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ANNEX II

to the Commission Implementing Decision on the Annual Action Plan in favour of Türkiye for 2024

Action Document for Fight against Organised Crime

ANNUAL ACTION PLAN

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and annual and multiannual action plans and measures in the sense of Article 9 of IPA III Regulation and Article 23(2) of NDICI - Global Europe Regulation.

1. SYNOPSIS

1.1. Action Summary Table

Title	Fight against Organised Crime Annual Action Plan in favour of Türkiye for 2024
OPSYS	ACT-62928
ABAC	ABAC Commitment level 1 number: JAD.1655607
Basic Act	Financed under the Instrument for Pre-accession Assistance (IPA III)
Economic and Investment Plan (EIP)	No
EIP Flagship	No
Team Europe	No
Beneficiary(y)/(ies) of the action	The action shall be carried out in the Republic of Türkiye
Programming document	IPA III Programming Framework
PRIORITY AREAS AND SECTOR INFORMATION	
Window and thematic priority	Window 1- Rule of Law, Fundamental Rights and Democracy Thematic Priority 3- Fight against organised crime / security
Sustainable Development Goals (SDGs)	Main SDG: 16) Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

DAC code(s)	DAC – 15113 – Anti corruption organisations and institutions (100%)			
Main Delivery Channel	12000 – Recipient Government 12001 – Central Government			
Targets	N/A			
Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Internal markers and Tags	Policy objectives	Not targeted	Significant objective
EIP		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EIP Flagship		YES <input type="checkbox"/>		NO <input checked="" type="checkbox"/>
Tags:		YES		NO
Transport		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Energy		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Environment and climate resilience		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Digital		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Economic development (incl. private sector, trade and macroeconomic support)		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Human Development (incl. human capital and youth)		<input type="checkbox"/>		<input checked="" type="checkbox"/>

	Health resilience	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Migration and mobility	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Agriculture, food security and rural development	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Rule of law, governance and Public Administration reform	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Digitalisation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Tags	YES	NO
	digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	digital governance	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	digital entrepreneurship	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	digital skills/literacy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	digital services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Connectivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Tags	YES	NO
	digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	health	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	education and research	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Migration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Reduction of Inequalities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION

Amounts concerned	<p>Budget line: 15.02 01 01.01</p> <p>Total estimated cost: EUR 4 700 000.00</p> <p>Total amount of EU budget contribution EUR 4 500 000.00</p> <p>This action is co-financed in joint co-financing by:</p> <p>- Council of Europe for an amount of EUR 200 000.00</p>
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MANAGEMENT AND IMPLEMENTATION

Implementation modalities (management mode and delivery methods)	<ul style="list-style-type: none"> - Indirect management with the Council of Europe (Outcome 1) - Indirect management with the United Nations Office on Drugs and Crime (UNODC) (Outcomes 2 and 3)
Final Date for conclusion of Financing Agreement	At the latest by 31 December 2025

Final date for concluding contribution / delegation agreements, procurement and grant contracts	3 years following the date of conclusion of the financing agreement, with the exception of cases listed under Article 114(2) of the Financial Regulation
Indicative [operational implementation] period	72 months following the conclusion of the Financing Agreement
Final date for implementing the Financing Agreement	12 years following the conclusion of the Financing Agreement

1.2. Summary of the Action

The overall objective of the Action is to make progress on alignment with the EU acquis and improve Türkiye's institutional capacity in the fight against organised crime.

The Action firstly aims to enhance the Financial Crimes Investigation Board's (MASAK) effectiveness in combating money laundering and the financing of terrorism (AML/CFT). It focuses on strengthening investigative capabilities, modernising technological infrastructure, and improving coordination and information sharing with both national and international partners involved in AML/CFT investigations. Mover importantly, it will help Türkiye align its AML/CFT framework with the latest FATF recommendations and EU standards.

Secondly, technical assistance will be provided to improve data collection, dissemination and analysis processes in combatting organised crime and enhance national and international cooperation as well as coordination through capacity building activities and training sessions. The Action will support the creation of an intelligence-led policing and evidence-based policy for better monitoring of the existing national action plans and strategies. In addition, it will prepare the ground for establishing an electronic information collection system together with the necessary regulatory framework such as Türkiye's data protection legislation and IT tools.

1.3 Beneficiar(y)/(ies) of the Action

The action shall be carried out in the Republic of Türkiye.

2. RATIONALE

2.1. Context

According to the **IPA III Programming Framework (2021-2027)**, "IPA III support in the fight against organised crime' will focus on assisting authorities to develop a more strategic approach towards tackling various forms of organised crime, including a better prioritising and allocation of resources. This should result in effectively identifying and dismantling criminal networks together with their economic activities, making systematic and proactive use of financial investigations and applying asset confiscation in cooperation with

the responsible institutions. Beneficiaries also have to step up their capacity to effectively address organised crime and money laundering on-line and to develop a strategic approach towards tackling cyber criminality.

The European Commission's **2023 Türkiye Report** offers several recommendations in relation to Chapter 4 (Free Movement of Capital) and Chapter 24 (Justice, Freedom, and Security), particularly focused on Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT). Key recommendations include:

- Enhancing Türkiye's AML/CFT regime in alignment with the EU acquis to address strategic shortcomings.
- Improving counterterrorism legal frameworks and practices, also in line with the EU acquis, and addressing recommendations from the Financial Action Task Force (FATF).

AoS#1: Strengthening the Technical Capacity for Financial Investigations in Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT)

The related EU acquis is as follows:

- **Anti-Money Laundering Directive (AMLD):** Directive (EU) 2015/849, as amended by Directive (EU) 2018/843
- **Transfer of Funds Regulation:** Regulation (EU) 2015/847, repealed and replaced by Regulation (EU) 2023/1113 (applicable as of 30 December 2024)
- **Directive (EU) 2018/1673** stresses the need for investigative tools, personnel, and training to combat money laundering effectively,
- **Directive (EU) 2019/1153**, amended by **Directive (EU) 2024/1654**, focuses on access to financial and bank account information for combating serious financial crimes,

The EU's AML/CFT framework has been comprehensively overhauled by the new AML package which entered into force in June 2024. This includes a 6th Anti-Money Laundering Directive (Directive (EU) 2024/1640), a new Anti-Money Laundering Regulation (Regulation (EU) 2024/1624) and a recast of the Transfer of Funds Regulation. While Regulation (EU) 2023/1113 will apply as of 30 December 2024, most of the other provisions of the package will be applicable as of mid-2027. Additionally, the Authority for Anti-Money Laundering and Countering the Financing of Terrorism is established by Regulation (EU) 2024/1620, which however is an EU agency and therefore not of relevance for Türkiye.

AoS#2: Technical Assistance to Strengthen the Institutional Capacity for the Fight against Organised Crime in Türkiye

The European Commission stated in its **2022 Türkiye Report** that Türkiye should collect and use aggregate statistics to facilitate a threat assessment, policy development and implementation and improve Türkiye's track record on dismantling criminal networks and confiscating criminal assets as well as improve the legal framework and practices on counterterrorism in line with the EU acquis.

An arrangement enabling structured cooperation with Europol has been in place since 2016, although this cannot be the legal basis to exchange personal data. The completion of an international agreement between the EU and Türkiye on the exchange of personal data between Europol and the Turkish authorities with responsibility for fighting serious crime and terrorism is still pending as the Turkish data protection legislation is still not in line with the EU acquis to the extent necessary to implement the safeguards under the envisaged Agreement." Türkiye continues to be an important transit and destination country for trafficking in human beings.

The **EU Strategy to tackle Organised Crime** for 2021-2025 states the importance of international cooperation on organised crime. "There is an urgent need to further develop serious and organised crime intelligence at Europol and enhance information exchange and investigative actions with third countries and

regions constituting major hubs for high-risk organised crime affecting EU Member States, including via Member States' bilateral Liaison Officers seconded to these critical areas. The Commission has received directives for negotiating international agreements with third countries to exchange personal data with Europol and to enable judicial cooperation with Eurojust and it will strive to make progress in these difficult negotiations.

Regarding **Türkiye's Visa Liberalisation Road Map benchmark criteria**, the related benchmarks are as follows:

- Take measures for improving the investigatory capacity on organised crime cases, or facilitated illegal migration,
- Continue and complete the implementation of the National Strategy and Action Plan for the fight against organised crime,
- Provide adequate infrastructure and resources ensuring decent reception and protection of victims of trafficking and supporting their social and professional reintegration,
- Continue implementing the National Strategy and the Action Plans against Drugs and Drug Addiction; cooperate with the European Union Drugs Agency (EUDA),
- Ensure law enforcement co-operation among the relevant national agencies - especially border guards, police, and customs officers - as well as with judicial authorities,
- Reinforce regional law enforcement services co-operation, implement bilateral and multilateral operational cooperation agreements, and share information with EU Member States authorities,
- Improve the operational and special investigative capacity of law enforcement services to tackle more efficiently serious and cross-border crime including ID and travel document fraud.

Related National Strategies and Policies

AoS#1:

The Strategy Document for Increasing Effectiveness in Anti-Money Laundering (AML), Counter Terrorist Financing (CFT), and Confiscation Practices in Türkiye (2021-2025) aims to enhance the judicial and administrative processes for handling money laundering and terrorist financing offenses, strengthen financial intelligence capabilities, and coordinate asset recovery measures as well as effective implementation of targeted financial sanctions to deprive criminals of illicit proceeds. In line with this Strategy Document Türkiye has developed National Risk Assessment methodology and the NRA report was endorsed in 2023.

In the **Pre-Accession Economic Reform Program (2022-2024)**, crypto-asset service providers and savings finance companies were brought under AML/CFT regulations.

AoS#2:

This AoS is relevant within the context of the strategic goals of the **National Strategy on Fight against Organised Crimes (2022-2027)** particularly on i) increasing coordination and cooperation between institutions in the fight against organised crime; ii) ensuring data sharing between law enforcement units combating organised crime and other institutions; iii) ensuring and improving international cooperation in the fight against organised crime; iv) conducting training activities to increase capacity in the fight against organised crime; v) increasing the personnel and technical capacities of units combating organised crime; vi) strengthening the legal infrastructure in the fight against organised crime; vii) conducting an effective fight against organised crime organisations and various crime forms by law enforcement units and judicial authorities, viii) supporting the efforts with administrative measures; ix) carrying out necessary studies to increase the effectiveness of the complaint mechanisms; x) identifying the links between organised crime organisations and terrorist organisations, xi) carrying out activities to deprive criminals from the proceeds of

organised crime activities and prevent the financing of terrorism; xii) developing measures with a pro-active approach in the fight against organised crime and conducting studies to prevent organised crime at its source.

More specifically, AoS#2 is relevant in the context of the activities proposed by the **National Action Plan on Fight against Organised Crimes (2022-2024)** such as: i) establishment of "Monitoring and Reporting Software for the Action Plan" for the fight against organised crime, ii) organisation of international trainings on organised crimes such as combating terrorism, drugs, weapons, proceeds of crime, trafficking in human beings within the scope of fight against organised crime; iii) ensuring close and continuous contact with international institutions; iv) identifying and learning the implementation methods, working procedures and principles of international institutions, and transferring their knowledge to all officials; v) increasing awareness trainings on combating the proceeds of crime of organised crime organisations for the personnel of law enforcement units involved in the fight against organised crime; vi) conducting courses and trainings combining theory and practice on organised crime; vii) combating proceeds of crime and financing of terrorism for the personnel working in the units working in the fight against organised crime; viii) increasing awareness trainings on combating proceeds of crime; ix) strengthening the technical capacity of units in the fight against organised crime; x) reviewing the effectiveness of legal regulations on combating organised crime, evaluating their coordination within national legislation, within the framework of national security and national legislation assessing their compliance with international law and keeping them up-to-date.

2.2. Problem Analysis

AoS#1

MASAK, the Financial Intelligence Unit of Türkiye, was established by Law No. 4208 on Prevention of Money Laundering on 19/11/1996 and started to function on 17/02/1997. Aiming to follow EU legislation and international practices, the duties and competencies of MASAK were redefined by Law No. 5549 on Prevention of Laundering Proceeds of Crime dated 18/10/2006. MASAK operates within the framework of Law No. 5549 "Prevention of Laundering Proceeds of Crime", Law No. 6415 "Prevention of Financing of Terrorism" and Law No. 7262 "Prevention of Financing of Weapons of Mass Destruction".

MASAK performs core functions such as developing policies and improving legislation on AML/CFT, data collecting, analysis and evaluation, supervision, coordination and investigation. MASAK also monitors the implementation of required measures, collects financial intelligence, analyses the financial profile and other situations of individuals or entities linked with crimes and compare them with other available data. Furthermore, MASAK shares any important conclusions and findings in terms of AML/ CFT with national and international counterparts and related units.

FATF established a comprehensive set of requirements for member countries to effectively combat money laundering and terrorist financing. Türkiye's recent removal from the FATF grey list in June 2024 reflects significant progress in addressing the strategic deficiencies identified during the FATF's 4th round of mutual evaluations. This progress was ensured by Türkiye's efforts to implement an Action Plan that focused on strengthening its AML/CFT framework. Improving MASAK's human resources, proactive analysis capacity of MASAK and use of financial intelligence products in ongoing investigations and prosecutions in line with the risk profile of Türkiye were among the action items of this plan.

While Türkiye has made significant progress in meeting FATF requirements, continuous improvement and follow-up actions are essential to ensure sustained compliance and effectiveness in AML/CFT measures:

Furthermore, FATF emphasises the need for countries to assess the risks associated with Non-Profit Organisations (NPOs), which can be exploited for money laundering or terrorist financing. MASAK should implement measures to evaluate and monitor the activities of NPOs to prevent misuse. Providing clear guidelines to NPOs regarding their AML/CFT obligations and conducting regular compliance checks will help ensure that these organisations operate transparently and accountably. In accordance with the FATF June 2024 Public Statement, Türkiye will continue to work with the FATF to sustain its improvements in its AML/CFT

system, including by continuing to ensure its oversight of the NPO sector is risk-based and in line with the FATF standards.

Lastly, considering the evolving financial landscape, MASAK must ensure that regulations regarding crypto assets are aligned with FATF recommendations especially R.15-16. This includes imposing and supervising AML/CFT obligations on cryptocurrency service providers and ensuring that they implement robust customer due diligence procedures. MASAK should leverage technological tools and platforms for monitoring crypto transactions, allowing for real-time tracking of suspicious activities and enhancing its investigative capabilities. Türkiye has already designated crypto asset service providers among the obliged parties in terms of their AML/CFT preventive measures and adopted licensing procedures; but secondary legislation tools and outreach activities should be enhanced.

AoS#2

Organised crime remains a very serious issue in the region as reported in Serious and Organised Crime Threat Assessment (SOCTA) reports. Important smuggling routes run through Türkiye and the Western Balkans, where powerful criminal networks continue to operate from and via this region. Criminal procedures and operational capacities (the practical implementation of a risk-based approach and intelligence led policing) of the law enforcement institutions should be improved notably in the framework of the European Multidisciplinary Platform Against Criminal Threats (EMPACT) and by increasing whenever relevant the participation of competent authorities in operational activities of the platform. Furthermore, it is crucial to establish a sound data collection and analysis system to monitor implementation of the organized crime strategy and track trends and developments in relation to organised crime.

In recent years, there has been an increase in the number of organised crime cases and seizures of assets originating from organised crime in Türkiye. There is a need for enhancement of the capacities of the authorities concerning the implementation of legislation to better combat organised crime and dismantle criminal networks. In this regard, the establishment of a comprehensive and effective management structure in the fight against organised crime is necessary. Cooperation and coordination among law enforcement and other relevant public institutions should be enhanced through a data sharing system, which will ensure proper monitoring, reporting and evaluation of the outcomes of the National Action Plan on the Fight against Organised Crime, clarify the role of each institution and increase awareness among all relevant stakeholders at national level. In addition, the nature of organised crime necessitates targeted regional and international cooperation to disrupt and dismantle criminal groups.

The main authority responsible for the coordination of the National Action Plan on Fight against Organised Crime is the Ministry of Interior's Department of Smuggling, Intelligence, Operation and Data Collection (DSIODC – aka. KIHBI in Turkish). According to Article 262 of the Presidential Decree No:1, DSIODC is responsible for i) the nationwide collection and evaluation of data on all types of smuggling attempts; informing relevant authorities competent to prevent, track and investigate the smuggling attempts; steering prevention and interception activities ; and taking necessary measures for coordination and cooperation among relevant institutions, ii) the identification of targets, tactics and methods in the fight against smuggling and the printing of educative publications, iii) keeping records of suspected perpetrators, stolen or lost motor vehicles, firearms and all kinds of identity documents, informing the security forces, and ensuring coordination between involved institutions. In addition to these duties listed in the aforementioned decree, the Department is tasked to follow up on the relevant national action plans in a wide range of areas, such as combating organised crime, trafficking of cultural heritage, fuel smuggling, drug trafficking, and alcoholic beverage smuggling, and also to facilitate coordination among the relevant ministries and organizations.

DSIODC also carries out the secretariat duties of Smuggling Intelligence Coordination Board established in 1987. The Board evaluates all kinds of smuggling activities in Türkiye and abroad and ensures coordination among the relevant Ministries, institutions and organisations. The Board has various stakeholders such as National Intelligence Organisation, Turkish General Staff, Land Forces Command, Ministry of Foreign

Affairs, Ministry of Trade, Ministry of Treasury and Finance (the Financial Crimes Investigation Board-MASAK), Ministry of Health, Ministry of Culture and Tourism, Presidency of Migration Management (MoI), Gendarmerie General Command (MoI), Turkish National Police (MoI), Turkish Coast Guard Command (MoI) and General Directorate of Provincial Administration (MoI)

Currently, the data collection of DSIODC is based on the seizures data received from different law enforcement agencies and Ministries, and the results of the organized crime investigations. This data is transferred to DSIODC manually (on paper or excel/word formats) through the vertical reporting line of each Ministry (from the provinces to the headquarters), which often causes the delayed transmission of the data. Therefore, the existing data exchange system needs to be migrated to a digitalized platform for more timely and efficient data submission. Such a platform will facilitate continuous and complementary data entries by the stakeholders, allowing DSIODC to monitor trends and conduct effective analysis.

With the support and the coordination of DSIODC, the technical and operational capacities of the stakeholders (particularly the law enforcement agencies) should be strengthened with practical implementation of a risk-based approach and intelligence-led policing. Therefore, data collection and analysis processes of DSIODC should be strengthened in a more strategic approach through analysing general strategic priorities, legal and institutional frameworks, policies, and practices in the field of Fight against Organised Crime in Türkiye.

Organised crime groups have a transnational structure. Their criminal activities do not remain limited within the borders of a country but involve at least two, and most of the time more countries. These activities can have regional coverage and lately even an inter-continental scope. Therefore, international cooperation is essential in the fight against organised crime. Such cooperation should consist of different pillars, including data exchange, mutual legal assistance, common threat analysis and the exchange of best practices and lessons learned.

2.3. Lessons Learned

AoS#1

MASAK has implemented two EU funded projects in the past. The first project, “*Strengthening the Fight against Money Laundering*” was financed under the 2002 Financial Programme. As an outcome of the project, MASAK accomplished to build its institutional framework and technical infrastructure especially focusing on AML related activities. However, after the project only a restricted number of obliged entities (only banks and some insurance companies) were enabled to report suspicious transactions using online systems. This was not enough in the fight against money laundering and terrorist financing, as each of the obliged parties operating in different fields should be enabled to report Suspicious Transaction Reports (STRs) through an online system. In addition, the project had no activity regarding CFT since MASAK had no duties regarding this issue. Furthermore, during the implementation of the project, most of the public institutions (including MASAK) had no technical capacity to enable secure data exchange with other public institutions.

Another EU funded twinning project titled “*Efficiency in Anti-Money Laundering and Counter-Terrorist Financing*” under IPA 2012 programme implemented complementary activities to the previous project. As a result of the project, the AML software of MASAK (which was developed during 2002 project) was improved and extended to manage activities related to financing of terrorism. Online STR system was improved and extended to support each different sector of obliged parties to enable them for online STR filing. A secure online system was developed to enable MASAK to exchange reports, documents and information electronically with examiners and other related institutions playing role in the fight against money laundering and terrorist financing in Türkiye. The project also increased awareness of stakeholders in AML/CFT matters including the obliged parties as the rate in the number of STRs and adequate quality level in the filled STRs further improved. Finally, the number of developed ML and TF examinations were increased.

AoS#2

Türkiye is committed to better aligning with the EU acquis and has therefore developed National Action Plans on the Fight against Organised Crime since 2010. The adoption and implementation of National Action Plans

demonstrate its commitment to continuous improvement. As a result of long planning and implementation experience, it has been concluded that a more systematic follow-up of the activities listed in the Action Plans is necessary to achieve the predetermined objectives. In this regard, an important initial step is to enhance data sharing, as well as coordination and cooperation among law enforcement agencies.

Secondly, updated data is needed for developing a national report in the format of SOCTA report specific to Türkiye. The need for training of law enforcement agencies regarding organised crimes to increase the technical investigation capacity in a more holistic approach is also seen as an important lesson learnt from previous experiences. The last implemented IPA 2008 project on “Strengthening the Investigation Capacity of the Turkish National Police and the Gendarmerie against Organised Crime” produced results highlighting the importance to associate technical trainings with relevant software procurement and need for increasing cooperation between law enforcement agencies both at national and international level.

3. DESCRIPTION OF THE ACTION

3.1. Intervention Logic

The overall objective (Impact) of the Action is to make progress on alignment with EU acquis and improve Türkiye’s institutional capacity in the fight against organised crime.

The Specific(s) Objective(s) (Outcomes) of this Action are:

1. Improve MASAK’s investigation capacity for effectively fighting against money laundering and financing of terrorism (AoS#1)
2. Improve data collection, dissemination and analysis in relation to the fight against organised crime (AoS#2)
3. Enhance international cooperation and coordination capacity against organised crime (AoS#2)

The Outputs to be delivered by this Action contributing to the corresponding Specific Objectives (Outcomes) are:

Under AoS#1:

- 1.1 (Contributing to Outcome 1): Strengthened AML/CFT framework in alignment with the updated FATF standards and the evolving EU acquis for increasing credibility in international financial systems.
- 1.2 (Contributing to Outcome 1): Increased institutional capacity focusing on advanced techniques in financial investigations, AML/CFT compliance, and the use of analytical/technological tools.

Under AoS#2:

- Output 2.1 (Contributing to Outcome 2): Established electronic information management system for increased data quality, quantity, variety, dissemination, analysis and exchange of information on organised crime.
- Output 2.2 (Contributing to Outcome 2): Strengthened analytical capacity for intelligence-led policing and evidence-based policy development and enforcement in the fight against organised crime.
- Output 2.3 (Contributing to Outcome 2): Developed monitoring and coordination system for effective implementation of the national strategy and action plan against organised crime.
- Output 3.1 (Contributing to Outcome 3): Improved technical capacity on international cooperation and mutual legal assistance in the fight against organised crime.
- Output 3.2 (Contributing to Outcome 3): Increased exchange of data with international organisations and pilot innovative approaches on international cooperation launched.

3.2. Indicative Activities

Outcome 1:

Activities related to Output 1.1:

a) legal gap analysis to identify areas that require reform, b) sector-specific guidelines for financial institutions and designated non-financial businesses and professions (DNFBPs) and training for AML/CFT obligations including those related to politically exposed persons (PEPs), c) training modules based on FATF standards and the EU acquis focusing on risk-based supervision, national risk assessments, and financial intelligence analysis, d) workshops and seminars to build the capacity of compliance officers.

Activities related to Output 1.2:

a) assessment on training needs of MASAK, law enforcement staff and relevant stakeholders, b) curriculum incorporating advanced topics in financial investigations, AML/CFT compliance and supervision, and the application of analytical tools, c) practice advanced investigative techniques and the use of analytical tools in various scenarios, d) study visit to EU Member States to discuss good practices in the implementation of robust AML/CFT frameworks, e) risk based supervision and national risk assessment methodologies, f) analysis on the current technological systems and tools used by MASAK to identify gaps g) strategic plan outlining the necessary upgrades, including specific technologies to be implemented h) advanced data analytics and visualisation tools that enable MASAK to analyse large volumes of financial data, detect patterns, and identify suspicious transactions i) training on the use of new technological systems and tool,

Outcome 2:

Activities related to Output 2.1:

i) exchange of methods for data collection and analysis on organised crime, ii) exchange of EU best practices on organised crime-related data collection systems, iii) needs assessment/gap analysis and development of technical requirements and specifications for the electronic organised crime information management system, iv) software development to establish the electronic organised crime information management system, v) procurement of relevant hardware, vi) regulatory framework for the functioning IT system, vii) training materials and training for users and other stakeholders.

Activities related to Output 2.2:

i) exchange of international standards and best European practices on SOCTAs, ii) exchange of EU member states experiences in relation to SOCTAs, iii) development of a national SOCTA template, trends analysis of classified organised crime types iv) a national conference to launch the SOCTA and policy recommendations feeding into the national organised crime strategy and action plan

Activities related to Output 2.3:

i) Facilitation of regular interagency coordination meetings on implementation of the national strategy and action plan, ii) analysis on the legal framework governing the fight against organised crime iii) a review of implementation of the national strategy with an analytical report, iv) development of a new national strategy and action plan based on the UNODC toolkit for the development of high-impact organised crime strategies.

Outcome 3:

Activities related to Output 3.1:

i) training needs assessment/situational analysis on the application of international standards and best European practices in international cooperation on organised crime; ii) training course on systems analysis, disruption planning, joint investigations and other aspects of international cooperation and mutual legal assistance in the fight against organised crime; iii) pilot trainings based on the developed course modules.

Activities related to Output 3.2:

i) international conference to discuss the findings of the SOCTA and make recommendations to strengthen international coordination and cooperation; ii) situation analysis and recommendations regarding the cooperation of Türkiye with international agencies/organisations, as well as source/transit/destination countries in the fight against organised crime; iii) exchange information on mutual legal assistance, joint investigations and other aspects of international cooperation against organised crime with EU agencies (such as Europol or/and Eurojust); iv) exchange of data evaluation and reporting techniques with international organizations.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

AoS#1 will support efforts to integrate environmental considerations wherever possible. This includes: i) promoting the use of digital tools and reducing reliance on paper-based processes, thereby minimising the project's carbon footprint, ii) encouraging sustainable practices within MASAK and among stakeholders, such as developing recommendations for an energy-efficient IT infrastructure and environmentally friendly office practices.

AoS#2 envisages the development of a software that would enable the relevant authorities to exchange data through an electronic platform. This software will decrease the paper-based information exchange and thus minimise the carbon footprint.

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1.

Under AoS#1, efforts will be made to maintain gender balance and inclusivity in the training sessions. The workshops will be organised in such a way that both women and men can equally participate and contribute to discussions, ensuring diverse perspectives and experiences are represented.

Personal data that will have been collected, processed, or shared during investigations would have been handled in compliance with data protection laws. Data minimisation would have been practiced, ensuring that only the necessary data was collected. Additionally, data security would have been ensured to protect the integrity and confidentiality of sensitive information used in financial investigations.

Under AoS#2, the action will promote increased coordination for the implementation of the national strategy against organised crime based on key international tools, which facilitate mainstreaming of gender equality, empowerment of women and girls, and more broadly human rights. These include the Organised Crime Strategy Toolkit for Developing High-Impact Strategies, which provides guidance on comprehensive approaches to tackling organised crime based on the 4P framework of measures to prevent organised crime, pursue organised crime groups, protect victims and witnesses of organised crime (including women and girls) and promote cooperation and partnerships. The action will also use the Toolkit on Mainstreaming Gender and Human Rights in the Implementation of the United Nations Convention against Transnational Organised Crime as a framework for a human-rights based approach to implementation of the national strategy and action plan against organised crime. Development of a serious organised crime threat assessment (SOCTA) will be done in strict accordance with international best practices and based on available guidance on the preparation and use of such assessments, which include relevant gender and human rights considerations.

3.4 Risks and Assumptions

Category	Risks	Likelihood (High/	Impact (High/	Mitigating measures
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		Medium/ Low)	Medium/ Low)	
AoS#1				
2-Planning, processes and systems	Inadequate stakeholder engagement leading to ineffective project design	Low	Medium	Feedback from stakeholders will be gathered and plans will be adjusted accordingly. Regular meetings will be made.
4-Legality and Regularity	Non-compliance with international AML/CFT standards leading to reputational damage.	Low	Medium	-Regularly review outputs of the project against FATF and EU standards. -Conduct compliance audits.
AoS#2				
2-Planning, processes and systems	Lack of stakeholders' dedication to participate and cooperate throughout the process.	Low	High	All major stakeholders will be represented in the steering committee. A close collaboration between implementing partner (IP) and stakeholders will be ensured. If needed ad hoc meetings will take place.
2-Planning, processes and systems	Rotation of trained staff in different posts during the implementation of the project.	Medium	Medium	Training of trainers and group training models will be preferred and ensured during the implementation of the Action. Training materials developed will be used for all relevant staff and updated in the future if needed.

External Assumptions

Regarding AoS#1, assumptions include: i) collaboration of relevant stakeholders, including law enforcement agencies and financial institutions, with MASAK in implementing AML/CFT measures, ii) political support provided in relation to meeting FATF standards and taking steps to align with the EU acquis.

Regarding AoS#2, assumptions include: i) stable political environment and continuous political support for the fight against organised crime, ii) the Government of Türkiye ensures the necessary investment of budgetary and other resources to sustain the results achieved by this Action, iii) commitment, ownership and investment of human and financial resources on the part of the authorities ensured for the continued functioning of the information management system, iv) availability of experts with appropriate qualification and experience; v) increased willingness of Türkiye to cooperate and exchange information with EU law enforcement partners.

3.5 Indicative Logical Framework Matrix

PROJECT MODALITY (3 levels of results / indicators / Source of Data / Assumptions - no activities)

Results	Results chain: Main expected results [maximum 10]	Indicators [it least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To make progress on alignment with EU acquis and improve Türkiye's institutional capacity in the fight against organised crime	Progress made towards meeting the necessary criteria verified in the Türkiye Country Report	N/A (2023)	Progress achieved (2030)	EU Country Report on Türkiye Administrative reports of public institutions in Türkiye.	NA
Outcome 1	Improved MASAK's investigation capacity for effectively fighting against money laundering and financing of terrorism	Number of financial investigations successfully initiated and completed by MASAK	3.861 (2023)	6.000 (2030)	MASAK's Activity Report EU Country Report on Türkiye FATF Reports	
Outcome 2	Improved data collection, dissemination and analysis in relation to the fight against organised crime	The percentage of the implementation of the National Strategy and Action Plan on the Fight against Organised Crime (2026-2028)	N/A (2024)	98 % (2028)	Official statistics, records Analytical reports on implementation of the strategy EU Country Report on Türkiye	Stable political environment and continuous political support for the fight against organised crime in Türkiye
Outcome 3	Enhanced international cooperation and coordination capacity against organised crime	Availability of a national report on Organised Crime (In conformity with SOCTA methodology)	Non-existence of the SOCTA template and data provided (2024)	Agreed SOCTA template in place and data collected and shared (2028)	Official records MOJ/Prosecutor's Office/MoI official data Mission reports	Stable political environment and continuous political support for the fight against organised crime in Türkiye

Output 1 related to Outcome 1	1.1 Improved AML/CFT framework in alignment with the updated FATF standards and evolving EU acquis	1.1 Percentage of Türkiye's AML/CFT regulations aligned with FATF Recommendations	1.1 97 % (2024)	1.1 100 % (2030)	Project Reports, MASAK's Activity FATF reports	
Output 2 related to Outcome 1	1.2 Increased institutional capacity focusing on advanced techniques in financial investigations, AML/CFT compliance, and the use of analytical/technological tools	1.2.1 Number of suspicious transaction reports (STRs) leading to investigations 1.2.2 Number of data analytics tools in use	1.2.1 81 (2024) 1.2.2 4 (2024)	1.2.1 150 (2030) 1.2.2 6 (2030)	Project Reports, MASAK's Activity	
Output 1 related to Outcome 2	2.1 Established electronic information management system for increased data quality, quantity, variety, dissemination, analysis and exchange of information on organised crime	2.1 Time period for obtaining data to assess the progress in the Action Plan on the Fight against Organised Crime	2.1.1 Quarterly (2024)	2.1.1 Weekly (2028)	KIHBI Activity Reports	Commitment, ownership and investment of human and financial resources to ensure continued functioning of the information management system
Output 2 related to Outcome 2	2.2 Strengthened analytical capacity for intelligence-led policing and evidence-based policy development and enforcement in the fight against organised crime	2.2 Full alignment with the SOCTA template and provision of data in relation to the report.	2.2 Non-existence of the SOCTA template and data provided (2024)	2.2 Agreed SOCTA template in place and data collected and shared (2028)	Official records MOJ/Prosecutor's Office/MoI official data Mission reports	Readiness to conduct a SOCTA in line with international standards and best practices

Output 3 related to Outcome 2	2.3 Developed monitoring and coordination system developed for effective implementation of the national strategy and action plan against organised crime	2.3.1 Number of coordination meetings on implementation of the organised crime strategy and action plan 2.3.2 Number of analytical documents on implementation of the strategy and action plan	2.3.1 0 (2024) 2.3.2 0 (2024)	2.3.1 At least 4 2.3.2 At least 1 evaluation on implementation (2028)	Minutes of the meetings and workshops. Project reports Evaluation report	Active coordination by KIHBI
Output 1 related to Outcome 3	3.1 Improved technical capacity on international cooperation and mutual legal assistance in the fight against organised crime	3.1.1 Number of law enforcement, criminal justice and other practitioners using agreed methodologies to provide for coordination and international cooperation	3.1.1 0 (2024)	3.1.1 At least 100 (2028)	Project activity reports Training reports Database of training participants (disaggregated by type and sex of official, training topic, duration and location) Database with results of pre- and post-training tests	Stable political environment and continuous political support for the fight against organised crime in Türkiye
Output 2 related to Outcome 3	3.1 Increased exchange of data with international organisations and pilot innovative approaches on international cooperation launched	3.2.2 Number of visits and other meetings to promote coordination and international cooperation on organised crime	2.2.2 0 (2024)	2.2.2 At least 10 (2028)	Project activity reports Mission reports	Stable political environment and continuous political support for the fight against organised crime in Türkiye

4. IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

In order to implement this action, it is envisaged to conclude a financing agreement with the Republic of Türkiye.

4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 72 months from the conclusion of the financing agreement.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3 Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures¹.

4.3.1 Indirect Management with a pillar-assessed entity

A part of this action (AoS#1) may be implemented in indirect management with the Council of Europe (CoE). This implementation entails needs assessment activities on AML/CFT, legal gap analysis, identification of training needs, providing network, organisation of workshops, seminars and study visits, conducting a situation analysis on technological systems and tools used by MASAK.

The envisaged entity has been selected using the following criteria: experience on fight against organised crime, track record in the promotion of human rights and the rule of law, technical expertise in developing strategies to combat money laundering and the financing of organised crime, international cooperation record in the noted fields and strong network with public bodies in the field of organised crime.

In case the envisaged entity would need to be replaced, the Commission's services may select a replacement entity using the same criteria. If the entity is replaced, the decision to replace it needs to be justified.

A part of this action (AoS#2) may be implemented in indirect management with the United Nations Office on Drugs and Crime (UNODC). This implementation entails strengthening institutional capacity of responsible institutions, enhancing knowledge and skills of law enforcement and other professionals via trainings, workshops and study visits, guidance on the preparation and use of serious and organised crime threat assessments through a SOCTA Handbook and technical assistance to pilot new electronic tools for data collection and information management.

The envisaged entity will be selected using the following criteria: expertise on the fight against transnational organised crime, track record in crime prevention in the context of sustainable development and security, work experience on illicit trafficking in and abuse of drugs, crime prevention and criminal justice.

¹ [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

UNODC, as the guardian of the UN Convention against Transnational Organised Crime, will facilitate knowledge development on the related international standards and sharing, comparing and applying EU and other international good practices, including through international cooperation. UNODC will provide technical expertise in developing strategies and policies on organised crimes and other crime types.

In case the envisaged entity would need to be replaced, the Commission’s services may select a placement entity using the same criteria. If the entity is replaced the decision to replace it needs to be justified.

4.4 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.5 Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Indicative third-party contribution, in EUR
Methods of implementation – cf. section 4.3		
Outcome 1 composed of	2 000 000	200 000
Indirect Management with the Council of Europe - cf. section 4.3.1	2 000 000	200 000
Outcome 2 and Outcome 3 composed of	2 500 000	
Indirect Management with UNODC- cf. section 4.3.1	2 500 000	
Evaluation – cf. section 5.2 Audit – cf. section 5.3	May be covered by another Decision	
Strategic Communication and Public Diplomacy – cf. section 6	Will be covered by another Decision	
Totals	4 500 000	200 000

4.6 Organisational Set-up and Responsibilities

Thematic Priority 3 (Fight against organised crime / security) is a cross-cutting area; hence there is a wide range of institutions and stakeholders. The Managing Authority (MA) in the field of Rule of Law, Fundamental Rights and Democracy is the National IPA Coordinator (NIPAC). The Intermediate Body for Policy Management (IBPM) is the Department of Smuggling, Intelligence, Operation and Data Collection (DSIODC) of the Ministry of Interior.

The Ministry of Interior will be responsible for overall coordination, programming and monitoring & evaluation of the Thematic Priority at this action level.

A Steering Committee (SC) will be established which will be mainly composed of the representatives of the IBPM, the selected international organisation, the Ministry of Interior (EU Affairs and Foreign Relations Department IPA Unit), other stakeholders, the National IPA Coordinator (NIPAC), Presidency of Strategy and Budget as well as Delegation of the European Union to Türkiye (EUD). The SC will act as the advisory body that will provide high-level strategic guidance and oversight on activity implementation. SC will be gathered at regular intervals and additionally whenever deemed necessary.

Furthermore, a Sectoral Monitoring Committee (SMC) which is one of the highest decision taking platforms in terms of effective management of the funds provided by the EU, will meet regularly to solve the problems encountered during the programming, implementation and monitoring and give recommendations for effective utilisation of funds. The SMC will be mainly composed of the representatives of the Commission/EU Delegation to Türkiye, IBPM, other stakeholders, the Presidency of Strategy and Budget, NIPAC and if necessary relevant line ministries.

The functions of Sectoral Monitoring Committee are as follows:

- Review at each meeting the progress made towards achieving the specific targets of the Programme on the basis of the basic documents.
- Examine at each meeting the results of implementation, particularly the achievement of the targets set for each priority axis and measures and interim evaluations.
- Examine the sectorial annual and final reports on implementation.

The SMC will meet at least twice a year at the initiative of NIPAC. The issues to be followed up will cover the period between two Committee meetings and the Committee Members will be informed about the current situation with regards to those issues.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix (for project modality). The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Roles and responsibilities for data collection, analysis, and monitoring:

- Monitoring tasks undertaken by the implementing partners/ beneficiary country, under the coordination of NIPAC Office, and NAO Office for financial monitoring, will consist of collecting and analysing data aiming at informing on the use of resources and progress towards planned results, feeding the management of the action's decision-making processes.

Monitoring tasks undertaken by the EU Delegation shall complement the implementing partners'/ beneficiary country's monitoring system, especially in key moments of the action cycle. It will also support follow-up of recommendations stemming out of external monitoring and will be used for informing EU management. This monitoring could take different forms and methodologies (meetings with implementing partners, action steering committees, on the spot checks ...), to be decided based on specific needs and resources at hand. Reporting will be done according to methodologies and tools included in DG NEAR guidelines on linking planning/programming, monitoring and evaluation, including the use of standard checklists.

Both types of internal monitoring are meant to inform and provide support to external monitoring:

- External monitoring / Results Oriented Monitoring (ROM)

The Commission and/or NIPAC may undertake additional project monitoring in line with the European Commission rules and procedures set in the Financing Agreement through independent consultants recruited directly by the Commission/NIPAC for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission/NIPAC for implementing such reviews). These reviews might be composed of monitoring of the action, results data collection or any other task that is identified in the most recent EC guidelines.

The Steering Committees will be established at activity level in order to steer the implementation of activities, achievement of results against indicators in the action document, to discuss monitoring findings (including ROM findings) and agree on corrective actions as appropriate. The Steering Committees will be composed of the representatives of end beneficiaries, Lead Institution, NIPAC Office, the Presidency of Strategy and Budget, Contracting Authority and the EU Delegation.

5.2 Evaluation

Having regard to the nature of the action, evaluation(s) may be carried out for this action or its components by the beneficiary via independent consultants. The evaluations will be carried out as prescribed by the DG NEAR guidelines on linking planning/programming, monitoring and evaluation.

The evaluation reports shall be shared with the partner country and other key stakeholders following the best practice of evaluation dissemination². The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external actions have the contractual obligation to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. To that end they must comply with the instructions given in the 2022 guidance document [Communicating and raising EU visibility: Guidance for external actions](#) (or any successor document)

This obligation will apply equally, regardless of whether the actions concerned are implemented by the Commission, the partner country, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

² See best [practice of evaluation dissemination](#)

For the purpose of enhancing the visibility of the EU and its contribution to this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds. Effectiveness of communication activities on awareness about the action and its objectives as well as on EU funding of the action should be measured.

Implementing partners shall keep the Commission and the EU Delegation/Office fully informed of the planning and implementation of specific visibility and communication activities before the implementation. Implementing partners will ensure adequate visibility of EU financing and will report on visibility and communication actions as well as the results of the overall action to the relevant monitoring committees.

7 SUSTAINABILITY

AoS#1

MASAK, as the primary beneficiary, possesses a strong institutional framework and management capacity to maintain and advance the technical skills gained through the action. The organisational structure within MASAK is well-established, with dedicated units focused on AML/CFT investigations, making it highly likely that the training outcomes will be integrated into standard investigations' practices. The action also aims to enhance collaboration between MASAK and other law enforcement and financial institutions, ensuring that the broader network is capable of sustaining the enhanced investigative capacity developed during the action." A comprehensive legal gap analysis will support future reforms needed in the future. A new curriculum will provide for sustainable trainings and a common methodology within the beneficiary institution.

AoS#2

The sustainability of training modules on organised crime will be shared with beneficiary institutions periodically for newly recruited personnel. A training of trainers' model will be chosen as a training approach. Also, manuals, handbooks and case study reports will be provided for future use so that the beneficiary public agencies will take ownership of this knowledge and tools by using them in their daily work. A national report on the fight against organised crime will be developed based on a standard template in line with the globally recognized methodology for SOCTAs. Based on the agreed template, the report can be regularly updated and will feed into the development of a new strategy against organised crime to ensure continued coordination of efforts after the end of the implementation period of the action. Also, to ensure the continued maintenance of hardware and software procured during the project after its conclusion, staff will ensure the on-going operation of the system.