wealth statements
- c) Following ethics, morality and code of conduct
- d) Provision of incentives and remuneration of public officials
- e) Effective implementation of anti-corruption legislation

C. Sharing of Progress with UNODC

D. Coordination, Management and Communication of UNCAC Compliance

A. Changes in the Legal Framework

a) Review and update of the anti-corruption legislation

Result 1: Anti-corruption legislation are reviewed and amended.

Actions	Indicator	Time frame	Responsibility	Other actors	Reference to UNCAC
1	Review relevant legal instruments in view of UNCAC and elaborate amendments/changes of selected legislation	June 2010	MoLJPA Cabinet Division	Concerned Ministries and Institutions	Article 5: State Parties are required to develop and implement or maintain effective anti-corruption policies that encourage the participation of society, reflect the rule of law and promote sound and transparent administration of public affairs.
1.1	Review Anti-corruption Commission Act, 2004 (ACC Act)	June 2010	Cabinet Division	Inter-Ministerial Committee	Article 5.3: States Parties shall periodically evaluate relevant legal instruments and administrative
1.1.1	Form an inter-ministerial technical committee to review the anti-corruption legal instruments other than ACC Act	Dec 2009	MoLJPA	Do	
1.1.2	Review relevant legal instrument in light of Supreme Court judgments	March 2010	MoLJPA	Attorney-General Office, ACC	

	Actions	Indicator	Time frame	Responsibility	Other actors	Reference to UNCAC
1.1.3	Examine the possibility of criminalisation of certain UNCAC offences such as bribery of foreign public officials and officials of public international Organisations and bribery in the private sector	Recommendations presented	June 2010	MoLJPA	ACC	measures with a view to determining their adequacy to prevent and fight corruption. Article 6: The State Parties are obliged to have an anti-corruption body or bodies in charge of preventive measures and policies, to grant that body independence to ensure that it can do its job unimpeded by undue influences, provide it with adequate resources and training.
1.1.4	Review the MLPA, 2009 and address inter alia the issues listed below: Responsible investigative authority for predicate offences Extension of the list of predicate offences Increase of the number of Reporting Organisations Improved effectiveness of the Financial Intelligence Unit (FIU)	Appropriate provisions suggested	June 2010	MoF	MoHA, Bangladesh Bank, Inspector General of Police	Article 36: Each State Party shall ensure the existence of a body or bodies or person

	Actions	Indicator	Time frame	Responsibility	Other actors	Reference to UNCAC
1.1.5	Examine inconsistency of Income Tax Ordinance and relevant Banking Law with ACC Act	Appropriate provisions suggested	June 2010	MoLJPA	NBR, BB	specialised in combating corruption through law enforcement. Such body or bodies or persons shall be granted the necessary independence, in accordance with the fundamental principles of the legal system of the State Party, to be able to carry out their functions effectively and without any undue influence. Such persons or staff of such body or bodies should have the appropriate training and resources to carry out their task.
1.2	Present recommendations for amendments/changes to Cabinet Division for necessary action	Recommendations presented	Dec. 2010	Do	Do	

b) Review of Government Servants (Conduct) Rules, 1979

Result 2: Government Servants (Conduct) Rules, 1979 are in compliance with UNCAC Art. 8.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
2	Revise Government Servants (Conduct) Rules, 1979	Revised Government Servants (Conduct) Rules gazetted	June 2010	MoE	All ministries	<p>Article 8.1, 8.2 and 8.3: State Parties are required to promote integrity, honesty and responsibility among public officials.</p> <p>State Parties are obligated to formulate codes or standards of conduct for the correct, honourable and proper performance of public functions.</p> <p>State Parties are required to take note of relevant initiatives of regional, interregional and multilateral organizations (Resolution 51/59 of UNGA)</p>
2.1	Entrust a technical committee to review and revise the Rules, 1979 particularly with respect to discretionary power and overall implementation of the Rules	A committee is formed and work plan agreed	Feb 2009	Do	Do	
2.2	Examine code of conduct of other countries with similar legal and institutional framework representing international standards in view of their relevance for Bangladesh	Report with specific recommendations on filling gaps in Bangladesh made for inclusion in Public Service Conduct Rules	June 2010	Do	Do	

Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
Revise/include provisions of wealth statements every three years	Appropriate provisions suggested	June 2010	Do	Do	Other developments: The proposed NIS addresses these issues.
Formulate and seek approval of the revised Public Servants Conduct Rules	Amended Rules submitted for approval	Dec 2010	Do	Do	

c) Review of Government Servants (Discipline and Appeal) Rules, 1985
 Result 3: Government Servants (Discipline and Appeal) Rules, 1985 are in compliance with UNCAC Art. 8.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
3	Revise/overhaul Government Service (Discipline and Appeal) Rules	Amended Rules gazetted	Dec 2010	MoE	All ministries	Article 8.1, 8.2 and 8.3: State Parties are required to promote integrity, honesty and responsibility among public officials.
3.1	Study similar legal basis of other countries representing international standards and make recommendations for changes	Recommendations available	June 2010	Do	Do	State Parties are obligated to formulate codes or standards of conduct for the correct, honourable and proper performance of public functions.
3.2	Include provisions for mandatory sanctions for failure/non-compliance	Sanctions suggested	June 2010	Do	Do	State Parties are required to take note of relevant initiatives of regional, interregional and multilateral organizations (Resolution 51/59 of UNGA).

d) Enactment of Civil Service Act¹

Result 4: A Civil Service Act is enacted and in compliance with UNCAC Art. 7 and Art. 10.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
4	Introduce Civil Service Act	Civil Service Act gazetted	June 2011	MoE	MoLJPA, MoF, MoFA	Article 7.4 : Each State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.
4.1	Form a technical committee to prepare a proposal for a Civil Service Act/ amendments to rules	A committee is formed and work plan agreed	May 2010	Do	Do	Article 10 (a): Taking into account the need to combat, corruption, each State Party shall, in accordance with the fundamental principles of its domestic law, take such measures as may be necessary to
4.2	Examine Public Service Act/Civil Service Act/Public Administration Procedures act of other countries with similar legal traditions and institutional framework and exchange with relevant authorities from the countries and/or experts	Report with recommendations is prepared and discussed by committee	Oct 2010	Do	Do	

1. The purpose of the act is the reduction of discretionary power as provided for in UNCAC Art. 10. The transparency and accountability of the decision taking process needs to be enhanced.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
4.3	Study Bangladeshi institutional context relevant for the Act in line with stakeholders' input	Report with recommendation is prepared and discussed by committee.	Dec 2010	Do	Do	enhance transparency in its public administration, including with the regard to its organization, functioning and decision-making processes, where appropriate.
4.4	Formulate a Civil Service Act for discussion	Recommendation for amendments/Draft Civil Service Act prepared	May 2011	Do	Do	

e) **Introduction of legal provisions for the protection whistle-blowers**

Result 5: Domestic legal framework for whistle-blower protection is compliant with UNCAC Art. 8.4., Art. 32 and Art. 33.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
5	Introduce legislative measures to protect Whistle-Blowers and Witnesses	A Whistle-Blowers Act is gazetted/inclusion of the new provisions in the existing laws.	Dec 2010	MoLJPA,	MoE, ACC MoHA, MoF	Article 8.4: State Parties are required to establish measures and systems that facilitate the reporting by public officials of acts of corruption to appropriate authorities.
5.1	Form an inter-ministerial technical committee	Committee is formed and work plan agreed	Dec 2009	MoLJPA, MoHA	Do	Article 32: State Party shall take appropriate measures in accordance with its domestic legal system and within its means to provide effective protection from potential retaliation or intimidation for witnesses and experts who give testimony concerning
5.2	Study Whistle-Blower Act of other countries and examine their relevance to Bangladesh	Report with recommendations prepared and discussed by Committee	June 2010	MoLJPA, MoFA	Do	
5.3	The following issues should be addressed in the proposed legislation: Informing the higher authority within the institution A focal point who can raise the issue with the higher authority	The report contains the proposed issues	Do	Do	Do	

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
	<p>Referral of the complaint to the competent authority</p> <p>Addressing the competent authority directly with the complaint</p> <p>Protection of the whistleblower until the case is completed</p> <p>Include provisions to discourage misuse of reporting</p> <p>Include provisions for settling the case within a specific period</p>					<p>offences established in accordance with this Convention and, as appropriate, for their relatives and other persons close to them.</p> <p>Article 33: Each State Party shall consider incorporating into its domestic legal system appropriate measures to provide protection against any unjustified treatment for any person who reports in good faith and on reasonably grounds to the competent authorities any fact concerning offences established in accordance with this Convention.</p>

f) Enhancement of in-country cooperation for law enforcement

Result 6: Legal basis for in-country cooperation strengthened in view of UNCAC Art. 38 and Art. 39.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
6	Establish a legal basis/ mechanisms for in-country cooperation among law enforcement agencies	Necessary legal instruments/ mechanisms are in place	Dec 2010	MoLJPA, MoHA	ACC	<p>Article 38: State Parties are required to take appropriate measures to encourage cooperation, particularly exchange of necessary information, between public authorities and investigating or prosecuting authorities.</p> <p>Article 39: State Parties are required to take appropriate measures to encourage cooperation between national investigating or prosecuting authorities and private sector entities, particularly financial institutions, relating to matters involving the commission of UNCAC offences.</p>
6.1	Develop and introduce legal provisions/guidelines for cooperation among law enforcement agencies and other relevant agencies with ACC for investigation and other activities	Legal provisions/guidelines are prepared in the form of a comprehensive handbook	Do	Do	Do	
6.2	Include the provision of coordination/lead authority	A lead/coordination agency is formed.	Jan 2011	Do	Do	

g) Review of extradition legislation

Result 7: Domestic extradition legislation are in compliance with UNCAC Art 44 and Art.45.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
7	Review Extradition Act, 1974 and propose amendment in the schedule of offences to include UNCAC offences	The amended Act is gazetted	June 2010	MoHA	MoHA, MoLJPA, ACC, MoFA, BB	Article 44: State parties are required to grant extradition to offenders, regard all UNCAC offences as "extraditable offences" and take the UNCAC as the legal basis for extradition or opt for compliance through bilateral treaties and notify the UNSG.
7.1	Assign an inter-ministerial committee to review the Extradition Act, 1974 addressing inter alia Amendment in the schedule of offences Dual criminality Transfer of sentenced persons Foreign sentences enforceable in Bangladesh	The review committee has submitted their recommendations for amendment	June 2010	MoHA, Review Committee	MoLJPA MoFA, ACC, MoF	Article 45: The article encourages bilateral agreements for the transfer of sentenced persons to their own territory to complete their sentence.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
7.2	Sign bilateral agreement with other relevant countries for extradition if necessary	Bangladesh formally submitted a proposal	June 2010	MoHA	MoLJPA, MoFA	
7.3	Assign an agency for joint investigation and develop rules and procedures for implementation	A nodal agency is determined, and rules and procedures made	June 2010	MoHA	MoLJPA, AG	

h) Introduction of legal basis for Mutual Legal Assistance (MLA)

Result 8: Legal basis for MLA in line with UNCAC Art. 43 and 46 are in place.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
8	Make MLA operational	Legal basis for MLA in place	Dec 2010	MoLJPA, MoHA	MoHA, BB, MoF, AG	Article 43 and 46: States Parties are required cooperate in criminal matters particularly in matters of mutual legal assistance, etc. The article requires the widest measure of MLA in investigation, prosecution, judicial proceedings, asset confiscation and recovery. State Parties should consider entering into bilateral or multilateral agreements for MLA.
8.1	Introduction of MLA Act and/or revision of Evidence Act, 1872, to provide legal basis admissibility of evidence obtained under MLA and by FIU under MLPA, 2009	An MLA Act and/or revised Evidence Act are gazetted	Dec 2010	MoLJPA, MoHA	MoF, BB, MoF, AG	
8.1.1	The Act should address inter alia: Mechanism of MLA agreement Restrictions Responsible authorities Provision for spontaneous dissemination of information to foreign jurisdictions	Respective provisions are suggested	June 2010	MoLJPA, MoHA	MoF, BB, AG	

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
8.1.2	Incorporate provisions for collaborations related to prevention of money laundering and asset recovery	Respective provisions suggested	June 2010	MoLJPA, MoHA	MoF, BB, AG	
8.2	Sign treaties with other countries on MLA for investigations, prosecution, judicial proceedings, and asset recovery	Treaties signed with major countries	Dec 2010	MoHA, AG	MoFA, MoLJPA, BB	
8.2.1	Use the systems and mechanisms	The nodal agency uses the systems and mechanisms	June 2010	MoHA, AG	MoLJPA, MoHA, BB	

i) **Public sector auditing and accounting system**

Result 9: Proposal for legislative changes for improved public sector auditing and accounting system is available.

Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
9 Review the existing legislations governing activities of the Comptroller and Auditor General's office in view of its independence and separation of audit from accounting	Recommendations are made	Dec 2010	MoF	MoLJPA, Comptroller & Auditor General	Article 9.2 (c): States Parties shall promote transparency and accountability in the management of public finances through a system of accounting and auditing standards and related oversight.

B. Changes in Practice

a) Practice of accountability and performing supervisory roles

Result 1: Government Servants (Conduct) Rules, 1979, and Government Servants (Discipline and Appeal) Rules, 1985 are followed in practice.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
1	Entrust the administrative heads of the institutions to follow up the implementation of all provisions of Government Servants (Conduct) Rules, Discipline & Appeal Rules, Regulations and other instruments ² related to provision of service	Senior public servants provide a yearly report to head of institution/or ACC on activities undertaken to implement and monitor application of key legislative instruments to prevent corruption.	Continuous	Respective administrative head of the institution	MoE	Article 8.5: Public officials are required to make declarations about their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may arise.
1.1	Prepare 'Guideline on Corruption Prevention' explaining how to implement the Rules and Regulations	Guideline for Corruption Prevention gazetted	June 2010	MoE or Cabinet Division	Relevant ministries	Article 8.6: State Parties are obligated to take measures to initiate disciplinary measures against public officials who

2. Particularly including the proposed Civil Service Act

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
1.2	Prepare checklist for heads of department on necessary actions to apply the guideline	Checklist made available to all head of departments	Do	Do	Relevant ministries	violate the codes or standards. Article 5.1: States Parties are to develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability.
1.3	Provide sensitisation, training and counselling to head of departments on how to apply the guideline	Trainings conducted and counselling available	Dec. 2010 and continuous	MoE	All ministries	Article 7.4: States Parties are to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.
1.4	Socialise junior public officials in view of Guideline, Rules and Regulations	Ministries and agencies conduct socialisation events	Dec. 2010 and continuous	MoE	All ministries	
1.5	Ensure submission of statement on wealth, property, outside employment, and gifts, as stipulated in Government Servants (Conduct) Rules, 1979 in every third year	Every public servant submits wealth statements every third years	Continuous	MoE	All ministries	

b) Monitoring of Wealth Statements

Result 2: Wealth statements are examined in view of appropriateness and sanctions are in place in case of deviations in accordance with Art. 8.5 and Art. 20.

Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
2	Establish mechanism to monitor wealth statements and lifestyle checks and introduce sanctions for false declarations in practice	Dec 2011	MoE	ACC, NBR, Relevant Ministries	Article 8.5: Public officials are required to make declarations about their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may arise.
2.1	Form a technical committee to develop monitoring mechanism	Dec 2010	Do	Do	
2.2	Based on revised ACC law and other relevant legislation, develop mechanisms for monitoring in practice (i.e. random checks, etc.)	June 2011	Do	Do	
2.3	Train and sensitise responsible institutions on how to monitor wealth statements	Dec 2011	Do	Do	
2.4	Undertake monitoring	Continuous	Do	Do	

c) Following ethics, morality and code of conduct

Result 3: High standard of morality and practice of ethical values are ensured within the public service.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
3	Encourage the civil servants to act as a trustee of power, follow up the breach of trust, misuse of power and supervise the respective junior officials	All public training institutions included the trusteeship of the State as a value in the module on code of conduct	Continuous	All public training institutions	MoE	Article 8.1: State Parties are required to promote integrity, honesty and responsibility among public officials. Article 8.2: State Parties are obligated to formulate codes or standards of conduct for the correct, honourable and proper performance of public functions.
3.1	Introduce or further develop 'ethics and morality' and 'code of conduct' as separate modules in all foundation level courses in public institutions (including autonomous ones) based on the relevant legislation ³ . The modules should include guidance on the proper use of discretionary power.	A module on 'ethics and morality' and 'code of conduct' in public service' based on international standard is part of training programme	June 2010	MoE	BPATC, JATI, Police Training Academy, Planning Academy, etc.	Resolution 51/59 of UNGA and Article 8.3: State Parties are required to take note of relevant initiatives of regional,

3. Government Servants (Conduct) Rules, 1979 Government Servants (Discipline and Appeal) Rules, 1985 and Civil Service Act (proposed).

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
3.2	Organise a workshop to (further) develop cadre-based modules for inclusion in the training programme of all training institutions	One workshop held with specific recommendations on module (general and specific) or different cadres	June 2009	BPATC and MoLJPA in partnership	Other training institutions	interregional and multilateral organisations Article 7.1(b) and (d): State Parties are required to train public officials to enhance performance and increase aversion to risks of corruption.
3.3	Seek approval from competent authority	Respective ministries/departments approved the module for inclusion in the curriculum.	June 2009	Respective ministries/departments	All public training institutions, National Training Council	Article 60: State Parties are required, to the extent of their need and capacity provide training and technical assistance to prevent and combat corruption.
3.4	Strengthen training institutions to deliver training/awareness sessions, and workshops.	The training institutions have materials and resource persons.	June 2010	Cadre-based institutions	Relevant ministries	

d) Provision of incentives and remuneration of public officials

Result 4: In compliance with Art. 7.1. (a) remuneration systems are based on principles of efficiency, transparency and objective criteria such as merit and aptitude, and adequate remuneration and equitable pay scales are practiced in compliance with Art. 7.1 (b).

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
4.1	Establish a permanent pay commission with the provision of automatic salary adjustment based on change of cost of living	A permanent pay commission exists A salary adjustment policy is approved	June 2010 Dec 2010	MoE	MoF	Article 7.1: States Parties must adopt, maintain, and strengthen systems for recruitment, hiring, retention, promotion of public officials based on principles of efficiency, transparency and objective criteria such as merit, equity and aptitude. Article 7.1(c): States Parties are required to promote adequate remuneration and equitable pay scales.
4.2	Introduce an incentive system for public officials based on objective and participatory performance evaluation	An objective and participatory performance appraisal system is in practice An incentive policy is available and operational	June 2010	MoE MoE	MoF	
4.3	Regularly review compensation packages and monetise the facilities for public servants	Monetised benefits and facilities are part of income	June 2010	MoE	MoF	
4.4	Undertake ongoing research to identify ways and means of improving efficiency in the work process and right-sizing of the institutions	Recommendations are available and adopted for implementation	Continuous	Each Ministry	Cabinet Division	

e) **Effective implementation of anti-corruption legislations**

Result 5: The existing anti-corruption legislation are effectively implemented and periodically reviewed.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
5.1	Prepare recommendations on how to effectively implement anti-corruption legislations	Guideline prepared.	June 2010	Cabinet Division	MoLJPA, ACC and relevant ministries/institutions	Article 5.3: Each State Party shall endeavour to periodically evaluate relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption.
5.2	Include provisions for periodic review of relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption.	Appropriate provisions suggested.	June 2010	Coordination Committee		
5.3	Periodically evaluate administrative measures and legal instruments	Reports available every two years.	June 2011	Do		

C. Sharing of the Progress with UNODC

Result 1: The notification requirements under UNCAC have been fulfilled.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
1	Furnish copy of the Money Laundering Act, 2009 to the Secretary General of the UN (UNSG)	UNSG has received the copy of the Act	Dec 2009	MoFA	MoLJPA MoF, BB	Article 23.2 (d): Each State Party shall furnish copies of its laws that give effect to this article
2	Ensure notification to the UNSG in the areas where Bangladesh is already in compliance with UNCAC	UNSG has received notification along with the required documentation	Do	Do	Relevant Ministries/ government agencies.	(Laundering of proceeds of crime) and of any subsequent changes to such laws or a description thereof
3	Follow up Bangladesh's status of UNCAC compliance with UNODC and inform on the current status	UNODC's record on Bangladesh's compliance is regularly updated	Continuous	Do	Do	to the Secretary-General of the United Nations. Article 55.5: ... its laws and regulations that give effect to... (Confiscation) ...

D. Coordination, Management and Communication of UNCAC Compliance

Result 1: All institutions related to UNCAC implementation have access to required capacities (human resources, skills, materials and systems) to implement UNCAC.

Result 2: The progress of the implementation of the Action Plan is regularly monitored, co-ordinated and reviewed.

Result 3: The COSP is informed about UNCAC implementation in Bangladesh on a regular basis.

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
1	Establish a national level oversight authority to oversee implementation of UNCAC obligations	An oversight authority has been nominated by the GoB	Jan 2010	Cabinet Division		Article 61: State Parties are required to consider analysing trends in corruption, along with the circumstances relating to corruption offences; State Parties are obligated to contemplate sharing statistics, analytical expertise and information. State Parties are required to consider monitoring policies and practices, along
2	Establish a coordinating committee to monitor and report about implementation of UNCAC Action Plan and facilitate coordination among the relevant Ministries/institutions	A coordination committee of relevant Ministries/institutions headed by the focal point, MoLJPA, is in place and meets quarterly	Feb 2010	Advisory Committee	Coordinating Committee	

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
2.1	Ensure coordination and communication on UNCAC activities among the members of the Coordinating Committee	Institutions provide up-date on their activities for implementation of the Action Plan to the focal point through standardised form	Continuous	Coordinating Committee	Ministries/ Agencies	with evaluating their effectiveness and efficiency. Article 13: State Parties are required to promote the active participation of individuals and groups outside public sector, such as civil society, NGOs and community-based organizations and raise public awareness.
2.2	Establish mechanism for reporting to the oversight authority.	The committee prepares a report/up-date on compliance once a year for submission to the oversight authority.				Article 65: Each State Party shall take the necessary measures, including legislative and administrative measures, in accordance with fundamental principles of its domestic law, to ensure the
2.3	The committee ensures that progress/information on UNCAC is communicated to the relevant stakeholders and made accessible for the public	The MoLJPA maintains a website/intranet system to update information on UNCAC compliance	Continuous	MoLJPA	Other relevant institutions	

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
3	Undertake capacity building measures for the Coordinating Committee and other relevant government officials	Need based measures are identified and addressed	June 2010	MoLJPA MoE	All public officials' training institutes.	implementation of its obligations under this Convention. Article 5.3: Each State Party shall endeavour to periodically evaluate relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption.
4	Share information on UNCAC and its progress in implementation of UNCAC	A national conference is held once a year to disseminate Bangladesh's compliance to stakeholders, civil society and the general citizens	Continuous	Ministry of Information	Coordinating Committee	Article 7.1(d): States Parties to have systems in place that promote education and training programmes to enable them to meet the requirements for the correct, honourable and proper performance
5	Build private public partnership with civil society/private sector to facilitate UNCAC implementation	Implementation of UNCAC requirements is undertaken in partnership with civil society/private sector	April 2010	MoLJPA		

	Actions	Indicator	Time frame	Resp.	Other actors	Reference to UNCAC
6	Participate in the Conferences of the States Parties to the UNCAC	Bangladesh participates and reports on progress to the Conferences of the State Parties	Continuous	MoFA	MoLJPA and other relevant agencies	of public functions and that provide them with specialized and appropriate training to enhance their awareness of the risks of corruption inherent in the performance of their functions. Such programmes may make reference to codes or standards of conduct in applicable areas.

6. Implementation Arrangements

An UNCAC Advisory Committee headed by the Minister of Law, Justice and Parliamentary Affairs (MoLJPA) and comprising of the Secretaries of the relevant ministries will oversee the implementation process.

A Coordination Committee will be formed by the Advisory Committee to facilitate the implementation of the Action Plan by the relevant institutions of the government. The Coordination Committee will be headed by the UNCAC Focal Point within the MoLJPA and comprising of members from relevant institutions (including the Ministries of Foreign Affairs, Home Affairs, Finance, Information, the Anti-Corruption Commission, the Office of the Attorney General and the Bangladesh Bank). It will coordinate and record the state of implementation. The Focal Point will gather information from relevant agencies half-yearly and prepare a progress report for the Advisory Committee. The Advisory Committee will review the reports and offer guidance for future activities.

The Coordination Committee will collaborate with the National Integrity Strategy (NIS) Implementation Unit (to be formed) within the Cabinet Division for the implementation of NIS. The Coordination Committee will also work together with the Ethics Committees to be formed by the NIS Implementation Unit.

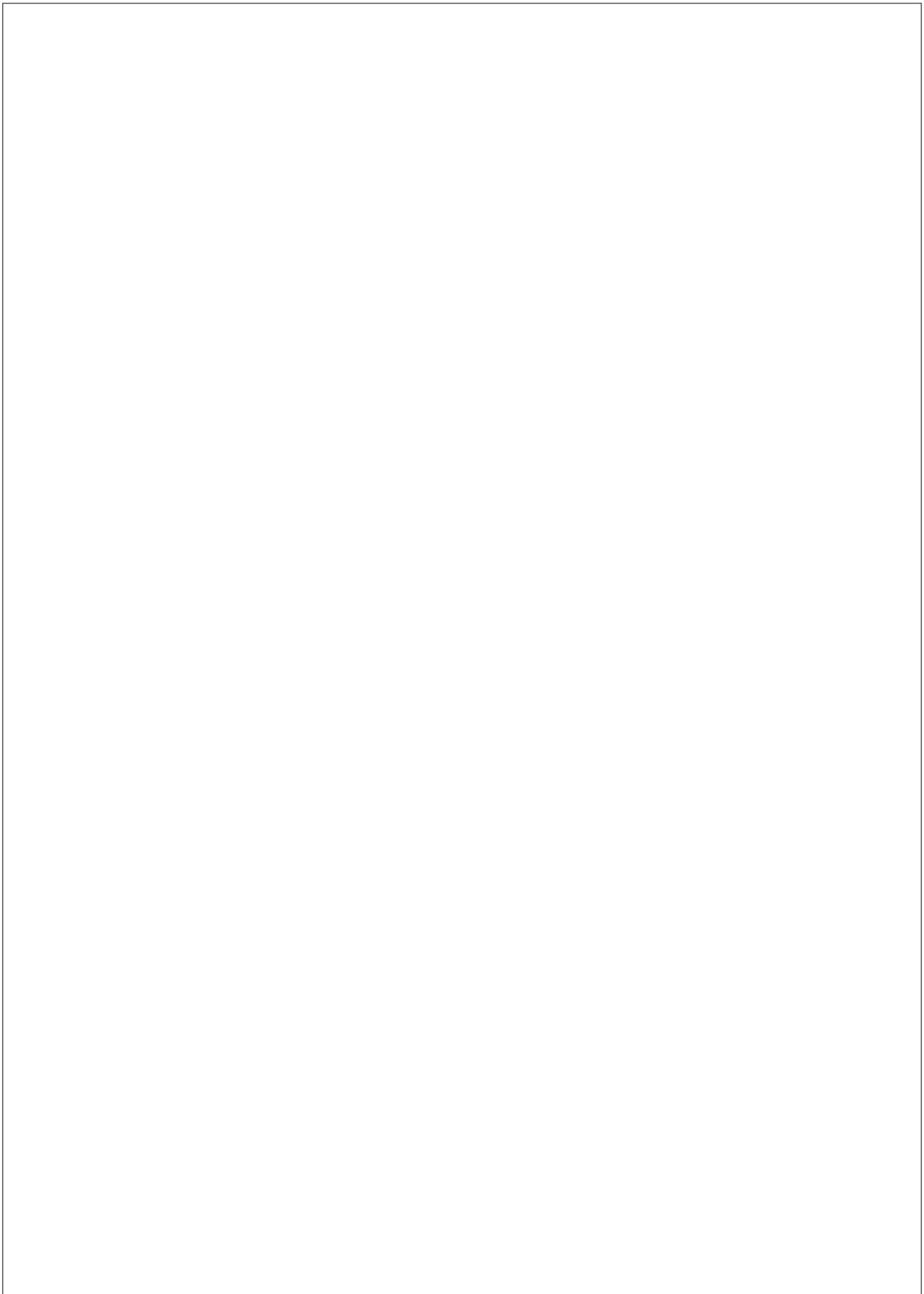
The government will co-opt the media, the private sector and NGOs to raise awareness on UNCAC. The government may also enter into public-private partnerships to implement the Action Plan, particularly for capacity building measures.

7. Monitoring, Review and Reporting

The Focal Point at the MoLJPA will monitor the implementation of the Action Plan and report to the Advisory Committee. Bangladesh will also welcome external agencies assigned by the UN to undertake an independent review of the state of implementation every second year. Bangladesh will share the progress reports with the UN and other stakeholders abroad. Bangladesh will also share information on the progress of UNCAC implementation with different stakeholders including the civil society and involve them in the review process.

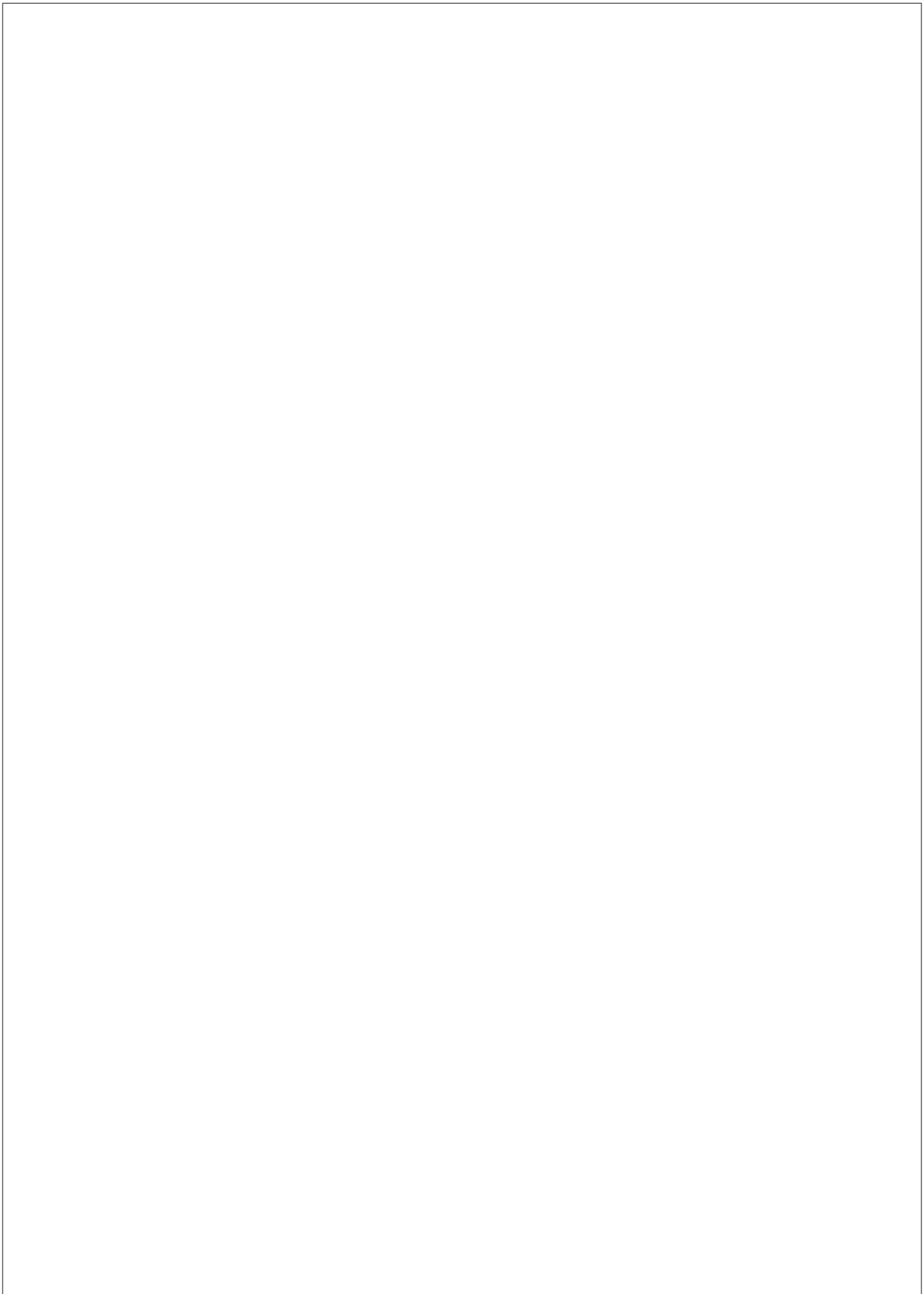
Section 3

8. Conclusion



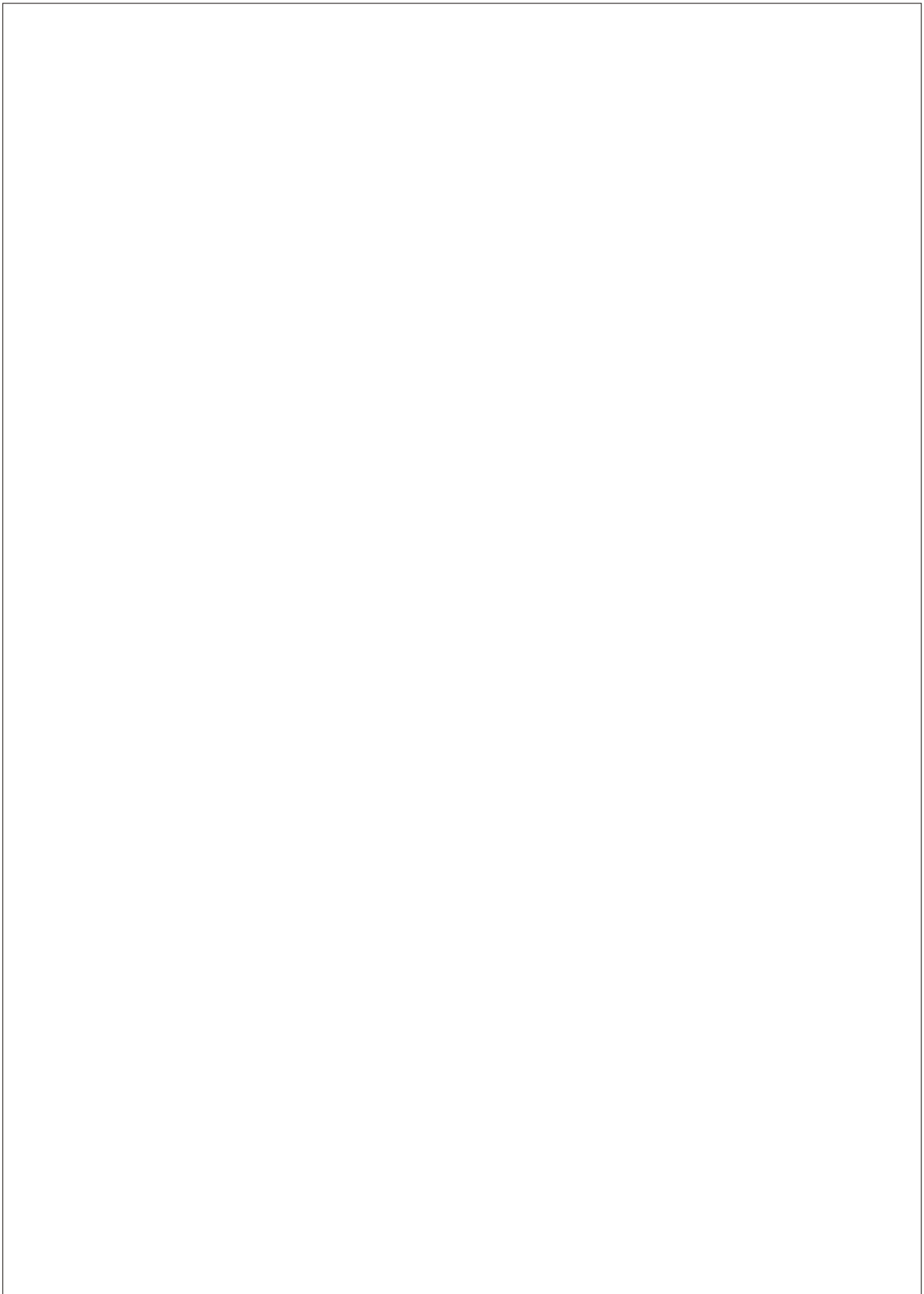
8. Conclusion

The Action Plan is the outcome of a follow-up activity by the Government of Bangladesh in order to address the findings and recommendations of the Bangladesh Compliance and Gap Analysis. The Action Plan is the result of a consultation process in which relevant government ministries and other relevant stakeholders participated. It takes into account the UNCAC requirements and their implementation in the Bangladeshi context. The Plan provides a systematic approach by setting thematic priorities, defining expected outcomes and outlining specific activities to be undertaken as well as assigning responsibility to relevant agencies to be completed within a given timeframe. It further outlines the implementation arrangement and provides guidance on how to monitor, review and report on the progress. The plan also contains suggestions on how to collaborate with various stakeholders for its effective implementation. The Action Plan is a groundbreaking attempt by the Government of Bangladesh to implement UNCAC in a holistic manner in order to establish good governance by reducing corruption in different segments of Bangladeshi society.



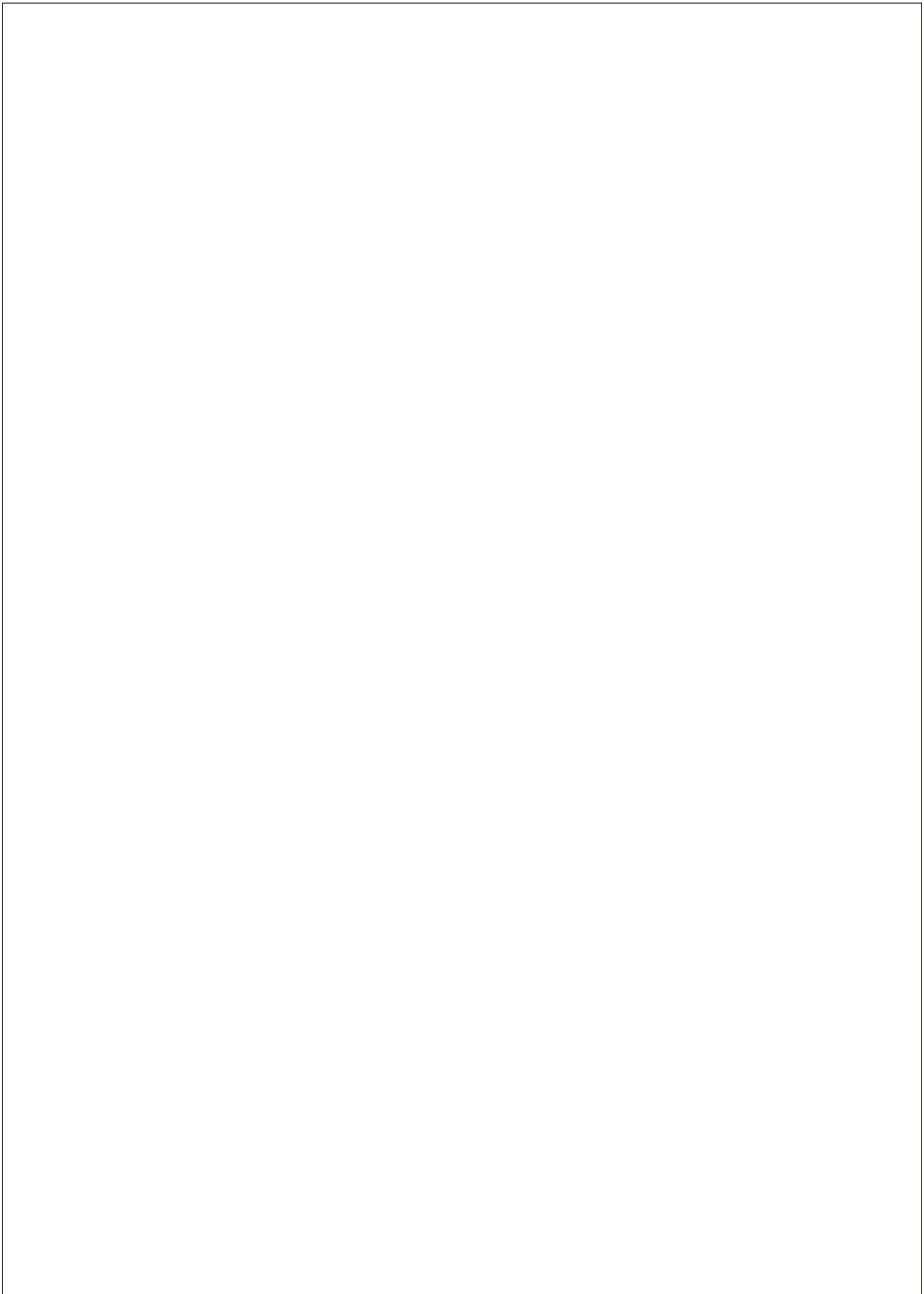
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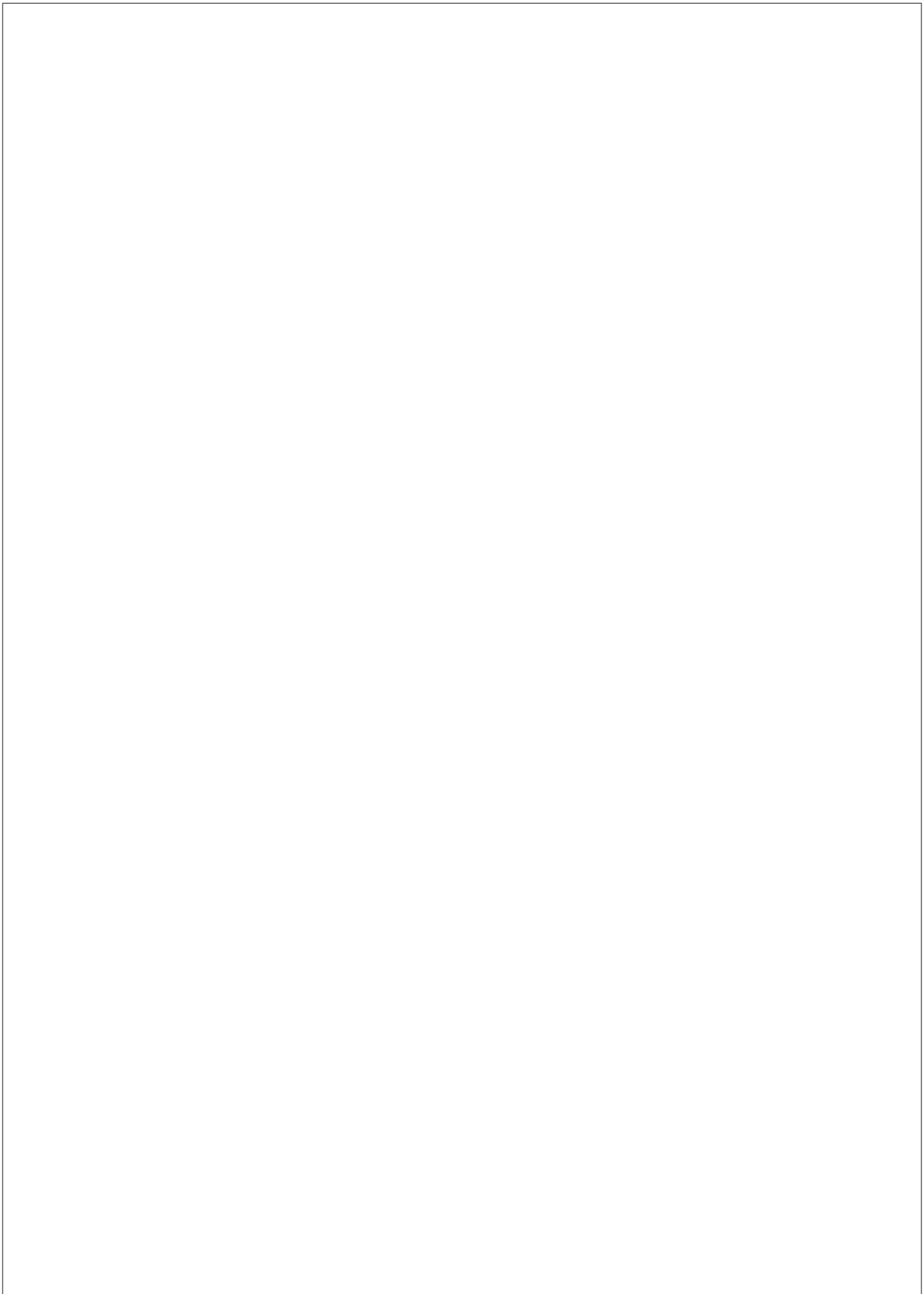
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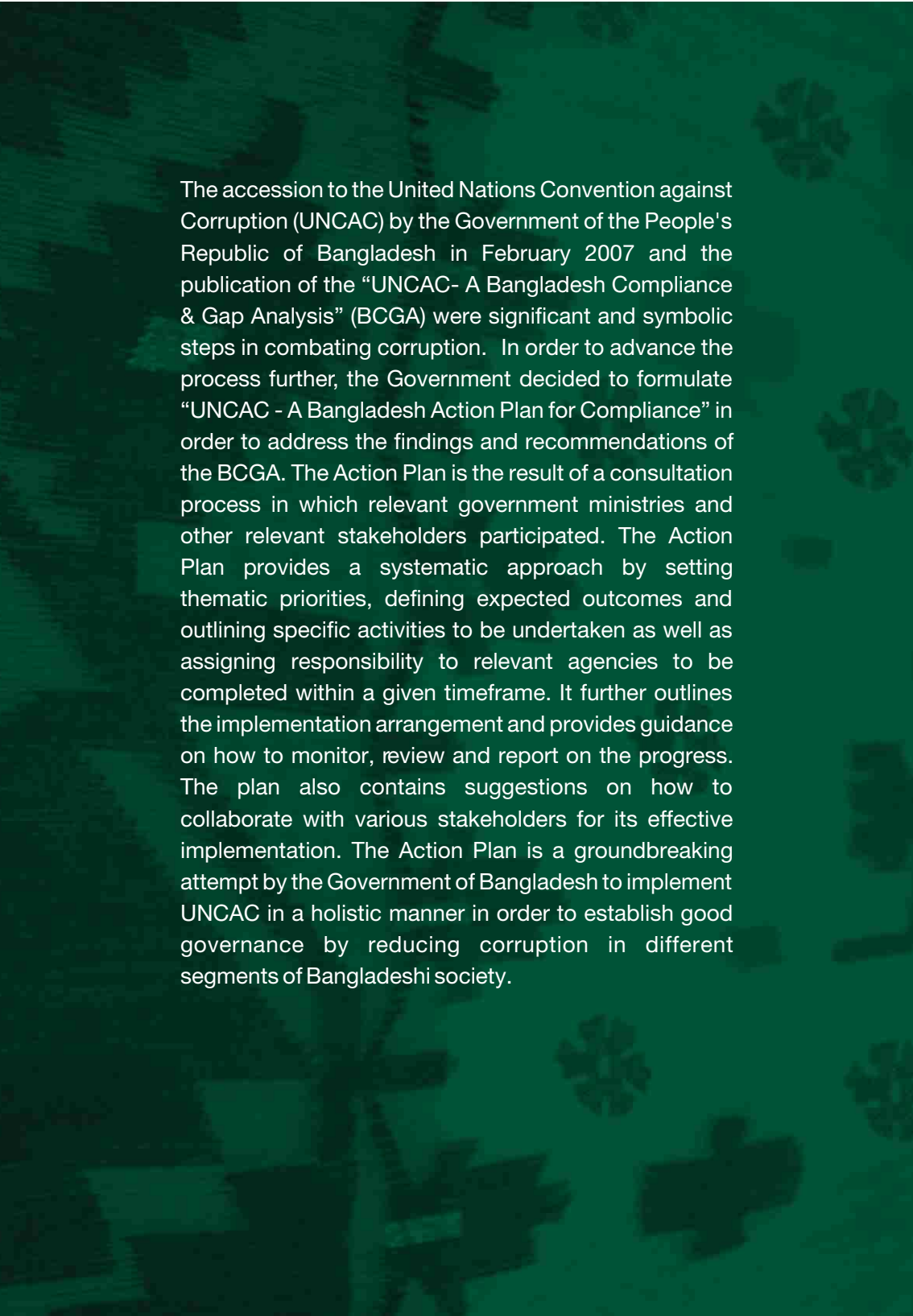




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The accession to the United Nations Convention against Corruption (UNCAC) by the Government of the People's Republic of Bangladesh in February 2007 and the publication of the “UNCAC- A Bangladesh Compliance & Gap Analysis” (BCGA) were significant and symbolic steps in combating corruption. In order to advance the process further, the Government decided to formulate “UNCAC - A Bangladesh Action Plan for Compliance” in order to address the findings and recommendations of the BCGA. The Action Plan is the result of a consultation process in which relevant government ministries and other relevant stakeholders participated. The Action Plan provides a systematic approach by setting thematic priorities, defining expected outcomes and outlining specific activities to be undertaken as well as assigning responsibility to relevant agencies to be completed within a given timeframe. It further outlines the implementation arrangement and provides guidance on how to monitor, review and report on the progress. The plan also contains suggestions on how to collaborate with various stakeholders for its effective implementation. The Action Plan is a groundbreaking attempt by the Government of Bangladesh to implement UNCAC in a holistic manner in order to establish good governance by reducing corruption in different segments of Bangladeshi society.