



**C1-EU-NPA**  
CLUSTER ONE EU NEGOTIATIONS PLATFORM - ALBANIA

# POLICY PAPER



## EVALUATING THE EFFECTIVENESS OF INTEGRITY PLANS



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Published on January 2024

This publication of the Albanian Helsinki Committee (HLC) was carried out in the framework of the project C1 - EU - NPA, “Improving the Debate on Policies and Accountability to Fulfill Basic Rights, through the creation of the Negotiation Platform of Cluster 1 Albania.”, implemented by four Albanian organizations, the Center for the Study of Democracy and Governance, the Albanian Helsinki Committee, the Institute for Political Studies and the Albanian Institute of Science, with the financial support of the Embassy of the Kingdom of the Netherlands in Tirana.

**The views expressed in this document are those of the Albanian Helsinki Committee and do not necessarily represent the views of the donor and implementing organizations.**

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## List of Abbreviations

<b>MHSP</b>	Ministry of Health and Social Protection
<b>MIE</b>	Ministry of Infrastructure and Energy
<b>MFE</b>	Ministry of Finance and Economy
<b>MoJ</b>	Ministry of Justice
<b>ASP</b>	Albanian State Police
<b>IP</b>	Integrity Plans
<b>IRAM</b>	Integrity Risk Assessment Methodology at Central Government Institutions
<b>OECD</b>	Organization of Economic Cooperation and Development
<b>GRECO</b>	Group of States Against Corruption
<b>AHC</b>	Albanian Helsinki Committee
<b>CSSC</b>	Cross-Sector Strategy against Corruption
<b>CJEU</b>	Court of Justice of the European Union

## INTRODUCTION

Corruption remains a disturbing phenomenon globally. For that reason, the fight against it has always been at the center of attention of countries but also of important high-profile international organizations. The traditional approach to the fight against corruption through the introduction of more rules or through strengthening their implementation apparently has not produced the required results. Therefore, new strategies were necessary. Strengthening institutional (or public) integrity represents a new approach for addressing not only corruption in public institutions.<sup>(1)</sup> The concept of public/institutional integrity aims first of all to strengthen and promote institutional integrity through a system that prevents integrity risks, which would serve at the same time to enhance and encourage individual integrity. Although integrity represents a feature or characteristic of individuals, attention today is being directed at using the same matrix (integrity) for public institutions or even more broadly for countries. These (institutions and countries) are being asked to make functional a system for integrity management.<sup>(2)</sup>

It is worth emphasizing that our country too has become part of the initiative to implement this system, through the introduction of this instrument in central and local institutions. All ministries, some of their subordinate institutions, as well as part of local government units have drafted integrity plans and are now at the phase of their implementation. This represents an achievement to be noted and appreciated for the institutions that are trying to establish the concept of institutional integrity.

Because of the importance of this mechanism toward the fight against corruption, this policy paper tries to evaluate how effective have been the measure implemented by some of the selected institutions. The approach to evaluating integrity plans and measures applied for their implementation has been generally critical, not as a goal in itself, but as a need to objectively evaluate this instrument, in order to highlight problems, articulate them properly, and to provide relevant recommendations for the improvement of quality and for achieving the target objectives. The need to fully implement and monitor their implementation has been stressed continually by GRECO as well as the latest European Commission report on Albania. Aside from attention from these bodies, we emphasize that integrity plans are instruments that are being tested domestically for the first time and therefore the necessary attention and care are needed to understand and implement them correctly and to lay the foundations for creating a system of institutional integrity and more broadly a national one.

Therefore, in this context, we consider it appropriate to share this objective and impartial evaluation by pointing out the need to improve the drafting and implementation of these plans so that each of them achieves the objectives it was approved for and that this achievement is highlighted also by the bodies that oversee their implementation.

### **Executive Summary**

Corruption remains a challenging phenomenon that requires proper mechanisms for fighting it. It harms the potential of the society by manifesting itself visibly although committed in full secrecy. Indicators point to high levels of corruption in our country in almost all spheres of public life and in business. However, regulatory and institutional measures to address this phenomenon should be

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(1) OECD Public Integrity Handbook, 2020, [https://www.oecd-ilibrary.org/governance/oecd-public-integrity-handbook\\_ac8ed8e8-en](https://www.oecd-ilibrary.org/governance/oecd-public-integrity-handbook_ac8ed8e8-en)

(2) Manual on Integrity Planning and Integrity Management, UNDP, 2015, f. 11.

appreciated. The punitive approach to corruption has not produced the desired results and therefore, a new, preventive approach is necessary to be tested.

The 2020-2023<sup>(3)</sup> Action Plan envisages as a measure for the achievement of preventive objectives the drafting and approval of integrity plans by all central institutions (ministries). The introduction of such an instrument for preventing corruption should be underscored as a measure of special significance in the circumstances when the emphasis is on prevention and corruption risk management and not on measuring corruption indicators or indexes. This measure represents a new strategy for the management of the risk that corruption presents for the concrete institution and society in general. In this context, institutions implementing integrity plans should realize the importance of implementing this measure and, above all, take care especially for reporting appropriately and correctly the results achieved from the implementation of this system.

It is useful to stress that integrity plans are instruments that are being tested for the first time domestically and therefore, necessary care and attention are needed for comprehending and implementing them in the right manner so as to lay the foundations for establishing an institutional and even broader integrity system.

An Integrity Plan represents a document that is developed as a result of the institution's self-assessment regarding the level of its exposure to corruption and the exposure of unethical and unprofessional conduct. The objective of the Integrity Plan is linked with strengthening individual integrity, which indicates individual honesty, professionalism, ethics, and conduct in accordance with moral rules. Strengthening individual integrity will be reflected in the institution by reducing the risk that public authorities act against their own primary goals.

The Integrity Plans of institutions that are being reviewed pursued different methodologies and have different deadlines for implementation. From a formal standpoint, they are different because even the understanding of the drafters is different. Some plans represent a pure strategic document with clear objectives to be achieved and, at the same time, an operational document that contains the plan of measures. Some others are plans for which one of the components is missing; for instance, the IP of the MFE does not contain clear objectives and does not have an action plan attached to it. IPs are strategic and operational documents, according to their definition by authoritative resources. Having such a hybrid nature, the IPs should identify clear objectives and the action plans pursuant to the integrity policies should be part of the integrity plan, as a function of achieving these objectives. The lack of clear objectives risks that IPs turn into declarative documents, without any measurable effect or impact.

Furthermore, based on the review and evaluation of the integrity plans, we find that even the plans that followed the same methodology in their drafting did not fully respect the format of drafting the action plan. On the face of it, this may appear just formal or an insignificant detail, but it is important to stress that the IRAM makes a distinction between the concept of the measure (reflected in a special column) and the activities implemented pursuant to the measure. The IP of the MHSP and the MIE, it is not clearly reflected what the measures and the activities are, and this leads to the problem of the institution not reporting whether it has realized the relevant measure, but only lists relevant activities. This approach causes confusion in the reference to accurate and concretely measurable data.

Besides their drafting and approval, both important steps for building the corruption prevention

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(3) Approved by Council of Ministers' Decision no. 516, on 1.7.2020.



system, just as important is the monitoring of their implementation, reporting accurate and credible data, and above all, drawing lessons from the institution's documented experience. The need for monitoring their implementation is particularly emphasized in the GRECO compliance report, which underscores "...further measures are required to ensure monitoring and compliance of integrity plans in all ministries and to identify specific measures for addressing risks linked with integrity that ministers and political advisors may face with regard to all integrity plans."

The evaluation of monitoring reports points out that the focus and reporting generally had a quantitative nature, that is the total number of applied measures or the events for the implementation of the concrete measure, as well as measures that were implemented partially or those not implemented. Reports lack concrete quantitative indicators for the degree of implementation and accurate and measurable indicators on the impact or result that the implementation of the measures led to. Furthermore, we emphasize that the report should not only show the measures that were not implemented and the causes that led to that, but also clearly show how the measures implemented fully had a positive impact through clear and accurate measurement indicators. The monitoring report should also indicate the causes why the measure was not realized and what actions will be taken for the mitigation of risks. This way, institutions engage also in a qualitative analysis, and not just quantitative, which teaches them to reflect on processes and integrity as a value.

Pointing out this issue seeks to increase the awareness and attention of institutions about the seriousness of the implementation of integrity plans, especially the experience of institutions that implement these plans for the first time and, above, all, documenting this experience properly is important for the successful adoption of a preventive or deterring mechanism against corruption. Monitoring reports should reflect accurate and sustainable data in order for them to be used for assessing results achieved by them.

Regarding concrete measures, this document points out that institutions should engage to highlight concrete measures that directly address aspects of corruption. Based on the review of the contents of integrity plans, we find that not all measures that have been defined are appropriate for creating and promoting institutional integrity. Part of the measures, such as those seeking only at filling vacancies, do not directly address aspects linked with corruption. Furthermore, it is noticed that there is an absence of measures for sectors that may represent a high risk of corruption. For instance, the IPs of the MIE had no identified risk for the General Directory of Public Property, whose scope of activity is to lead government policies for the administration, transformation, privatization, and sale of state-owned property.

Furthermore, based on the evaluation of measures of these plans, we find that there are measures that are appropriate and that have a direct connection with strengthening institutional integrity; however, the institution's actions and engagement do not match the importance of the measure. For instance, the integrity plan of the MIE includes a (very important) measure of "Addressing complaints about competitive procedures for the process of procurements or PPPs." Meanwhile, the MIE reports as a step *"Regarding the address of complaints, these are done in keeping with laws and by-laws in force and there are no gaps or work processes that are not covered or that need special standardization."*<sup>(4)</sup> Meanwhile, we bring to attention the standards established by the CJEU on public procurement/concession competitions whereby a participant in a tender who has been disqualified from the procurement procedure for a phase preceding that of entering the contract, and whose request to suspend the disqualification has

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(4) MIE letter no. 8995/1 Prot. dated 11.12.2023.

been rejected, that participant may submit a request to suspend the decision for the qualification of the other candidate's bid. In realizing this measure, the MIE could have established clear rules for becoming familiar with and implementing this right, legitimizing even disqualified subjects to request the suspension of the other candidate's bid.

The drafting of Codes of Ethics for institutions is a valuable measure toward creating a regulating framework on issues of ethics, but just as important is the content of this document so it reflects the best standards of conduct that public officials should pursue. Based on the evaluation of reports, it results that the MHSP drafted one such pursuant to the IP, while the MIE seeks to update it to expand its scope of work to include political advisors to the minister, the Deputy Ministers, and the Minister. Based on the importance of this act in creating the regulatory framework for ethics, it is necessary that the MFE is invested in drafting the Code. Meanwhile, in the ASP, the Regulations contain norms about ethics of conduct in the State Police. Also, on its website on the internet, there is an inaccessible document called "Manual of Ethics and Integrity in the State Police," but the IP itself has not envisaged any intervention toward updating or drafting a special document that would address aspects of ethics or conflict of interest.

In terms of content, although the MHSP has considered this measure implemented, based on the review of its contents, we find that it does not reflect the objectives established by the IP itself, which envisaged the creation of the register of gifts, the manner of functioning, and its administration; also, rules for sponsorships and the relevant register, meetings with lobbyists and groups of interest, and rules for the creation and administration of the relevant register are lacking. Furthermore, although it was not identified by the MHSP in the IP, the contents of the Code indicate the lack of rules for the period before and after employment.

The experience of other countries<sup>(5)</sup> shows that some of the encountered problems from the lack of rules for the period after employment have to do with the public officials who may find employment in the private sector (which they often monitored or inspected while holding the public function). Furthermore, due to their knowledge or access that they have to public institutions, former public officials may lobby with these institutions after concluding their labor relations, to use inside information or return to the public sector after being in the private sector.

Based also on the GRECO recommendations in the latest compliance report, we consider lastly that the contents of the provisions of the Code raises concerns about its effective implementation in senior leadership levels, especially political advisors who, though subjects thereof, there is no concrete procedure to be pursued for them in case of ethical breaches, as long as they are not subjects of the law "On civil servants."

Besides these deficiencies in content, the Code should be accompanied by an explanatory manual for its users that can illustrate appropriate behavior for an official, using concrete cases and examples.

Another measure that is reflected in almost all integrity plans has to do with the conduct of training for public officials on issues related to ethics and integrity. This is an important intervention as the officials who implement ethical and moral norms should first understand them. It is worth stressing that not all measures for training have had as a focus issues linked with ethics and integrity, but also other spheres of activity of the institution and, above all, it appears that these measures have a

(5) See, OECD Integrity Review of the Slovak Republic, 2022, [https://www.oecd-ilibrary.org/sites/45bd4657-en/1/3/2/index.html?itemId=/content/publication/45bd4657-en&\\_csp\\_=ab053e00c299c67e9d5c639dc65306ff&itemIGO=oecd&itemContentType=book#tablegrp-d1e3738](https://www.oecd-ilibrary.org/sites/45bd4657-en/1/3/2/index.html?itemId=/content/publication/45bd4657-en&_csp_=ab053e00c299c67e9d5c639dc65306ff&itemIGO=oecd&itemContentType=book#tablegrp-d1e3738)

generally formal character. This perception is created due to the lack of concrete data on the topics the training will be conducted on and, above all, after its conduct to establish the number of staff that received the relevant training. All monitoring reports lack such quantitative data on the number of staff from the relevant institution that underwent training. Based also on GRECO recommendations (round five of compliance), the IPs lack concrete data or reporting on the training of political advisors.

In these circumstances, we recommend that each institution exploit alternative and innovative methods for bringing aspects of integrity as close to its employees, including political advisors, as possible. Thus, the IP may envisage that besides the classical format of lectures by specialists of integrity there be also other methods, such as e-learning modules offered through online platforms or websites on ethics rules, integrity, administrative procedures, principles, and concepts linked with ethics, etc. Other forms include: coaching and mentoring that links new staff to experienced staff who stand out in terms of ethical conduct, so that new employees can follow the example of the experienced ones who help increase awareness and promote ethical behavior; simulating games or concrete solutions for scenarios that pose ethical dilemmas.

In the field of human resources management, it is found that for the presented measures, almost all IPs are linked with the announcement of relevant vacancies or the filling of vacancies. In general, these measures serve to provide services by the institution and its performance, but have no direct impact on strengthening institutional integrity. If the measure were reformulated toward strengthening transparency in the field of new hirings or promotions, or by establishing procedures for the timely review of complaints and their publication, it would be a measure that helps more in promoting institutional integrity.

Likewise, decisions for career support and development, assigning staff for study visits or for following a Master's degree or in-depth studies in a certain field, whose expenses are covered by the institution, etc., could have been highlighted as activities with high risk of corruption. In this context, one effective measure toward promoting integrity would be the definition of clear, standard, and transparent rules for the selection of the staff member who would benefit this privilege.

## **Methodology**

In preparing this paper, we first highlighted the institutions that had drafted and approved an integrity plan. Of these institutions, we selected four, whose field of responsibility was closely linked with sectors that internal strategic documents have identified as more exposed to corruption.<sup>(6)</sup> Taking into consideration the fact that areas mentioned as having high corruption risks include the customs, taxes, procurement, health care, energy, and infrastructure, police, institutions that are directly linked with these sectors (except for the State Police) have not drafted integrity plans. Therefore, the institutions that were subjected to this analysis are: State Police, Ministry of Infrastructure and Energy, Ministry of Finance and Economy, Ministry of Health and Social Protection. The evaluation of the effectiveness of integrity plans of the institutions mentioned above in this paper encountered some limitations. First, the integrity plans are still in the implementation phase and therefore the

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(6) Cross-Sector Strategy against Corruption 2015-2020, p.11, approved by Council of Ministers Decision no. 247, dated 20.03.2015. UNODC, Corruption in Albania: Bribery as Experienced by the Population, f. 8, [https://www.unodc.org/documents/data-and-analysis/statistics/corruption/Albania\\_corruption\\_report\\_2011\\_web\\_small.pdf](https://www.unodc.org/documents/data-and-analysis/statistics/corruption/Albania_corruption_report_2011_web_small.pdf)

evaluation of the effectiveness of the plans will be limited to the time of their implementation to date. Another limitation has to do with the different deadlines that the plans have established for implementation (two institutions approved the IPs for 2022-2025, one for the period 2021-2023, and another for 2022-2024). This distinction makes comparisons a bit difficult as institutions are at different phases of their implementation. On the other hand, not all of them have drafted monitoring reports. All three ministries, in respect of the methodology of IP monitoring approved by the Minister of Justice by order no. 553, dated 30.09.2021, have drafted and published on their internet websites the monitoring report while this same report is missing for the State Police. For that reason, for the latter, AHC asks in its letter no. 747, dated 14.11.2023 to the State Police for more information asks that it make available the reports drafted pursuant to the implementation and, if such a report is lacking, to secure complete and accurate data on the realized measures. For the Ministries, requests for information were drafted that seek to clarify and exact the published data and to secure additional data that have not been reported yet. At the same time, they were asked for a self-evaluation on the impact that the implementation of measures to date has had and whether the institutions have indicators that measure the success of their implementation. The Ministry of Justice was also involved in this process, not as an institution subjected to the analysis, but because of the role that it has as an anti-corruption coordinator and because of the leading role that it has had in terms of drafting integrity plans.

In order to evaluate the IPs approved by the selected institutions at the current phase, we will combine several methods of research, review, and evaluation of documents drafted by the institutions themselves and of secondary documents drafted by reputable bodies in the field of promotion of integrity, evaluation by experts on implemented measures, and a comparative overview against the best standards for reporting and measuring their effectiveness and self-evaluation by the implementing institutions.

At first, the IPs were compared for all the selected institutions in terms of the evaluation of formal aspects, such as deadlines, the methodology their drafting was based on, etc. After that phase, we expanded the analysis to evaluate specific measures. It has not been possible to evaluate the effectiveness of each implemented measure due to the diversity and high number of envisaged measures, but those encountered most frequently in the plans that were reviewed were selected. For the selected measures, the evaluation was done taking into consideration the documents drafted by the institution itself, the review of their contents on whether their subject includes addressing aspects of integrity, when possible, comparing them to international standards, and lastly, providing relevant recommendations if viewed necessary for the concrete measure.

# CHAPTER I - NORMATIVE FRAMEWORK ON INTEGRITY PLANS

## Meaning of integrity

In order to discuss, reflect on, or understand a specific quality, it needs to be defined first. An in the case of integrity, it is necessary to refer to domestic definitions and authoritative international resources. Referring to the definition of the OECD on integrity, it is defined as “the continued alignment and respect for shared ethical values, principles, and norms for the preservation and prioritization of public interest over private interests in the public sector. In other words, public integrity indicates:

- Doing the right thing even when nobody is watching.
- Placing public interest over personal interest.
- Exercising duties in such a way that would resist public scrutiny: if your decisions were reported in the newspaper the next day, all could agree that you did the right thing, based on the information you had.”<sup>(7)</sup>

We deem it important to refer to the definition of the concept of integrity, because in that manner, public officials understand their duties and responsibilities toward creating a system that promotes and strengthens institutional integrity. After it is defined, public integrity requires high-level engagement to support, check, and implement it.<sup>(8)</sup>

The methodology for evaluating the integrity risk is based on a concept that is almost along the same line as the above definition, but with some minor differences. The IRAM provides the following definition: “*integrity consists in fulfilling some characteristics, such as: being transparent, accountable, ethical and honest, effective and efficient, that is responsible governance for improving the performance of the public administration and the reduction of corruption levels.*” As may be seen, the emphasis in this definition is on the activity of the public institution in general, which should be subjected to the principles of transparency and accountability. Meanwhile the OECD definition has an emphasis on personal integrity as a precondition for promoting public integrity manifested in respect for shared ethical values, norms, and principles and the priority of public over private interest.

Although integrity represents a feature or characteristic of individuals, more and more today attention is oriented toward the use of the same matrix (integrity) for public institutions or more broadly for countries. These (institutions/countries) are being asked to make functional a system for managing integrity.<sup>(9)</sup> This system of measuring and evaluating institutional integrity has been introduced as a measure in the context of the fight against corruption. However, it should be stressed that the concept of integrity is broader than that of anti-corruption, but it clearly serves the fight against corruption and addresses other aspects of a public body/institution for being more professional and with good reputation.

(7) OECD Recommendation on Public Integrity, 2017, <https://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf>

(8) OECD Public Integrity Handbook, 2020 <https://www.oecd-ilibrary.org/sites/ff8780e6-en/index.html?itemId=/content/component/ff8780e6-en>

(9) Manual on Integrity Planning and Integrity Management, UNDP, 2015, f. 11.



## Integrity Plan and its introduction as a preventive mechanism in the fight against corruption

Integrity generally refers to an individual feature and not a fiction as a private or public entity. However, today the term integrity is widely being used as interlinked with public institutions and the latter are displays of the entirety of individual conduct. Strengthening individual integrity will be reflected in the promotion of institutional integrity and, on the other hand, the creation of standard institutional procedures will affect the conduct with integrity of individuals who make up the institution.

An Integrity Plan represents a document that is developed as a result of self-evaluation of the institution regarding the level of its exposure to corruption and the exposure to unethical and unprofessional conduct. The objective of approving the Integrity Plan is linked with strengthening individual integrity, which means individual honesty, professionalism, ethics, and conduct according to moral norms. Strengthening institutional integrity reduces the risk that public authorities would act against the primary purpose of their foundation, which later contributes to improving the quality of institutional performance, and therefore enhances public trust in their activity.<sup>(10)</sup>

### The Integrity Plan represents:

- a preventive anticorruption strategic tool to strengthen the integrity of the institution, which includes individual integrity, professionalism, ethics, institutional integrity, as well as adherence to moral values and professional standards.
- an instrument for increasing awareness about organizational vulnerabilities and exposure to integrity violations, as well as for generating support to measures that aim at enhancing its resilience to corruption and building a climate of trust and co-ownership in anticorruption across the organization, involving all levels and all functions
- a natural, inherent part of the overall management of the organization
- a living document, part of the organizational learning.<sup>(11)</sup>

The purpose of the IP is not to resolve individual corruption cases, but to create mechanisms that would eliminate the circumstances and reduce the risk of corruption and unethical and unprofessional behavior in all areas of the institution's activity/responsibility.<sup>(12)</sup> We emphasize that the drafting of the IP is a measure of a preventive nature that seeks to create a system that would resist corruption as prevention is more efficacious than punishment.

One of the preventive measures for the fight against corruption, envisaged in the Cross-Sector Strategy against Corruption 2015-2020 (CSSC), was the approval of integrity plans<sup>(13)</sup> in the context of achieving objective A 9 on "Strengthening the Integrity of Public Employees" which stipulates that

(10) Manual for the Integrity Plan Development, Anti-Corruption Agency, Belgrade 2015, p. 4.

(11) Manual on Integrity Planning and Integrity Management, UNDP, 2015, p. 13.

(12) Manual for the Integrity Plan Development, Anti-Corruption Agency, Belgrade 2015, p. 5.

(13) According to the Action Plan 2020-2023 for the implementation of the Cross-Sector Strategy against Corruption.

“The honesty and integrity of individuals who are employed in the public sector is a precondition for preventing corruption. In these circumstances, it is decisive that in some sectors of government, which are more prone to corruption (e.g., police, procurement, taxes, judiciary, etc.), personnel sectors will adapt and implement methodologies to test in advance the integrity of candidates for these jobs and continuously the integrity of employees.”<sup>(14)</sup>

In this context, the Ministries and their subordinate institutions, as well as some municipalities<sup>(15)</sup> drafted Integrity Plans that include a series of measures seeking to improve institutional integrity and the fight against corruption. Pursuant to the CSSC, this is an important measure that is implemented for the first time in our country, following the best international standards. Therefore, it is worth emphasizing that there is a lack of experience in drafting and managing this system. As a result, the deficiencies or problems encountered in this regard are understandable. It is our opinion that the problems should be highlighted, articulated properly, and addressed.

However, as an anti-corruption mechanism, the impact it brings in the fight against corruption in general and the promotion of integrity should be evaluated. The process of monitoring integrity includes the definition of the concept of integrity – which is broader than that of anti-corruption – and establish a theoretical framework that clearly defines the objectives and results through which its progress is measured.<sup>(16)</sup> The evaluation of the impact that the implementation of the IP brings is important for understanding the effect of this measure in general and for improvements in the future if necessary. On the other hand, it is important to evaluate and establish the impact of special measures on strengthening institutional integrity in order to make relevant recommendations to institutions that will implement measures in their integrity plans in the future.

The importance of integrity plans has been emphasized also in the last report of the European Commission on Albania’s progress, which stresses the importance of fully implementing and properly monitoring these approved plans...<sup>(17)</sup> and guaranteeing their full and effective implementation.<sup>(18)</sup> In fact, to reinforce this position on integrity plans, the report itself has incorporated the findings and tasks left by the fifth round of the GRECO assessment.<sup>(19)</sup>

## **Regulatory framework for drafting and monitoring integrity plans**

As was stressed above, the integrity plan consists in measures presented pursuant to fulfilling objective A 9 of the Cross-Sector Strategy against Corruption (CSSC). Under the guidance of the Ministry of Justice, as the first institution to implement such a measure, the Integrity Risk Assessment Methodology in Central Government Institutions was also drafted, approved by decision of the Minister of Justice no. 334, on 07.10.2020, which served as a guide for other institutions to draft and approve their integrity plans. Beside this document, which establishes that the IP should be subjected

(14) Cross-Sector Strategy against Corruption 2015-2020, Objective A 9.

(15) Partnership for Open Governance, National Action Plan, 2023-2025, March 2023, p. 5-8.

(16) Armytage, L., 2009, Monitoring judicial integrity: Lessons for implementation of UNCAC Article 11.

(17) Albania 2023 Report, Brussels, 8.11.2023 SWD (2023) 690 final, p. 12.

(18) Albania 2023 Report, Brussels, 8.11.2023 SWD (2023) 690 final, p. 26.

(19) Albania 2023 Report, Brussels, 8.11.2023 SWD (2023) 690 final, p. 27.

to a monitoring plan, Order no. 553, dated 30.09.2021 of the Minister of Justice, approved the “Integrity Plan Monitoring Methodology for Institutions of the Central Government.” To complete the framework of acts approved for the approval and implementation of the IP, a guide was also drafted for assessing the integrity risks.<sup>(20)</sup>

## Integrity Risk Assessment Methodology

In evaluating the conceptual framework on integrity plans that seek to create a standard for the drafting, approval, and monitoring of IPs, it should be kept in mind that, first, the Integrity Risk Assessment Methodology (IRAM) is based on a broad concept of institutional integrity that is reflected in the phenomena evaluated as sources of risk. We should keep in mind that the reason why these measures are implemented, at least at present, is mainly linked with limiting corruption. From this standpoint, although the drafting of integrity plans is an approach that serves the strengthening of institutional integrity in general, maybe it should have been more focused on mechanisms that directly address the fight against corruption. By keeping in mind this objective, all or the main part of the measures should have focused on this aspect. Another phase, for the second-generation plans, after testing the instruments implemented in this regard, could extend also in strengthening other aspects of integrity (neglect, ethics, professionalism, etc.).

For instance, to elaborate on the above, primary measures implemented by the first-generation integrity plans could have been those linked with: i) instruments that present the concept of integrity such as codes of conduct/ethics, policy on conflict of interest, rules/measures after the termination of labor relations, participation of groups of interest, etc.; ii) guidelines on integrity through activities such as training, counseling, etc.; iii) monitoring integrity through tools such as protection of whistleblowers, mechanisms/policies for complaints, inspection, early alert systems, integrity breach measurement, etc.; iv) implementing integrity, including formal and informal sanctions, procedures on addressing integrity violations, etc.<sup>(21)</sup>

Of course, it should be kept in mind that the realization of these measures relies on a broad system that includes complementary measures on integrity that include finance, personnel, information management, that although their primary goal is not addressing integrity, they still play an important role in strengthening integrity.<sup>(22)</sup> However, focusing on this category of activities in the first phase of the IP would give time and experience to the institution to implement and test more complex and more peripheral measures in the following generation of integrity plans. Nevertheless, it is our opinion that this moment alone does not invalidate the importance that the drafting of this act has as a starting point toward approval of IPs. Yet, in our opinion, it would be a strategic approach to first implement a more “reserved” plan in measures that would be perfected with experience.

(20) Integrity Risk Assessment Manual October 2021, [https://www.drejtesia.gov.al/wp-content/uploads/2022/02/GUIDA-VLERESIMIT-RISKUT-\\_AL.pdf](https://www.drejtesia.gov.al/wp-content/uploads/2022/02/GUIDA-VLERESIMIT-RISKUT-_AL.pdf)

(21) Marie Chêne, Monitoring public institutions’ integrity plans, Transparency International, 2011, [https://knowledgehub.transparency.org/assets/uploads/helpdesk/296\\_Public\\_institutions\\_integrity\\_plans.pdf](https://knowledgehub.transparency.org/assets/uploads/helpdesk/296_Public_institutions_integrity_plans.pdf).

(22) Marie Chêne, Monitoring public institutions’ integrity plans, Transparency International, 2011, [https://knowledgehub.transparency.org/assets/uploads/helpdesk/296\\_Public\\_institutions\\_integrity\\_plans.pdf](https://knowledgehub.transparency.org/assets/uploads/helpdesk/296_Public_institutions_integrity_plans.pdf).



## 3.2. Methodology for Monitoring the Integrity Plan

One of the important aspects of the implementation of the IP is their monitoring. For that reason, the Minister of Justice issued order no. 553, dated 30.09.2021, by which he approves the methodology for monitoring the IPs. According to this methodology, reporting IP implementation would be periodical (six months and annual) and will serve as an instrument for informing the higher political/leadership level of the institution, donors, and the public on the progress made in the fight against corruption.<sup>(23)</sup>

In fact, the methodology focused generally on a quantitative and formal reporting on the implementation of the plan and does not contain elements that are linked with measuring progress, such as progress indicators, with the reasoning that institutional objectives are different.<sup>(24)</sup> Although the methodology tasks each institution with this duty of establishing progress indicators, based on the analysis of monitoring reports, it does not appear that the institutions established any such. In this context, monitoring reports may not be used to understand the efficacy of each measure, thus disabling or making it difficult to implement the comparative method and the implementation of the same/similar measures by other institutions, as long as their efficacy has not been tested. The lack of measurement indicators makes it impossible to evaluate and transplant the concrete measure in other institutions after their effectiveness has been tested and makes it difficult to apply the comparative method before-after, if indicators are established and data is collected before the strategy is implemented, or a without approach where the performance of a comparison group is measured against the other.<sup>(25)</sup> Therefore, in spite of the specifics that each measure has for the relevant institutions, measurement indicators should have been identified to evaluate their effectiveness. Obviously, the methodology does not place an emphasis on substantial reporting or reporting on the impact that the measures have brought about, but only seeks to standardize the manner of reporting in the formal aspect.

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(23) “The six-month and the annual report will be used as a tool to inform the senior political/leadership level of institutions, donors, and the public on progress made toward implementing strategic anti-corruption engagements. These reports will be used also to evaluate progress made in realizing the goals of the policies, specific objectives, and measures envisaged in achieving the planned reforms.” Methodology for Monitoring Integrity Plans for Central Government Institutions, p. 4.

(24) Methodology for Monitoring Integrity Plans for Central Government Institutions, 2021, p. 5.

(25) UNODC (2015), *The United Nations Convention against Corruption. National Anti-Corruption Strategies: A Practical Guide for Development and Implementation*, United Nations, Vienna, [https://www.unodc.org/documents/corruption/Publications/2015/National\\_Anti-Corruption\\_Strategies\\_-\\_A\\_Practical\\_Guide\\_for\\_Development\\_and\\_Implementation\\_E.pdf](https://www.unodc.org/documents/corruption/Publications/2015/National_Anti-Corruption_Strategies_-_A_Practical_Guide_for_Development_and_Implementation_E.pdf)

## CHAPTER II - EVALUATION OF INTEGRITY PLANS IN THE FORMAL ASPECT

### Formal evaluation of integrity plans

Integrity plans of the selected institutions, as it results from their comparison, were obviously drafted by being based on different methodologies. The IPs of the MHSP and the MIE are based on the Integrity Risk Assessment Methodology, approved by the MoJ, while the other institutions chose a different methodology for drafting them. This comes due to the fact that formally, but also substantially, the documents are different. For instance, the MHSP and the ASP integrated the AP in the respective IP, while the MIE and MFE published them as separate documents. In fact, this is not any substantial difference, but it shows that the institutions did not rely on the same methodology in drafting them.

It is also worth-mentioning that the plans were approved for different periods of implementation. The IP of the MHSP and MIE was approved for the period 2022-2025 while the MFE approved it for 2021-2023, and the ASP approved the IP for the period 2022-2024.

Institution	Period of implementation
MHSP	2022-2025
MIE	2022-2025
MFE	2021-2023
ASP	2022-2024

In this context, we emphasize that the selected institutions are at different moments of the implementation of their plans and, based on the approval deadlines, expectations are that the institutions that approved IPs earlier may have a better documented experience to show results produced by the IP implemented in the relevant institution.

With regard to the number of measures introduced by each institution, again we find that each institution identified different risks of corruption and presented relevant measures. The IPs of the MIE and MHSP were drafted by addressing the identified objectives and introduced measures and were not divided by relevant directories/fields of each ministry.<sup>(26)</sup> Meanwhile, the MFE identified risks only by sector and identified relevant risks for each directory. The IP of the State Police focuses on anti-corruption measures, that is, strengthening integrity to fight corruption, after identifying 18 risks or behaviors that breach integrity. In other words, although institutional integrity is a much broader concept than avoiding displays of corruption, the IP of the State Police has evidently managed to focus the interventions on those that have a more immediate and direct impact on corruption. The approach has also been sectoral, by identifying as main sectors: crime investigation structures, human resources and recruitment processes, management, public procurement, and whistleblowing of corrupt practices.

Each plan has been translated into concrete measures that are tools for addressing the risk highlighted by the phase of analyzing and highlighting higher risk areas.

(26) MIE followed both approaches as the plan identifies also risks by specific sector.

The above graphic indicates the number of measures envisaged for each integrity plan. The graphic presentation serves only for comparing the number of measures adopted in each plan from a quantitative standpoint.

## Target objectives

The objectives that the IP seek to achieve are established according to different methodologies they were based on.

Thus, the MHSP has identified these objectives: i) Improvement of ethics and integrity mechanisms; ii) Improvement of the human resources management system; iii) Increasing transparency through civic participation; iv) Improving the financial management and control system; v) Improving the direction of policies to promote integrity and prevent corruption.

Similar to the above, the MIE<sup>(27)</sup> identified almost the same objectives, with slight differences in formulation: i) Improving the regulatory and institutional framework on ethics and integrity in the Ministry; ii) Consolidating the human resources management system; iii) Increasing transparency in sharing data with the public; iv) Improving the system for internal financial planning, monitoring, and control; v) Improving efficacy, transparency, and accountability in the health care sector.

The integrity plan of the MFE does not have concrete objectives, but highlighted the risks for each directory of the Ministry while also envisaging relevant measures to be taken to address the identified risk.

E management of corruption of small (street) crime; and v) Increasing integrity and reducing bureaucratic corruption in procurement.

## Reports on Monitoring of Integrity Plans

The implementation of integrity plans is essential for achieving their objectives. Therefore, institutions that approved them need to monitor their implementation in order to evaluate the level of implementation of the proposed measures. According to the IRAM, *“Reporting is a regular procedure that ensures implementation of the action plan on integrity risks according to the envisaged deadlines. [...] The minimal frequency for reporting is within a six-month period. Reporting allows the principal to undertake improving measures on time, if the implementation of any measure has caused difficulties or delays.”*<sup>(28)</sup>

The need to monitor their implementation is especially emphasized in the GRECO compliance report, which underscores *“...further measures are needed to secure monitoring and compliance with integrity plans in all ministries and to identify specific measures to address risks related to integrity that ministers and political advisors may encounter with regard to all integrity plans.”*<sup>(29)</sup>

(27) The IP of the MIE contains only these objectives, but intervention through measures in the AP is sectoral.

(28) Integrity Risk Assessment Methodology in Central Government Institutions, 2020, p. 15.

(29) Fifth Round of the Evaluation on Prevention of corruption and promotion of integrity in central government (senior executive functions) and law enforcement agencies, Compliance Report, GrecoRC5 (2020), p. 5

The IP monitoring methodology approved by order of the Minister of Justice,<sup>(30)</sup> determined the format according to which monitoring is to be realized. We believe that this format is necessary for documenting the institution's experience during the implementation of the IP and for comparing data and respect for standards that the institution should establish for achieving.

In the long term, this method of reporting through continuous data, the establishment of standards, and the comparison of such data are essential for evaluating integrity levels. In this context, the strategy is the collection of accurate and credible data instead of relying solely on perception as well as the comparison of such data against the standards established by similar institutions. With time, such a strategy will enable policymakers to collect data and make an inclusive evaluation of integrity processes and encountered issues by identifying this way specific and targeted measures whose effect may be judged with a higher level of credibility.<sup>(31)</sup>

In the realization of this paper, monitoring reports were collected for three institutions, namely the MFE, MIE, and MHSP, which were published on the respective internet websites. For the implementation of the ASP IP, the internet website of the latter does not feature any published monitoring report. Therefore, by letter no. 747, dated 14.11.2023, AHC wrote to the State Police to have them make available for us the monitoring report (reports) on the integrity plan. The State Police response did not indicate whether this institution had drafted earlier monitoring reports, but stressed that the Annual Report would be prepared at the start of 2024. Meanwhile, for the period from the approval of the IP to the start of 2023, the ASP letter did not say, although our request referred to any monitoring report drafted for the implementation of the plan. As a result, the effectiveness of the measures identified in this plan may not be subjected to analysis on the effect they produced.

Based on the review of the three monitoring reports (prepared by the MIE, MFE, and the MHSP), we find that the reports did not follow the form established by the Methodology for Monitoring Integrity Plans for Central Government Institutions. The latter establishes a unified format, not only narrative, but also tables to reflect progress in implementing the IP. Of these institutions, the MIE drafted and published the table report as an annex while the MFE made it available together with the response provided electronically. Aside from this element that should be stressed is formal, it is more important to highlight that for the measures that were not implemented, the reasons for this were not identified, which would have identified that cause that led to non-implementation and eliminate it in the future. For each measure that was not implemented, the reason for this should be defined, whether it had a budget origin or a non-functioning of human resources, or whether there were other reasons that should be highlighted respectively through the engagement of the institution in measures it will take to successfully implement them.

Furthermore, based on the analysis of the contents of the report, suspicions arise about the accuracy of data reflected therein. For instance, the monitoring report prepared by the MHSP establishes *"pursuant to objective one, seven measures were implemented fully, 1 partially, and 1 was not implemented. Meanwhile, the action plan for the integrity plan, for objective one, envisaged six measures."*<sup>(32)</sup> Also, on

(30) Methodology for Monitoring Integrity Plans for Central Government Institutions, 2021, p. 4-7.

(31) OECD, Components of Integrity: Data and Benchmarks for Tracking Trends in Government, GOV/PGC/GF(2009)2 p. 7.

(32) Integrity Plan Monitoring Report, MHSP, p. 9.

objective 2, the report specifies that *“six measures were envisaged and all were fully implemented.”*<sup>(33)</sup> Meanwhile, the Integrity Plan envisaged 12 measures for this objective.

In order to clarify the situation presented in the report, the Albanian Helsinki Committee sent a letter to the MHSP to seek more detailed information on the realized measures for each objective. In its response, the MHSP elaborated the measures envisaged in IP in activities by considering as such even related and necessary activities for considering the measure fulfilled. For instance, while the drafting of the Code of Ethics is presented as a measure, the involvement of political level officials in its implementation is also viewed as a separate measure. In fact, according to such calculation, the IP action plan would not have 43 measures, as the monitoring report envisages in page 5, but many more. In fact, the IRAM itself, when it provides guidance on the manner of drafting the action plan, draws a distinction between the concrete measure (as a separate column) and necessary activities for considering that measure realized (in a separate column). In other words, the monitoring report should identify whether the measure is realized or not by evaluating the activity or the entirety of activities planned for its implementation.

Therefore, we stress again that pointing out this issue seeks to raise the awareness and attention of institutions about the seriousness of the implementation of integrity plans, especially the experience of institutions that implement them for the first time and, above all, the proper documentation of this experience as important for successfully adopting a preventive mechanism against corruption. Monitoring reports should reflect accurate and credible data in order to be used for evaluating the result achieved by them. Implementing institutions should be particularly careful to create strong foundations for building the integrity system as the drafting of plans represents the first step toward building the integrity management system.

As a conclusion, it is worth emphasizing that based on the evaluation of these reports, we find that the focus and the reporting had a generally quantitative nature, that is the total of measures that were realized, realized partially, or not realized. Without concrete quantitative indicators on the realized measure and without accurate and measurable indicators on the effect produced by the implementation of measures. As stressed above, the report should not only indicate the measures that were not implemented and the causes that led to the lack of implementation, but also indicate clearly how fully realized measures had a positive impact through clear and accurate measuring indicators.

For instance, the MIE monitoring report highlights the following: *“...Measures were mainly of an operational, legal, regulatory, and contractual character. This objective had the highest number of measures to be fulfilled within 2022 and some sub-measures or activities were fulfilled within the deadline and are an obligation to be fulfilled continuously. It is worth emphasizing that the majority of envisaged measures are fulfilled successfully and that the number of those not fulfilled is relatively low compared to the total number envisaged in this objective.”*<sup>(34)</sup> This extract of the monitoring report makes it impossible to clearly identify which are the measures fulfilled in the context of realizing objective no. 5 of the IP.

Also, the report continues *“Progress has been made mainly in the field of human resources, in sending announcements of vacancies, in planning training for professional growth of staff...”*<sup>(35)</sup> It is not clear

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(33) Integrity Plan Monitoring Report, MHSP, p. 11.

(34) Integrity Plan Monitoring Report, MIE, p. 7.

(35) Integrity Plan Monitoring Report, MIE, p. 7.



from the report whether sending announcements of vacancies was a measure that was proposed to be realized during 2022 and was realized. However, although the substantial analysis of the proposed measures will be addressed further, the announcement of vacancies is not a measure that even seemingly strengthens integrity. If the institution would propose clear and standard rules and procedures that encourage and promote on the basis of merit and not connections or influences of any kind, this would be an important measure and the identification of concrete tools and mechanisms would contribute to strengthening institutional integrity.

It has been particularly difficult to easily identify measures implemented by the MFE according to the matrix that accompanies the Integrity Plan (as an independent document published on the internet website). This was the case because the drafting of the IP at this institution is based on a different methodology, without identifying objectives, which has made evaluation and analysis more difficult on whether the defined objectives were met. The monitoring report indicates that 21 of 27 planned measures were fulfilled. Five are partially realized and only one was not fulfilled. For the latter, there is no reason that did not allow their fulfillment fully. Based on the narrative explanation in the monitoring report, it is difficult to identify concretely what are the measures realized for each directory and for what period. In fact, even in its (MFE's) response to the AHC letter to identify more clearly the fulfilled measures, it still refers to the monitoring report, which lacks clarity in this regard.

For instance, the matrix that accompanies the IP highlights as a risk the "Realization without efficiency of coordination of activities for managing debt with monetary and fiscal policies." Meanwhile, the activities planned to be undertaken for implementing the measure are: 1. Preparation of periodical reports for the developments of monetary policy and the Publication of periodical reports on the official website of the Ministry of Finance and Economy." The monitoring report indicates that the measure was realized "*The law regulating state budget, state loans, and stage guarantees for loans/ Debt Directory was revised. The Midterm Strategy for Debt Management 2022-2026 was prepared, relying on analyses and exercises realized for this purpose, exploiting all external resources. Market analysis, information and transparency on the internal market.*"<sup>(36)</sup>

The examples above show the lack of accuracy of information that is published, which makes it difficult to evaluate whether the measures have been realized and the objectives achieved. In this context, we reiterate the importance of following the reporting methodology and reflecting accurate and clear data.

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(36) Integrity Plan Monitoring Report, MFE, 2022, p. 7.

## CHAPTER III - EVALUATION OF APPROPRIATENESS AND EFFECTIVENESS OF MEASURES

### Measures on the Code of Ethics

Of the four IPs that were subjected to analysis to evaluate their effectiveness, only two contained norms regarding the drafting of a new Code of Ethics or the review of the existing Code of Ethics. Respectively, the MHSP defined as one of the higher priority measures and the MIE defined as a measure the intervention in the existing Code of Ethics to establish a broader circle of subjects. Meanwhile, such a measure is completely absent in the MFE integrity plan. In fact, even the internet website of this ministry does not appear to indicate the approval of any such Code that disciplines the ethics of all public officials of all ranks. Therefore, as long as it has not been published, we are inclined to think that such an act is lacking. In the State Police, its Regulations contain norms on ethics of conduct in the State Police; its website, inaccessible, contains a document called “Manual of Ethics and Integrity in the State Police,” but the IP itself does not envisage any intervention for updating or approving any special document that would address the aspects of ethics or conflict of interest in the State Police.

### Code of Ethics approved by the MHSP

Pursuant to the IP, the MHSP approved the Code of Ethics. This measure in itself is important to be noted as the institution did not have a Code of Ethics. However, we should highlight some deficiencies from the evaluation of the contents of this act. For the sake of truth, the official online website of the ministry contains the Code uploaded not in its final form and approved by the head of the institution, but a draft that contains even the comments from Ministry staff.<sup>(37)</sup> The IP of this ministry envisages that the Code will address issues such as: a) clear rules for the process of declaration and acceptance of gifts, other similar benefits, expenses covered by others, and the administration of the relevant register; b) rules for accepting donations/sponsorships and the functioning of the relevant register; c) rules for declaration by institution officials of meetings with lobbyists or groups of interest and the functioning of a relevant register; ç) rules for the outside activity of employees and their declaration; d) rules for the use of assets and material resources of the ministry for personal needs.

The Code of Ethics of the MHSP, article 2 (2), establishes that the Code applies to civil employees of the MHSP, political functionaries of the MHSP..., without concretely identifying who the political functionaries are and leaving it unclear whether this phrase includes the minister, deputy minister, and the cabinet. In order to not allow room for interpretation, the Code of Ethics should have clearly defined the area of its implementation and for the sake of clarity to not make references to other legal acts about the concepts that the Code includes (for instance, on gifts) but rather establish itself the definitions based on those existing in our legal system. Besides, there is no specific regulation on the procedure or responsible structure for evaluating the ethical violation by this category of subjects (especially for political advisors who are not subjects of the Ministry Code of Ethics). In the absence

(37) At the round table of discussion on Integrity Plans and their effectiveness, the representative of the Ministry of Health stated that the correction had been made and the final version had been published on the official website of the MHSP.

of rules and procedures to be pursued in this situation, in practice, the establishment only in the field of implementation of the Code of Ethics makes this provision ineffective.

Also, the Code has not regulated, according to the measure identified by the IP, the creation of the register of gifts and the manner of its functioning and administration, clear rules about actions to be taken by the official who has been offered a gift. At the same time, there are no rules about sponsorships and the relevant register, or about meetings with lobbyists and groups of interest, as well as rules for the creation and administration of the relevant register.

Besides these, we find that the Code also lacks rules about the period before and after employment or rules about the dissemination of information that MHSP employees come into contact with or aware of as a result of their work, known as “inside information”.

The experience of other countries<sup>(38)</sup> shows that some of the problems encountered by the lack of rules for the period after employment of public officials who may find employment in the private sector (that they often monitored or inspected while holding the public function), due to the knowledge or access that they have in public institutions may lobby with these institutions, use inside information to benefit during their labor relations, or turn to the public sector after being in the private sector and advance the interests of the latter.

All of these issues have not been addressed by any legal instrument or by the Code of Ethics or internal regulations. We emphasize that law no. 9131, dated 8.9.2003 “On the rules of ethics in the public administration” contains very superficial and ineffective regulation on these issues as there is no coercive mechanism for their effective implementation. Concretely, articles 16 and 17 of the mentioned law specify:

*“Article 16 Use of Information*

*Public administration employees, after leaving their duty, should not use confidential information, obtained while exercising their duties, for personal interest.*

*Article 17 Prohibition of representation in conflicts with the public administration*

*For a two-year period, upon departure from the post, the former employee should not represent any entity or organization in conflict or in commercial relations with the Albanian public administration, on the duties he carried out or in continuation thereof.”*

Based on this context, a mechanism needs to be identified and introduced through the law in order to make these provisions implementable and to clearly establish what the prohibitions are for the post-employment period, aside from prohibition of representation. Aside from the obligation to not represent, could the former public official be employed in the private sector he may have inspected or supervised? Aside from provisions in this law, it would be appropriate that the Code of Ethics itself determined clear rules and procedures for the period after the conclusion of the labor relations in the public institution.

Lastly, we consider that the contents of provisions in the Code raises concerns about its effective

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(38) See, OECD Integrity Review of the Slovak Republic, 2022, [https://www.oecd-ilibrary.org/sites/45bd4657-en/1/3/2/index.html?itemId=/content/publication/45bd4657-en&\\_csp\\_=ab053e00c299c67e9d5c639dc65306ff&itemIGO=oecd&itemContentType=book#tablegrp-d1e3738](https://www.oecd-ilibrary.org/sites/45bd4657-en/1/3/2/index.html?itemId=/content/publication/45bd4657-en&_csp_=ab053e00c299c67e9d5c639dc65306ff&itemIGO=oecd&itemContentType=book#tablegrp-d1e3738)



implementation at senior leadership levels, especially for political advisors, who though subjects of it, are not subject of the law on “Civil servants” and the Ministerial Code of Ethics.<sup>(39)</sup> Therefore it is unclear what procedure is to be followed in cases of ethical violations committed by them. For the effective implementation of the Code, it is advisable to establish clear and accurate procedures along with relevant sanctions. Although parts of the procedure are regulated in other legal acts, the Code itself should identify clearly the procedure to be pursued in case of ethical violations and their classification.

## Code of Ethics of the Ministry of Infrastructure and Energy

At the MIE, the Code of Ethics was approved by Order no. 49, dated 28.01.2021 “On the approval of the Code of Ethics in the MIE,” before the IP was approved. However, as highlighted above, one of the proposed measures in the IP envisages the intervention in the Code of Ethics to improve its contents by updating it with rules that address: a) acceptance of donations/sponsorships and the functioning of the relevant register; b) rules for the declaration by institution employees of meetings with lobbyists and the functioning of a relevant register. At the same time, the measures seek to expand the circle of subjects of the Code to include the Minister, Deputy Minister, the cabinet, and the high-level leadership corps in the ministry.

However, aside from its approval, which represents an important quality step toward creating the integration management system, there are no concrete measures for the familiarization of employees with the new Code of Ethics at the MIE. Thus, the action plan envisages training on ethics, conflict of interest, but specifically, no measures are envisaged for awareness about the Code among ministry employees. This instrument is very important for promoting integrity and therefore, for its efficacious implementation, it is important to first get to know the Code, which compared to the MHSP Code of Ethics is more complete and addresses a good part of issues found in the analysis of the MHSP Code of Ethics.

## Norms on Ethics at the MFE

The MFE has not published on its website the Code of Ethics or of Conduct; in fact, it is not a measure envisaged in the IP approved by it. In this context, it is recommended that while drafting the ensuing integrity plan, the MFE keep in mind as a high-priority measure the drafting of a Code of Ethics that integrates rules not only on ethical conduct, but also conflict of interest, rules after the end of labor relations, clear and accurate procedures for pursuing violations of the Code of Ethics, etc.

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(39) Approved by Council of Ministers Decision no. 830, dated 15.9.2013, amended.

## Training of public officials about the norms of ethics and integrity

For public officials to be able to manage and prevent conflict of interest or strengthen integrity, first they need to be clear about the situations that may represent a conflict of interest or of conduct that reflect integrity during the exercise of their duties. Therefore, continued training on the identification and management of conflict of interest, as well as other aspects linked with integrity, are essential for cultivating institutional integrity. The IP envisages measures regarding training. For instance, the MHSP IP envisages the measure “Update the inclusive training plan to include training provided by the APAS, NCCE, external actors and internal informing meetings provided by ministry employees/directorates” or the IP of the MIE that includes measures such as: *Providing training on ethics, conflict of interest, non-discrimination, of employees involved in the process of drafting and monitoring the implementation of public contracts; Realize a plan of training/informative and awareness-raising meetings for MIE employees on the mechanisms for the protection of whistleblowers, the role of responsible units, and on provisions for the protection of confidentiality and protection against retaliation; Assessment of needs for training and drafting of a training plan for the Ministry staff in cooperation with the APAS, Specialized Institutions out of the country on specific duties with funding from the ministry budget; Drafting and implementing procedures on the transfer of knowledge and dissemination of training materials by trained individuals to other interested employees so as to ensure maximal benefits with regard to training on specific areas of the institution’s activity (energy, mining, etc.).*

The matrix (which represents the IP Action Plan) drafted by the MFE does not contain measures linked with training on issues of ethics. The plan contains measures for training in relevant areas of responsibility of the institution, for instance: “I. Development of continued training on tax legislation,” without a main focus on ethics and integrity. In fact, even for these training programs, the monitoring report lacks data regarding the concrete number of personnel that were trained and the concrete topics of training. For instance, the MFE monitoring report reads as follows: “During 2022, training sessions were held for the entire technical staff of the MFE with coordination and planning by the Human Resources sector with APAS. The APAS conducted the training “Management of ethics and integrity plans in the public administration,” where MFE representatives participated; issues linked with integrity, especially the Ministry Code of Ethics, legislation, and the framework on integrity and against corruption, were addressed.”<sup>(40)</sup> Thus, the IP itself does not include measures linked with training on aspects of ethics and integrity but reports activities conducted by APAS on ethics.

In the measures identified in the IP regarding training, we find that they appear to have a formal character for the following reasons:

First, for the proposed measure (regarding staff training) to be effective and measurable, it should clearly identify from the proposal phase how many members will be trained, for which period, and there should be concrete and measurable indicators to evaluate their effectiveness. In the phase of IP preparation, the institution should have identified in advance the concrete needs of staff for training in the area of integrity, the concrete area where there is the greatest need for developing training.

(40) MFE, Monitoring Report, 2022, p. 7.

For instance, the MHSP Code of Ethics is a new document and the staff needs to become familiar with it and therefore there should be a plan to communicate the contents of the document to new staff. Training on conflict of interest, ethics, and professionalism should extend to political officials<sup>(41)</sup> because there are no clear provisions on involving these ranks in training. This intervention is essential for fulfilling the obligation required by the latest GRECO compliance report, which notes that recommendation V has not been realized fully and stresses the need to increase awareness among political advisors on issues related to integrity, including the Ministry Code of Ethics and legislation and framework against corruption and integrity, through regular training, dedicated guidelines, and confidential counseling.

Secondly, the measures envisage training of personnel about specific areas of the institution's activity that fall outside the main focus of strengthening integrity in the relevant institution.

In order for the standards of integrity to be institutionalized and integrated appropriately in the culture of the organization, it is possible to exploit instruments such as communication, awareness, and guidelines. OECD recommendations on Public Integrity call on adhering parties to “ensure sufficient information, training, guidelines, and timely advice for public officials to implement the standards of public integrity in the workplace, especially by:

- providing public officials throughout their careers with clear and up-to-date information about the organization's policies, rules and administrative procedures relevant to maintaining high standards of public integrity;
- offering induction and on-the-job integrity training to public officials throughout their careers in order to raise awareness and develop essential skills for the analysis of ethical dilemmas, and to make public integrity standards applicable and meaningful in their own personal contexts;
- providing easily accessible formal and informal guidance and consultation mechanisms to help public officials apply public integrity standards in their daily work as well as to manage conflict-of-interest situations.”<sup>(42)</sup>

In this context, we recommend that each institution exploit alternative and innovative methods for bringing the aspects of integrity as close to employees as possible. Thus, the IP could envisage beside the classic format of lectures by specialists in the area of integrity also other ways such as e-learning modules offered through online platforms and websites on ethical rules, integrity, administrative procedures, ethics-related principles and concepts, etc. Other forms include: coaching and mentoring that links new staff with experienced staff that stand out for ethical conduct so that new employees can follow the example of the experienced ones who help increase awareness and promote ethical behavior; simulation games or the resolution of concrete scenarios that pose ethical dilemmas.<sup>(43)</sup>

(41) 2. Cultivating a culture of integrity in the public sector in the Slovak Republic | OECD Integrity Review of the Slovak Republic: Delivering Effective Public Integrity Policies | OECD iLibrary (oecd-ilibrary.org)

(42) OECD Recommendation on Public Integrity, <https://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf>.

(43) [https://www.oecd-ilibrary.org/sites/45bd4657-en/1/3/2/index.html?itemId=/content/publication/45bd4657-en&\\_csp\\_=ab053e00c299c67e9d5c639dc65306ff&itemIGO=oecd&itemContentType=book#tablegrp-d1e3738](https://www.oecd-ilibrary.org/sites/45bd4657-en/1/3/2/index.html?itemId=/content/publication/45bd4657-en&_csp_=ab053e00c299c67e9d5c639dc65306ff&itemIGO=oecd&itemContentType=book#tablegrp-d1e3738)

## Integrity Coordinator

Pursuant to the IP, the MIE, MHSP, and MFE assigned an Integrity Coordinator. Based on monitoring reports, the role and other functions do not come out clearly aside from drafting the monitoring report; however, based on the experience of other countries, it might be appropriate for them to assume a greater role toward promoting integrity. Based on good practices, the creation of the ethics unit could be an appropriate option that would integrate the integrity coordinator and the anti-corruption coordinator and, above all, plan a considerable role toward providing confidential or individual counseling based on requests, but also toward internal training in the institution on integrity and corruption in general.

## Measures in the area of human resources

With regard to human resources, some of the integrity plans feature measures such as: filling vacancies in certain directories (MFE in the tax appeals directory), or *“Announcement of vacancies in jobs according to the structure approved for this directory; Sending request to the PAD, Sending letter to PAD to announce vacancies in the executive category for employees in the Directory of Programs and Development in the field of Energy and Energy Efficiency, Sending request to PAD to announce vacancies according to the approved structure for the Directory of Programs and Development in the field of Mining and Industry (IP of the MIE, no. 42, 73, 83).”* In the same line with the measures highlighted above, the IP of the MFE features measures in the area of human resources linked generally with filling vacancies, for instance: *“Filling vacancies, Sector of Analysis, Investigation, Monitoring & AFCOS”* (for DIFP) or only *“Announcement of vacant positions”* (for the National Fund Directory).

These measures, though with an impact on the performance of the institution, in our opinion are not directly linked with integrity. The public official with integrity will continue the same whether with normal or excessive workload. In the second case, the official may not complete all assigned duties, but this would be for reasons going beyond integrity and professionalism. If the measure were reformulated toward strengthening transparency in the area of new recruitments or promotions, or by establishing procedures for timely review of complaints and their publication. This would be a measure that helps promote institutional integrity.

For instance, the measure presented by IP of the State Police in the context of objective 2 *“Increasing integrity and reducing bureaucratic corruption in human resources management”* that stipulates: *Increasing transparency and the level of monitoring of the recruitment process by internal and external structures during all phases until the announcement of results. Transparent evaluation and handling of complaints in all phases of competition to the Appeals Commission seems a measure linked more directly with promoting integrity during new hirings in the institution.*

In this aspect, we recommend that measures have a more direct connection to promoting institutional integrity.

Likewise, the following could have been highlighted as activities with high risk of corruption: decisions for career support and development, assigning staff for study visits or for following master’s studies or in-depth studies in a certain field, with costs borne by the institution, etc. In this context, an effective

measure toward promoting integrity would be the establishment of clear, standard, and transparent rules for the selection of the staff member that would benefit this privilege.<sup>(44)</sup>

### **Access to privileged or confidential information**

Access to information is another area that bears a high risk of corruption as inside information of the institution could be exploited for private interests. In order to create a mechanism for reducing the risk of access to privileged or confidential information, the MIE integrity plan envisages the following measures: *“Implementation of the procedure for realizing back-ups, in cases of termination of employment and making available electronic documentation to newly appointed staff; Taking measures on the basis of analysis of workload, to ensure necessary equipment such as scanners, to upload efficiently documentation in the electronic system.”*

Part of these measures appear appropriate, but we also notice that there are no measures to regulate clearly access to confidential information, its protection and duplication (including electronic files). Establishing clear rules for the management of such information avoids the risk of its leaks and use for private interests.

## **Measures in the field of inspections and the approval of transparent procedures**

### **Ministry of Finance and Economy**

One of the areas that generally bears a high risk of corruption is the activity of inspections. Therefore, such procedures should be transparent. The Integrity Plan of the MFE contains the following as one of the measures envisaged in this regard: *“Conducting public financial inspections with professionalism and integrity, according to approved rules and principles, monitored systematically by the FPID (measure III).”* A request of AHC to the MFE sought more information about this measure on whether standard rules or procedures were approved for the realization of inspections. In its response, the MFE refers to an Instruction no. 30, without highlighting the date for evaluating whether procedures set by the act in question were issued as a result of the implementation of this measure. Thus, it is unclear whether it was an existing act and provisions on inspections were revised pursuant to the Integrity Plan.

*“Instruction no. 30, ‘On rules and procedures for conducting Public Financial Inspection,’ paragraph 2.3, 2.4, paragraph 10 (10.1-10.3), and paragraph 11 (11.1-11.2) establishes the rules and procedures for monitoring the inspection and evaluating the quality of the conducted inspection, which is realized for every public financial inspection carried out by the FPID.”*

### **Ministry of Infrastructure and Energy**

The MIE response to our letter makes available the report on measures implemented during the first half of 2023, among which we notice measure no. 18, in the context of objective 2, which specifies that *“in the context of drafting and approving the internal SOPs in the MIE, the handling of complaints on competition procedures for the procurement process or PPPs should be included.”* The measure is

(44) Manual on Integrity Planning and Integrity Management, UNDP, 2015, p. 12.



considered realized, but surprisingly, the explanation or evidencing of undertaken steps it is reported: *“Regarding the handling of complaints, it is conducted in accordance with laws and by-laws in force and there are no gaps or working processes that are not covered or that need special standardization.”*

With regard to this measure, we bring to attention the standard of the Court of Justice of the EU (CJEU) in the case C-771/19, dated 24.03.2021, which argued that, especially for competitions of public procurement/concessions, a participant in the bidding who has been disqualified from the procurement procedure for a public contract, at a phase before that of entering into the contract, and who has been refused the right to suspend disqualification, may file a request to suspend the decision for the suspension of qualification of other candidate’s bid. In this context, based on this standard and to provide maximal transparency in public competitions, clear rules and procedures should be introduced in order to recognize the right of the disqualified candidate to seek the suspension of the decision to qualify the other competitor.

## **Role of the Ministry of Justice in monitoring Integrity Plans**

In its role as the National Anti-Corruption Coordinator, the Ministry of Justice has had a direct impact on drafting the conceptual framework on integrity plans. This ministry has drafted the methodology for drafting and monitoring the plans. However, in spite of this function, according to the methodology for the monitoring of the IP, the MoJ has no role in monitoring the implementation of the IP for each institution. We consider that in its capacity as the National Anti-Corruption Coordinator, it should have a more active position for evaluating and comparing the effectiveness of measures implemented in the context of integrity plans. At the end of the implementation of the first-generation integrity plans, the MoJ should have drafted a report on the efficacy of measures (by category) and highlight lessons learned from the implemented measures that had been successful.

## **Implementation of the Integrity Plan in the State Police**

The State Police drafted an Integrity Plan that contains measures that are more focused on the fight against corruption. However, the evaluation of the effects that these measures have produced is impossible to be included in this paper because we are completely lacking the data on its implementation. Based on the fact that the official website of the State Police does not contain information or reports published on the implementation of the IP, on 14.11.2023, AHC addressed the State Police with the request for information on implementing the IP, concretely on: whether a monitoring report has been drafted on the measures envisaged in the IP; concrete measures implemented during 2022; whether the ASP had assigned an Integrity Coordinator on supervising the implementation of the plan as well as concrete information on the indicators for measuring the effectiveness of each measure. Lastly, self-evaluation is requested on the overall effect of the measures of the Integrity Plan in improving institutional integrity.

Unfortunately, the letter no. Prot. 1485/2, dated 30.11.2023, did not make available to us any report on the implementation of the Integrity Plan from the time of its approval. Meanwhile, we were told that the annual report on 2023 would be prepared in the beginning of 2024.

We emphasize that the latest monitoring report of GRECO included a recommendation on implementing with priority the integrity plan in the State Police, which in fact referred to IP 2018-

2022<sup>(45)</sup>, but this does not mean the implementation of subsequent plans should be neglected.

Also, GRECO notes that the Manual of Ethics in the State Police is a summary of legal texts and lacks any practical guidelines in the form of concrete examples and explanations regarding expected conduct by police officers, taking into consideration the specifics, diversity of duties, and weaknesses of the State Police.

Based on the above report, we understand the special attention that the strengthening of integrity in the State Police has had for the fight against corruption. Therefore, the implementation and documentation of the implementation of the integrity plan should have been addressed with priority by leadership authorities in the State Police.

## CONCLUSIONS AND RECOMMENDATIONS

The Integrity Plan is an anti-corruption measure that presently has been approved by all ministries and their implementation is expanding also to subordinate institutions and local government bodies. The IP is a preventive instrument that seeks to build a system that minimizes the risk of corruption. Its drafting and approval are notable achievements of Albanian institutions. However, just as important is the period of their implementation. In order for measures to be implemented and to yield the intended effects, they should be continuously overseen and there should be self-evaluation process by the relevant institution on the effectiveness of the implemented measures.

Based on the review of the integrity plans for the selected institutions and the evaluation of acts drafted for their implementation and responses to requests for information to the institutions, we present the following recommendations:

1. IPs are strategic and operational documents and, because of such a hybrid nature, we recommend that the action plan to implement the integrity policies is attached to the Integrity Plan. Furthermore, in order to enable comparison and collection of data, the drafting and reporting of their implementation should respect formats approved by the MoJ.
2. Drafting and implementation of the IP as an instrument that prevents corruption and that is tested for the first time, should have been tested with interventions focused mainly on the fight against corruption and not include at the same time other, more peripheral manifestations vis-à-vis institutional integrity. After testing the first-generation of integrity plans and evaluating their effectiveness, the following generations of these plans could be expanded with other elements that are incorporated into the broader meaning of integrity, such as the treatment of citizens, neglect, or professionalism.
3. Monitoring reports implemented pursuant to the integrity plan monitoring methodology contain superficial and an almost exclusively quantitative analysis on the realized measures, those in process, and those not realized. This method makes it difficult to monitor the effectiveness and efficacy of the relevant measures. In this context, we recommend a more detailed analysis in Integrity Plan monitoring reports to include quantitative data and a qualitative analysis, especially on the results and impact produced by the implementation of each measure. To this

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(45) Round Five Evaluation Prevention of corruption and promotion of integrity in the central government (senior executive functions) and law enforcement agencies, Compliance Report, GrecoRC5 (2022), p. 16.

- end, it is necessary to build a monitoring system based on accurate and credible data, collected sustainably, in order to evaluate the effectiveness of the Plans.
4. For measures that have not been implemented, we recommend identifying the reasons/obstacles that led to failure to do this on time and that the institution engage in concrete actions to reduce the risk of this reoccurring in the future.
  5. The Codes of Ethics, as important documents for familiarization with and implementation of ethical norms and other norms linked with conflict of interest, gifts, or lobbying should be complemented by guides that include illustrations of concrete examples for each institution and should incorporate norms for regulating conduct after employment.
  6. Each institution should exploit alternative and innovative methods for bringing aspects of integrity as close to its employees as possible. Thus, the IP may envisage, aside from the classical form of lectures by specialists in the field of integrity, also other methods, such as e-learning modules offered through online platforms or websites on rules of ethics, integrity, administrative procedures, principles and concepts linked with ethics, etc. Other forms include coaching and mentoring that links new staff with experienced staff who stand out in terms of ethical behavior so that recent employees may follow the example of the more experienced ones that help increase awareness and promote ethical conduct.
  7. We find that a good part of measures in the field of human resources is linked only with the announcement or filling of vacancies, while these measures, though with impact on the performance of the institution, are not closely linked with the promotion of institutional integrity. More appropriate measures in this regard would be those introducing rules or procedures that strengthen transparency of competition and avoidance of any influence. Furthermore, in this context, we recommend that decisions on career support and development, assigning staff for study visits or in-depth studies in a certain area, with expenses covered by the institution, etc., are also considered activities with a high risk of corruption. An effective measure toward the promotion of integrity would be the establishment of clear, standard, and transparent rules for the selection of the staff member that would benefit from this privilege.



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