

Risks Of Corruption In Montenegrin Sports

December 2012

SUMMARY

Fight against corruption in Montenegrin sports is underdeveloped and implementation of the existing anti-corruption measures is inefficient. This results in a greater susceptibility to corruption, especially in the sports organizations co-financing, construction of sports facilities and potential match-fixing.

The sports organizations co-financing from the local budgets is especially un-transparent and worrying. Therefore, all local governments should provide public with an insight into a precise amount of money, allocated for the co-financing of sport organizations, and into the criteria upon which that money was allocated.

Construction and re-construction of sports facilities is another area susceptible to the misuse of public interest, given the strategic orientation of the Government to increasingly employ the concept of Public-Private Partnership (PPP) in important infrastructure projects. For the successful implementation of this concept in sports, the special Law on PPPs, which would introduce the obligation of publishing the details and the way the PPP contracts were realized, needs to be brought.

Match-fixing is taking pace even in more developed countries but Montenegro still does not have the system which would detect the dubious payments to the sport betting shops and possibly reveal the influence on match result. With the aim of preventing match-fixing, capacities of the competent authorities and their coordination need to be strengthened, primarily through the establishment of the system of the on-line supervision of payments and pay-outs to the sport betting shops.

INTRODUCTION

Harmful effects of corruption in sports are two-fold. Apart from the financial aspect, and that is the danger of irrational and illegal waste of public resources, emergence of corruption in sports, given its popularity and public interest for its promotion, can have a negative impact on the whole society.

At international level, the issues of integrity in sports and fight against corruption in the field, only recently started having a more comprehensive treatment. In the European Union (EU), the first step in that direction was the adoption of the White Paper on Sport in 2007.¹ This document recognized key threats to the contemporary sports in the member states, among them being corruption and money laundering. The EU, based on previously conducted analyses, undertook the whole range of other activities aimed at increasing integrity in sports - the efforts of European Council to adopt conclusions on match-fixing in late 2012 being the last such activity in a row².

In Montenegro, however, activities on prevention and fight against corruption in sports are at early stage. The Government's strategic documents insufficiently recognize the need for preventing and minimizing the corruption risks in the area, despite the certain allegations and indications about irregularities in the work of certain sport clubs and about sports betting-related frauds. Given the internationally recognized and potential "national" risks in the field, the aim of the paper is thus to pinpoint the means of advancing the fight against corruption in Montenegrin sports.

1 Commission of the European Communities, *White Paper On Sport*, July 2007

2 See: EU Council busy with sport issues: health, statistics, doping, match-fixing, possible European Week of Sport, na: http://ec.europa.eu/sport/news/20121204-eu-council-sport-issues_en.htm

Author: Milena Milošević, M.A.

(Un)recognized Risks

Contrary to the developed countries of the Western Europe, budgets of sports organizations in Montenegro are modest. The annual budget of the biggest football club, Budućnost, amounts for 800,000 euro³. As of November 30, 2012, accounts of the 19 sport organizations (clubs and associations), including the most famous football clubs, Budućnost and Sutjeska, were blocked by the Central Bank of Montenegro due to their debts and inability to settle certain obligations⁴.

Nonetheless, the small amount of money within the Montenegrin sports does not minimize the risks of corruption and other criminal acts in the field. On the contrary, precisely the financial vulnerability of sports organizations can direct them towards dubious ways and sources of financing⁵.

In many countries, state and local budgets are among the sources of sports organizations financing. The mere fact that the money of tax payers is being spent on the activity of sport clubs and associations increases possibility for arbitrary allocation of the money and for favoring certain sport organizations and activities, which do not necessarily lead to the sports development.

Other, internationally recognized risks of hampering the integrity in sports also include corruption during construction and re-construction of sport facilities and during the public procurement procedures, difficulties in following the money trail and the way the international transfers of players are contracted and realized, as well as the match-fixing⁶. Danger of match fix-

ing is closely related to the sport betting, and it often appears in the form of bribery of referees and players with the aim of reaching a certain result. Some estimation says that the money turnover at the global grey market of games of chances reaches even 1,000 billion euro⁷.

Not even the countries with low corruption index are immune to match-fixing⁸, and this phenomenon often represents an opportunity for money laundering⁹. Additional challenge in tracking the dubious money flows is posed by the services of on-line sports betting, whose largest illegal market is situated in Asia. Certain allegations already point to doubts about frauds committed by Montenegrins, which included betting on fictive matches of Montenegrin clubs in the Asian betting shops¹⁰.

Montenegrin Sports: Marginal Target of Anti-corruption Policies

Despite the numerous corruption risks in sports, neither are measures for combating these phenomena in Montenegro sufficiently developed nor is the need for new measures sufficiently recognized.

Strategy for the fight against corruption and organized crime for the period 2010 – 2014 and Innovated action plan for its implementation for the period 2010 – 2012 envisage obligation of publishing financial and audit reports of sports clubs, sports associations and Montenegrin

Fraud In Sport – Putting The Pieces Together, 2012

- 7 *Kako regulisati igre na sreću i klađenje u Evropi? Dosadašnja dostignuća I buduće perspektive – Rezime debata*, Brisel, Evropski parlament, 27. jun 2012. godine, str. 30
- 8 Robert Hoyzer, referee of the German national football league, was convicted in 2005 after his involvement in the match-fixing fraud - all that, related to the work of sport betting shops (See: Transparency International, *Corruption and Sport: Building Integrity and Preventing Abuses*, 2009)
- 9 See: Bozkrut, E, *Match Fixing And Fraud In Sport – Putting The Pieces Together, 2012*; European Commission, *Communication From The Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions: Towards a more comprehensive European framework for online gambling*, 2012
- 10 *Međunarodna prevara sa crnogorskim pečatom*, Vijesti, oktobar 2012. godine

3 Information obtained during the interview of Institute Alternative researcher with Momir Djurdjevac, Secretary General of Football Association of Montenegro

4 Spisak blokiranih pravnih lica i preduzetnika koji se ne nalaze u evidenciji CRPS-a na dan 30.11.2012 god., available at http://www.cb-mn.org/slike_i_fajlovi/fajlovi/fajlovi_platni_promet/preduzeca_u_blokadi/2012-11-30_blokirani_-_ne_postoje_u_crps.pdf

5 FATF Report, *Money Laundering Through The Football Sector*, 2009, p. 15

6 See: FATF Report, *Money Laundering Through The Football Sector*, 2009, p. 24, Transparency International, *Corruption and Sport: Building Integrity and Preventing Abuses*, 2009, Bozkrut, E, *Match Fixing And*

Olympic Committee, as well as publishing information about sports pension holders¹¹.

In practice, not even this measure, being the only one in the Innovated action plan to exclusively treat corruption in sports, is adequately implemented. In other words, the 2011 financial reports about the work of sport clubs and Montenegrin Olympic Committee, as well as the reports on people who acquired the rights on sports pensions, were made but they were not published¹².

In 2011, Government adopted the National Program for Sports Development (hereafter: National Program) and the accompanying action plan for its implementation in the period between 2012 and 2016. National Program recognised certain threats to the integrity of Montenegrin sports, such as the lack of transparency in allocation of public funds to the sports organizations. It especially highlighted that the clearly defined criteria for allocation of money from local budgets were missing¹³. The National Program, however, also neglected some of the key challenges.

Since 2008, Special departments for corruption, organized crime, war crimes and terrorism in Podgorica and Bijelo Polje Superior Courts, have not brought a single verdict about the criminal acts of corruption and organised crime in sports. Such cases have not been prosecuted in front of these courts either. Administration for Prevention of Money Laundering, on the other hand, stated that within the same time period it dealt with several dubious cases of sports betting activity¹⁴.

11 The word "sport" is virtually absent from the local governments' programmes for the fight against corruption in Montenegro.

12 As one of the excuses why the documents were not published, it was stated that the Internet presentation of Administration for Youth and Sports was under construction (Source: Nacionalna komisija za sprovođenje Strategije za borbu protiv organizovanog kriminala i korupcije, *Treći izvještaj o realizaciji mjera iz Inoviranog akcionog plana za sprovođenje strategije za brobru protiv korupcije i organizovanog kriminala*, april 2012. godine)

13 Vlada Crne Gore, *Nacionalni program za razvoj sporta*, 2011.

14 Information obtained upon the request for free access to information, submitted by the Institute Alternative

Given the previously listed corruption risks in sports and idiosyncrasy of Montenegro's context, the remainder of the paper will focus on those risks which point to the most striking form of the corruption - the misuse of public funds. Therefore, the paper will focus on allocation of public funds to sport organisations and on the construction and re-construction of sport facilities. Still, since the match-fixing is gaining prominence at the global level, and due to the information about dubious sport betting in Montenegro, the attention will be devoted to this issue as well.

Co-financing Sports Organizations: No Obligations

System of sports financing in Montenegro is not transparent enough, and it suffers from the weak coordination between the different authorities and institutions during the allocation of public funds to the sport organizations.

The co-financing of sport organizations is justified by the fact that the sport in Montenegro is

Between 0,2 and 0,3 per cent of Montenegrin state budget is allocated for sport. The biggest amount of money (70 per cent) is allocated for the programmes of national sport associations and Montenegrin Olympic Committee.

defined as the activity of public interest. The legal definition of "the public interest in sports" includes activities such as sports development, creating conditions for construction and maintenance of sport facilities, stimulating the activities of national sports organizations, taking care about top athletes etc¹⁵. Nonetheless, during the allocation of state money, sport organizations do not receive the detailed reasoning about the amount of money which was approved for their

to the Superior Courts in Bijelo Polje and Podgorica, and to the Administration for Prevention of Money Laundering. The Supreme Court of Montenegro, also upon the request for free access to information, informed us that it did not have information about the number of final verdicts, brought after January 1, 2008, about the criminal acts of corruption and organized crime, which could be characterized as connected to the organization and financing of sport activities and to the work of sport betting shops.

15 Član 11, Zakon o sportu, (*, Sl.list CG" br.36/11)*

programs¹⁶. On the other hand, previously described legal criteria of public interest in sports are not precise enough to prevent arbitrary decisions about the money allocation.

During the 2012, the state, according to the Decision on co-financing sport associations and Decision on the co-financing sport organizations, allocated money to 431 sport organizations¹⁷ and 50 sport associations, based on the previously submitted plans and work programs of these entities for that year¹⁸. It is worrying, however, that some clubs, whose accounts were blocked by the Central Bank of Montenegro, also received money. This case points to the virtual absence of coordination between the different state authorities and institutions, such as Central Bank and Administration for Youth and Sports, what makes eventual abuses more likely.

Insufficient capacities of the Administration for Youth and Sports represent an additional challenge in establishing the more efficient control and allocation of funds to the sports organizations. The weak capacities of this authority to efficiently control implementation of legal provisions the sports organizations cofinancing are reflected by the fact that only one person, the chief sports inspector, conducts inspection control. This hampers the possibility of detailed and comprehensive inspection of all sports organizations in central, northern and southern regions of the country.

16 Information obtained during the interview of researcher of Institute Alternative with Momir Djurdjevac, Secretary General of Football Association of Montenegro

17 The exact number of sport organizations in the country, so far, can only be anticipated, because the establishment of Central Register of Sport Organisations, envisaged by the Law on Sport, is still ongoing. Yet, it is known that during 2011 there were 1,236 sport clubs (Crnogorski zavod za statistiku, MONSTAT, Statistički godišnjak za 2011. godinu)

18 Decisions are available at the website of the Administration for Youth and Sport (<http://www.upravazamladeisport.me/me>). According to them, 2.467.500,00 euro was allocated to the sport organizations and associations from the state budget. Sport associations and organizations also receive funds from the Commission for the allocation of revenue from gambling. The 2012 Decision of allocation of revenue from gambling, allocated 341,600 euro to the various organizations which applied with sport development programmes.

National Program envisages implementation of software which would enable following the sports organizations' financial flows and introduction of unified forms for financing the sports organizations' programs. In order to define criteria for allocation of tax payers' money to the sport organizations more closely, National Program envisaged adoption of the new Regulation, which should streamline conditions, benchmarks and criteria for allocation of funds and control over the sports development programs' realization. The framework of criteria and conditions to be included in the Regulation was also scratched. The recognized need for a more precise definition of the way and procedures of control and analysis of realization of approved programs is another advantage of the National Program. If implemented, this measure would create basis for the assessment of implementation of "public interest in sports"¹⁹. Yet, the Regulation will not affect the control of local governments' spending on sports²⁰.

As already noted, the sports clubs' financing from the local budgets is un-transparent. While the national expenditure for sports in 2012 amounted for 2,8 million euro, the exact amount of money allocated at the local level remains unknown²¹. The final accounts of all municipalities do not show the amount of money allocated for the work of sport clubs or construction of sport facilities in an equally transparent manner. For example, the 2011 Decision on final account of Kotor municipality precisely lists transfers to sport clubs, which for that year amounted for 222,160 euro, and half million euro capital expenditure for construction of the sport hall²². On the other hand, the final account of the capital Podgorica does not contain precise data on the money allocated for sports. By contrast, it

19 So far, sport organizations which receive more than 3,000 euro were obliged to submit financial reports to the Administration for Youth and Sport about the way the money was spent to the Administration for Youth and Sports. Reports, however, were not published.

20 Information obtained during the interview of researcher of Institute Alternative with Branimir Ivanovic, the chief sport inspector

21 Ibid.

22 Odluka o završnom računu opštine Kotor za 2011. godinu (Broj:11-602), str.3

lists transfers to both institutions of sports and culture as one, unified item²³.

The special Regulation streamlines the way of classifying the municipalities' expenditure²⁴. This document, to a certain extent, leaves discretion to local authorities to decide the way of listing certain costs. Yet, the separation of transfers to the sports institutions and to the institutions of culture into special items would contribute to the greater transparency of the sports organizations co-financing at the local level.

Construction and Reconstruction of Sport Facilities: Blurred Inter-twining of Public and Private

Corruption risks, which might emerge during the construction and reconstruction of sports facilities are closely related to the general corruption risks in PPPs, since this concept is being increasingly employed precisely in this field²⁵.

The deficit of financial means in the Montenegro's capital budget urged wider implementation of the PPPs. The advantages of this concept, reflected in the higher quality of services, increased ability of meeting the society's general needs and in the rational distribution of financial means, boosted Government's strategic orientation to employ it more intensively in the upcoming period.

One of the first projects in which the PPP was implemented was precisely the reconstruction of the sport facility. During the reconstruction

23 Završni račun budžeta glavnog grada - Podgorice za 2011. godinu

24 Pravilnik o jedinstvenoj klasifikaciji računa za budžet republike, budžete vanbudžetskih fondova i budžete opština („Sl. list RCG“, br. 35/05, 37/05, 81/05)

25 The Public-Private Partnership implies co-operation between public and private sectors with the aim of ensuring financing, construction, reconstruction of infrastructure objects and sector of services, meaning financing projects and services which are traditionally provided by the public sector. Apart from the reconstruction of Podgorica's city stadium, this model is being implemented during the construction and reconstruction of other sport facilities as well, such as: construction of sport hall in Zabljak, reconstruction of sport hall in Mojovac etc. Revision of the 2012 budget, envisaged 4,883,000 euro of capital expenses for construction and reconstruction of sport facilities.

of Podgorica's city stadium, partnership was established in 2003 between Hidromol company and Public enterprise "Gradski stadion". At the end of the project, private investor had 66,4 per cent of office space at disposal, while Gradski stadion had 34,5 per cent.

Nevertheless, the successful implementation of the PPPs implies synchronization of legal, regulatory and political frameworks, which is not the case in Montenegro. Precisely due to these reasons, PPPs are an area highly susceptible to corruption.

The transparency of the PPPs at the local level has been slightly improved. The amendments to the Law on Local Self-Administration, adopted in July 2012, brought about certain improvements in terms of enabling the public to have an insight into the contracts, concluded between the local governments and legal and physical entities²⁶. Municipalities are now obliged to publish decisions about granting business and services, as well as other decisions, acts and any contracts concluded in the disposal of property procedures at their Internet pages. However, the consistent implementation of these provisions is missing²⁷.

Games Of (No) Chances

According to the available information, there are no prosecuted cases of match-fixing in Montenegro. This, however, does not mean that the problem is absent. On the contrary, its difficult traceability, absence of coordination between the competent authorities and institutions, and every day allegations about tipping the match results, urge the need for adapting institutional and legal frameworks and their consistent implementation in order to prevent match-fixing. This problem can be analyzed from two aspects: form

26 *Zakon o izmjeni i dopuni zakona o lokalnoj samoupravi* ("Sl.list br. 38/2012")

27 Number of the published contracts at the Internet presentations of various municipalities drastically varies. For example, Kolasin municipality published at its website even the contacts about the volunteering jobs, and the overall number of published contracts at its website since July 2012 exceeds the number of contracts, published at the website of Niksic municipality and Podgorica capital. Also, the visibility and accessibility of published contracts vary.

the aspect of the oversight over the work of sport betting shops, and from the aspect of ensuring the integrity of referees and players, since they are the most often targets of bribery during the match-fixing.

Approximately, 400 sport betting shops run business in Montenegro²⁸. However, it is extremely difficult to trace money flows, payments and payouts of the organizers of sport gambling. The Law on Games of Chances obliged these organizers to keep all the payments and payouts within the special system of on-line supervision which should have been connected to the informatics system of the competent authority, all that with the aim of ensuring the permanent and direct oversight²⁹. Although the interim and concluding provisions envisaged for this obligation to be applied within 60 days since the establishment of the on-line system by the Administration for Games of Chances, the system has not been established yet. This represents a significant obstacle in revealing the dubious payments.

For a concrete example, Administration for Games of Chances cannot be adequate associate to other authorities in revealing the dubious activities. To be more precise, Administration for Prevention of Money Laundering received a tip about dubious transaction in one case, but, after checking, which included asking an opinion and control by the Administration for Games of Chances, determined that there was no criminal acts of corruption and organized crime in the case³⁰. Still, due to the described deficiencies of the current supervision system of sports betting, the Administration for Games of Chances cannot provide an adequate opinion when asked to do so.

More developed countries also have a problem of insufficient co-operation of competent authorities and insufficient knowledge among

the representatives of judiciary and repressive institutions about mechanisms to be employed in the fight against match-fixing. In October 2012, the EU adopted a Communication, which represents a significant boost to the creation of comprehensive European framework for on-line betting. One of its priorities was precisely prevention of fraud and money laundering³¹. This document recommends extension of the implementation of the EU's Directive against money laundering³² to the on-line betting shops and recognizes the need for additional education of holders of judiciary posts about the potential criminal activities with respect to the business of these shops. It places special emphasis on the need for more efficient co-operation between betting shops, sports organizations and associations, and authorities regulating games of chances.

All EU member states incriminated match-fixing³³. In Montenegro, there is also an ongoing initiative of Football Association of Montenegro for match-fixing to be declared a criminal act by the Criminal Code, whose eventual amendments are being publically debated at the moment³⁴. However, as noted in the EU's Communication on online gambling itself, incriminating the sport frauds did not *per se* decreased the number of dubious cases. What more, the main deficiency in the criminal prosecution of match fixing is of an operational nature, meaning that it is consisted in the insufficient and inadequate implementation of laws. Hence, although declaring match fixing a criminal act in Montenegro would have a good, indirect effect, primarily through raising awareness about the harmful consequences of these frauds, efficient implementation and

28 Information obtained during an interview of Institute Alternative researcher with Marko Culafic, acting director of Administration for Games of Chances

29 Član 55, Zakon o igrama na sreću („Sl. list RCG“ br. 52/04 od 02.08.2004. i „Sl. list Crne Gore“, br. 13/07 od 18.12.2007, 73/10 od 10.12.2010, 40/11 od 08.08.2011)

30 Answer to the freedom of information request

31 European Commission, *Communication From The Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions: Towards a more comprehensive European framework for online gambling*, 2012

32 *Directive 2005/60/EC on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing*, Official Journal of European Union, 2005.

33 KEA European Affairs, *Match Fixing In Sport: A Mapping of Criminal Law Provisions In EU 27*, March 2012

34 Information obtained during the interview of Institute Alternative researcher with Momir Djurdjevac, Secretary General of Football Association of Montenegro

coordination of the competent authorities are of key significance.

On the other hand, while the bribery and the certain level of players' performance are hard to prove, there is a possibility for decreasing the risk of referees being bribed by the control of their work and by streamlining their delegation. Sports associations in Montenegro have wide autonomy when it comes to the overall organization, control and appointment of referees. Football Association of Montenegro (FSCG) brought the Rulebook about the referees and supervision, which assigned the Referees' Commission duty of delegating referees. The Rulebook, however, does not contain detailed provisions about the way the delegation is done³⁵. Random delegation of referees within a short time period before the start of the match would decrease the possibility of bribing the referees with the aim of match-fixing.

35 Fudbalski savez Crne Gore, *Pravilnik o sudijama i suđenju Fudbalskog saveza Crne Gore*, 2008.

Conclusion and Recommendations

The awareness about corruption risks in Montenegrin sports, despite some activities of competent state authorities, is low. National Program represents a solid basis for a more precise definition of the way the money from the state budget should be spent on sport organisations' financing. Yet, the year after this document was adopted, the Regulation which would enable the enforcement of new rules has not been brought yet. Activities, which might improve the system and transparency of sport organizations' financing, are thus missing.

Construction and reconstruction of sport facilities through the PPPs share general deficiencies of this concept in Montenegro, and those are primarily the lack of transparency and of an adequate legal framework. Even in the cases where the need for additional anti-corruption measures is recognized, their implementation is absent.

Capacities of the competent state authorities, such as the Administration for Youth and Sport and the Administration for Games of Chances, for the successful implementation of anti-corruption measures are weak. For example, the lack of funds was the main reason why the on-line system of supervision of on-line betting shops has not been established yet³⁶. On the other hand, capacity-building is not self-sufficient in the absence of the mutual coordination of competent authorities. Information that whether a single case of corruption and organized crime in sports has been prosecuted is not known does not demonstrate the absence of these criminal acts. On the contrary, given the deficiencies of the institutional and legal frameworks, difficult traceability, and general lack of knowledge about the forms of corruption in sports, similar to the recommendations of the EU's Communication on on-line gambling, it is necessary to raise awareness and educate people in police and judiciary about the way and importance of fight against these phenomena.

³⁶ Information obtained during the interview of Institute Alternative researcher with Marko Culafic, acting director of Administration of Games of Chances

Key recommendations:

- Anti-corruption measures, which are already envisaged by the Government's strategic documents, should be advanced and consistently applied.
- Capacities of competent state authorities, at first place of the Administration for Youth and Sport and of the Administration for Games of Chances, should be strengthened. Their cooperation with other institutions in the fight against corruption, namely with the Administration for Prevention of Money Laundering, Police Directorate, Central Bank of Montenegro and Supreme State Prosecutor, needs improvement.
- Awareness about the necessity of the fight against corruption in sports should be raised, by training holders of judiciary posts about the specificities of the corruption in this field.

Recommendations with regard to the sports organizations' financing:

- The Administration for Youth and Sports should consistently enforce the measure, which prescribes publishing of financial reports of sports clubs and Montenegrin Olympic Committee, as well as of the reports on the people who receive compensation for their sports achievements.
- Special Regulation about the unified classification of local budget costs should oblige local authorities to implement unified criteria for demonstration of their expenditures, in a way which would enable a public insight into the precise amount of money allocated to sports organizations.
- Local administrations should define precise criteria for allocation of money to the sports and control of its expenditure by adoption of special, internal acts.
- The Administration for Youth and Sports should bring the Regulation about the way and procedures of bringing the

- annual sports development programs, conditions, benchmarks and criteria for allocation of money and for the control over the programs' realization.
- Capacity-building of the Administration for Youth and Sports should ensure the inspection control over the work of sports entities, their management and governance bodies, as well as over the implementation of other norms and standards in line with the Law, to be conducted by more inspectors instead of the one – chief sports inspector, as it is the case now.
 - By amending the Criminal Code, match-fixing should be incriminated.
 - Sports associations should introduce system of random delegation of referees and non-disclosure agreement about the referees' identities, in order to prevent their bribery which might influence the match result.

Recommendations with regard to the construction and reconstruction of sports facilities:

- The special Law on PPPs, which would clearly define obligations of publishing the details and the way the PPPs contracts are being realised, needs to be brought.
- The Central register, which should contain all past and future PPPs contracts and be accessible for all the interested parties, should be established.

Recommendations with regard to the match-fixing prevention:

- In line with the Law on Games of Chances, the sport betting-related payments and payouts should be stored in a special system of on-line supervision, which needs to be connected with the informatic system of the competent authority, in order for the continuous and direct oversight over the sports betting to be established.
- After this system of on-line supervision is established, the information-sharing between the Administration for Games of Chances and other authorities and institutions, primarily with the Central Bank of Montenegro and Administration for Prevention of Money Laundering should be strengthened.

About Institute Alternative

Institute Alternative is a non-governmental organisation, established in September 2007 by a group of citizens, experienced in civil society, public administration and business sectors.

The mission of Institute Alternative is to strengthen the democratic processes in Montenegro by identifying and analysing public policy options.

The strategic aims of Institute Alternative are to: increase the quality of development of public policy, contribute to the development of democracy and the rule of law, and to contribute to the protection of human rights in Montenegro.

The values we adhere to in our work are dedication to our mission, independence, constant learning, networking, cooperation and teamwork.

Institute Alternative acts as a think tank, i.e. a research centre, and its activities focus on the domains of good governance, transparency and accountability. Topics covered by the Institute's research activities, in which it exercises influence by providing its own recommendations are: parliamentary oversight of security and defence sectors, oversight role of the Parliament and its role in the process of European integration, public administration reform, public procurement, public-private partnerships, state audit and control of the budget of local authorities.

To date, Institute Alternative published the following reports / studies:

- Parliament and civil society organisations - partners in budget control
- Development of PIFC in Montenegro - From the civil society perspective
- Committee for Anticorruption - cure or placebo?
- Corruption and Public Procurement in Montenegro
- Montenegro and negotiations in Chapter 24 - Justice, Freedom and Security
- Montenegro and negotiations in Chapter 23 - Judiciary and Fundamental Rights
- Secret Surveillance Measures in Criminal Procedure - Neglected control
- National Security Agency and Secret Surveillance Measures - Is there any control?
- Parliamentary inquiries in Montenegro - Control mechanism without political support
- The Parliament of Montenegro in the process of European integration - observer or active participant?
- Law on Parliamentary Oversight in the Security and Defence Sectors - First Year of Implementation
- Montenegro under the watchful eye of Đukanović and the EU
- Analysis of RIA effects in Montenegro - toward 'good legislature'
- Control of the local self-government's budget
- State Audit in Montenegro - proposals for strengthening its influence
- Think Tank - the role of independent research centres in public policy development
- Public Administration Reform - between high ambitions and limited possibilities
- Public-Private Partnerships in Montenegro - Accountability, Transparency and Efficiency

- Public Procurement in Montenegro - Transparency and Accountability
- Assessment of the Legal Framework and Practice in the implementation of certain control mechanisms of the Parliament of Montenegro: Consultative Hearing, Control Hearing and Parliamentary Inquiry • Parliamentary oversight of the defence and security sector: What next?
- The Lipci Case 2008: How not to repeat it
- The Case of the Prva Bank - Lessons for the supervisor and other decision-makers
- Public Administration in Montenegro: salary schemes, reward system and opportunities for professional advancement

Institute Alternative is a member of the NGO self-regulatory body and has disclosed full details of its financial affairs in line with Activity Code for NGOs, to which Institute Alternative is a party. In its hitherto activities, Institute Alternative was supported by: the European Fund for the Balkans, Foundation Open Society Institute - Representation in Montenegro (FOSI ROM), Open Society Institute - Think Tank Fund, Foundation Friedrich Ebert, the Parliamentary Commission for the distribution of resources for NGO projects, European Commission.

The Institute cooperates with the European Stability Initiative from Berlin, which carried out a capacity building programme for IA associates. Institute cooperates with a number of national organisations, numerous institutions and state bodies such as: the State Audit Institution, Public Procurement Agency, the Parliament of Montenegro (especially its Committee for economy, budget and finance as well as the Committee for security and defence), the Ministry of Finance, Concessions Commission, etc.

All publications / research reports are available online:

institut alternativa

www.institut-alternativa.org

Find out more about the work we do at:
www.institut-alternativa.org