INTEGRITY
IN ACTION

Assessment Report on the Implementation of
Anti-Corruption Measures by Local Self-Government Units

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Integrity in Action

Assessment Report on the Implementation of Anti-Corruption Measures
by Local Self-Government Units

December 2024

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Executive Summary

Local self-government units consist of 23 municipalities, the Old Royal Capital Cetinje, and the Capital City Podgorica.

Four local self-government units failed to respond to the request for submitting a self-assessment report, in accordance with the **Methodology for Assessing the Implementation of Anti-Corruption Measures** and the accompanying means of verification:

1. Municipality of Gusinje
2. Municipality of Šavnik
3. Municipality of Tivat
4. Old Royal Capital Cetinje

Based on the analysis of the data obtained from individual reports for local self-government units that participated in the implementation of the *Methodology for Assessing the Implementation of Anti-Corruption Measures* in the areas of corruption risk management, internal controls, transparency in operations and access to information, professional conduct, and ethical culture, the key findings are:

The performance in implementing anti-corruption measures by local self-government units is **51.08%**. The largest number of local self-government units, a total of **12**, achieved **moderate performance** (between **50% and 75%**), while **9** achieved **lower performance** (between **25% and 50%**). The ranking of local self-government units based on their performance is shown in Table 1 below.

Table 1. Ranking of local self-government units by their performance in 4 categories

No.	The name of the local self-government unit	Performance
1	Municipality of Nikšić	74.43%
2	Municipality of Mojkovac	67.05%
3	Municipality of Pljevlja	65.34%
4	Municipality of Plužine	64.20%
5	Municipality of Bijelo Polje	61.36%
6	Municipality of Bar	60.23%
7	Municipality of Andrijevica	59.09%
8	Municipality of Herceg Novi	59.09%
9	Municipality of Žabljak	55.11%
10	Municipality of Danilovgrad	53.41%
11	Municipality of Rožaje	53.41%
12	Municipality of Kotor	50.57%
13	Capital city Podgorica	47.16%
14	Municipality of Plav	44.32%
15	Municipality of Kolašin	41.48%
16	Municipality of Berane	40.34%
17	Municipality of Budva	36.36%
18	Municipality of Petnjica	36.36%
19	Municipality of Ulcinj	36.36%
20	Municipality of Zeta	35.80%
21	Municipality of Tuzi	32.39%

The performance by category is shown in Table 2 below.

Table 2. Performance in the implementation of anti-corruption measures by category			
Category	**Maximum score**	**Actual score**	**Performance (%)**
1. Putting in place the assumptions for implementing anti-corruption legislation	735	495	**67.48%**
2. Strengthening the institutional anti-corruption framework	735	335	**45.58%**
3. Strengthening ethical culture	378	163	**43.12%**
4. Deductible scores	- 336	- 49	**- 14.58%**
Total	1,848	944	**51.08%**

Across the categories, the best performance was achieved in the first category, which relates to taking measures in the area of corruption risk management, as derived from the Law on the Prevention of Corruption [1]. All local self-government units have designated an Integrity Manager, developed an Integrity Plan, prepared a report on its implementation, and published these documents on their websites. Additionally, the majority have established internal audit mechanisms. However, only one in four government bodies has conducted an internal audit in the past two years.

Within the second category, which assesses transparency in the work of government bodies, among other things, it has been observed that documents such as the Integrity Plan and the Report on its Implementation are published on official websites. However, practices vary when it comes to fulfilling obligations under Article 12 of the Law on Free Access to Information, as not all required information is made publicly available. A positive example is that most local self-government units (18 in total) publish a public consultation programme before adopting decisions and plans of common interest, such as urban development projects and budgets, ensuring greater citizen participation in local governance.

The weakest performance was recorded in the third category, primarily due to the failure of management staff to attend training on ethics and integrity, the failure of public officials to submit regular annual income and asset reports or reports upon assuming office, and the absence of detailed regulations governing conflict of interest procedures and the acceptance of gifts by employees.

Local self-government units had points deducted due to legally concluded court cases ruled against the authority and qualified or adverse opinions from the State Audit Institution (SAI). In two municipalities, the Agency for the Prevention of Corruption issued opinions determining that the public interest had been endangered, indicating the presence of corruption.

The application of the Methodology contributed to **improving the implementation of anti-corruption measures** right from the start of the assessment. During the period designated for collecting and submitting documentation, a total of **9** municipalities adopted **21** documents, published them, established the necessary practices, and issued **2** decisions on appointing individuals responsible for implementing specific measures—carrying out a total of **23** activities related to corruption prevention.[2]

1 Official Gazette of Montenegro 54/2024
2 A detailed overview is given in Attachment no. 1. on pages 42-43 of this Report.

Introduction

Article 82 of the Law on the Prevention of Corruption[3] mandates that the Agency for the Prevention of Corruption (hereinafter: the Agency) oversee the adoption and implementation of integrity plans, provide recommendations for their improvement, and assess their efficiency and effectiveness.

An Integrity Plan is a strategic document designed to identify and evaluate corruption risks and define appropriate preventive measures, with the goal of enhancing work quality, efficiency, professional standards, and ethical culture. A key feature of this preventive mechanism is that its development can also facilitate the implementation of other anti-corruption mechanisms.

To assess the implementation of adopted integrity plans and other anti-corruption measures, the Methodology for Assessing the Implementation of Anti-Corruption Measures for Local Self-Government Units (hereinafter: the Methodology) was developed in July 2024.

The Methodology was finalized through a consultative process during a workshop with representatives of local self-government units, held on 4 July 2024.

The purpose of the Methodology is to assess whether authorities are implementing anti-corruption measures, whether their implementation has resulted in measurable change, and to encourage authorities to take a proactive approach in planning and implementing anti-corruption measures.

Methodology for Assessing the Implementation of Anti-Corruption Measures

This Methodology was developed based on recommendations outlined in the methodology description of the **"**Assessment of Anti-Corruption Initiatives", conducted by the Anti-Corruption and Civil Rights Commission of the Republic of Korea. One key recommendation is that countries seeking to adopt a similar methodology should begin with a limited set of simple criteria supported by quantitative indicators.[4]

The Methodology consists of three main categories, ten criteria, and 70 performance indicators, with a total of **88** points. These indicators assess whether local self-government units have established mechanisms for corruption risk management, internal control, access to information on government activities, professional conduct in the workplace, awareness of ethics and integrity among employees and managers, conflict of interest prevention, gift management, and the application of ethical rules.

The fourth category includes indicators that result in point deductions for the authority. It contains six indicators, with a total of **-16** points, serving as a corrective measure for the fulfillment of indicators from the first three categories. These indicators can be monitored through various sources, including data and reports from regulatory authorities.

A government entity is awarded points across various categories, and the aggregate of these points constitutes its total score. The higher the total score, the more effective the government entity is in implementing anti-corruption measures.

3 "Official Gazette of Montenegro", no. 54/24
4 For more details see: ***Introduction to Korea's Anti-Corruption Initiative Assessment (2016)*** www1.undp.org/content/seoul_policy_center/en/home/research-and-publications/ACRC.html

The effectiveness index of the implementation of anti-corruption measures for all categories is derived by calculating the proportion of the total points received by a government body against the maximum possible points. Annex No. 2 provides a detailed overview of the points awarded by category and criteria for each government body.

The Methodology was submitted to the authorities on July 15, 2024. They were allocated until August 16, 2024, to carry out a self-assessment regarding the fulfillment of the specified criteria. This involved entering the number of points in the table corresponding to each indicator and submitting the means of verification for each indicator to the Agency.

The following sources were used to verify the indicators:

a) Documents in electronic or written format submitted to the Agency by government authorities;

b) Data from records maintained by the Agency; and

c) Publicly available data on the work of government bodies, including official government websites and reports from the State Audit Institution.

If an authority did not provide the required means of verification or submitted evidence that failed to confirm compliance with the set indicators—and verification could not be established using other sources—**0 points** were awarded. If the authority provided the means of verification or if it was obtained from other sources, a score between **0.5 and 5.5 points** was awarded, depending on the level of indicator fulfillment. Fulfillment of the indicator in the fourth category led to the deduction of points. In cases of partial fulfillment, the number of points awarded depended on its fulfillment.

The effectiveness index for the implementation of anti-corruption measures across the four key categories was calculated as the percentage of the total points awarded to a public authority in relation to the maximum possible points.

Report Preparation Methodology

The methodology for preparing this report is based on the statistical and content analysis of data from individual reports on the 21 authorities that participated in the implementation of the Methodology. Each local government unit's report was compiled after the self-assessment was completed and the required verification materials were submitted to confirm compliance with the established criteria.

Self-assessments were conducted by most local government units (18), while the Capital City of Podgorica, the Municipality of Petnjica, and the Municipality of Ulcinj did not submit theirs. In municipalities that provided self-assessment tables, the final scores were generally higher than those assigned by the Agency. However, the self-assessments of the municipalities of Plav and Pljevlja matched the scores given by the Agency, whereas the municipalities of Andrijevica and Zeta reported slightly lower self-assessment scores compared to their final awarded points.

On 31 October 2024, the Agency submitted individual reports to the authorities assessing the implementation of anti-corruption measures.

Following the submission of these reports, nine municipalities provided additional comments, clarifications, and documentation, which, in some cases, resulted in score adjustments for certain indi-

cators. Each individual report includes detailed explanations regarding the acceptance or rejection of the proposed changes.

The structure of the individual reports aligns with the Methodology and, in addition to detailing the number of points awarded (or deducted) and key findings for each criterion, also includes recommendations for the implementation of anti-corruption measures for each public authority. A total of **470 recommendations** were provided.

At the system level, for each category, criterion, and indicator, an overview of the total points achieved in relation to the maximum possible points is presented. The implementation effectiveness was then calculated and expressed as a percentage to highlight the areas where anti-corruption measures have been implemented and those where further improvements are needed.

The tables contain data on the percentage of completion for each individual indicator, while the narrative section below the tables presents the results by indicator, highlighting examples of good practice. The report includes conclusions and recommendations for each category.

The findings and recommendations of this report are intended to guide decision-makers at the system level in identifying areas of systemic shortcomings and determining the necessary responses—whether through the adoption, amendment, or implementation of regulations, the establishment or strengthening of oversight mechanisms, or other measures—to enhance the integrity of public authorities.

Based on the findings of the Report, the Agency will have the opportunity to monitor the dynamics of implementing anti-corruption measures, assess their efficiency and effectiveness, and determine whether the identified systemic shortcomings have been addressed or remain unresolved.

Results of the Application of Anti-Corruption Measures by Category

Category 1: Putting in Place the Assumptions for Implementing Anti-Corruption Legislation

Within this category, the implementation of anti-corruption measures was assessed against three criteria and 23 indicators and sub-indicators. The framework for these assessments is prescribed by two systemic laws: the Law on Prevention of Corruption and the Law on Management and Internal Controls in the Public Sector.[5]

A very high level of performance was achieved in the application of fundamental mechanisms outlined in the Law on Prevention of Corruption (96.26%), while the weakest performance was recorded in establishing mechanisms for detecting and reporting corruption through whistleblower reports (42.86%).

5 Official Gazette of Montenegro 75/2018

Category - criteria	Maximum score	Actual score	Performance (%)
1. Putting in place the assumptions for implementing anti-corruption legislation	**735**	**495**	**67.35%**
1.1. Establishing an internal corruption risk management mechanism	294	283	96.26%
1.2. Establishing a mechanism for monitoring and controlling work processes	294	149	50.68%
1.3. Establishing mechanisms for detecting and reporting corruption through whistleblower reports	147	63	42.86%

Criterion 1.1: Establish an internal corruption risk management mechanism

The highest performance in the implementation of anti-corruption measures was achieved under this criterion (96.26%). Nearly all public authorities fulfilled their obligations under the Law on Prevention of Corruption, including the appointment of Integrity Managers, the development and implementation of Integrity Plans, and the completion of questionnaires for assessing the efficiency and effectiveness of Integrity Plans.

A **good practice** example is that public authorities incorporated dedicated chapters into their integrity plans, focusing on risk assessment and the identification of measures for individual local self-government bodies, local administrations, and special and expert services. In these areas, most public authorities defined appropriate measures to mitigate identified residual risks.

Shortcomings observed:

Some authorities have yet to enter their **Integrity Plans** into the application as required by the user manual. Additionally, certain authorities conduct a joint assessment of multiple residual risks within the same area instead of evaluating each residual risk individually. This approach has, in some cases, hindered the ability to define appropriate measures, assign responsible persons, and set deadlines for implementing measures for each specific risk.

It was also observed that the measures established to prevent corruption risks are often inadequate in relation to the identified risks.

Criterion – indicators	Maximum score	Actual score	Performance (%)
1.1. Establishing an internal corruption risk management mechanism	**294**	**283**	**96.26%**
1.1.1. Integrity Manager designated	21	21	100%
1.1.2. Integrity Plan developed in accordance with the Law on Prevention of Corruption and the Rules for the Development and Implementation of an Integrity Plan: Integrity Plan developed- **1 point**	21	21	100%
*If the adopted Integrity Plan is entered into the web-based application of the Agency for Prevention of Corruption, the authority receives **an additional 1 point**	21	19	90.48%
If the adopted Integrity Plan is entered into the application in compliance with the user manual, the authority receives **an additional 1 point.	21	18	85.71%
***If the Integrity Plan has been updated at least once in the previous two years, the authority receives **an additional 1 point**.	21	21	100%
1.1.3. The Integrity Plan, in addition to general risk areas, also contains specific risk areas or separate chapters relating to individual local self-government bodies, local administration bodies, and special and expert services: a) one specific risk area- **1 point** b) two specific risk areas- **2 points** c) three or more specific risk areas- **3 points**	63	63	100%
1.1.4. A report on the implementation of the Integrity Plan for the previous year has been prepared and submitted to the Agency by 15 April of the current year: a) in printed form- **1 point** b) through the web-based application- **2 points**	63	58	92.06%
1.1.5. A questionnaire for assessing the efficiency and effectiveness of the Integrity Plan over the past two years has been completed and submitted to the Agency: a) in printed form- **1 point** b) through the web-based application- **2 points**	63	62	98.41%

Indicator 1.1.1: Integrity Manager designated

This indicator was met by all local self-government units with 100% performance, indicating that this measure from the Law on Prevention of Corruption has been fully established within the system.

Indicator 1.1.2: Integrity Plan developed

All authorities **(100%)** have developed an Integrity Plan and updated it at least once in the past two years. While the development of an Integrity Plan through the web-based application is not a legal obligation under the Law, it is required by the Rules for the Development and Implementation of an Integrity Plan to support authorities in conducting a high-quality corruption risk assessment. As a result, 90.48% of local self-government units have also developed their Integrity Plans using this method. By the end of August 2024, the Capital City of Podgorica and the Municipality of Budva had not entered their Integrity Plans into the application.

Additionally, **85.71%** of local self-government units entered their Integrity Plans into the web-based application in the manner prescribed by the Agency's user manual—all units except the Capital City of Podgorica, the Municipality of Budva, and the Municipality of Plužine.

Indicator 1.1.3: Specific risk areas in the Integrity Plan

The indicator related to the content of the developed Integrity Plan has also achieved full implementation (**100%**), as all local self-government units have assessed risks and defined measures concerning individual local self-government bodies, local administration, and special and expert services.

In most cases, dedicated chapters focused on: the Mayor's Office, the Office of the Chief Administrator, the Office of the Chief City Architect, the Secretariat for General/Local Administration, the Secretariat for Culture, Sports, Youth, Social Activities, and Social Welfare, the Secretariat for Property, Representation, and Investments, the Secretariat for Urbanism and Spatial Planning, the Secretariat for Communal and Housing Affairs, the Secretariat for Finance, Economic Development, and Entrepreneurship, the Municipal Police, the Service for Parliamentary Affairs, the Service for Internal Audit, and others.

It was observed that some authorities, instead of individually assessing the intensity of each residual risk or a group of closely related risks, provided a joint assessment of a large number of residual risks within the same area. Additionally, the measures identified were often inadequate to effectively prevent the identified risks.

For example, in the area of Management and Governance, various residual risks—such as failure to perform and unprofessional performance of duties by committee members, deviation from adopted development plans and programmes, failure to fulfil activities established by internal acts, and conflict of interest—were grouped together. However, the measures planned to prevent these risks, such as submitting a report on received sponsorships and donations to the Agency for Prevention of Corruption or updating internal instructions for keeping records and receiving gifts from employees, were not substantively related to the assessed risks.

Indicator 1.1.4: Report on the implementation of the Integrity Plan prepared

High performance (**92.06%**) was also achieved in the preparation of reports on the implementation of the Integrity Plan. All authorities prepared a report on the implementation of the Integrity Plan and submitted it to the Agency within the deadline. However, the Capital City of Podgorica and the Municipality of Budva did not enter the data into the web-based application, and the Municipality of Plav did not submit the report to the Agency in printed form.

Indicator 1.1.5: Questionnaire for assessing the efficiency and effectiveness of Integrity Plans

In addition to being a legal obligation (Article 80 of the Law), the assessment of the efficiency and effectiveness of the Integrity Plan is a crucial tool, as it serves as the basis for adopting a new Integrity Plan for the next two-year period. By responding to the questions prepared by the Agency, authorities evaluate how effective the measures from their adopted Integrity Plans have been in preventing corruption risks. With an indicator performance of **98.41%,** it can be concluded that authorities recognize the importance of this assessment in terms of formal compliance. However, the Municipality of Plav failed to submit the questionnaire to the Agency in printed form.

Criterion 1.2: Establish mechanisms for monitoring and controlling work processes

The aforementioned criterion evaluated the implementation of anti-corruption measures as prescribed by the Law on Management and Internal Controls in the Public Sector, with a particular emphasis on internal audit, the development of a risk register, and the establishment of a book of internal procedures. Compared to the previous criterion, the implementation performance is notably lower, standing at 50.68%.

On a positive note, the majority of authorities (80.95%) have established an internal audit mechanism and have developed both a risk register and a book of internal procedures.

Shortcomings observed:

Although most authorities have established an internal audit mechanism, in practice, it has yet to deliver the expected results, as evidenced by the limited number of audits conducted and the very low implementation rate of the recommendations issued. Furthermore, Risk Registers are not yet recognised as an effective risk management tool within public authorities, and a similar situation exists with the Book of Procedures. At present, the Book of Procedures serves as a collection of instructions, rules, and internal acts that vary from one authority to another, without a unified standard defining its required content. As for the Annual Report on Suspicions of Irregularities and Fraud, it remains largely a formal compliance exercise rather than a substantive tool for addressing irregularities.

Criterion – indicators	Maximum score	Actual score	Performance (%)
1.2. Establishing a mechanism for monitoring and controlling work processes	**294**	**149**	**50.68%**
1.2.1. Internal audit in place	42	34	80.95%
1.2. 2. Internal audit conducted (audit report prepared) in the previous two years: a) one- **1 point** b) two or more- **2 points**	42	18	42.86%
1.2.3. Percentage of internal audit recommendations implemented in the last reporting period: a) from 50%- 70%- **1 point** b) from 70%- 90%- **2 points** c) over 90%- **3 points**	63	11	17.46%
1.2. 4. Risk Register developed in accordance with Article 14 of the Law on Management and Internal Controls in the Public Sector: Registry established- **1 point**	21	16	76.19%
*If the register has been updated within the last year, the authority receives **an additional 1 point.**	21	11	52.38%
In case the valid Risk Register is published on the authority's website, the authority receives **an additional 1 point	21	11	52.38%
1.2.5. Annual Report on Notified Suspicions of Irregularities and Fraud and Measures Taken, prepared in accordance with Article 53 of the Law on Management and Internal Controls in the Public Sector	21	14	66.67%
1.2. 6. A Book of Internal Procedures has been developed in accordance with Article 50 of the Law on Management and Internal Controls in the Public Sector: Book of Procedures prepared- **1 point**	21	15	71.43%
*In case the Book of Procedures has been updated in the last two years, the authority receives **an additional 1 point**	21	6.5	30.95%
In case the most up-to-date Book of Procedures is published on the authority's website, the authority receives **an additional 1 point	21	12.50	59.52%

Indicator 1.2.1: **Internal audit in place**

This is the best-performing indicator within this criterion, with an 80.95% compliance rate. However, four municipalities—Mojkovac, Petnjica, Tuzi, and Zeta—have not established an internal audit function. The Municipality of Mojkovac has submitted a request to the Municipality of Kotor to conclude an agreement for outsourcing internal audit tasks but has not provided evidence that the agreement has been finalised. Thirteen authorities have established an internal audit service, while four have formalised agreements to delegate internal audit tasks to another municipality: the Municipality of Andrijevica to the Municipality of Berane, the Municipality of Kolašin to the Municipality of Herceg Novi, the Municipality of Plužine to the Municipality of Nikšić, and the Municipality of Žabljak to the Municipality of Pljevlja.

Indicator 1.2.2: **Internal audit conducted (audit report prepared) in the previous two years**

Slightly less than half of the government bodies that have established an internal audit (**42.86%**) have conducted audits in the past two years. Among them, eight authorities carried out two or more internal audits, with the Capital City of Podgorica conducting the highest number (seven audits), while two municipalities conducted a single internal audit each.

It has been observed that when internal audit functions are entrusted to another municipality through an agreement, the number of audits performed tends to be low or non-existent. This is the case with the Municipality of Kolašin, which signed an agreement with the Municipality of Herceg Novi on 22 September 2023 to delegate its internal audit tasks. However, as of August 2024, no audits have been conducted in the Municipality of Kolašin under this arrangement.

Indicator 1.2.3: **Percentage of internal audit recommendations implemented in the last reporting period**

This criterion recorded the lowest performance, with a compliance rate of just **17.46%**. Only four local government units—Nikšić, Pljevlja, Plužine, and Rožaje—provided evidence of implementing more than 70% of internal audit recommendations. In three other municipalities, the implementation rate falls between 50% and 70%

Indicator 1.2.4: **Risk Register prepared**

The second-best performing indicator, with a compliance rate of **76.19%**, relates to the preparation of the Risk Register, with only five authorities yet to develop this document.

A total of **53.38%** of authorities regularly update their Risk Register, and the same percentage make it publicly available online.

Indicator 1.2.5: Report on Notified Suspicions of Irregularities and Fraud

More than half of the authorities (**46.15%**) have prepared and submitted the Annual Report on Notified Suspicions of Irregularities and Fraud and Measures Taken to the Ministry of Finance.

Of the 12 reports submitted, all stated that there were no reported suspicions of irregularities or fraud in the previous year. The only exception was the Ministry of Capital Investments, which reported 33 cases of suspected fraud and irregularities, including 13 cases where suspicions were confirmed. However, as this report was submitted outside the monitoring period, it was not included in the assessment.

Seven municipalities failed to prepare and submit this mandatory report, despite it being a legal obligation. The Law on Management and Internal Financial Controls in the Public Sector does not prescribe sanctions for non-compliance with this requirement.

Indicator 1.2.6: **Book of Procedures prepared**

The performance of this indicator is high, at **71.43%,** as 15 out of 21 municipalities have developed a Book of Procedures. However, different approaches to developing the Book of Procedures have been observed. Most municipalities have compiled a single document that includes various instructions, rules, and procedures related to the work of the authorities, such as internal rules and procedures for the legalisation of illegal buildings, rules on departmental operations, internal instructions on the use of official telephones, regulations on municipal property management, internal rules on conflict of interest and gifts, and procedures for handling whistleblower reports. In some municipalities, such as Ulcinj and Berane, Books of Procedures were developed by individual secretariats and administrations within their respective areas of work, but not across all local self-government authorities.

When assessing the fulfilment of this indicator, decisions by some municipalities that have a section titled "Book of Internal Procedures" on their websites (e.g., the municipalities of Bar and Bijelo Polje) and have published procedures, rules, and instructions related to the work of local authorities were also taken into account.

It appears that authorities are unclear about which procedures and rules should be included in the Book of Procedures and how each procedure should be structured.

Every third local self-government unit (**30.95%**) regularly updates its Book of Procedures, while **59.52%** publish it on their website.

Criterion 1.3: Establish mechanisms to detect and report corruption

The third criterion in the first category relates to the implementation of measures aimed at establishing an effective mechanism for handling whistleblower reports. Three-quarters of local self-government units (76.19%) have initiated the process of setting up mechanisms for detecting and reporting corruption by designating a responsible person to receive and process reports.

Shortcomings observed:

This criterion has the weakest overall performance within the category, with a fulfilment rate of only 42.86%. While most authorities have appointed a designated person for handling whistleblower reports, significantly fewer have made the person's contact information publicly available, and even fewer (19.05%) have developed clear procedures for handling reports, including criteria for selecting the responsible person.

Criterion - Indicators	Maximum score	Actual score	Performance (%)
1.3. Establishing mechanisms for detecting and reporting corruption based on whistleblower reports	**147**	**63**	**42.86%**
1.3.1. A designated person/organizational unit established for receiving and acting on whistleblower reports with at least one filled systematized position – **1 point**	21	15	71.43%
*In case the information on the designation of the person/organizational unit is published on the website or made easily accessible in the work environment, the authority receives **an additional 1 point.**	21	9	42.86%
In case the authority keeps a record of whistleblower reports (including the number, date of the report, name and surname – if not anonymous, a brief description of the irregularity, number and date of notification of receipt of the report and measures taken), the authority receives **an additional 1 point	21	11	52.38%
1.3.2. Procedure for handling whistleblower reports created- **2 point**s	42	20	47.62%
*In case the developed procedure includes the method and criteria for selecting the person responsible for receiving and acting upon whistleblower reports, the authority receives **an additional 2 points.**	42	8	19.05%

Indicator 1.3.1: Designation of persons to receive and act on whistleblower reports

Although the Law on Prevention of Corruption provides for penalties[6] for authorities that fail to designate a person to receive and act on whistleblower reports, some have still not done so. Five local self-government units—Berane, Budva, Plav, Ulcinj, and Zeta—did not submit evidence of having appointed such a person. Two municipalities, Herceg Novi and Andrijevica, designated a responsible person only after submitting individual reports on the assessment of anti-corruption measures, whereas the remaining 12 municipalities made these appointments much earlier, in 2016, 2020, and 2021. The Capital City of Podgorica and the Municipality of Bar received half a point because they designated a person to handle whistleblower reports for some of their administrative authoritiesa but not for all.

Data on the designation of persons or organisational units was made publicly available by **42.86**% of local self-government units through the publication of the decision on the designation of persons on their websites.

Regarding the maintenance of records on whistleblower reports—which should include details such as the number and date of the report, the name and surname (if not anonymous), a brief description of the irregularity, the number and date of the notification of receipt, and any measures taken—this obligation, like the previous one, was introduced through amendments to the Law on the Prevention of Corruption, which entered into force in June 2024.

Considering that the implementation of the Methodology began in July and that there was a short period for authorities to familiarise themselves with this obligation, for the purposes of verifying this indicator, submitted extracts from records, record-keeping forms, as well as cases where an internal act regulating the handling of whistleblower reports contains a provision on record-keeping, were recognised. As a result, the performance of authorities for this indicator stands at **52.38%.**

6 Article 108, paragraph 1, item 14 of the Law on the Prevention of Corruption prescribes a fine ranging from 1,000 to 20,000 euros for a legal entity that fails to designate an impartial person or organisational unit to receive and act on whistleblower reports, in accordance with the procedure outlined in Article 54 of the Law (Article 55, paragraph 1). Additionally, paragraph 2 of the same article stipulates a fine of 500 to 2,000 euros for a responsible person in a public authority for the same offence..

It should be noted that the Law on the Prevention of Corruption also prescribes fines for failure to publish data about the designated person or organisational unit in the work environment and on the website, as well as for failure to fulfil the obligation to keep records of whistleblower reports.[7]

Indicator 1.3.2: Procedure for handling reports

The procedure for handling whistleblower reports was developed by 10 local self-government units, five of which did so during the assessment of the implementation of anti-corruption measures.[8]

Only four municipalities (Andrijevica, Herceg Novi, Mojkovac, and Nikšić) have incorporated criteria for selecting the persons responsible for receiving and acting on whistleblower reports into their internal acts, making this the weakest-performing indicator, with a fulfilment rate of **19.05%.**

The first and most crucial step in establishing an effective whistleblower complaint-handling mechanism within a public authority is to designate a person who possesses the necessary personal, ethical, and professional competencies to handle complaints, ensuring that whistleblowers have confidence that their reports will be properly addressed. It is therefore essential not only to define the selection process but also to establish clear criteria that the designated person must meet.

Category 2: Strengthening the Institutional Anticorruption Framework

Under the category Strengthening the Institutional Anticorruption Framework, the implementation of anticorruption measures related to free access to information, human resource management, and the ethical and professional conduct of employees was assessed through a total of three criteria and 33 indicators and sub-indicators.

The best performance was achieved in the application of measures aimed at increasing transparency in the work of public authorities, with a fulfilment rate of 54.04%. The weakest performance was recorded in efforts to improve the ethical and professional conduct of employees in public authorities, with a fulfilment rate of 22.22%.

Category - criteria	Maximum score	Actual score	Performance (%)
2. Strengthening the institutional anticorruption framework	**724.50**	**335**	**46.24%**
2.1. Increase transparency of public authority's work	483	261	54.04%
2.2. Take measures to improve human resource management	126	46	36.51%
2.3. Take measures to improve the internal mechanism ensuring ethical and professional conduct	126	28	22.22%

7 Article 108, paragraph 1, items 15 and 20 of the Law on the Prevention of Corruption
8 A detailed overview of the authorities and acts adopted during that period is provided in Appendix 1.

Criterion 2.1: Increase transparency of public authority's work

The criterion measured the extent to which public authorities made information about their work visible and accessible to the public, not only by complying with legal obligations but also by proactively publishing information. It also assessed requests for and responses to free access to information requests. A high level of performance was achieved where publication was a legal obligation, such as the publication of an Integrity Plan, a Guide to Access to Information, and similar documents.

Shortcomings observed:

When it comes to the proactive publication of information required by Article 12 of the Law on Free Access to Information,[9] it has been observed that such information is not fully accessible to the public. Although public authorities are legally required to publish information that has been granted upon request, the prevailing practice is to publish only decisions on free access to information requests.

A different approach among authorities was observed when creating and publishing guides for free access to information. In some municipalities, separate guides were created for each local self-government authority, while others developed a single guide covering all authorities, and only a smaller number actively update them. A similar variation was observed in the establishment of e-counters for citizens.

9 Official Gazette of Montenegro 44/2012 and 30/2017

Criterion - Indicators	Maximum score	Actual score	Performance (%)
2.1. Increase transparency of public authority's work	**483**	**261**	**54.04%**
2.1.1. Valid integrity plan published on the institution's website- **1 point**	21	18	85.71%
*In case the document is published in a way that it is accessible in three clicks or less from the homepage, **0.5 points are added**	10.5	9	85.71%
2.1.2. Published report on the implementation of the integrity plan for the previous year on the institution's website- **1 point**	21	16	76.19%
*In case the document is accessible in three or fewer clicks from the homepage, **0.5 points are added**	10.5	8	76.19%
2.1.3. Published Activity Report for the previous year of the institution- **1 point**	21	14	66.67%
*In case the document is accessible in three or fewer clicks from the homepage, **0.5 points are added**	10.5	6.5	61.90%
2.1.4. The Guide for Free Access to Information is published- **1 point**	21	16.5	78.57%
*In case the document has been updated in the last year-1 **point is added.**	21	7	33.33%
In case a valid guide is accessible in three or fewer clicks from the homepage, **0.5 points are added	10.5	10	95.24%
2.1.5. Full and updated information published, as stipulated by Article 12 of the Law on Free Access to Information: a) list of civil servants and employees	21	16.50	78.57%
b) list of public officials with payroll information, including all income and benefits related to their public office	42	25	59.52%
c) information to which access is granted upon request	21	0	0%
*In case that all requested data is accessible in three or fewer clicks from the homepage or the authority's page on the central website, **0.5 points are added.**	10.5	0	0%
In case certain datasets are also published on the Open Data Portal, **1 point is added	21	0	0%
2.1.6. Accepted and partially accepted requests for accessing information or notifications of the information already being in the public domain as a share of the total number of requests received over the previous two years: a) 70 to 90% of all requests received were accepted or partially accepted or the requesting party notified that the information was already in the public domain- **1 point** b) Over 90% of all requests received were accepted or partially accepted or the requesting party notified that the information was already in the public domain- **2 points**	42	8	19.05%
*In the event that the authority promptly uses the information system for free access to information of the Agency for Personal Data Protection and Free Access to Information and submits evidence thereof, **0.5 points are added.**	10.5	2.5	23.81%
2.1.7. Established electronic provision of services to citizens (e-counter), which includes a guide to accessing services, downloading necessary forms, tracking case progress, submitting requests for extracts from civil registers, filing tax returns, and reviewing tax decisions **- 2 points**	42	13	30.95%
*In case the website is adapted to persons with disabilities, the authority receives **- an additional 1 point**	21	7	33.33%
2.1.8. Participation of the interested public was ensured before adopting plans and programmes for individual areas in the municipality, urban planning projects, budgets, and general acts that determine the rights and obligations of citizens, by conducting a public hearing procedure a) Published programme of public discussion	21	18	85.71%
b) Published notice on the manner, deadlines, place and time of holding the public hearing with the necessary information on the subject of the public hearing	21	18	85.71%
c) Published report on the results of the public hearing (summary of comments given with reasons for acceptance/non-acceptance)	21	11	52.38%
2.1.9. Information about the work of public authorities is also available to citizens through social media (Facebook, Instagram, etc.)	21	21	100%
2.1.10. Live broadcast provided from the sessions of the Assembly of the local self-government unit	21	16	76.19%

Indicator 2.1.1: Integrity Plan published

This is an indicator with a high compliance rate of **85.71%.** For all authorities that have published their Integrity Plan, it is accessible in fewer than three clicks from the homepage. Three municipalities—Budva, Petnjica, and Tuzi—have not published a valid Integrity Plan on their website.

Indicator 2.1.2: Report on the implementation of the Integrity Plan published

Although all local self-government units that produced a report on the implementation of the integrity plan did so either in printed form or through a web application, only 16 published the report on their website and made it accessible in fewer than three clicks from the homepage. The remaining five authorities received no points for this indicator as they did not publish the report.

Indicator 2.1.3: Activity Report published

The Activity Report for the previous year was published by 14 local self-government units (**66.67%**) and is accessible within three clicks from the homepage. Seven municipalities—Andrijevica, Kotor, Petnjica, Plav, Tuzi, Ulcinj, and Zeta—did not publish their Activity Reports.

Indicator 2.1.4: Guide for Free Access to Information published

This is one of the best-performing indicators, with a compliance rate of **78.57%.** Full points were awarded to authorities that provided a link to a website where the guide to access information for the local self-government unit was published or a link to a site where guides for individual bodies of the local self-government unit were available.

Almost all local self-government units published a guide for access to information; however, those that published guides only for some authorities were awarded half a point, which was the case for seven municipalities.

Only the Municipality of Petnjica has not published a guide to access to information for any authority, nor a guide covering the work of all bodies within the municipality.

In the past year, 12 authorities updated this document, with half a point awarded to those that updated guides for only some local self-government bodies or local administration authorities.

The municipalities of Danilovgrad and Tuzi were the only ones to receive full points, as they updated the guides for all individual authorities within their jurisdiction.

Indicator 2.1.5: Publication of information in accordance with Article 12 of the Law on Free Access to Information

Within the mentioned indicator, the performance of authorities was measured in terms of publishing information required by Article 12 of the Law on Free Access to Information. No authority achieved the maximum number of points under this indicator.

More than half (16) of local self-government units published a list of civil servants and employees, with the Municipality of Bar doing so for only one secretariat.

The list of public officials, along with the list of their salaries, other income, and benefits relat-

ed to the performance of public office, was published by 10 local self-government units, while five published only the list of public officials without disclosing the income they receive on that basis. As a result, the performance of this indicator stands at **59.52%.**

Regarding the information to which access was granted upon request, all local self-government units published on their websites the decisions resolving requests for accessing information, while some municipalities (Kotor, Herceg Novi, and Nikšić) also published some of the requested information. However, in order to meet this indicator, it was necessary to publish all information to which access was granted upon request, which is why no points were awarded to any municipality.

Sometimes the requested information is included in the decision resolving the request, but there are instances where this is not the case, requiring the publication of the requested information alongside the decision or a notice informing the requesting party where the information can be accessed (e.g., where previously published documentation requested by the applicant can be reviewed).

Since the authorities did not publish the information to which access was granted upon request, they did not receive points under the indicator requiring all data from Article 12 of the Law on Free Access to Information to be accessible within three clicks from the homepage.

Although Article 12a of the Law on Free Access to Information stipulates that public authorities must publish information for reuse in an open format on the electronic government sub-portal (Open Data Portal), which serves as a unified platform in a machine-readable and open format, no local self-government unit has fulfilled this obligation.

Indicator 2.1.6: Approved requests for accessing information

The indicators listed in this Methodology measure the effectiveness of public authorities' proactivity in publishing information about their work, as well as their responsiveness to requests for access to information when such information is not readily available to the public. The indicator measuring the share of approved and partially approved access requests, along with notifications about published information in the total number of submitted requests in the previous two years, showed a performance rate of **19.05%**.

Only five local self-government units submitted a report on the share of approved and partially approved requests for accessing information, as well as notifications about published information, in the total number of requests submitted in the previous two years.

In three municipalities (Herceg Novi, Mojkovac, and Zeta), the share of accepted and partially accepted requests for access to information, as well as notifications of published information, in relation to the total number of submitted requests, exceeds 90%. In the other two municipalities that submitted a report (Danilovgrad and Nikšić), this share ranges between 70% and 90%.

Some authorities provided a link to the website where decisions on submitted applications were published for each individual local self-government body but did not submit a report detailing the number of requests received in the previous two years or the proportion of approved requests. Additionally, they did not provide an extract from the information system for free access to information of the Agency for Personal Data Protection and Free Access to

Information, which would allow verification of the share of approved requests relative to the total number submitted.

Proof of the use of the information system for free access to information, managed by the Agency for Personal Data Protection and Free Access to Information, was submitted by four local government units: the Capital City of Podgorica and the municipalities of Kolašin, Mojkovac, and Rožaje.

The most reliable method of record-keeping is accessing this information system directly. As evidence of compliance with the relevant indicators, an official extract from the system should be provided.

Indicator 2.1.7: Electronic provision of services to citizens

The performance under this indicator is **30.95%**. Some authorities have made efforts to provide citizens with services electronically in some form, through a functional e-counter, where citizens can electronically submit requests for civil registry extracts, file tax returns, or check tax decisions.

Only the Capital City of Podgorica has a fully established and functional system of electronic service provision to citizens, which includes forms for download, the possibility of tracking the status of a submitted request (motion, appeal, complaint, etc.) as it is processed by the administrative bodies/services of the Capital City, the ability to submit electronic tax returns for real estate tax assessment and electronic monthly returns for calculating surtax on personal income tax, an electronic review of real estate tax decisions and financial statements, as well as the option to submit an electronic request for issuing an extract from the marriage registry.

A total of 11 municipalities have partially established electronic services for citizens. They primarily offer the ability to download applications and forms from their websites, which citizens need to exercise various rights, as well as the option to file or monitor property taxes.

A third of the local self-government units (**33.33%**) have adapted their websites for persons with disabilities..

Indicator 2.1.8: Participation of the interested public ensured – by conducting public hearings

The aim of this indicator is to assess the extent to which local self-government units ensure public participation before making decisions of common interest and adopting plans (such as urban development projects, budgets, etc.) that are important for the residents of that local community.

The majority of government bodies (**85.71%**) adopt and publish a public consultation programme, which includes a notice on the method, deadlines, location, and time of the public consultation, along with specific information about the subject of the consultation and the name of the authority responsible for conducting it.

The legislator has prescribed[10] that local self-government units are obliged to consider all received comments, proposals or suggestions from participants in the public debate, compile a summary of the comments along with their positions on acceptance or reasons for non-ac-

10 Article 168, paragraph 1, item 4 of the Law on Local Self-Government (Official Gazette of Montenegro 2/2018, 34/2019 , 38/2020, 50/2022 and 84/2022).

ceptance, prepare a report on the results of the public debate, and submit it to the proposer, along with a draft municipal development plan and programme, budget, and general acts that determine the rights and obligations of citizens.

However, in addition to this verification prescribed by law, fulfilling the indicators also required that the authority act in accordance with good governance standards by publishing a report on the results of the public hearing (a summary of the comments provided, along with reasons for their acceptance or non-acceptance) on its website as part of other documentation related to the public hearing.

Half of the authorities, or 11 of them, complied with this requirement.

Indicator 2.1.9: Availability of information via social networks (Facebook, Instagram, etc.)

This is the only indicator within the given criterion that has been fully met, with a compliance rate of **100.00%**.

Given that modern forms of communication are largely based on the use of social media, it appears that local self-government units have recognised their importance in informing the public about their work, as all of them utilise these platforms.

The most commonly used social media networks are Facebook, Instagram, and X.

Indicator 2.1.10: Live broadcast of local assembly sessions provided

In addition to providing citizens with essential information relevant to their local community, the use of social media and the broadcasting of sessions from local assemblies also promote more responsible behaviour among decision-makers in that community.

One way to monitor the work of a local assembly—whose jurisdiction includes, among other things, the adoption of regulations, urban plans, budgets, and spatial planning—is by enabling citizens to follow live broadcasts of its sessions.

The majority of local government units (16 in total) have facilitated live broadcasts of sessions via YouTube channels or local TV stations.

Criterion 2.2: Taking measures to improve human resource management

This criterion assessed whether internal acts provided detailed regulations on the engagement of persons outside the employment relationship (such as occasional jobs and additional work) and whether authorities recognised risks in planning, personnel selection, and promotion within their Integrity Plans. The results indicate that, in most cases, authorities have incorporated risks and measures related to the planning and recruitment process in their Integrity Plans.

Shortcomings observed:

A smaller number of authorities consider it necessary to introduce additional regulations on the hiring of persons under temporary and occasional work contracts, despite the fact that this area allows significant discretionary power in recruitment decisions.

Criterion - indicators	Maximum score	Actual score	Performance (%)
2.2. Taking measures to improve human resource management	**126**	**46**	**36.51%**
2.2.1. The authority has adopted an internal rule/procedure with criteria and standards that more closely regulate the management, conclusion, execution, supervision and reporting of service contracts and contracts for temporary and occasional work	42	7	16.67%
2.2.2. The authority has adopted an internal rule/procedure with criteria and standards that more closely regulate the management, conclusion, execution, supervision and reporting of contracts for additional work within the authority.	21	2	9.52%
2.2.3. The Integrity Plan identifies risks and measures related to: a) planning recruitment and/or recruitment process	21	18	85.71%
b) performance appraisal and monitoring	21	13	61.90%
c) rewards and sanctions	21	6	28.57%

Indicator 2.2.1: Engagement of persons under contracts outside the employment relationship

Only two municipalities—Mojkovac and Plužine—have adopted rules with criteria and standards that more precisely regulate the management, conclusion, execution, supervision, and reporting of service contracts and contracts for temporary and occasional work.

The other three municipalities (Bar, Bijelo Polje, and Nikšić) have only drafted a rule that provides more detailed regulations on the conclusion, execution, and supervision of service contracts. Additionally, the municipalities of Bar and Nikšić adopted the act after the Methodology was submitted to them (in August and September 2024).

The overall level of compliance with this indicator remains very low, standing at **16.67%.**

Although concluding contracts for temporary and occasional work grants decision-makers broad discretionary powers, which can create opportunities for various forms of corruption—such as conflicts of interest (if contracts are awarded to an affiliated person), nepotism, and other irregularities—the lack of a structured selection procedure and clear criteria for hiring increases the risk of employing unqualified personnel. Despite these concerns, authorities have not taken sufficient measures to regulate this procedure in greater detail.

Indicator 2.2.2: Conclusion of secondary employment contracts

The lowest performance **(9.52%)** within the aforementioned criterion was recorded for this indicator. Only two municipalities (Bar and Nikšić) have developed an internal act that regulates in more detail the conclusion, execution, monitoring and reporting of secondary employment contracts within the authorities. However, both municipalities adopted these regulations only after they were provided with the Methodology.

Indicator 2.2.3: Integrity Plan and human resources management

Within this indicator, an assessment was conducted to determine whether the developed Integrity Plans include risks and measures related to key human resource management processes, such as planning and recruitment procedures, performance appraisal and monitoring, and rewards and sanctions.

Only five municipalities incorporated all three categories into their Integrity Plans. The remaining 14 municipalities included risks and measures in their Integrity Plans, though in most cases, these primarily addressed planning, recruitment processes, and performance appraisal and monitoring.

Risks and measures related to the process of planning and recruiting personnel are recognized in most developed Integrity Plans within the area of Personnel Policy, Ethical and Professional Conduct of Employees. The identified risks in the planning and recruitment process mainly relate to the lack of human resource capacities, deficiencies in personnel plans, and the inadequate execution of certain tasks.

Regarding measures to mitigate these risks, the most commonly planned action is conducting an assessment of the necessary personnel required for the efficient performance of tasks within the municipality's jurisdiction.

In some Integrity Plans, risks and measures related to human resource management are also included in specific areas concerning the work of certain bodies and services. For example, in relation to the work of the mayor's office, they address matters such as the timely development of a personnel plan and the consistent application of procedures in the recruitment process.

Criterion 2.3: Taking measures to improve the internal mechanism of ensuring ethical and professional conduct

This criterion recorded the weakest performance, with a compliance rate of 22.22%. There are small steps towards establishing positive practices in public authorities that demonstrate a commitment to ethics and integrity, particularly those that have systematized job positions related to these areas or established dedicated offices, as seen in the Municipality of Budva.

Shortcomings observed:

Integrity Plans of government bodies include risks and specific measures related to areas regulated by the Law on Prohibition of Discrimination, the Law on Prohibition of Harassment at Work, the Law on Prohibition of Discrimination against Persons with Disabilities, and the Law on Gender Equality. However, these measures are largely generic and broad, lacking clear identification of specific risks and corresponding preventive actions.

Criterion - indicators	Maximum score	Actual score	Performance (%)
2.3. Taking measures to improve the internal mechanism of ensuring ethical and professional conduct	**126**	**28**	**22.22%**
2.3.1. A designated employee tasked, in addition to their ordinary job description, with matters concerning ethics, integrity and anticorruption, giving advice, etc. apart from the tasks the employee is required to perform under the Law on the Prevention of Corruption (such as integrity manager, members of the Integrity Plan drafting group, person responsible for receiving and acting on whistleblower reports, etc.) a) in case of an additional task for the given officer- **1 point** b) in case of a sole responsibility of an officer, or a special organizational unit established to deal with these issues- **2 points**	42	5	11.90%
2.3.2. The Integrity Plan includes the risks and measures concerning the matters governed by the following laws: a) Law prohibiting mobbing	21	8	38.10%
b) Law prohibiting discrimination	21	9	42.86%
c) Law prohibiting discrimination against persons with disabilities	21	5	23.81%
d) Gender equality law	21	1	4.76%

Indicator 2.3.1: Designated person tasked with matters concerning ethics, integrity and anti-corruption

A small number of municipalities earned points under this indicator. Only four have designated a person responsible for tasks related to ethics, integrity, and the fight against corruption, including providing advice—tasks that are not mandatory under the Law on the Prevention of Corruption (such as integrity managers, members of the Integrity Plan drafting group, or a person responsible for receiving and acting upon whistleblower reports).

An **example of good practice** is the Municipality of Budva, which established an Anti-Corruption Office with four systematized positions.

The municipalities of Bar, Plužine, and Rožaje have also incorporated ethics and integrity-related responsibilities into their systematization acts, listing these duties alongside existing job descriptions for certain employees.

Indicator 2.3.2: Inclusion of areas regulated by special laws in the integrity Plan

This indicator is intended to assess whether authorities have included in their Integrity Plan risks and measures related to areas regulated by the Law on Prohibition of Harassment at Work, the Law on Prohibition of Discrimination, the Law on Prohibition of Discrimination against Persons with Disabilities, and the Law on Gender Equality.

Only the Integrity Plan of the Municipality of Nikšić contains risks and measures related to three of the four mentioned laws, excluding the Law on Gender Equality, despite the fact that the Integrity Plan was updated during the collection of documentation.

Other authorities, in most cases (eight municipalities), included risks and measures related to the prohibition of harassment at work, such as designating a person to mediate in cases of harassment at work and issuing internal instructions for handling cases of mobbing.

The area of discrimination was addressed by nine local self-government units in their Integrity Plans. However, the identified risks are mostly generic, such as discrimination of citizens on any grounds, while the proposed measures primarily focus on supervising employees' conduct.

The Municipality of Pljevlja is the only one that has assessed risks related to gender equality in its Integrity Plan, applying this assessment to several bodies under its remit.

Considering the above, it appears that when developing the Integrity Plan, the working groups did not conduct a thorough analysis of all internal and external factors that may contribute to corruption in relation to the areas covered by the four aforementioned laws. This is contrary to the approach outlined in the Rules for Developing and Implementing the Integrity Plan.

Category 3: Strengthening Ethical Culture

Under the category of Strengthening Ethical Culture, the effectiveness of government bodies in raising awareness among employees and managers about anti-corruption efforts, ethics, and integrity was assessed. This category also measured the adoption of internal rules on conflict of interests and the acceptance of gifts by employees and public officials. The evaluation was conducted based on a total of four criteria and 14 indicators and sub-indicators.

The best performance was recorded regarding the existence of internal rules on conflict of interests, with a compliance rate of 48.98%, while the weakest performance was in the attendance of training on ethics and integrity, which stood at 29.76%.

Category - criteria	Maximum score	Actual score	Performance (%)
3. Strengthening ethical culture	**378**	**163**	**43.12%**
3.1. Raising awareness of managers and employees about ethics and integrity	84	25	29.76%
3.2. Existence and application of conflict-of-interest rules	147	72	48.98%
3.3. Existence and application of rules on accepting gifts	84	36	42.86%
3.4. Existence and application of ethical rules	63	30	47.42%

Criterion 3.1: Raising awareness of managers and employees about ethics and integrity

The achieved performance of 29.76% in attending various thematically diverse trainings on ethics and integrity by employees and management staff is the lowest among the four criteria in this category. In some authorities, a positive practice was observed when employees participated in the Education Programme for Acquiring Key Skills for Performing Integrity Manager Jobs, organized by the Human Resources Administration in cooperation with the Agency.

Shortcomings observed:

Although senior managers and executives should lead by example in demonstrating commitment to integrity values, their participation in training remains very low (11.90%), which has contributed to the overall decline in performance for this criterion.

Criterion - Indicators	Maximum score	Actual score	Performance (%)
3.1. Raising awareness of managers and employees about ethics and integrity	**84**	**25**	**29.76%**
3.1.1 Number of various thematic training courses related to the areas of anticorruption, ethics and integrity attended by staff in the previous two years: a) up to 2 trainings **- 1 point** b) more than 2 trainings- **2 points**	42	20	47.62%
3.1.2 Number of various thematic training courses related to the areas of anticorruption, ethics and integrity attended by managers (mayors, heads of local administration authorities or services, etc.) in the previous two years: a) up to 2 trainings- **1 point** b) more than 2 trainings- **2 points**	42	5	11.90%

Indicator 3.1.1: Ethics training attended by employees

Based on the submitted evidence and records maintained by the Agency, seven local self-government units received two points for this indicator. Of these, six were awarded two points because their current integrity manager attended the Education Programme for Acquiring Key Skills for Performing Integrity Manager Jobs. Only the Municipality of Žabljak received full points, as its employees participated in multiple thematically diverse training courses on ethics, integrity, and the fight against corruption.

The remaining six municipalities provided evidence of employees attending one or two training courses in these areas. As a result, the overall performance achieved for this indicator stands at **47.62%.**

Indicator 3.1.2: Ethics training attended by managers

A relatively low performance was recorded in training attendance by management staff, with a rate of **11.90%**.

Only four municipalities—Danilovgrad, Rožaje, Tuzi, and Zeta—submitted evidence of training participation by employees in leadership positions. However, only the Municipality of Rožaje received full points, as its integrity manager, who holds a managerial position, completed the Education Programme for Acquiring Key Skills for Performing Integrity Manager Jobs.

Criterion 3.2: Existence and application of conflict-of-interest rules

The fulfillment rate for this criterion is 48.98%, making it the highest-ranked in this category. This is largely due to the existence of developed codes of ethics for local civil servants and employees, which provide more detailed definitions of conflict of interest, provisions on job incompatibility, restrictions on accepting gifts, liability for non-compliance, and monitoring mechanisms.

Shortcomings observed:

The fact that the Agency initiated proceedings against 11 local self-government units for failing to submit reports on income and assets suggests that public officials are still not fully aware of this legal obligation.

Criterion - indicators	Maximum score	Actual score	Performance (%)
3.2. Existence and application of conflict-of-interest rules	**147**	**72**	**48.98%**
3.2.1. Existence of an internal rule governing the conflict of interest of civil servants and employees in the local government unit. Created internal rule- **1 point**	21	13	61.90%
*If the internal rule also includes a definition of an affiliated person, the authority receives **an additional 1 point.**	21	5	23.81%
If the internal rule includes provisions for employees on performing other tasks (permitted/prohibited tasks, reporting procedures, etc.) or if a separate internal rule defines this, the authority receives an **additional 1 point	21	12	57.14%
***If the internal rule specifies a method for monitoring its implementation and prescribes consequences for non-compliance, the authority receives an **additional 1 point**	21	12	57.14%
3.2. 2. All officials employed within the authority who are subject to the income and asset declaration requirement have regularly submitted their annual declarations to the Agency for the Prevention of Corruption in a timely manner or upon assuming office, starting from January 1 of the current year.	63	30	47.62%

Indicator 3.2.1: Existence of internal rules defining conflicts of interest, affiliated persons, performance of other tasks

Slightly more than half of the municipalities (**61.90%)** have an internal rule that provides a more detailed definition of conflict of interest. With the adoption of the Code of Ethics for Local Officials and Employees in 2009 and 2010, nine municipalities have regulated conflict of interest and job incompatibility, including prescribed liability for non-compliance and a monitoring mechanism overseen by the Ethics Commission.

Four municipalities—Andrijevica, Mojkovac, Plužine, and Bar—have developed a specific internal rule on managing conflicts of interest. The municipalities of Andrijevica, Mojkovac, and Bar did so after the submission of the Methodology. Additionally, the Municipality of Plužine adopted a decision appointing a designated person to provide employees with necessary information and guidance on conflict of interest.

In five municipalities (**23.81%**), the internal act regulating conflict of interest also includes a definition of an affiliated person, with the Municipality of Bar adopting a separate regulation specifically defining this term.

Indicator 3.2.2: Submission of Income and Assets Declarations to the Agency

A review of the Agency's official records found that 11 local self-government units have initiated proceedings against public officials for failing to submit their regular annual income and assets declarations for 2023 (by 31 March 2024) or a report upon assuming office during 2024. As a result, the compliance rate for this indicator stands at **47.62%**.

Criterion 3.3: Existence and application of rules on accepting gifts

Under this criterion, a performance of 57.14% was achieved in the development of an internal act regulating the receipt of gifts and the handling of gifts received by employees. The same performance was recorded in the additional regulation on how public officials handle received gifts.

Shortcomings observed:

The internal acts drafted in most cases include provisions on the receipt of gifts as outlined in the Law on the Prevention of Corruption but do not provide further details on the procedure and the disposal of gifts received by employees. Although the law mandates the obligation to keep records of gifts received by public officials and to submit extracts from these records to the Agency, only seven local self-government units have complied with this requirement.

Criterion - indicators	Maximum score	Actual score	Performance (%)
3.3. Existence and application of rules on accepting gifts	**84**	**36**	**42.86%**
3.3.1. Internal rules governing the receipt of gifts and actions to be taken when receiving gifts applied to all staff in the public authority – **1 point**	21	12	57.14%
*If records of received gifts are maintained for all staff, the authority receives **an additional 1 point**	21	5	23.81%
3.3.2. Internal rules governing the handling of gifts received by public officials – **1 point**	21	12	57.14%
*If a record of received gifts for public officials is maintained, the authority receives **an additional 1 point.**	21	7	33.33%

Indicator 3.3.1 Management of gifts received by employees

Through this indicator, an assessment was conducted to determine the extent to which authorities are willing to establish certain standards that, while not always legally mandatory, can contribute to fostering ethical and professional behaviour among employees.

Half of the municipalities (**57.14%**) have an act in place regulating the management of gifts received by employees.

Of these twelve municipalities, six have adopted a specific internal act that provides more detailed regulations on the receipt and recording of gifts by employees. The Municipality of Plužine has also adopted a decision appointing a person responsible for maintaining records of gifts received by public officials and employees.

The other six municipalities have addressed the acceptance of gifts by employees through ethical codes for local officials and employees, which were adopted in 2009/2010. Given that these ethical codes were created almost 15 years ago, it would be advisable to consider updating them.

With regard to keeping records of received gifts, only a small number of municipalities have fulfilled this sub-indicator, with just five meeting the requirement.

Indicator 3.3.2 Management of gifts received by public officials

The same performance as in the previous indicator (**57.14%**) was achieved in the more detailed regulation of the receipt of gifts by public officials.

A special internal act regulating the receipt and recording of gifts received by public officials was adopted by three municipalities—Mojkovac, Plužine, and Rožaje. Other authorities have included a provision within the Code of Ethics for Elected Representatives and Officials in Local Self-Government, which prohibits public officials from accepting gifts.

Local self-government units[11] that incorporated a provision in the Code of Ethics stating that the provisions of the Law on the Prevention of Corruption regarding the receipt of gifts by public officials should be applied accordingly were not awarded points. This was due to the lack of additional effort to further elaborate on the section governing the receipt and recording of gifts by public officials.

A total of seven municipalities submitted notifications stating that no gifts were received by public officials in the previous year.

Criterion 3.4: Existence and implementation of the Code of Ethics for elected representatives and officials

The highest compliance under this criterion was recorded in the indicator related to the development of the Code of Ethics, with a compliance rate of 76.19%. However, as most codes of ethics were developed 15 years ago, they require updating.

11 The Capital City of Podgorica and the municipalities of Danilovgrad, Herceg Novi, and Kolašin..

Shortcomings observed:

Most municipalities have promoted the Code of Ethics by publishing it on their websites. Additional promotional activities should be considered to increase awareness among employees and citizens, such as social media campaigns, announcements from relevant events, and other outreach efforts.

Criterion - indicators	Maximum score	Actual score	Performance (%)
3.4 Existence and application of ethical rules	**63**	**30**	**47.62%**
3.4.1 Existence of a Code of Ethics for elected representatives and officials in local self-governments – **1 point**	21	16	76.19%
***** If there is evidence of promotion of the Code of Ethics, the authority receives **an additional 1 point**	21	12	57.14%
******If there is evidence of the implementation of the Code of Ethics, the authority receives **an additional 1 point**	21	2	9.52%

Indicator 3.4.1: Code of ethics for elected representatives and officials in local self-governments

A significant number of local self-government units (16) have developed a Code of Ethics for elected representatives and officials, achieving a compliance rate of **76.19%.** Most of these bodies adopted the act in 2009 and 2010, except for the Municipality of Tuzi (2019), the Capital City of Podgorica (2021), the Municipality of Herceg Novi (2022), and the municipalities of Danilovgrad and Kolašin, which adopted the document in 2023.

Although several municipalities have published the Code of Ethics on their websites, even fewer have provided evidence of its implementation. Only two municipalities—Berane and Nikšić—have submitted such evidence.

Publishing the Code of Ethics on the website was sufficient to award points in the sub-indicator measuring efforts to promote this act, which was fulfilled by 12 municipalities.

An **example of good practice** in promoting and monitoring the implementation of the Code of Ethics is the Municipality of Berane, which features a dedicated banner on its website for the Ethics Commission for Elected Representatives and Officials. Within this section, information is provided about the Ethics Commission, which is responsible for overseeing the implementation of the Code of Ethics for Elected Representatives and Officials in the Municipality of Berane. Additionally, the banner includes an application form, a list of officials, and a report on the work of the Ethics Commission.

Category 4: Indicators Used for Deductible Scores

This category is structured differently from the previous three, as it does not contain specific criteria but consists of six indicators, the fulfilment of which results in a deduction of points obtained by the authorities. It serves as a corrective measure to the points awarded in the previous three categories, considering that the fulfilment of these indicators can be verified through records and reports from other supervisory institutions.

The fulfilment of indicators in this category highlights areas where the measures from the previous three categories are either not being applied or are ineffective in practice.

Most local self-government units submitted reports stating that they had not encountered any situations that would have led to the fulfilment of these indicators.

The assessment of indicator fulfilment in this category was based on evidence submitted by authorities, records maintained by the Agency, and publicly available SAI reports.

A total of 49 points were deducted from the authorities in this category, accounting for 14.58% of the points that could be deducted.

Shortcomings observed:

The highest number of points was deducted due to legally concluded court cases that ruled against the authority (34.92%), followed by conditional and negative opinions from the SAI (20.63%).

Negative points were reduced for authorities that provided proof of having acted in accordance with the given recommendations.

Category 4	**Maximum score**	**Actual score**	**Performance (%)**
Indicators whose fulfilment leads to points being deducted from the authority's score	**- 336**	**- 49**	**14.58%**
4.1. Final court rulings against the authorities received before 1 January of the current year (all disputes except those listed in indicator 4.3).	- 63	- 22	34.92%
4.2. Since 1 January of the current year, the Agency for Personal Data Protection and Free Access to Information has identified irregularities through inspection supervision (related to the creation and updating of the Guides for Accessing Information, proactive publication of information, and submission of acts and data for the Free Access to Information electronic system).	- 42	- 4	9.52%
4.3. Since 1 January of the current year, the Administrative Court has passed rulings against authorities on the count of "administrative silence" in cases where a public law authority has failed to issue an administrative act, decide on a party's appeal, or undertake administrative activity, i.e. respond to a party's objection.	- 63	- 4	6.35%
4.4. Opinion of the State Audit Institution on financial performance and regulatory compliance in case the authority has been subject to an audit by SAI in the previous five years: a) Qualified opinion:- **2 points** b) Adverse opinion or disclaimer of opinion and/or adverse findings in the performance audit report:- **3 points** * If evidence is provided that the authority has implemented the recommendations, a reduction of negative points is possible, depending on the percentage of implementation.	- 63	- 13	-20.63%
4.5. Opinions of the Agency for the Prevention of Corruption, which established harm to public interest indicative of corruption, issued in the previous two years.	- 63	- 6	9.52%
4.6. In the past three years, cases have occurred where the statute of limitations for initiating and conducting disciplinary proceedings (against employees) has expired, within the jurisdiction of the local self-government unit.	- 42	0	0.00%

Indicator 4.1: Legal proceedings

Against eight municipalities (Bar, Berane, Danilovgrad, Mojkovac, Herceg Novi, Kolašin, Zeta, and Rožaje), court cases with unfavourable outcomes were finally concluded in 2024, resulting in a total deduction of 22 points.

The municipalities did not provide detailed information on the nature of the disputes they lost. Some indicated that the cases involved compensation for damages, property disputes, debt payments, monetary claims, and similar matters.

The remaining 13 municipalities did not submit evidence or indicate that there were any legally concluded proceedings against them.

Indicator 4.2. Supervision of the Agency for Personal Data Protection and Free Access to Information over proactive disclosure of information

Only two municipalities submitted evidence that, in the previous year, irregularities were identified through an inspection by the Agency for Personal Data Protection and Free Access to Information regarding the proactive publication of information and the submission of acts and data for maintaining the information system, resulting in a total deduction of four points.

Since this indicator covers the period from 1 January 2024, it could not be verified through the annual report of the Agency for Personal Data Protection and Free Access to Information, as the report has not yet been published.

Indicator 4.3 Judgments issued by the Administrative Court on the count of "administrative silence"

As under the previous indicator, only two local self-government units submitted evidence of judgments issued on the grounds of "administrative silence" (the Capital City of Podgorica and the Municipality of Rožaje). The Capital City of Podgorica explained that amendments to regulations placed an increased burden on the Public Revenue Administration, leading to a high number of requests for amendments to individual tax acts, which resulted in decisions not being issued within the prescribed timeframe. The Municipality of Rožaje submitted a draft decision as evidence of its compliance with the judgment. However, since the decision had not yet been adopted at the time of the assessment, points were still deducted for this indicator, although the deduction was reduced.

Indicator 4.4 Opinions given by the State Audit Institution (SAI)

In six authorities, grounds were found for deducting points in this indicator, resulting in a total deduction of 13 points. The authorities themselves provided evidence in five cases, while the Municipality of Tuzi did not report the given opinion but was identified through a comparative check of published SAI audit reports.

The municipalities of Herceg Novi and Nikšić lost the maximum number of points for this indicator, as the SAI opinion was adverse. In the case of the Municipality of Andrijevica, although the SAI also issued an adverse opinion, the points were reduced because a follow-up audit report confirmed that more than half of the recommendations had been fully or partially implemented.

Indicator 4.5 Opinions of the Agency for the Prevention of Corruption establishing threat to public interest

According to the records of the Agency for the Prevention of Corruption, in the past two years, a threat to the public interest indicating the existence of corruption was identified in the municipalities of Budva and Rožaje. As a result, a total of six points were deducted.

Indicator 4.6 Obsolescence of disciplinary proceedings

There were no grounds for deducting points in this indicator, as the authorities either did not provide evidence or reported that, in the past three years, there had been no cases in which the statute of limitations for initiating and conducting disciplinary proceedings against employees had expired within the jurisdiction of the local self-government unit.

Conclusions and Recommendations

During the implementation of the Methodology for the local self-government system, the Agency prepared 21 individual reports. Each report provides an overview of the implementation of anti-corruption measures within administrative authorities and includes specific recommendations for improvement in the coming period. A total of **470 recommendations** were issued.

The sector report focuses on recommendations aimed at achieving systemic solutions to the identified irregularities.

As this was the first time local self-government units applied the Methodology, factors such as the **short implementation period**, **varying levels of understanding** of the indicators by the authorities, and challenges in assessing certain **evidence that was not entirely clear** were taken into account. Based on the analysis of collected data across all categories, criteria, and indicators, the following conclusions were reached:

Category 1: Putting in Place the Assumptions for Implementing Anti-Corruption Legislation

The best performance in implementing anti-corruption measures was achieved in establishing internal mechanisms for managing corruption risks. Most municipalities have met the formal obligations under the Law on the Prevention of Corruption, including the appointment of Integrity Managers, the development and implementation of an Integrity Plan, and the completion of a questionnaire assessing the efficiency and effectiveness of the Integrity Plan.

However, some authorities have yet to enter their integrity plans into the application or have not done so in accordance with the user manual. Additionally, some authorities conduct a joint assessment of the intensity of multiple residual risks within the same area, rather than assessing each residual risk individually. In certain cases, this has made it difficult to define appropriate measures, assign responsible persons, and set deadlines for the implementation of measures for each risk (or group of related risks) based on such assessments. It has also been observed that the measures established to prevent corruption risks are often inadequate in relation to the identified risks.

It is encouraging that most authorities have established an internal audit mechanism (80.95%) and have developed a risk register and a Book of Procedures. However, in practice, the number of audits conducted remains low, particularly when the audit is entrusted to another municipality by agreement, and the implementation of given recommendations is at a very low level.

There are also varying practices regarding the content of the Book of Procedures. In some authorities, it includes the Code of Ethics, as well as rules on gift management and whistleblower reporting. However, these rules are often not structured as formal procedures. This suggests that authorities lack clarity on what procedures the Book of Procedures should contain and how they should be properly drafted.

Most municipalities (76.19%) complied with the legal obligation to designate a person responsible for receiving and handling whistleblower reports. However, less than half went a step further by publishing information about the designated persons on their websites and drafting internal acts on handling reports. Even fewer municipalities (only four) have established more detailed regulations on the method and criteria for selecting these persons.

Recommendations:

- When developing an integrity plan and identifying residual corruption risks, it is necessary to analyse all sources of risk (normative, organizational, personnel) and then define one or more measures that will reduce/eliminate it.
- When developing an integrity plan, it is necessary to individually assess the intensity of each residual risk or group of several related risks and, in accordance with such assessment, define appropriate measures, deadlines and persons responsible for their implementation for each risk or group of risks.
- Efforts should be made to strengthen internal audit capacities through education and training, and consideration should be given to filling systematised positions in internal audit services, particularly in municipalities responsible for conducting audits in another municipality by agreement.
- In cooperation with the Ministry of Finance – Central Harmonisation Unit, a uniform practice should be established for developing the content of the Book of Procedures. This should define the essential procedures it must contain, the areas of work it should cover, the methodology for developing procedures, and the set of actions each procedure should include.
- The Ministry of Finance should prepare an analysis of the submitted annual reports on notifications of suspected irregularities and fraud and the measures taken. The analysis should include data on whether authorities regularly submit reports, whether it is clear what the reports should contain, how many authorities indicated in their reports that there were suspected irregularities and fraud, and which irregularities and fraud were most frequently reported. In light of the findings, measures should be taken to more effectively implement this legal provision.
- It is necessary to designate a person/organizational unit for receiving and acting on whistleblower reports, make data on identifying persons transparent in the work environment and on the website, and keep records of received reports.

- When updating the integrity plan, authorities should consider the shortcomings identified in this report and assess the risks of corruption and other irregularities in these areas.

Category 2: Strengthening the Institutional Anticorruption Framework

This category recorded a somewhat weaker performance, with an achievement rate of 55.24%. The best results were observed in efforts to improve the availability of work-related information and documents, such as the Integrity Plan and the Guide to Access to Information. All authorities have ensured public access to their activities through social media platforms (Facebook, Instagram), and most have also provided documentation on organising public hearings for the adoption of planning and other significant documents within local self-government.

However, inconsistencies were noted in how authorities fulfil their obligations under Article 12 of the Law on Free Access to Information. A common misunderstanding was observed regarding the publication of information for which access was granted upon request. Many authorities have only published decisions on these requests, believing this satisfies the legal requirement, rather than disclosing the actual content of the requested information.

In some cases, the requested information is included in the decision resolving the request. However, there are instances where the requested information must be published alongside the decision or the applicant must be provided with a notice indicating where the information can be accessed (e.g. specifying where previously published judgments requested by the applicant are available).

The practice of utilising the Agency for Personal Data Protection and Free Access to Information's system for processing free access to information requests has not yet been fully established. Additionally, no authority has published data on the Open Data Portal, despite this being a legal obligation.

Municipalities have partially implemented electronic service provision for citizens (E-counter). In most cases, their websites allow users to download applications and forms needed to exercise various rights, as well as to file or track property taxes. However, only one-third (33.33%) of municipalities have adapted their websites for persons with disabilities.

In the area of human resources management, most authorities lack internal acts that specifically regulate the engagement of individuals under contracts outside of standard employment. The results indicate that, in most cases, municipalities have incorporated risks and measures related to the planning and recruitment process within their integrity plans. However, fewer have addressed processes concerning appraisal, promotion, and sanctioning.

Authorities have not demonstrated a willingness to establish internal mechanisms for ethical and professional conduct, particularly in designating a person responsible for ethics and integrity-related tasks—only five municipalities have done so. Additionally, they have not adequately assessed risks in their integrity plans concerning protection against discrimination in various areas, gender equality, and the prohibition of workplace harassment.

Recommendations:

- Publicly relevant information needs to be proactively published and regularly updated.
- Authorities are required to submit data on requests, decisions, and measures taken to the Agency for Personal Data Protection and Free Access to Information within 10 days of their submission, preparation, or implementation, in accordance with Articles 41 and 42 of the Law on Free Access to Information. Alternatively, they should maintain records of free access to information requests through the designated information system.
- In cooperation with the Agency for Personal Data Protection and Free Access to Information, a uniform practice should be established for publishing information granted through access requests. This includes clarifying procedures for cases where decisions do not contain the requested information, ensuring consistency and preventing varied interpretations of this obligation by authorities.
- It is necessary to enable the display of work data via the open data portal (https://data.gov.me).
- It is necessary to establish the provision of services to citizens electronically (e-Counter), which will contain a guide for accessing services with downloading the necessary forms, tracking cases, submitting requests for extracts from civil registers, submitting tax returns and reviewing tax decisions, etc.
- Adapt the website to persons with disabilities.
- Internal acts should more closely regulate the engagement of persons under contracts outside of employment (contracts for temporary and occasional work, contracts for services, etc.).
- When updating the integrity plan, consider risks in the area of human resources management, which relate to planning and recruitment procedures, performance monitoring, rewards and sanctions, and determine measures to prevent them.
- Consider the possibility of designating a person or systematizing a job position to perform tasks related to ethics and integrity, corruption prevention, providing advice, etc., in addition to those prescribed by the Law on the Prevention of Corruption (such as an integrity manager, members of the working group for developing an integrity plan, a person for receiving and acting on whistleblower reports, etc.).
- In the next cycle of developing an integrity plan, assess the risks related to the areas of non-discrimination, harassment at work, discrimination against persons with disabilities and gender equality and determine measures for their prevention.

Category 3: Strengthening Ethical Culture

Although senior managers and executives should lead by example in demonstrating their commitment to integrity values, the effectiveness of training attendance among managers remains very low (11.90%), while participation among other employees is somewhat higher (47.62%). A positive practice was observed in the attendance of the Education Programme for acquiring key skills required to perform the duties of an Integrity Manager.

In most cases, authorities have regulated the management of conflicts of interest and gifts through the adoption of a Code of Ethics for Local Civil Servants and Employees. These codes define conflicts of interest and incompatible jobs, prohibit the acceptance of gifts, prescribe liability for non-compliance, and outline methods for monitoring implementation through the Ethics Commission. However, these codes were drafted between 2009 and 2010. A smaller number of authorities have adopted specialised internal acts to regulate these areas in greater detail.

The obligation for public officials in local self-government units to submit reports on assets and income has not yet become standard practice. The Agency has initiated proceedings against 11 municipalities for failing to submit their regular annual reports on income and assets for 2023 (by 31 March 2024) or for failing to file a report upon taking office in 2024.

The practice of keeping records of gifts received by public officials and submitting extracts from these records to the Agency has not been widely adopted, with only seven municipalities fulfilling this obligation.

On a positive note, most municipalities (76.19%) have adopted the Code of Ethics for Elected Representatives and Officials in Local Self-Government. However, as this document was also drafted between 2009 and 2010, it should be reviewed and updated as necessary.

Recommendations:

- At the level of authorities, assess the training needs of employees and managers, including professional development, ethics and integrity training, and anti-corruption programmes, to ensure targeted participation in these areas.
- Consider updating the Code of Ethics for elected representatives and officials in local self-government, as well as the Code of Ethics for local civil servants and employees, given that they were mostly adopted nearly 15 years ago. The updated codes should include necessary provisions on defining a related party, protocol and occasional gifts, procedures for managing received gifts, and maintaining gift records.
- When updating the Integrity Plan, assess the risk of irregularities in submitting the regular annual report or the report upon assuming office as a public official. Design measures and control activities to improve compliance with this legal obligation (e.g. a reminder from the Integrity Manager).

Category 4: Indicators Used for Deductible Scores

In the category where fulfilment leads to the deduction of points, the assessment of indicator fulfilment was based not only on records maintained by the Agency and publicly available reports from the State Audit Institution (SAI) but also on evidence provided by the authorities.

The most significant point deductions resulted from legally concluded court cases ruled against the authority in 2024, followed by qualified and adverse opinions issued by the State Audit Institution. Additionally, some deductions were due to opinions from the Agency for the Prevention of Corruption, which, in the past two years, established threats to the public interest and indicated the presence of corruption. Points were also deducted for judgments issued by the Administrative Court due to "silence of the administration"—cases where a public authority failed to issue an administrative act, did not decide on a party's appeal, or neglected to take administrative action in response to an objection.

Recommendations:

- At the level of authorities, an analysis of final judgments (including those related to labour disputes, administrative disputes, and claims for compensation of damages) should be conducted to identify underlying causes and implement appropriate corrective measures.
- At the system level, an analysis of final judgments against local governments in labour and administrative disputes should be prepared to determine whether systemic issues exist, such as outdated legal provisions or excessive discretionary powers of decision-makers. If such issues are identified, necessary amendments to relevant regulations should be initiated.
- In cases of delays in processing requests for free access to information, the causes should be identified: Is the issue due to a lack of staff handling requests, inadequate work organisation, or other factors? Based on the findings, determine whether a systemic approach is needed, such as revising staffing plans, updating professional development programmes, or adjusting job classifications and descriptions for employees responsible for processing requests in all municipalities.
- The State Audit Institution (SAI) should ensure timely implementation of the recommendations outlined in its reports.
- When updating the Integrity Plan, risks related to compliance with public officials' obligations under the Law on the Prevention of Corruption should be assessed, and measures should be established to improve adherence to these obligations. For example, upon taking office, public officials should be informed of their legal responsibilities, required to seek opinions or approvals for secondary employment, comply with restrictions on holding multiple public positions, and adhere to regulations on transferring management rights in private companies)

Annex 1: Effects of Applying the Methodology

The Methodology was submitted to the authorities on 15 July 2024, with a deadline of 15 August 2024 to conduct a self-assessment and provide evidence verifying the fulfilment of the set indicators. A review of the documents listed below revealed that they were drafted after the submission of the Methodology or the draft individual report. In total, **nine** authorities adopted 21 documents, published them, established the necessary practices, and issued **two** decisions designating persons responsible for implementing specific measures. In total, **23** activities related to corruption prevention were carried out.

When implementing the Methodology, only Integrity Plans that were valid at the time local government units submitted their documentation were taken into account. However, most municipalities updated their Integrity Plans after submission, in line with the deadlines prescribed by law. The Agency will subsequently assess the extent to which the new Integrity Plans have been improved based on the recommendations received.

1. **Municipality of Andrijevica**

   - ✓ Decision on appointing a person to receive and act upon whistleblower reports (14 August 2024)
   - ✓ Internal instructions on how to proceed with a whistleblower's report of a threat to the public interest indicating the existence of corruption (13 August 2024)
   - ✓ Internal instruction on actions aimed at preventing conflicts of interest (12 August 2024)
   - ✓ Internal instructions for receiving and recording gifts (12 August 2024).

2. **Municipality of Bar**

   - ✓ Instructions on the detailed procedure for reporting a whistleblower (18 September 2024)
   - ✓ Instructions on the conditions and engagement of persons under a service contract (18 September 2024)
   - ✓ Instructions on detailed conditions for performing additional and supplementary work by employees in the Municipality of Bar (18 September 2024)
   - ✓ Instructions defining conflict of interest (18 September 2024)
   - ✓ Instructions defining the concept of a related party (18 September 2024)
   - ✓ Instructions on regulating the receipt of gifts and the treatment of employees regarding received gifts (18 September 2024).

3. **Municipality of Bijelo Polje**

   - ✓ Internal regulations on handling whistleblower reports concerning threats to the public interest indicating the existence of corruption or other irregularities (5 November 2024).

4. **Municipality of Herceg Novi**

   - ✓ Book of Internal Procedures (15 August 2024)
   - ✓ Decision appointing a person to receive and act upon whistleblower reports (25 July 2024).

5. **Municipality of Mojkovac**

   - ✓ I Internal instruction on handling cases of conflict of interest (14 August 2024).

6. **Municipality of Niksic**

   - ✓ Report on notifications of suspected irregularities and fraud and measures taken, in accordance with Article 53 of the Law on Management and Internal Control in the Public Sector (2 August 2024)
   - ✓ Instructions for handling reports and records of threats to the public interest indicating the existence of corruption within the Municipality of Nikšić, as well as protecting the identity of the person who filed the report (15 August 2024)
   - ✓ Rulebook on the conditions and manner of engaging persons under a service contract (8 August 2024)
   - ✓ Internal rule on detailed conditions for performing additional work in local government bodies of the Municipality of Nikšić (15 August 2024)
   - ✓ The Integrity Plan has been updated, incorporating risks and measures related to the indicators from the Methodology (12 August 2024).

7. **Municipality of Pluzine**

   - ✓ Internal procedure on the conditions and manner of engaging persons under a service contract (15 August 2024)
   - ✓ Internal procedure on the conditions and manner of engaging persons under temporary and occasional employment contracts (15 August 2024).

8. **Municipality of Rozaje**

   - ✓ Instructions on the actions of municipal officials upon reports of endangerment of the public interest indicating the existence of corruption (12 August 2024).

9. **Municipality of Zabljak**

   - ✓ Rules for handling reports, recording reports of corruption in local government and local self-government bodies of the Municipality of Žabljak, and protecting the identity of the person who filed the report (24 July 2024).

Annex 2. Achieved Scores for Each Local Self-Government Unit by Categories and Criteria

Local self-government	1.1.	1.2.	1.3.	1.	2.1	2.2	2.3	2.	3.1	3.2	3.3	3.4	3.	4.	Score	Performance (%)
Municipality of Nikšić	14	13	7	34	16.5	5	3	24.5	2	3	4	3	12	-5	65.50	74.43%
Municipality of Mojkovac	14	7	7	28	15	4	1	20	1	5	4	2	12	-1	59	67.05%
Municipality of Pljevlja	14	11	2	27	16.5	1	2	19.5	2	6	2	1	11	0	57.50	65.34%
Municipality of Plužine	13	10	5	28	12.5	4	2	18.5	1	4	4	1	10	0	56.50	64.20%
Municipality of Bijelo Polje	14	9	5	28	15	2	2	19	0	3	2	2	7	0	54	61.36%
Municipality of Bar	14	11	3.5	28.5	15.5	2	2	19.5	1	6	1	0	8	-3	53	60.23%
Municipality of Andrijevica	14	7	7	28	10	3	1	14	0	7	4	1	12	-2	52	59.09%
Municipality of Herceg Novi	14	10	7	31	18	1	1	20	2	3	0	2	7	-6	52	59.09%
Municipality of Žabljak	14	3	4	21	14.5	3	1	18.5	2	7	0	0	9	0	48.50	55.11%
Municipality of Danilovgrad	14	10	5	29	14	2	1	17	2	0	1	2	5	-4	47	53.41%
Municipality of Rožaje	14	10	5	29	15	2	1	18	2	3	2	2	9	-9	47	53.41%
Municipality of Kotor	14	8	1	23	12.5	2	1	15.5	2	3	1	0	6	0	44.50	50.57%
Capital city Podgorica	10	9	1.5	20.5	16	3	2	21	1	0	0	2	3	-3	41.50	47.16%
Municipality of Plav	12	7	0	19	10	1	0	11	1	3	2	2	8	0	38	43.38%
Municipality of Kolašin	14	6	1	20	9.5	2	0	11.5	2	3	0	2	7	-3	36.50	41.48%
Municipality of Berane	14	6	0	20	9.5	1	1	11.5	0	4	2	3	9	-5	35.50	40.34%
Municipality of Budva	10	4	0	20	8	2	4	14	0	3	2	2	7	-3	32	36.36%
Municipality of Petnjica	14	1	1	16	5	1	1	7	2	3	3	1	9	0	32	36.36%
Municipality of Ulcinj	14	4	0	18	9	3	2	14	0	0	0	0	0	0	32	36.36%
Municipality of Zeta	14	3	0	17	10.5	2	0	12.5	1	3	1	0	4	-3	31.50	35.80%
Municipality of Tuzi	14	0	1	15	8.5	0	0	8.5	1	3	1	2	7	- 2	28.50	32.39%