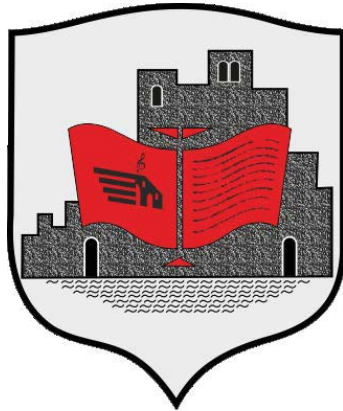# INTEGRITY PLAN

Municipality of Gjakovë/Đakovica
2015 – 2016

March 2015

Integrity Plan

Municipality of Gjakovë/Đakovica

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Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra
Swiss Cooperation Office Kosovo

ABBREVIATIONS

CSO	Civil Society Organizations
FERMA	Federation of European Risk Management Associations
IP	Integrity Plan
HRD	Human Resource Development
HRM	Human Resource Management
ISO	International Organization for Standardization
KAA	Kosovo Anti-Corruption Agency
KIPA	Kosovo Institute for Public Administration
SAEK	Support to Anti-Corruption Efforts in Kosovo (SAEK)
SDC	Swiss Development and Cooperation Agency
SMI	System for the Management of Integrity
TI	Transparency International
UNDP	United Nations Development Programme

INTEGRITY STATEMENT

We, in the Municipality of Gjakovë/Đakovica, are proud to represent a community with a unique history, exhibiting a diversity of cultural backgrounds and a mix of suburban and rural opportunities.

We are a progressive community with a diversified economy incorporating both traditional resource-based activities and a spirit of entrepreneurship that capitalizes on new economic opportunities. To further develop and grow as a community of choice that recognizes the value of sustainable development, rule of law and quality of life, we, in the municipality of Gjakovë/Đakovica are determined to act with uncompromising integrity in everything we do. Our success shall be built on a strong work ethic, responsible and productive working relationships with our community and national and international partners.

We recognize the scale and complexity of corruption and integrity issues which we as a Municipality face. Our Municipality is an important local employer, has a considerable budget, and is involved in dozens of transactions each week. As such, it is inherently exposed to various and serious corruption risks. Public officials enjoy considerable discretionary powers and monopoly over public services such as local economic development, health, education, housing, land, water, etc. High levels of administrative bureaucracy combined with closer interactions at the point of service delivery can provide numerous opportunities for corruption. Political party affiliations, local power interest groups and social networks, combined with a multiplicity of interaction points between the public and private sector, provide a rich backdrop for corruption pressure. Complex and sometimes incoherent regulatory frameworks endanger consistent application of the rule of law and thus, keep doors to integrity violations wide open. Burdensome administrative procedures come to present an extra threat to effective and efficient services.

Given the above, we fully understand our mandate for fighting corruption locally. To date, through our integrity management policies and measures, the Municipality has been putting a strong effort to increase organizational resistance to corruption and other integrity violations and thus, significantly enhance not only its integrity performance, but also the related efficiency, effectiveness, transparency, and quality of the public services provided. We are determined to bring together people, partnerships and possibilities for a strong, vibrant Municipality of Gjakovë/Đakovica that is resistant to integrity violations.

For our community:
We keep our commitments to our stakeholders and earn the confidence by acting with integrity and behaving ethically. Considering sustainability and the long-term consequences of actions,

we relate integrity to other concerns, think broadly about issues, across sectors and act accordingly. We also envision a Municipality that by its actions demonstrates a deep appreciation for the community's past, responds to current needs and plans for our collective future.

For our citizens:

We strive to provide quality services in areas that are under the jurisdiction of the Municipality on a timely, effective and efficient manner and maintain the highest standards of professional integrity. In order to obtain information from diversified channels of citizens' oversight, we encourage customer satisfaction surveys and an anticorruption hotline as functional feedback and reporting mechanisms.

For our staff:

We value our people, encourage their development and reward their performance. We are accountable – individually and in teams – for our ethical conduct, actions and integrity performance. It is the responsibility of all staff to report all incidents of corruption or any other integrity violations. Those shall be treated with the strictest confidentiality and not be disclosed or discussed with parties other than those charged with investigation. Above that, however, each employee is responsible for contributing to the municipal integrity performance by acting as a risk manager within her/ his area of competence.

For our institution:

We value the trust bestowed on us by the citizens and all our actions must reflect care and integrity as we manage public resources. Citizen satisfaction with municipal services is an important measure of our success as an organization. Collaboration and cooperation with all sectors of the community is necessary to improve community well-being, therefore, services must be provided in a fiscally responsible and accountable manner.

We are determined to a straightforward "zero tolerance" to corruption policy. All detected violations will be investigated, where required, and appropriate actions instituted against those found responsible.

Moreover, we strive to develop, document, implement and continuously improve a functioning integrity management system as an indispensable tool to prevent integrity violations and boost municipal integrity performance. The Integrity Plan is a critical step, but not the end of our anticorruption efforts, and we well do what is necessary to make sure that measures are implemented, risks are periodically reassessed and informed integrity risk-taking becomes part of the organizational culture of the Municipality of Gjakovë/Đakovica.

We hope our experience will provide value added in the process of introducing integrity planning in Kosovo's public sector and serve as an exemplary model for all Kosovar municipalities. We expect our actions to be consistent with the words we say, our words to be consistent with our intentions. We hold ourselves accountable for our words and our actions.

I, hereby, declare my unconditional support and strong commitment to all efforts to strengthen and continuously develop and improve the integrity management system within the Municipality of Gjakovë/Đakovica.

Mimoza Kusari Lila
Mayor of Gjakovë/Đakovica

2015

INTEGRITY PLAN

The Integrity Plan is a *strategic*, as well as *operational* document that substantiates the results of the integrity risk assessment process undertaken within the Municipality of Gjakovë/Đakovica. The Plan demonstrates the commitment of the Municipality to further enhance the existing operational controls in the full spectrum of activities conducted, including provision of services to the public. To this purpose, it specifies risk-based measures for achieving its integrity objectives and reinforcing the rule of law and professional values and standards.

This Plan is to play an instrumental role for the Municipality of Gjakovë/Đakovica to:
- Increase the likelihood of achieving organizational objectives, encourage proactive rather than reactive integrity risk management, minimize loss from corruption and integrity violations, reduce/eliminate opportunities for corruption and improve organizational resistance to corruption;
- Maintain a focus on priorities, based on informed risk identification and assessment that will help the Municipality effectively allocate the limited available resources for anticorruption towards their best perceived use;
- Ensure continuous compliance with relevant legal and procedural requirements and leading international management standards;
- Build/strengthen capacities of staff for effective anticorruption efforts, build awareness at all levels and create co-ownership in the process of developing, implementing and monitoring integrity plans;
- Improve external and internal stakeholders' confidence and trust and respond to their requirements and expectations as it regards to integrity performance of the Municipality.

The Plan is based on the *results of a comprehensive integrity planning and risk assessment process* undertaken within the Municipality of Gjakovë/Đakovica in the period July 2014 - February2015. The process involved *identification* of the organizational vulnerabilities to integrity violations and their *assessment* by considering (1) the damage in material and non-material terms that respective potential violations cause, and (2) the likelihood that such events can occur seen through the current organizational resistance substantiated in the relevant regulations, procedures, codes, practices and involvement of staff. To accomplish the above, the Municipality has undertaken the following actions:

- Assigned clear responsibilities for integrity risk assessment by setting up a Working Group led by the Mayor of Gjakovë/Đakovica, thus demonstrating commitment to integrity;
- Analyzed the relevant legal, regulatory and operational framework of the Municipality ;
- Analyzed data from integrity performance, monitoring and implementation;
- Analyzed client satisfaction and perception of corruption in the local government sector surveys, including surveys/reports commissioned by international organizations;
- Conducted a reference organizational survey- self- assessment to provide insight and valuable input to the assessment of the integrity management system in the Municipality; based on results, identified risk areas and operational lines and measures for improvement.
- Based on the data obtained from the survey developed the organizational integrity system;
- Conducted one focus groups where special risk tables to address specific risks in key administrative units and high risk areas were processed to identify and assess integrity risks and list enhancement measures. As a result Integrity Risk Register and Risk Tables were developed;
- Used integrity development related documents: UNDP guidelines, Integrity Best Practices Compendiums, TI handbooks, ISO 31000 and FERMA risk management standards, BS 10500 Specification for an anti- bribery management system; Australian/New Zealand Standard for anti- corruption - AS 8001-2008; ISO 26000 Guidance on social responsibility; Transparency International's Business Principles for Countering Bribery; ISO 9001 quality management system requirements and ISO 27001 Information Security Management, to align the developed Integrity Plan with best international standards and practices.

In addition to the Kosovo Anti-corruption Strategy and Action Plan, this Integrity Plan shall be implemented throughout the period of 2015-2016, aligned with the next anti-corruption strategic planning cycle.

A special budget for implementation of this Integrity Plan will be allocated as per the *Action Plan* developed. Its implementation shall be monitored in a structured format, periodically reviewed and updated in accordance with the relevant normative, institutional, procedural and personnel developments within the changing organizational external and internal environment. The *ongoing monitoring of implementation* is important to ensure that the integrity risk control and treatment measures turn out effective in both design and operation; that procedures are understood and the integrity plan followed. In addition, monitoring should also determine whether the proposed risk treatment measures produced the intended effects; whether they

can detect changes in the external and internal context including changes to the risk itself which can require revision of risk treatments and priorities; and identify what lessons could be learned for future planning.

Responsibilities for regular monitoring of the Plan are assigned to_____. Regular reporting will ensure that the implementation of the Plan is following the schedule and planned results are being achieved. The _____ shall be responsible to report periodically to the Mayor of the Municipality of Gjakovë/Đakovica on the progress of implementation. The minimum frequency of reporting is every six months. Reporting allows the Mayor to undertake on time adequate corrective/ preventive measures in case where implementation of particular measure(s) poses difficulties/ delays.

In terms of content, the Integrity Plan:

- Includes an Integrity Statement which restates the commitment of the Municipality of Gjakovë/Đakovica to integrity.
- Explain the background, scope, purpose, objectives and the methodology used for developing the Integrity Plan. It presents key aspects of the relevant implementation, monitoring and reporting procedures.
- Contains strategic objectives, activity lines and measures which outline key strategic objectives and summarize action areas aimed to strengthen the protection of integrity in the Municipality of Gjakovë/Đakovica.
- Contains an Action Plan which outlines in details all measures that will be undertaken to achieve the objectives set, as well as the relevant timeframe and organizational responsibilities for implementation. Indicators for each measure should be clearly defined and supported by the necessary resource/financial numbers.

We believe that by developing and implementing this Plan, the Municipality of Gjakovë/Đakovica will be better placed to ensure the effective, efficient, and ethical delivery of its intended outcomes, including improved public services and increased satisfaction of beneficiaries. Adoption of this Plan, however, is seen as the basis of future efforts to master a functioning *Integrity Management System (hereinafter, IMS).* Such system is intensively recognized in the public, private and non-governmental sectors as well, perceived as key to reducing outstanding economic and human costs of integrity violations, to enhance future business and boost organizational reputation and creditability. Assuring integrity will become instrumental to the Municipality's ability to fulfil in practice its commitments to stakeholders, with integrity planning being its fundamental pillar.

STRATEGIC OBJECTIVES, ACTIVITY LINES AND MEASURES

The Municipality of Gjakovë/Đakovica is currently undergoing an intense process of developing, documenting, and implementing a Quality Management System, in line with the requirements of ISO 9001:2008. This effort to introduce a performance-oriented, process-based management, supported by the commitment of top management and large scale involvement of staff, provides a sound basis for advancing integrity management in the coming years. Moving forward, the Municipality of Gjakovë/Đakovica shall reinforce measures to enhance integrity and prevent corruption by focusing on the following _three core areas_:

- Strengthened resistance to integrity violations and increased efficiency, effectiveness and transparency of the municipal management system by improving the management of integrity risks function and enhanced integrated management practices;
- Enabling the internal environment to sustain integrity-sound municipal processes through optimized integrity controls at strategic and operational process levels and building/ strengthening of local capacities, knowledge and skills in integrity management;
- Enhancing the external environment to reinforce and widen the integrity aspects in the modernization and reform processes through better coordination with citizens and legal entities; increased transparency, effective communication and stakeholder engagement;.

The section below presents and explains the strategic objectives listed above and translates these objectives into concrete policy and management action activity lines and measures to support their achievement.

STRATEGIC OBJECTIVE I:

Strengthened resistance to integrity violations, and increased efficiency, effectiveness and transparency of the holistic municipal management system by improving the management of integrity risks function and enhanced integrated management practices.

Activity lines and respective measures

1.1. Improve the management of integrity risk function through internalizing integrity planning as a sustained practice and progressively developing and implementing a functioning integrity management system

Rationale: In the Municipality of Gjakovë/Đakovica, integrity planning is underway as a critical step towards effective integrity risk management. However, sustaining a functioning integrity management system will require the Municipality to further implement a fully pledged *Plan - Do - Check - Act (PDCA)* continual improvement framework and incorporate integrity management into routine management practices. This implies that it should (1) *plan* its integrity policies/ measures; (2) *implement* the plan and the related operational controls; (3) monitor and measure key characteristics of operations that determine integrity performance; and (4) *take actions* to continually improve the integrity performance and the IMS. Working towards the IMS will help create/ strengthen competence in integrity management and general anticorruption awareness. Although the IMS cannot provide absolute assurance that no corruption has occurred or will take place in the Municipality, it can help the organization prevent and detect abusive practices. It shall also demonstrate that the Municipality has implemented reasonable and proportionate measures to assist it in complying with its legal obligations and ethical aspirations.

Measures:

1.1.1. Make all staff *aware* of the developed Integrity Statement and Integrity Plan, including allocation of implementation responsibilities and respective timeframe. If appropriate, consider publishing the integrity statement through the organization's internal and external communication channels to communicate it to external stakeholders as well.

1.1.2. Define clearly the *responsibility and authority* for the *integrity compliance function* in the Municipality of Gjakovë/Đakovica. For this purpose, assign the

responsibility and authority for: overseeing implementation of the IMS and the Integrity Plan; providing advice and guidance to personnel on the IMS and issues relating to integrity and reporting on the performance to top management. The integrity compliance function shall be staffed by personnel who have the appropriate competence, status, authority and independence.

1.1.3. Review the need to *develop internal rules in key integrity prevention areas*: *disclosure of interest, outside work performance, asset declarations, gifts and hospitality,* in addition to the existing Code of Conduct and the applicable national regulations. Develop such rules if considered necessary to cover the above prevention areas adequately. Ensure *sufficient level of familiarity* of all staff with all existing rules on *conflict of interest, outside work performance, asset declarations,* and *gifts and hospitality* through appropriate training and awareness-raising events. Maintain the *Gift Register* of the Municipality and ensure staff is aware of the existence of the Gifts Register and fully understand the related obligations. To enhance the focus on prevention, make the *results of investigations* of breaches of the Code of Conduct within the Municipality available publicly, if any, by disclosing risks/ trends/ drivers.

1.1.4. Set up and maintain a system-based, structured *internal and external communications policy relevant to the IMS* including: on what it will communicate; when to communicate; with whom to communicate; how to communicate. Integrate integrity aspects into the internal communication policies/ practices.

1.1.5. Set up and maintain a system that enables *confidential reporting* of integrity violations. For this purpose, in line with the relevant national regulations, adopt a *Whistle Blowing Policy of the Municipality of Gjakovë/Đakovica,* setting out the detailed procedure which must be followed in order to report any incidents of fraud and/or corruption. Communicate this policy to all staff to support coherent understanding, positive attitudes and effective enforcement.

1.1.6. Determine strict timeline for re – assessment of *Integrity Risks,* as well as for review of the activities of the units with controlling functions in the areas with highest levels of risk.

1.1.7. Ensure structured *internal monitoring of the integrity performance* of the Municipality within planned intervals (i.e. every three months) and ensure results are reported to top management and the necessary corrective measures are being taken.

1.1.8. Institute *Integrity Management System review* - to review within planned intervals (i.e. annually) input data as it regards performance of the IMS (i.e. implementation of objectives and measures; changes in external and internal

issues that are relevant to the integrity management system; information on the integrity performance, including trends in: nonconformities and corrective actions; monitoring and measurement results; challenges and recommendations for improvement, etc.), and take decisions as in relation to enhanced effectiveness of the IMS. The outputs of the management review shall include decisions related to continuous improvement opportunities and any need for changes to the Integrity Plan and the Integrity Management System.

1.1.9. Maximize opportunities to communicate results of implementation to a wide range of stakeholders through appropriate communication formats: publications in the web site, briefings, etc.

1.2. Progressively integrate IMS aspects in the quality management system implemented to optimize integrity performance, foster customer focus and effectively limit opportunities for integrity violations

Rationale: The Municipality of Gjakovë/Đakovica has developed, documented, implemented and certified a Quality Management System in line with the international standard ISO 9001:2008. Total Quality Management based instruments have proven effect in enhancing public sector governance in most EU countries where various tools manage important aspects of public management - quality, accountability, integrity, transparency, effectiveness and efficiency. Whilst various tools are designed to be used independently, they can be aligned or integrated with other management systems as they are based on the same TQM principles, i.e. P-D-C-A cycle. The value of an integrated management model based on ISO 9001 and integrity management principles may be observed as follows. Compliance with international standards will set an internal operational framework focused on quality and integrity. For citizens, this will mean efficient and effective services, more transparent information system and professionalized staff. Application of IMS aspects will effectively limit opportunities for integrity violations. Integration of IMS with quality aspects will allow for building a management system along a fully pledged P-D-C-A cycle reinforcing quality and integrity. Integration will allow for more efficient use of resources and enable integrated planning. Recognition through certification (ISO 9001) provides additional incentives and rewards. It will *convey a strong message* to both internal and external clients of a clear management commitment to integrity and client-oriented and transparent service.

Measures:

1.2.1. In line with the implemented QMS, develop and maintain a *complete and comprehensive register of processes* of the Municipality of Gjakovë/Đakovica. *Cover all key strategic, operational and support processes* that are important for quality and integrity with adequately documented *internal operational procedures*, to reduce risk of errors, deviations and integrity violations. *Communicate these procedures* to all staff so that they become effectively in use. Train staff if necessary.

1.2.2. Ensure the *Organogram* covers positions clearly and comprehensively, and the respective responsibility and accountability lines to achieve maximum transparency and efficiency of operations.

1.2.3. Align *job descriptions* with the underlying processes and the respective work procedures and communicate them to all staff. Integrate integrity aspects in terms of references/job descriptions.

1.2.4. Develop *appropriate performance indicators* of key municipal processes to be able to assess the progress on the impact of reforms, identify problems, support decision-making/operational process etc. If feasible, establish an automated system to monitor specified performance indicators.

1.2.5. To strengthen customer focus, demonstrate commitment to high professional standards of service and maximize opportunities for citizens' oversight. Consider developing a *Client Service Charter of the Municipality of Gjakovë/Đakovica*. It will convey a strong message about the municipality's commitment to maintain professional excellence and high standards of conduct; inform clients of their rights and obligations;, describe the minimal level of service, related deadlines and quality; present complaints, compliments and feedback channels. Display the Client Service Charter in key public areas (i.e. information center, service delivery areas) and make it accessible through print and electronic media and web. *Make all staff aware* of the standards of service contained in the Charter.

1.2.6. *Integrate feedback from service users* into operations to enhance quality of service and integrity performance. For this purpose, where feasible, plan and implement customer satisfaction surveys; ad hoc checks, secret client operations, etc.

1.2.7. Consider possibilities to integrate the integrity management with the quality management *authority, roles and responsibilities*.

1.2.8. Consider possibilities to integrate *integrity management review* with the quality system management review where both quality and integrity related aspects are being considered.

1.3. **Further enhance the management system implemented in the Municipality of Gjakovë/Đakovica by adequately covering the risk related to security of information**

Rationale: The risk assessment conducted has identified the integrity risks related to security of information among the major challenges to maintain an effective IMS. To date, levels of protection of confidential, as well as of personal information are considered inadequate, thus opening a platform for reform and modernization agenda. It is felt that the on-going process of structuring the quality and integrity management system may be used to integrate security of information aspects into it. Good international practices (i.e. OECD Guidelines for the Security of Information and Networks, ISO/IEC 27001 that defines requirements for establishing, implementing, operating, monitoring, reviewing, maintaining and improving a documented Information Security Management System) provide an outstanding reference to guide the process of ensuring effective management of the numerous and complex risk factors related to security of information. Not all requirements may be complied with immediately, and resourced sufficiently well by the existing human, financial, technical infrastructure. Yet, they may become a good basis for a phased- in progressive process of developing a functional system for managing security of information as part of the holistic management system of the Municipality of Gjakovë/Đakovica. Risk assessment, security design, security management and re-assessment are among its integral components. To guarantee results, the application of the system has to be strictly controlled, monitored, and regularly audited.

Measures:

1.3.1. Develop a comprehensive reference framework based on the criteria set by the available good international practices, in particular the OECD Guidelines for the Security of Information and Networks, and the management standard ISO/IEC 27001. Assess the currently implemented system against the reference framework, and based on results, *devise and implement a phased up Action Plan on Securing Security of Information in the Municipality of Gjakovë/Đakovica.* The Plan is to specify municipal security statement, as well as specific measures to ensure the selection of adequate and proportional security controls that protect information assets. Allocate responsibilities related to its implementation, as well as the necessary resources. Communicate the Plan to all staff.

1.3.2. Support the development of security of information system by *appropriate capacity and awareness building* events. For this purpose, consider creating/ strengthening municipal capacities for information security management (i.e. trainings in ISO 27001 for selected staff). Set up a system of regular awareness

events/mentoring channels to ensure that staff is sensitized on a regular basis on integrity risks associated with information security and the utilization of computer resources, in particular – access control.

STRATEGIC OBJECTIVE II:

Enabling the internal environment to sustain integrity-sound municipal processes through optimized integrity controls at strategic and operational process levels and strengthening of local capacities, knowledge and skills in integrity management.

Activity lines and respective measures

2.1. Enhance resistance to integrity violations by strengthening integrity operational controls in key high-risk management and support processes

Municipal Assembly

Rationale: The directly enacted Municipal Assembly is the highest body in municipal context. It exercises critical high integrity risk functions as specified in LLSG and the Municipal Statute: i.e. approval of the budget and investment plans; the level of municipal charges, tariffs and fees; decisions related to the municipal property; approval and amendment of: Municipal Development Plan (MDP); Urban Development Plan (UDP) and Urban Regulatory Plan (URP). The role of the Municipal Assembly in local governance matters turns it into an important pillar of the IMS. Due to the limitations of horizontal accountability in the case of the Municipal Assembly, its responsibility for the municipal IMS is limited to ensuring the commitment of the Municipality to implement it, while the Municipality as an executive body is responsible for ensuring the suitability of the IMS, and for implementation of and compliance with it.

2.1.1. Propose to the Municipal Assembly to adopt a *Code of Ethics/ Code of Conduct/* Integrity Rules addressing *Members of the Municipal Assembly.* In line with the good international practices, this will convey a strong message of integrity commitments of the municipal counsellors.

2.1.2. Encourage participation of members of the Municipal Assembly in the integrity related awareness/ PR events, as well as in the integrity management review. Support them to demonstrate their leadership in preventing and detecting corruption as it applies to their areas of responsibility.

Cabinet of the Mayor

Rationale: It is particularly important that top management sustain the leadership role in achieving compliance and coherence in the parts of the Municipality for which they have responsibility. Coordination issues are critical in the Cabinet's understanding of their own role. They are also high on the reform agenda. The steps to coordinate local government policy-making and service delivery strive to eliminate situations in which different policies undermine each other, make better use of resources, create and offer citizens seamless rather than fragmented access to services. Achieving a shared goal and an integrated management response to the issue of integrity is an added critical dimension. Risk assessment conducted in the Municipality of Gjakovë/Đakovica has identified cases of losing control, influence and information, yet still being held accountable, as problematic. This has resulted in efforts to strengthen Cabinet of the Mayor's coordination and communication capacity and control. There is an increasing striving for coordination and coherence in municipal policy through creating a common policy platform- system that could yield efficiencies. It will generate a stronger collective capacity instead of primarily thinking about the interest of each single unit.

Measures:

2.1.3. Set up/ maintain a *coherent and structured system of internal coordination* along the following axes: (1) vertical coordination; (2) horizontal coordination between different units; (3) coordination with central government; (4) coordination with supra-national and multinational organizations; and (5) coordination with NGOs and private-sector interest organizations.

2.1.4. Set up/ maintain/ continually improve a *digital internal communication system* using the IT infrastructure to enable more efficient data exchange and communication across units.

2.1.5. To increase accountability and efficiency of service, implement an *electronic system of documents management*. The system will allow for electronic allocation and monitoring of documents; electronic processing of petitions, creation of an electronic inter-face in order to obtain information about petitions related to the files status.

2.1.6. To enhance transparency and accountability towards clients, ensure that *communication with clients* - direct requests, emails, incoming paper correspondence and the responses to them are managed by appropriate *Document Control Software Module*. Consider implementing a log to register all complaints for follow-up purposes; appointing a specific senior official to be charged with monitoring complaints and their resolution. Ensure results are

communicated on time to the complainant. Ensure periodical (biannual and annual) analyses of the signals, suggestions and complaints, related to the quality of the services and the observance of the standards for the services provided. The Information Centre should be aligned with the Document Control Software Module dealing with clients petitions.

Financial management system. Registration and management of assets

Rationale: Financial controls are the management processes that help the Municipality ensure that its finances are being properly managed. Selected operational controls that may reduce integrity risks in the Municipality are believed to cover, for example: consistently implementing a separation of duties in designated high risk areas; appropriate tiered levels of authority for payment approval; ensuring that the payees' appointment and work or services carried out have been approved using specific approval mechanisms; requiring at least two signatures on payment approvals; requiring the appropriate supporting documentation to be annexed to payment approvals; restricting the use of cash; ensuring that payment categorizations and descriptions in the accounts are accurate and clear; implementing periodic management review of significant financial transactions; and conducting periodic financial audits. The Municipality, in addition to the applicable legal regulations, will try to consistently integrate and implement the controls listed above in its internal financial management procedures and practices.

Measures:

2.1.7. Develop comprehensive *internal procedures on budget management;*
2.1.8. Set up a reliable system/ adequate mechanism to *trace budget expenditures* at planned appropriate intervals (i.e. on a monthly basis) to allow better accounting of the budget implementation dynamics;
2.1.9. Build/ strengthen adequate internal *professional capacities of staff* through targeted training and awareness activities;
2.1.10. Enhance *external oversight* over budget implementation by setting up a committee, to be staffed by local government representatives and independent NGO observers, to monitor budget implementation on a regular basis, i.e. every six months. This will open up the process and ensure that the process is being conducted effectively. Organize public debates/ forums to inform citizens about budget implementation. Publish reports on budget implementation;
2.1.11. Monitor and reconcile all credits on a monthly basis;

2.1.12. Publish list of debtors to provide additional stimulus for citizens to meet their obligations;

2.1.13. To prevent against misappropriation of assets, complete, maintain and regularly update the asset register and monitor it on a monthly basis.

2.1.14. Allow for regular and ad hoc audits over registration of property. Increase control over registration of property by allowing ad hoc checks on the same spot to verify whether registration is complete, precise and accurate.

2.1.15. As a safeguard against misuse of vehicles for personal benefit, vehicle register, GPS and logbooks will be introduced and monitored. Apply ad hoc audits to strengthen adherence to established rules and prevent misuse.

Public procurement

Rationale: Public procurement is a key economic activity of the Municipality that has a major impact on how public money is spent. Of all local government activities, public procurement is one of the most vulnerable to corruption as the direct private-public interface offers lucrative opportunities for rent-seeking. The financial interests at stake, and the close interaction between the public and private actors, make public procurement a major risk area. Strengthening integrity operational controls in public procurement becomes a vital element in integrity management.

Measures:

2.1.16. Ensure *optimal transparency* throughout the whole public procurement process, maximal public availability of relevant, easy to access and easy to use procurement information: i.e. procedures, selection and evaluation criteria; information about events that take place post-award, such as justification for awarding contracts and contract modifications. To enable a structured approach, adopt Minimal Transparency Thresholds in Public Procurement in the Municipality of Gjakovë/Đakovica and monitor their implementation.

2.1.17. Strengthen capacities for managing public procurement through effectively *using all opportunities* to enhance the *knowledge, skills and integrity* of public procurement officials (i.e. KIPA and project based activities).

2.1.18. Enhance capacities for preparing of *tender specifications* and related operational integrity controls: Build/strengthen capacities of staff to prepare tender specifications. Consider a structured approach to extend/ strengthen capacities for preparation of specifications and tender documentation and compensate existing capacity gaps through involvement of internal staff (i.e.

from other units in relevant subject areas), as well as external experts (i.e. from the relevant industry/ sectors, NGOs, etc.) Set up a Commission (Reference Body) to the Unit for Requests as a permanent support body tasked to verify the prepared specifications. Create and maintain an electronic database of specifications to facilitate preparation of future tenders.

2.1.19. Develop *internal guidelines* to establish a *clear chain of responsibility* together with effective control mechanisms by defining the authority for approval, based on an appropriate *segregation of duties*, as well as the obligations for *internal reporting*. Ensure that the following functions are handled by different employees: recommendation of award, issue of purchase orders, and certification of the receipt of goods and services, and payment verification.

2.1.20. Where feasible, practice staff rotation in public procurement and contracting unit to avoid potential corrupt relationships to establish and strengthen.

2.1.21. Allow for consistent application of CoI regulations in the public procurement process. Require all Tender Committee members to sign a Declaration of Interest form.

2.1.22. Limit opportunities for communication with bidders by establishing clear protocol for communications with bidders and creating clear contact points for bidders. Let only a small number of officers be allowed to deal directly with bidders.

2.1.23. Encourage companies doing business with the Municipality to certify that they comply with the integrity commitments of the Municipality and request that they sign such declaration of commitment in addition to the concluded contract.

2.1.24. Set up a system to screen potential contractors and beneficiaries, with specified criteria and procedure for assessment of contractors. In absence of a central system to check credentials, adopt and maintain a database/ blacklist of suppliers/ subcontractors who failed to adhere to the set by the Municipality internal integrity standards, as a tool to guide potential debarment decisions.

2.1.25. Empower CSOs, media and the wider public to scrutinize municipal public procurement, i.e. through disclosing public information on the headlines of major contracts, involving representatives from NGOs and the wider public in monitoring high-value or complex procurements that entail significant risks of mismanagement and corruption; maintaining the requirement that selection committees who are actually selecting the winning tender are comprised of local government representatives and independent NGO observers.

2.1.26.   Strengthen   procedures/   practices   on   *quality   controls   over implementation of contracts* by intensifying ad hoc controls, using commissions where feasible and straitening requirements to documenting quality checkups and acceptance of results/ deliverables.

2.1.27.   Develop *procurement performance indicators* to monitor and improve procurement performance over time: i.e. number of appeals, time between bid opening and award, number of contract amendments, price increase, etc.

2.1.28.   Strengthen *accountability and control mechanisms* (e.g. internal control and audits, review systems, etc.), depending on the value, complexity and sensitivity of the public procurement. Set up *post procurement award audits* on tenders above a specified threshold to review adherence to specified procedural standards. For large or high-value procurement, require *independent validation* (e.g. by probity auditor or involvement of external party). Conduct *random reviews or audits of non-competitive procedures*.

Human resource management (HRM) and human resource development (HRD)

Rationale: HRM and HRD processes tend to focus an outstanding sensitivity as far as integrity is concerned. Any risk assessment will start with the HRM operational controls and few measures can attract that much of co-ownership as the ones that relate to HRM processes. The strongest shield in integrity protection goes to effective HRM operational controls. Therefore, they are considered of critical importance in the Municipality of Gjakovë/Đakovica, which considers its staff to be its biggest asset.

2.1.29. Further upgrade the *recruitment and selection processes* through developing a clear and comprehensive *internal procedure* on recruitment and selection and ensuring that recruitment and selection refer to clear and transparent selection criteria to prevent favoritism and nepotism. Consider, if possible, using an E-*recruitment system* that will provide a clear audit trail and minimize opportunities for abuse. To compensate for deficiencies of eligible personnel, create and maintain a *Database of candidates* to facilitate search of staff. Define *minimum standards of transparency* and monitor their implementation. Set up clear rules on *functioning of selection committees* (CoI declarations signed by all members, interviews with prospective candidates to be held by line managers and HR, each member taking notes, handled to HR and filed on the applicant's file); conduct ad-hoc audit of activities of recruitment commissions, ensuring audit trail and effective complaint mechanisms

registration of applications and acknowledgement letters. Retain interview notes made by each member of the selection committee on the recruitment file. Where feasible, consider the possibility to include an independent observer from outside the Municipality on the selection panel.

2.1.30. Verify qualifications of job applicants as part of their claim to a position prior to appointment. Inform all applicants in clear terms that falsely claiming qualifications will lead to their dismissal and/or prosecution for any relevant offence. Ensure all applicants sign a certificate declaring that the qualifications they assert are genuine and that they acknowledge any falsely claimed qualifications can lead to their dismissal. Include a provision that permits the Municipality to terminate the employment of an applicant who claimed false qualifications.

2.1.31. Ensure job descriptions clearly and comprehensively define individual responsibilities in accordance with the relevant regulations for internal organization and systematization of jobs; ensure they are known to all staff. Review the duties and responsibilities of all staff positions to ensure adequate controls of responsibility, professionalism, and integrity.

2.1.32. In key operational processes, implement a system where personnel declare, and the Municipality maintains a written record of, actual or potential conflict of interest. This helps to identify situations where personnel may, through family or other connections, fail to prevent or report integrity violations.

2.1.33. Enhance controls over *management of working time*: consider using work time registration system; ad hoc surveillance actions; complaint system, etc.

2.1.34. Increase transparency in *business trip management*; ensure all business trips are made according to well-defined and acceptable criteria, be public and bound to terms.

2.1.35. Upgrade the current *reward system* to consider possibilities of attracting and retaining qualified staff. Consider opportunities to provide additional incentives to motivate staff in the high-risk positions. Review the incentive measure policy affecting staff motivation. Establish *Staff Performance Indicators* according to sophisticated European procedures. Maintain an adequate level of transparency of the system operation.

2.1.36. Upgrade the present *Staff Appraisal System* in line with the applicable national regulations. To maintain integrity, consider opportunities to apply consistent and comprehensive clear criteria to remove/minimize potential level of subjectivity by those involved; maximize transparency; guarantee audit trail; provide the necessary incentives and confidence building; and ensure merit-based promotion policies.

2.1.37. Where feasible, introduce the practice of *surveying satisfaction of staff* with work and integrity environment as an "early warning system" to detect issues and trends.

2.1.38. Upgrade the current *Training Management System* to enhance its effectiveness, efficiency and transparency. For this purpose, link the Training Needs Analysis (TNA) process, the delivery of training and the evaluation of training. TNA is to determine the actual training needs and link them best with training opportunities (use structured methodology, conduct random check- ups to ensure that participation in training opportunities has been decided on a need- and merit-basis and not based on arbitrary/subjective grounds, and record results). Delivery of training may be enhanced by strengthening the practical focus of training and customizing it to real needs. Improved evaluation of training will mean going beyond measuring perceptions/reaction to training, and measuring also knowledge transfer to the job and actual impact on the organization. Results shall be communicated and used to correct related inefficiencies.

2.1.39. Ensure appropriate professional training of personnel that works in the *Personnel Department*. Use the available external resources (i.e. KIPA, project based training) to extend own opportunities.

2.1.40. Provide senior and middle management with adequate training *in integrity planning and risk management* to ensure that the integrity management process in the Municipality is well resourced.

2.1.41. Consider possibilities of introducing changes/ amendments to the applicable legal regulations related to recruitment and selection, appraisal and career development through participation in expert groups and provision of comments/ proposals.

Internal audit

Rationale: The purpose of the audit is to provide reasonable assurance to top management that processes are operating effectively, including that the integrity management system has been implemented. They help detect integrity violations and provide a deterrent to any potentially corrupt personnel (as they will be aware that their project or department could be selected for audit). Increased quality of the audit function at the Municipality of Gjakovë/Đakovica shall cover, among other measures, a comprehensive reorganization; introduction of a risk assessment-based audit and inspection planning system (i.e. internal audit environment assessment); auditing system; risk assessment (risk criteria factors and risk

criteria assessment methods, auditing system prioritization; internal audit strategy, etc.); adequate staffing and professional development of staff involved; rigorous monitoring procedures and specific integrity controls.

2.1.1. *Revise the process flow* within the audit unit to identify possibilities to improve effectiveness, efficiency and transparency. If needed and feasible, restructure the functioning of the audit unit.

2.1.2. Revise the *existing operational procedure*, to provide with a clear SOP that covers all key phases: documentation and reporting requirements allocation of respective responsibilities. Address risk management, specific control actions, internal audit planning, internal audit resourcing, internal audit performance assessment and quality assurance. Communicate procedures to relevant staff. Ensure effective audit planning sensitized by results of risk assessment. Monitor implementation of the audit plan and provide for immediate corrective measures in case of failures.

2.1.3. Revise the Organogram and align the job *descriptions* of the audit personnel with the revised operational procedures.

2.1.4. Strengthen *unit capacities and increase professionalism of the audit* team. Set up and implement a targeted training programme for auditors and/or consider training opportunities offered by KIPA and other specialized training providers. Areas: conducting specific audits (e.g. fraud audits, IT audits, Quality Management Audits), application of audit procedures (sampling, interviews, sufficiency of evidence, etc.).

2.1.5. Review opportunities to *increase job incentives* for auditors in the current reward system, i.e. work in hazard coefficient.

2.1.6. Where feasible, implement *integrity operational controls*: rotation and four eyes principles to avoid corruptive relationships emerge and strengthen. Ensure efficient application of conflicts of interest in the audit processes to ensure that staff selected to perform these functions is free of any integrity-related suspicions. For this purpose, set clear requirements, require submission of CoI declaration and conduct random check on their effective implementation.

2.1.7. Improve the *system of communication* (information flow) between the internal audit unit and other municipal bodies. For this purpose, a quality information system should be implemented in all work processes.

2.1.8. Increased frequency and diversification of audits; *increased use of ad hoc audits* (not expected/planned) on a random basis to follow-up on recent audits and verify the findings/ procedures used.

2.1.9. *Increased control over implementation of audit findings/ recommendations*. To achieve this, consider setting up of a Monitor-web as an electronic system which monitors follow-up of internal audit and inspection activities to ensure that all instances of suspected violations are satisfactorily resolved. The system will address both internal and external audit recommendations and register the progress made in implementing them and will function as a single dashboard for public managers to monitor and evaluate internal control actions.

2.1.10. Periodically *evaluate effectiveness of the internal audit system* based on the developed procedures and relevant indicators. Allow for publicity of results to strengthen preventive focus.

2.2. Improve organizational resistance to integrity violations in key high-risk operational processes through optimized integrity controls

Rationale: The Municipality shall use operational controls to manage the identified major integrity risks, ensure compliance with legal requirements, and avoid or minimize integrity risks. When identifying needs for operational controls, the Municipality has considered all of its operations, including those related to management functions (i.e. purchasing, financial management, etc.); and these related all key day-to-day process operations. The risk assessment undertaken showed that major integrity risks exist related to core functions of the Municipality. In particular, risks were identified in following areas: urban and rural planning; implementation of building regulations and building control standards; public housing; local economic development; land use and development; licensing of local services and facilities, including those related to entertainment, cultural and leisure activities, food, lodging, markets, street vendors, local public transportation and taxis; public health; provision and maintenance of public services and utilities, including water supply, sewers and drains, sewage treatment, waste management, local roads, local transport, and local heating schemes. Based on an assessment, among the delegated competences of the Municipality, cadastral records are the most vulnerable to integrity violations (prone to corruption). Other areas of high risk in this regard include: voter registration, verification of social assistance applicants' situation ; and forestry protection on municipal territory. ;. Facing the challenges above, the Municipality has identified short and long term priorities and structured operational controls in various forms, such as procedures, work instructions, physical controls, use of trained personnel or any combination of these. The choice of the specific control methods depends on a number of factors, such as the skills and experience of people carrying out the operation and the complexity and integrity significance of the operation itself.

General

2.2.1. Where feasible, *increase the number of public services available electronically*. Employ information technologies to enhance transparency, quality and speed of public services.

2.2.2. Where feasible, create/increase the level of the services provided to the citizens as a *one stop shop*.

Public services

2.2.3. *Revise the process flow* in the sector of public services to identify possibilities to improve effectiveness, efficiency and transparency. If needed and found feasible, restructure the functioning of the public services unit.

2.2.4. Revise the *existent operational procedures*, to provide with clear SOPs. Develop and enforce *work plans to clearly define the procedures to issue permits for respective services* and their complete and satisfactory execution.

2.2.5. Align *job descriptions* of the involved personnel with the revised operational procedures.

2.2.6. Institute and maintain a *structured system of periodic regular reporting* on the execution of duties and projects based on the respective work plans. Increase the number and quality of *trainings* to make sure training gaps are well covered.

2.2.7. Analyze possibilities to optimize the existing *space* so that a more efficient allocation of offices is achieved.

2.2.8. *Minimize opportunities for direct contacts* of interested parties with the municipal officials and *enforce separation of duties* (the decision is drafted by the professional official, whereas the payment and delivery of the decision is made by the other official).

2.2.9. Enhance planning through enabling setting of *priorities, based on clear criteria and procedures.*

2.2.10. Support development of a *Central System of Monitoring of References of Service Providers* to effectively guide debarment decisions.

2.2.11. Set up a body to supervise projects before they enter the procurement phase.

2.2.12. *Ensure technical descriptions for projects and clearly and comprehensively drafted* in compliance with the applicable legal acts and standards. *Increase professionalism of staff* involved in drafting technical specifications and *provide for consistent monitoring and control* over quality of drafted technical descriptions.

2.2.13. Increase *control and inspection of the application of decisions* to assess conformity with the regulations.

2.2.14. Report on incoherencies in the applicable legal system so that necessary amendments are being effected.

Cadaster

2.2.15. Revise the *organogram* of the cadastral unit so that clear accountability trail is established, including clear reporting obligations. *Re-organize the process work flow* in the *Cadaster Unit* by embedding strong integrity controls. Ensure appropriate overall level of accountability in the Cadastral Unit.

2.2.16. Undertake effective steps to *adequately resource the cadaster function* with appropriate *competent personnel;* Ensure *adequate professional training* for staff in the cadaster directorate, familiarity with the IMS principles/ controls/rules; Provide adequate information and training on the new instructions or frameworks for cadaster measurements.

2.2.17. Ensure staff in the Cadastral Unit is guided by specific *Code of Conduct* to better respond to the special needs of the staff.

2.2.18. Strengthen control mechanisms, including ad hoc and secret client operations.

2.2.19. Introduce and maintain a workable *system of professional scanning and archiving.*

2.2.20. Strengthen/diversify *internal control mechanisms*, i.e. *in the reception offices-tellers*, *registration and de-registration of mortgages.*

2.2.21. Strengthen public complaint mechanisms and whistle-blowers.

2.2.22. Participate in activities that involve revision or amendments to the applicable legal provisions through expert opinions or work groups.

Inspections

2.2.23. *Improve the entire management of the inspection function* to increase its effectiveness, accountability and transparency and thus, increase resistance to corruption and integrity violations (e.g. organization of the inspection institutional structure, inspection planning, capacity, knowledge and skills of inspectors).

2.2.24. *Revise internal procedures to cover inspection function* with coverage of all key inspection areas; documentation and reporting requirements; and allocation of

respective responsibilities. Revise deadlines and set internal deadlines as standards in the SOPs depending on the risk and importance of inspections. Address issues such as risk management, specific control actions, planning, inspection resourcing, inspections performance assessment and quality assurance. Communicate these procedures to all staff.

2.2.25. Adequately resource the inspection functions. Ensure *staff professionalism* through careful consideration of existing capacity gaps. Where feasible, maintain the rotation and four eyes principles to avoid emergence and strengthening of corruptive relationships; Review opportunities to increase job incentives in the current reward system, i.e. work in hazard coefficient.

2.2.26. Ensure systematization of jobs and updated *organogram.*

2.2.27. Increase frequency of *ad hoc inspections.*

2.2.28. Ensure appropriate and consistent *monitoring* and implementation of inspection plans.

Urban and rural planning

2.2.29. Revise the *Organogram.*

2.2.30.   Develop an adequate *internal procedure/clear criteria* that address the key integrity risks in the urban and rural planning process and prevent subjective decisions.

2.2.31. *Strengthen the planning system*, institute midterm planning to link with priorities and avoid ad hoc decisions.

2.2.32.   For decisions of high importance, introduce specific operational controls, i.e. set up commissions as a decision body or other control body.

2.2.33. *Strengthen control mechanisms*, i.e. ad hoc controls at sample basis and post-issuance of follow up audits.

2.2.34. Increase *transparency* of urban and rural planning.

Directorate for Agriculture and Rural Development

2.2.35. *Review the process flow* in the agriculture unit to analyze where processes are overloaded and could be simplified; develop an adequate *simplified internal procedure/ clear criteria* that address the key integrity risks in the agricultural sector and prevent subjective decisions. Revise the *Organogram.*

2.2.36. *Strengthen the planning system*, institute midterm planning to link with priorities and prevent from ad hoc decisions; Define which sectors should receive subsidies; Draft medium-term plans on how to allocate means in the agricultural sector.

2.2.37. Ensure staff is *adequately trained.*

2.2.38. Improve the *coordination and communication system.*

2.2.39. Propose amendments to relevant regulations through expert opinions or participation in working groups.

Education

2.2.40. Revise the *operational procedures* on recruitment of staff in the education sector to ensure adequate integrity controls, i.e. involve NGOs, other external stakeholders in the interview panels, increase transparency of the interview process, increase publicity of selection results, and so forth.

2.2.41. Establish/maintain clear and detailed *procedures for emergency reconstruction of schools* with explicit criteria and requirements; increase transparency of the decision process through wider publication.

2.2.42. Develop a policy/strategy on *recruitment of younger new staff* in the education sector considering opportunities to increase incentives.

2.2.43. Contact the Ministry of Education to provide additional guidelines on the applicable regulations so that a coherent understanding and application is achieved. Make guidelines/ information easily and publicly available.

2.2.44. Initiate through expert opinion or participation in working groups *amendments to the relevant regulations* to increase consistency and effectiveness.

Land use and development

2.2.45. Develop *adequate internal procedure/criteria* to address key integrity risks in land use and development process and prevents subjectivism.

2.2.46. Strengthen the *planning system*, institute midterm planning to link with priorities and avoid from ad hoc decisions.

2.2.47. Strengthen *control mechanisms*, i.e. ad hoc controls at sample basis and post issuance follow up audits.

Licensing of local services and facilities, including those related to entertainment, cultural and leisure activities, food, lodging, markets, street vendors, local public transportation and taxis

2.2.48. Develop adequate *internal procedure/clear criteria* that address key integrity risks in the licensing processes and prevent subjective decisions.

2.2.49. Strengthen *control mechanisms*, i.e. ad hoc controls at sample basis and post issuance follow up audits.

Public housing

2.2.50. Develop a *housing policy* and related procedure that, at a minimum, will address the major integrity risk in the allocation of houses that housing may be irregularly allocated to beneficiaries, e.g. beneficiaries may be moved up the waiting list in exchange for undue benefit. Increase transparency over waiting lists.

2.2.51. Revisit the procedure for management of contractors active in reconstruction of municipal housing and strengthen integrity controls: i.e., handing over and payment of contractors' claims, checks over quality of work; payments of building contractors.

Economic Policy Directorate

2.2.52. Review the Organizational Chart of the Economic Development Directorate. Review the issue of infrastructure, whereby it could be established as a separate sector through a decision of the Assembly. This will enable the ED Directorate to implement municipal infrastructure development policies and complete professional staffing in the infrastructure sector.

2.2.53. Review the possibility to establish an appropriate framework for sustainable local economy.

2.2.54. Review the possibility and staff capacities for economic development policy development, and proposals for measures for municipal economic development.

2.2.55. Review the possibility to draft a global strategic plan for municipal economic development, in the short- and long-term perspective.

2.2.56. Review the annual tourism policy formation and propose measures to encourage the private sector to fulfil the tourism development policy goals. According to the Law on Tourism No. 04-L-176, dated 11 April 2013, hotels and travel agencies will be rated on voluntary, rather than mandatory, as stipulated by prior

legislation. Thus, the new Law on Tourism corresponds with the European Directive. This requires monitoring of such businesses which may request more advantages than eligible, in order to ensure a higher level of responsibility and transparency.

Physical security arrangements

2.2.57. Maximize protection against integrity violations through strengthening physical security controls, based on a detailed review of the physical security arrangements; i.e. specific focus is physical security of infrastructure, assets and staff.

STRATEGIC OBJECTIVE III:

Enhancing the external environment to reinforce and widen the integrity aspects in the modernization and reform processes through better coordination with citizens and legal entities; increased transparency, effective communication and stakeholder engagement

Activity lines and respective measures

3.1. Build/ strengthen consultation and communication mechanisms with key external stakeholders in the integrity agenda

Rationale: The Integrity Actions of the Municipality of Gjakovë/Đakovica are not simply an internal effort; they require a well-planned, proactive outreach and public relations effort. The public wants to hear for visible and immediate improvements. Change demands for effective and visible leadership at the highest level. To reach the high integrity standards and implement its objectives, the Municipality needs collective commitment of key stakeholders in the sector. Collective commitment can be strengthened through pro-active and structured consultation and communication processes.

Enabling participation of local stakeholders in municipal strategic and normative decision-making processes, as well as in monitoring and oversight over municipal policies.

3.1.1. Increased effectiveness of *consultations with external stakeholders in development of municipal strategies, regulations and budget* through elaborating a relevant *Policy of Inclusion of Key Stakeholders in the Work of Municipality*, listing diversified channels/measures to encourage meaningful public participation in key processes (i.e. posting of draft regulations on the website, initiation of public discussions and focus groups on budget planning and monitoring of budget implementation, web-based forums to discuss draft strategies and regulations, etc.).

3.1.2. Ensure *consultations* with *stakeholders* to be undertaken and *public submissions* to be given due consideration before the release of key strategic planning and

policy documents of the Municipality (i.e. Strategy of the Municipality and Budget of the Municipality).

3.1.3. Consider *setting Technical Risk Management Working Groups* with external participation (i.e. professionals, professional organizations, civil society representatives) in corruption-sensitive areas (i.e. preparation of tender specifications; selection of personnel in the education sector, etc.). Ensure their structured involvement.

Coordination/Communication with key groups of stakeholders

3.1.4. Strengthen the integrity aspects in the *external communication strategy* by focusing on integrity to convey the AC message to all external stakeholders. Upgrade the website with information related to integrity enhancement policies/measures/achievements of the KC. Strengthen/focus the AC message to the external stakeholders.

3.1.5. Explore opportunities for *targeted cooperation* with the National Association of Municipalities in Kosovo, the Ministry of Local Government Administration and other *municipalities* in the field of integrity management, as well as possibilities to obtain relevant technical assistance from *donors* to foster capacity building and further integrity related activities. For this purpose, establish a cooperation and communication structure: contact point, ToR, reporting and monitoring mechanisms. Consider setting up/participating in an *integrity network in the local government sector* to support information and experience sharing and build collective commitment.

3.1.6. Review opportunities to *constructively involve local civil society, businesses and media* in the anti-corruption activities led by the municipality. Consider developing a *Local Integrity Network* with participation of active CSOs, professional business organisations, locally important media (semi-formal organization, acknowledged by the local public administration). The Integrity Network shall connect, at local level, the local public administration with key stakeholders from the non-governmental and private sectors to streamline their integrity-related efforts. It shall serve the purpose of acting as a "citizens' watch" body in the work of administration; provide valuable feedback/expertise in community matters, and help strengthen co-ownership in difficult reform measures.

Anti-corruption hotline

    3.1.7.   Ensure effective functioning of a *secure anti-corruption hotline* for citizens and businesses to provide Municipality with a trusted channel to report integrity violations. Guarantee safety of users, timely provision of adequate feedback to complainants and integration of results into the management system through targeted data analysis and relevant corrective measures.

3.2.   Promote transparency as essential for enhancing accountability and external oversight of Municipality

Rationale: The role of transparency and engagement of citizens, businesses and non-governmental organizations in fighting corruption locally is critical. That does require the Municipality to provide stakeholders with quality information in order to enable them to oversee and evaluate decision-making and design of public policies. Together, transparency and stakeholders' engagement can facilitate: better policy outcomes at lower costs; higher compliance with decisions reached; shared responsibility for service delivery; and a shared role for enhancing integrity.

    3.2.1.   Periodically review opportunities to use the *Information Centre* as a focal point to maximize transparency in the work of the Municipality and provide citizens and businesses with sufficient accurate, consistent, accessible and user-friendly information to allow them to meet their obligations. Based on results, set up a *Transparency Stand* where various leaflets, regulations, orders, announcements, service standards, manuals/reference templates/ helpers, etc. may be displayed in user friendly format to allow easy and proper use.

    3.2.2.   Set up a *structured system to regularly update the institutional website* with sufficient information in key functioning areas of the Municipality: relevant laws and regulations; Code of Conduct; Client Service Charter; annual management reports; 'easy-to-understand budget reports' which provide a simple overview of financial operations; procurement; recruitment and vacancies;   activities and decisions taken by the municipal assembly and its administrative bodies; and asset declarations of municipal officials. Publish relevant information related to integrity enhancement policies/measures/achievements of the Municipality, i.e. the Integrity Statement, Integrity Plan and the reports on their implementation.

    3.2.3.   If necessary, *provide IT skills training* necessary to maintain user-friendly web transparency.

3.2.4.   In line with the central regulations, develop and implement a detailed and clear procedure for processing applications for *access to public information*; forms, sites for public information delivery and related costs. Ensure *staff is well trained* on relevant laws, regulations and newly-developed procedures. Provide adequate and professional monitoring of the implementation of the Law on Free Access to Information by the Municipality. Take immediate corrective measures where deficiencies are reported/ identified.

ACTION PLAN

Strategic Objectives

Action/Measures	Responsible unit	Coordinating unit/ partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source
Actions/measures to support implementation of the objectives	Municipality of Gjakovë/Đakovic a- responsible for implementation of specific measure	Units to coordinate implementatio n and institutions/or ganizations that partner	The anticipated time to complete the implementation of specific action	Indicators which serve to verify the implementation of the action	Presents the budget needed to implement the relevant action from the budget of Kosovo or different donors

STRATEGIC OBJECTIVE 1

Strengthened resistance to integrity violations, and increased efficiency, effectiveness and transparency of the holistic municipal management system through improving the management of integrity risks function and enhanced management practices

Action/Measures	Responsible unit	Coordinating unit/ partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source

STRATEGIC OBJECTIVE 2

Enabling the internal environment to sustain integrity sound municipal processes through optimized integrity controls at strategic and operational process level and building/ strengthening local capacities, knowledge and skills in integrity management;

Action/Measures	Responsible unit	Coordinating unit/ partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source

STRATEGIC OBJECTIVE 3

Enhancing the external environment to reinforce and widen the integrity aspects in the modernization and reform processes by improved co-ordination with citizens, businesses and other key stakeholders, structured and effective communication; promoting transparency and stakeholder engagement; dissemination of good practices and shared commitment

Action	Responsible institution	Coordinating institution	Deadline for implementation	Success indicators	Financial cost and funding source