



INTEGRITY PLAN

Municipality of Mamusha

2016 -2020



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March 2016

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INTEGRITY STATEMENT

This statement authorises, informs, drives, maintains and accounts for the processes of integrity risk management in the Municipality of Mamusha. It is built on the endorsement of the Kosovar Anti-Corruption Strategy and Action Plan, placing forward integrity planning as a key component. It does bridge with the dynamically evolving Kosovar public administration modernisation agenda supporting activities to enhance efficiency, effectiveness, accountability and transparency of operation of public institutions. Most of all, however, this statement comes as a result of our strong determination that effective integrity management is a top priority for us, as it will help us rethink our municipal processes, reorganise and redesign our procedures and strengthen trust at all levels. Situated in the southern part of Kosovo, our small rural municipality is unique and advanced in many prominent ways.

Though it was not until recently when we have obtained the status of an administrative center and municipality, we have been effectively functioning as a rural community since 1985. We care of a settlement with 9 neighbourhoods and of approximately 6,000 inhabitants. We are proud to maintain a long record of ethnic tolerance and respect for multi ethnic diversity, with our population being comprised of Turks, Albanians and the Roma, Ashkali and Egyptian community.

As a local government, we are determined to effectively support all businesses operating in our municipality. Historically, the people of Mamusha have exhibited considerable business proactivity and a dedicated entrepreneurial spirit. This has encouraged us also, as a local administration, to ingrain this stance in our governance work also. Raising efficiency and effectiveness of our services has become a priority. All the requests of the business community are aimed to be processed swiftly and tailored in order to fulfil all of their needs. To attract investment, we proceeded with removing taxes for new businesses for the initial 1 to 3 years of operation. Now we are proud to refer to close to 800 active businesses on our territory. We are led by the ambition to maximise the great potential of Mamusha that has one of the most fertile lands in the region and offers excellent opportunities for the cultivation of fruits and vegetables. Stimulating healthy food processing and organic agriculture has the potential to distinguish our municipality from other municipalities in the region. Further to that, we have developed the trade sector and promote our wealthy cultural heritage that has given form to a reassuring and welcoming behaviour towards everyone.

We integrate our mission with our responsibilities. We increasingly recognize that with the development opportunities arising and our competences extending, the potential for abusive behaviour expands as well. We operate in a complex administrative environment, with many regulations at various

levels that may sometimes be incoherent and pose challenges to effective enforcement. Where burdensome administrative procedures come to present an extra threat to effective and efficient services. Municipal officials enjoy considerable discretionary powers and monopoly over public services such as local economic development, health, education, housing, land, water, etc. We are proud to maintain close interactions at the point of service delivery and value each client, though this may also invite opportunities for corruption. In a small community of our type, local contacts and family relationships matter as they are part of the supporting environment. Though this may facilitate dialogue and understanding, it does create risk for nepotism and favouritism that may affect professional integrity and encourage biased decisions. We believe in customer feedback to increase quality of our services, but we need to build a pro-active attitude of our clients as well. Lack of active local media and a strong civil society weaken the citizens' oversight mechanisms that we consider essential to maintain a sound integrity climate. Deficit of resources, as regards the infrastructure and working environment, as well as professional expertise, present a serious challenge as well.

Given the above, we see integrity protection as our conscious choice. Our major challenge is to turn out the whole system and the processes within which we live and operate more resilient to abusive pressure so that our business, our economy and our local community can survive and prosper. Resilience means reducing vulnerability so that our municipal systems are better able to deal with increased pressures from outside, as well as from inside. Resilience also means being able to make the most of opportunities which can arrive such as any support received by the state or international community, our local businesses, the civil society and the media, as well as our citizens. In doing so we are determined to:

- Maintain a straightforward integrity risk policy that is adequate to our vision, mission and mandate, and complies with the overall anticorruption and public modernisation reform;
- Continually improve quality and effectiveness of integrity risk management, strengthening local capacities in this respect, implementing the measures of the integrity plan, providing for monitoring and evaluation, and gradually moving to a new culture of informed risk-based decision making;
- Rethink our practices and procedures as to increase the level of protection against integrity violations;
- Consistently apply a straightforward "zero tolerance" to corruption policy; effectively cooperate with responsible institutions in the field of anticorruption;

- Value and promote integrity at all times as adherence to professional standards and moral values; and provide for effective implementation of the Code of Ethics for Civil Servants; Respect Col regulations, refrain from engaging in any business or transaction or have any financial or other personal interest that is, or may appear to be, incompatible with the performance of official duties, and avoid nepotism and favouritism
- Refrain from any conduct that may bring financial losses, or detract from the image of integrity or professionalism of the Municipality of Mamusha.

I, hereby, declare my full and unconditional support and firm commitment to all efforts to strengthen integrity protection within the Municipality of Mamusha.

Arif Bütüç
Mayor of the Mamusha Municipality
2016

INTEGRITY PLAN

The Integrity Plan restates the commitment of the Municipality of Mamusha to further enhance the existing operational controls in the full spectrum of activities conducted, with a focus on provision of client centered, transparent and efficient services. It prescribes risk based measures for achieving its integrity objectives and reinforcing the rule of law and professional values and standards. This Plan is to play a critical role for the Municipality of Mamusha to:

- Provide for organisation-wide integrity risk management with a strategic focus on high-risk areas; balance proactive with reactive integrity risk management; reduce/ eliminate opportunities for corruption and improve overall resilience to corruption;
- Strengthen compliance with relevant legal and procedural requirements and leading international management standards;
- Further develop capacities of all staff for effective integrity prevention and detection of vulnerabilities, build awareness at all levels and functions, encourage collective commitment and co-ownership in the integrity management;
- Enhance the framework of trust with external and internal stakeholders, and respond to their requirements and expectations as regards the integrity performance of the Municipality.

The Plan builds on the *results of a comprehensive integrity planning and risk assessment process* undertaken within the Municipality of Mamusha, been conducted in the period of October, 2015- February, 2016. The process involved an identification of the organizational vulnerabilities to integrity violations, and their assessment by considering (1) the damage in material and nonmaterial terms that respective potential violations cause, and the (2) 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 responsibilities for integrity planning by setting up of a Working Group led by the Mayor of Mamusha;
- Surveyed the relevant to the Municipality strategic, regulatory and operational framework;

- Analysed data from integrity performance, monitoring and implementation;
- Processed a reference organisational 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 improvement operational lines and measures (Self-Assessment of the organisational integrity system developed);
- Used workshop focus groups and processed special risk tables to address specific risks in key administrative units and high risk areas to identify and assess integrity risks and list enhancement measures (workshop and interviews held; Integrity Risk Register developed);
- Used integrity development related documents/ guides of the UNDP, 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, as a reference to support the measures proposed.

To facilitate implementation, a special *Action Plan* developed and annexed (Annex 1). The Municipality shall provide for periodic *monitoring of its implementation*. 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 on the implementation. The minimum frequency of reporting is within six months period. Reporting allows the Mayor to undertake on time adequate corrective/ preventive measures in case where implementation of particular measure(s) poses difficulties/ delays.

The Integrity plan shall consist, in particular, of:

- **Integrity Statement** restates the commitment to integrity of the Municipality of Mamusha.
- **Integrity Plan**- explains the background, scope, purpose, objectives and the methodology.
- **Strategic objectives, activity lines and measures** outlines key strategic objectives and action areas aimed to strengthen the integrity defence in the Municipality of Mamusha. These are based on the assessed integrity risks, lessons learnt and relevant good practices. The Plan provides brief justification/ rationale of the activity lines planned, further supported by targeted measures to guide implementation.
- **Action Plan** outlines in details all measures that shall be taken to achieve the objectives set, as well as the relevant timeframe and organisational responsibilities for implementation. Indicators of success for each measure have been defined, supported by the necessary resource/financial numbers.

The Integrity Plan is seen as the strategic and operational basis to further improve the *integrity management system in the Municipality of Mamusha (hereinafter, IMS)*. Such system considered as a key to reduce outstanding economic and human costs of integrity violations, enhance future business and boost organizational reputation and creditability. Integrity planning remains its fundamental pillar.

STRATEGIC OBJECTIVES, ACTIVITY LINES AND MEASURES

The Municipality of Mamusha has streamlined its processes to increase effectiveness and efficiency of operations, modernise services and consistently reinforce a client centred approach in line with the challenges and opportunities driving the Kosovar public administration modernisation agenda. While building on its achievements so far, and inspired by national anticorruption agenda and successful international practices, the Administration shall further advance its integrity management practices by focusing on the following three core areas:

- **Further improve integrity risk policy and integrity risk governance to provide** an adequate policy and institutional framework for the municipality to effectively manage integrity risks, reduce potential for violations and improve integrity performance;
- **Strengthen integrity protection in critical processes and areas of operation;**
- **Foster openness and transparency and mobilize capacities** of external stakeholders to act as co-owners in the integrity reforms for the benefit of the community.

The following is to present and explain the above strategic objectives, and translate these objectives into concrete policy and management action activity lines and measures to support their achievement.

1. STRATEGIC OBJECTIVE:

Further improve integrity risk policy and integrity risk governance to provide an adequate policy and institutional framework for the municipality to effectively manage integrity risks, reduce potential for violations and improve integrity performance

Activity lines and respective measures

- 1.1. **Maintain an up-to-date integrity risk policy aligned with the current strategic priorities of the municipality of Mamusha, the key modernization aspects of the Kosovar public administration and the best standards in anti-corruption and integrity**

Rationale: Leadership is of central importance to the success of many strategies, especially to those related to organisational development and integrity. Organisational values and adherence to high professional standards of service will not be accepted and followed by the members of the Municipality unless demonstrated by those occupying key roles. Ethical leaders with proactive integrity risk policy encourage ethical behaviour to be the organisational norm. Thus, leadership is important at all levels of the Municipality and must be empowered through a visible and consistent integrity risk policy, that is communicated and known to all staff. To be effective, such risk policy needs to address localised risks and specific problems. To be sustainable and sensitive to important system issues and developments, it needs to be aligned with key priorities of the Kosovar public administration modernisation agenda. To be innovative, it needs to take into consideration current best achievements in the integrity management field, built upon lessons learnt and tailored to foster local contexts.

1.1.1. Demonstrate leadership in municipal integrity matters by organising/adequately resourcing consistent and timely implementation of the Integrity Plan, as well as its periodic reporting, review and update. The latter shall done in an a structured and informed format, based on reassessment of the identified risks and vulnerabilities, if and where found necessary, as well as at the end of the planning period.

1.1.2. Aimed at increasing visibility of integrity efforts of current municipal leadership across the Municipality, set up a structured system to include integrity related issues in the agenda of public hearings, public sessions and periodic meetings of senior management. To win partners in the reforms, adopt and maintain a policy to progressively involve larger segment of internal and external stakeholders in the discussion of integrity risks and integrity measures, including members of the Municipal Assembly and key interested parties.

1.2. Further strengthen the integrity management system as a governance framework to assure risk policy is achieved and effective risk management is implemented

Rationale: To ensure achievement of integrity policy objectives, the Municipality needs an appropriate governance framework that specifically supports risk policy and risk management. This requires a functioning and adequate integrity management system. Such system is to entail the planning of integrity measures in the Integrity Plan, but to also provides for its implementation, monitoring and measurement of key characteristics of operations that determine integrity performance. It covers taking follow up actions to continually improve the integrity performance and the integrity

management system. Currently, the Municipality of Mamusha demonstrates key elements of such system, yet, its pillars and interfaces are yet to be build/strengthened in line with the good practices and standards in integrity protection. This Integrity Plan involves important measures in the above direction. Though a fully pledged integrity management system is not the panacea to all integrity issues that may arise in municipal context, it appears crucial to minimise opportunities for corruption and vulnerabilities in the governance system. It provides an opportunity to rethink processes, redesign procedures and reinforce trust and collective commitment to comply with legal obligations and ethical commitments.

- 1.2.1. *Clearly allocate roles and responsibilities as regards the integrity compliance function* in the municipality of Mamusha, including responsibility and authority for overseeing implementation of the Integrity Plan and related reporting. Make staff fully aware that everybody is an integrity risk manager and has related serious responsibilities, within her or his area of competence and responsibility. Consider introducing a system of ethics counselling by appointing out an *ethics counsellor, who has* the competence, creditability, and status to be trusted by staff and help them solve ethical dilemmas.
- 1.2.2. Significantly upgrade the familiarity of all staff with the key instruments in integrity management and protection, that includes, but is not limited to the existing Code of Ethics and normative regulation of *Conflict of Interests, gifts, secondary employment, mandatory disclosure*. To this purpose, consider training and awareness formats as appropriate, as well as periodic testing of knowledge of employees. Such training should explicitly cover expectations of all employees regarding (1) their duty to communicate certain matters; (2) a list of the types of matters, including actual or suspected integrity violations, to be communicated along with specific examples; and (3) information on how to communicate those matters.
- 1.2.3. Ensure that the *Gift Register of the Municipality of Mamusha* is in existence, maintained as appropriate and known to all staff.
- 1.2.4. *Strengthen knowledge and skills of mid and senior management in risk policy and integrity risk management* through appropriate training, awareness and communication formats. Make sure that risk based thinking progressively becomes a basis for informed decision making, procedure writing, as well as of development and implementation of integrity operational controls. To this purpose, encourage participation of senior and mid management in relevant practitioners' networks, conferences and round tables, projects, etc.

1.2.5. Set up a properly designed and effectively functioning mechanism *for internal reporting* of abusive behaviour promoted as an instrument of prevention. Enhance familiarity of staff with the *whistle blowers protection* matters, including regulations and procedures, so that everyone understands the specific importance of whistleblowing and acts accordingly if and where needed. Ensure whistle blowers protection is well organised in the municipality. Ensure integrity related incidents, where identified, are registered, reported as appropriate, thoroughly investigated, analysed and evaluated for need of further action, trends and to the municipal leadership to identify early action. Review internal controls following detection of a fraud or corruption incident. Check for consistent application of the disciplinary procedures for detected incidents, document and communicate these checks. Report and publish trends on annual basis.

1.2.6. Raise staff awareness of the importance of *monitoring the implementation of the Code of ethics* in the Municipality of Mamusha. To this purpose, familiarise staff with the monitoring criteria, developed by the central government to be applied in the context of Code of Ethics. Train and develop capacities for persons responsible to monitor principles of ethics and transparency in the municipality.

1.3. Improve the human resource management and development practices, to make sure that staff is well prepared and aware of its role for managing integrity

Rationale: Performance of municipal officials as regards adherence to ethical values and professional standards remains a critical parameter of the implemented integrity management system. Therefore, appropriate care is to be taken to assure that processes are not only adequately staffed with the right people for the job, but also that all staff is given the opportunity and enabled to effectively protect the system against integrity violations. The risk assessment conducted in the Municipality of Mamusha demonstrated high level of awareness of all staff about the critical importance of the HRM and HRD processes. If the latter as a whole are to offer a strong resistance to integrity violations, the following areas are seen in need of further improvement: attestation and performance appraisal; selection and recruitment of staff; training system, study trips abroad, financial reward system, career development. As potential integrity related measures that may help increase integrity in the selection and recruitment processes, the following measures are considered appropriate: clear and transparent selection criteria to prevent favoritism and nepotism; written internal procedure on selection and recruitment of staff; clear documented audit trail of the work of the selection commission; reasonable length of time to prepare documents and submit

job application, CoI declarations of all members of the commission signed; check of qualifications and diplomas before recruitment. Opportunities for improvement of the carrier development system are seen as follows: clear and transparent criteria on carrier development established and consistently followed; clear internal procedures on carrier development; external audits on carrier development procedures, transparent pay scales and benefits system; complaint system upgraded to respond effectively to claims for abuse of carrier development procedures, ad hoc audits on adherence to rules. As regards assessment, opportunities for further improvement are seen in the following: written internal procedure on assessment of staff; clear and transparent assessment criteria to prevent favoritism and nepotism; clear documented audit trail of the assessment process; opportunity to get advice from and report to an integrity counselor on deficiencies of the assessment process. Opportunities to improve the HRD system are seen as follows: increased transparency of training opportunities, clear and transparent criteria for competitive selection of trainees; clear audit trail and reporting of training results; evaluation of training effectiveness.

- 1.3.1. Explore opportunities to introduce and maintain the *Human Resource Information Management System in the Civil Service (HRIMS)*– built and managed by Department of Civil Service Administration (MPA) and to be further extended to all institutions of public administration at local level. This will allow the municipality of Mamusha plan and monitor implementation of policies in the civil service. Ensure accuracy of information.
- 1.3.2. Ensure *non-discrimination, fair treatment and gender equality in all municipal* practices and procedures. To this purpose, review currently practiced gender policies to offer sufficient protection and develop a policy to encourage participation of women in senior management positions. Periodically account for progress achieved.
- 1.3.3. Adequately resource the HRM and HRD function with appropriately qualified *personnel*. Use any available external resources (i.e. KIPA, project based training) to further enhance current capacities.
- 1.3.4. Consider *enhancing the municipal recruitment processes* by increased transparency and strengthened controls. To this purpose, set up minimum standards of transparency in recruitment and monitor and report on implementation. Allow for sufficient time for application and preparation and submission of documents. Consider checking of qualifications of candidates for sensitive high-risk positions.

- 1.3.5. Explore feasibility and encourage implementation of the *new performance system* that is to be adopted centrally in Kosovo. This will help in movement and promotion based on objective and transparent criteria and on merit. Maintain appropriate level of transparency of the operation of the system.
- 1.3.6. Strengthen controls over *working time management*: i.e. consider using work time registration system, ad hoc controls; complaint system, etc.
- 1.3.7. Strengthen controls over *business trip management*; ensure all business trips are made according to accepted well defined criteria, be transparent and bound to terms.
- 1.3.8. Initiate periodic *surveys to monitor satisfaction of staff* with work and integrity environment as an “early warning system” to detect issues and trends.
- 1.3.9. Consider enhancing professional training by linking in appropriate format evaluation of training needs, delivery of training and evaluation of effectiveness. Ensure delivered training is needs based.
- 1.3.10. Strengthen monitoring and control mechanisms to ensure that *training opportunities are well and timely advertised* to all staff. To this purpose, consider introducing a structured procedure with clear transparency rules, controls, responsibilities and reporting mechanisms.
- 1.3.11. Consider creating *anonymous hotline specifically for HRM and HRD related concerns*. Analyse trends and report them to responsible senior management.

1.4. Significantly and visibly improve the internal coordination and communication system

Rationale: To ensure achievement of integrity policy objectives, the Municipality needs an appropriate internal coordination and communication system. Such system not only connects departments and people, but gives the unique profile of the openness, participation and common spirit in the organisation as regards integrity matters. Informed decision making and effective implementation of policies and decisions are necessarily build upon common understanding of the challenges/ tasks, as well as on shared goals and values. Any deficits in the communication and coordination system, therefore, are likely to result in underused or lost opportunities to utilise the existing individual potential towards achieving the common good.

- 1.4.1. Adequately *resource the communication and PR function* in the Municipality of Mamusha. To this purpose, consider *most urgent needs to appropriately support the IT function* as to enable easier access to ICT technologies and thus, facilitate information and data exchange at all levels.
- 1.4.2. Ensure integrity becomes a routine focus of the internal communication system so that integrity matters and developments are regularly discussed and proactive attitudes promoted. Consider appropriate channels of such communication, to increase outreach and make sure awareness is being enhanced. Where appropriate and feasible, set up/ maintain/ continually improve a *digital internal communication system* using the IT infrastructure to enable more efficient data exchange and communication across units
- 1.4.3. Enhance and further formalize procedures for internal vertical and horizontal *coordination*, as well as external coordination with various categories of stakeholders: central government, municipalities, businesses, NGOs, etc. Consider optimising the system for cascading down management meetings to decentralize tasks to all operational units. Where appropriate and feasible, set up/ maintain/ continually improve a *digital internal coordination system* using the IT infrastructure to enable more effective and efficient coordination across units.

1.5. Institute and maintain an effective audit and control system as a key pillar of a functioning integrity management system

Rationale: No management system can function effectively and may reasonably ensure that set objectives are achieved without having adequate, well structured, resourced and accountable audit and control pillar. It not only makes it possible to detect corruption cases, but also highlights vulnerabilities, thus, makes it possible to address them in their early stages and before risks emerge. In the Municipality of Mamusha, building and strengthening such system is yet to mature. Though importance of the audit has been well recognized, the municipality is yet to develop its own internal capacities in the auditing field, and to complete appropriate policy, regulatory and operational framework. The risk assessment conducted makes it clear that the respective role of the internal audit and control framework is well recognized by the staff. The challenges, however, lie ahead. In this respect, increased control over audit findings, increased professionalism of the audit team, ad hoc audits (not expected/planned), increased frequency, clear audit trail have been seen as appropriate operational controls that may increase the effectiveness of the audit process as far as integrity is concerned.

- 1.5.1. *Effectively resource the audit function* by putting forward the audit as a key pillar of integrity protection. *Consider hiring an internal auditor* and provide for comprehensive *job description*. Increase internal audit professional capacities to cope with the up-to-date requirements to the audit instruments. Review opportunities to *increase job incentives* for auditors in the current reward system, i.e. work in hazard coefficient, as well as by providing capacity building opportunities .
- 1.5.2. Review the current internal policies and procedures related to internal audit. Explore possibilities to provide with a *clear SOP* that covers all key phases/steps; documentation and reporting requirements; allocation of respective responsibilities. Focus on risk management, specific control actions, internal audit planning, internal audit resourcing, internal audit performance assessment and quality assurance.
- 1.5.3. Review the current *audit planning system* to seize opportunities to base auditing schedules on a risk assessment, which focuses on the prevalent high fraud and corruption risks. Increase frequency and diversify audits. Provide for monitoring of the implementation of the audit plan, with effective corrective measures, if and when necessary.
- 1.5.4. *Further strengthen and structure control over implementation of audit findings/ recommendations*. To this purpose, consider setting up of a database to trace follow up both internal and external audit recommendations and register the progress made in implementation and will function as a single dashboard for public managers to monitor and evaluate internal control actions.
- 1.6. Practice continuous quality improvement, to strengthen efficiency, effectiveness, transparency and accountability of local governance, and thus reduce opportunities for abuse of integrity and professional standards**

Rationale: Effective integrity management is indispensable from maintaining quality, accountability, transparency, effectiveness and efficiency of operation. Worldwide, local governments are increasingly using TQM based instruments to excell their performance, to the highest satisfaction of clients' needs and expectations. These include, among others, functional reviews, implementation of ISO standards as ISO 9001 that codifies requirements to quality management system, excellence schemes as CAF-Common Assessment Framework and EFQM, Citizens Service Charters, etc. Compliance with international standards will consistently provide an internal framework that entails a strong customer

focus and is process and risk based. Recognition through certification (ISO 9001) or registration and verification (CAF and EFQM) provides additional incentives and reward to staff in local government. Citizens Charters convey a strong message to both internal and external clients of a clear management commitment to integrity and to a client oriented and transparent service.

- 1.6.1. Further to the national modernisation agenda, adopt a *Regulation on internal organization and job classification, and their systematization* based on the Catalogue of Jobs adopted by the government. Review the Organogram to ensure that it clearly and comprehensively covers positions, and the respective responsibility and accountability lines to achieve maximum transparency and efficiency of operations. Continue adjusting job positions with responsibilities deriving from new regulation on internal organisation and systematisation of jobs in institutions and with the model defined by the job catalogue.
- 1.6.2. Aimed at progressively developing a *process based management system*, identify key strategic, operational and support processes, list them in a *Register of municipal processes* and review how well they are covered with respective SOPs and/or other operational instructions.. Where critical deficits are found, consider developing such procedures, to reduce risk of errors, deviations and integrity violations. *Communicate these procedures* to all staff involved. Train staff if necessary.
- 1.6.3. In line with the Regulation on the Internal organisation, systematisation of jobs, Organogram and the operational procedures, *review and respectively align existing job descriptions*. Communicate to all staff as necessary.
- 1.6.4. Strengthen efforts towards introducing/maintaining an *user-friendly and client focused service delivery*. Explore best practices and national strategic documents, and based on lessons learnt, and strategic priorities consider for *progressive implementation one or more of the proven instruments* to maximise effectiveness and efficiency of service delivery, including ISO 9001:2015, Common Assessment framework, EFQM excellence scheme, Client Service Charters, etc.
- 1.6.5. Significantly enhance *mechanisms for measuring public opinion about the quality of services* provided by the Municipality of Mamusha. Where feasible, plan and implement customer satisfaction surveys; secret client operations, etc. Ensure periodical (biannual and annual) analyses of the signals, suggestions and complaints, related to the quality of services and the observance of the professional standards in the context of the Municipality.

1.7. Progressively internalize security of information as a key area of protection vital to upholding integrity and strengthening resilience

Rationale: Security of information is increasingly becoming a key area of intervention, linked to the related vulnerabilities, impacts and critical risks. The risk assessment, conducted in the Municipality of Mamusha, indicates clearly that protecting security of information in Mamusha, similar to elsewhere in Kosovo, poses serious challenges. The area needs to be urgently addressed, given the deficiencies in resourcing the IT function in the Municipality, the high level of threats to integrity that are involved, as well as the ineffectiveness of the existing controls. Adequate concern about information security challenges will effectively limit opportunities for integrity violations.

- 1.7.1. Consider *resourcing the management of security of information function by hiring appropriate personnel* and developing a comprehensive ToR. Ensure adequate familiarisation and expertise in the field.
- 1.7.2. Promote protection of security of information as a key area of concern. Significantly *enhance understanding of key management of the importance to ensure security of information as a key asset of the municipality*. To this purpose, provide for respective capacity building and encourage participation of municipal leadership and senior and mid management in relevant forums in Kosovo and abroad. Raise familiarity and awareness of all staff as regards integrity risks associated with *information security and the utilization of computer resources*, in particular – access control.
- 1.7.3. Strengthen operational controls in protecting security of information, further to the reference framework shaped by the available international standards: OECD Guidelines for the Security of Information and Networks, and the management standard ISO/IEC 27001. Consider among others use of confidentiality agreements, computer usage terms and conditions, password renewal, classifications, scanning incoming mail, running audits and exception reports, automatically revoking access when employment ceases. Allocate responsibilities as regards its implementation, as well as the necessary resources.

2. STRATEGIC OBJECTIVE:

Strengthen integrity protection in critical processes and areas of operation

Rationale: The risk assessment, conducted in the Municipality of Mamusha has considered critical strategic, operational and support processes, aimed to identify relevant improvement fields/ measures that are thought to contribute at most to minimising vulnerabilities, optimising protection and strengthening resilience. As regards major integrity risks in the context of the core functions of the Municipality, optimized controls are needed in the following areas (listed according risk levels: from high to low): implementation of building regulations and building control standards; licensing of local services and facilities; urban and rural planning; land use and development; public health; provision of public primary health care; provision and maintenance of public services and utilities; local environmental protection; provision of public pre-primary, primary and secondary education, including registration and licensing of educational institutions, recruitment, payment of salaries and training of education instructors and administrators; public housing; local economic development. Among the delegated competences of the Municipality most vulnerable to integrity violations (corruption prone) have been assessed to be: cadastral records; voter registration; civil registries; forestry protection on the municipal territory. The major threats to integrity protection are seen in the areas as follows: purchasing/ procurement/ contracts; financial management/use of public monetary resources/misuse and theft; budgets and budget management; service delivery – organization of service provision; participation in projects; housing; use of public vehicles. The above wide range of potential risks and vulnerabilities indicates the need to well structure and phase in the reform agenda, to be drawn by this Plan. In some areas, where relevant policies and procedures are in place, enforcement mechanisms need to be strengthened, supported by the necessary capacity building, awareness raising and monitoring of existing controls. In areas, where protections appears somewhat weaker, the action platform will first need to address developing of appropriate policies and procedures, as well as adequate resourcing of the underlying functions, as to provide for reliable protection. Overreliance on existing normative regulations at the level of applicable laws and regulations, without elaborating the necessary internal regulatory environment at the level of work procedures, instructions, etc. may amount to a new risk emerging as the municipality will be left with general shield, without tailoring the necessary enforcement procedures that will further facilitate implementation in local context. The choice of the specific measures/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. In this local context, costs of action or non-action need to be carefully balanced to provide for the optimal protection level feasible. Further risk assessments may bring additional potential for reform, suggesting new activity lines and measures.

Activity lines and respective measures per processes and areas of operation:

Administrative procedures

- 2.1.1. Significantly improve the existing *document control management system*. To this purpose, explore possibilities and consider implementing the *Electronic Document Management System*, that is being developed/ piloted at central level in Kosovo. This will bring standardisation of electronic record keeping processes across the municipality, improve sharing of information between staff, and users, 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. Improvements here will increase accountability, efficiency and effectiveness of processes, reduce costs, and provide clear audit trail.
- 2.1.2. Significantly *improve record management system* by setting out appropriate archive. To this purpose, consider implementing the following: allocating appropriate premises, building a new facility as feasible, resourcing the function by hiring a special professional tasked with this job, ensuring adequate professional training for the job. Upgrade the database and where feasible, introduce professional scanning- using IT technologies to enhance record keeping.

Budget planning. Budget and financial management system. Assets

Rationale: Budget planning and budget management, as well as financial management and assets appear critical for integrity protection. Any mismanagement in this respect, will lead to not only material losses, but also damage on reputation and trust, that are hard to be compensated in the short and mid run. The integrity risk assessment conducted in the Municipality of Mamusha demonstrates that staff is well aware of the complexities of the current budget planning and management processe and their risk profile. High-risk areas are seen in the following vulnerabilities and potential risks: lack of asset register that may result in misappropriation of assets; processing of payments to creditors in return for favours; misuse of municipal vehicles for personal benefit; processing of payments to suppliers. To minimise related risk levels, operational integrity controls that are proven effective elsewhere, and may be reviewed for application in the Municipality of Mamusha, further to the applicable legal regulations, include among others: consistent separation of duties in designated high risk areas; appropriate tiered levels of authority for payment approval; ensuring that the payee's 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; implementing periodic financial audit.

- 2.2.1. *Actively promote participation of interested stakeholders:* citizens/ businesses/ NGOs in *budget planning* by holding relevant awareness and information campaigns, providing timely information, assuring that Draft budget is published and available for comments, monitoring existing rules and procedures of the municipal assembly on public participation in budget planning and undertaking necessary corrective measures, if and where necessary.
- 2.2.2. Significantly improve coordination and communication processes linked with planning of budget. Monitor strictly implementation of deadlines set and consider appropriate corrective measures to guarantee smooth and timely implementation.
- 2.2.3. Promote participation of citizens/ businesses/ NGOs in *monitoring of budget implementation by:* organizing public debates/ forums to inform citizens about budget implementation, publishing periodic reports on budget implementation in a timely manner, so that interested parties may track budget expenses and hold the municipality accountable.
- 2.2.4. *Upgrade the existing procedures on budget management* to make sure the Municipality is well equipped with a comprehensive internal procedure(s) which describes clearly underlying processes/ activities, reporting and accountability lines. They shall be aligned with the Regulation on internal organization and job classification, and their systematization.
- 2.2.5. Keep the *budget and financial management functions adequately resourced* with the number of personnel actually needed, and able to perform according professional standards. Ensure *staff* is well trained by utilizing any opportunities that arise, including trainings organized by central bodies, KIPA, donors, etc. Establish a local focal point for such trainings who is tasked to check up such opportunities periodically.
- 2.2.6. Consider introducing 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. Monitor and reconcile all credits on a monthly basis. Provide for analysis of trends and evaluate accordingly.

- 2.2.7. Develop/maintain an *asset register*. Organize its regular update and monitor it on a monthly basis.
- 2.2.8. Consider introducing and implementing *effective measures to prevent from using municipal vehicles for personal benefit*, i.e. vehicle register, using fuel cards with a PIN, monitoring high-value vehicles with GPS. Conduct ad hoc audits to strengthen adherence to established rules and prevent misuse.

Public procurement

Rationale: In the risk assessment conducted in the Municipality of Mamusha, procurement and contracting practices are highlighted as an area of potential corruption risk. Though the current municipal record demonstrates a satisfactory level of performance as regards public procurement, operational controls may be further strengthened in the areas (rated according to risk levels): evaluation of tenders; formulation of selection criteria; control over implementation of the contracts; financial monitoring of contract implementation; procurement planning of needs; pre-tender phase: preparation and publication of procurement plans/ bids; quality controls over implementation; amendments to contracts; award decision and justification; terms and conditions of the contracts.

- 2.3.1. Improve *governance structure* in the Procurement Unit. Improve *coordination and communication practices* among the public procurement units and other municipal departments.
- 2.3.2. Improve *capacities of staff* involved in all stages of public procurement. Provide for adequate understanding of the Public Procurement Law's technical requirements, nature and use of tender evaluation criteria, concept of best value for money and how to control quality of goods/services/works received through tender practices and procedures; protection of tenderers' rights and correct application of the procedure at the municipality level.
- 2.3.3. Enhance *the process of planning of needs*, with harmonized deadlines and improved procedures as regards terms of reference of the requesting unit.
- 2.3.4. Consider *optimizing the process of preparation of bids* to compensate against deficiencies of staff and resources. To this, purpose, consider general standardization and use of model tender documentation. Develop and maintain an electronic database of specifications to facilitate preparation of future tenders Consider including model contract terms to have specific provisions, including contract cancellation, to deal with corruption and related issues.

- 2.3.5. *Review the public procurement internal procedures/ practices* to identify possibilities for increased efficiency and effectiveness. To reduce possibilities for abusive conduct, where feasible, ensure *appropriate segregation of duties*, as well as the obligations for internal reporting. As appropriate, ensure that the following functions are handled by different employees: recommendation of award, issue of purchase orders, certification of the receipt of goods and services, and payment verification
- 2.3.6. *Increase transparency of public procurement procedures/ practices.* To this purpose, consider developing a minimum standard of transparency threshold for all public procurement types, aligned with the national regulations and the best practices.
- 2.3.7. *Effectively promote integrity commitments over the value chain.* To this purpose, consider introducing a practice to require companies doing business with the Municipality to certify that they comply with the integrity commitments of the Municipality of Mamusha and accordingly, signing such declaration of commitment.
- 2.3.8. *Increase citizens oversight over 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 critical risks of mismanagement and corruption.
- 2.3.9. *Significantly enhance integrity controls in the post-award stage* of public procurement. To this purpose, consider improving quality controls over implementation of contracts by using: commissions for accepting results and approving project deliverables, stricter requirements to documenting quality check ups and acceptance of results/ deliverables

Public services

- 2.4.1. *Optimize the process of planning of services*, linked with mid and long term priorities, to increase quality and scope of services provided, as well as clients' satisfaction.
- 2.4.2. *To raise quality, efficiency and transparency of services, list all services provided in a Register of services* of the Municipality of Mamusha. Review how adequately they are covered with respective operational procedures and consider filling in the gaps, if and where necessary. Significantly improve provision of information to citizens and businesses and access to service provided by the Municipality of

Mamusha. To this purpose, consider publishing a list of administrative services, as well as detailed information: address where service is delivered, responsible officer, procedures and conditions, cost and duration of service delivery, the right of appeal in case the service recipient is not satisfied with the quality of delivered service. Use the website to make sure that the above information is fully available, in an easy to use format, with all template/ documents that are required. Dedicate a special service stand in the municipal premises, to post such information. Consider publishing leaflets/ templates, that will make it easier for citizens and business to familiarize themselves with their respective rights and obligations.

2.4.3. *Train periodically staff in client-focused service delivery.* Raise awareness of all staff as regards the need and value added of a client focused service provision.

2.4.4. To increase efficiency of services, ensure appropriate familiarization of staff with the concepts of *“One Stop Shop”* organisation of services, as well as the *provision of electronic services*, and the recent related developments in Kosovo. To this purpose, task a focal point for e-government to establish cooperation with these Kosovar stakeholders actually responsible and involved in e-government. Within the technical infrastructure for Information and Communication Technology, MPA, respectively Agency for Information Society has already built an advanced infrastructure for electronic service delivery through the State Network which covers all offices of state administration (central and local) and State Data Centre, which reduces the cost for ensuring IT hardware resources. This infrastructure serves to all institutions of central and local level. The Municipality of Mamusha, given its limited resources, shall develop a phased in action plan to make the best possible use of this infrastructure and modernize its services.

2.4.5. Consider introducing instruments for periodically *measuring public opinion on quality and accessibility of public services* delivered.

Health care

2.5.1. Consider appropriate increase number of staff involved in delivery of health care and social services according to comprehensively identified and assessed needs. Focus on need to employ additional gynaecologists. *Progressively continue reorganisation of provision of health care processes* by introducing a 3rd shift.

- 2.5.2. *Improve coordination with relevant stakeholders* to enhance medical staff performance. Support regular professional refresher training for staff. Increase staff motivation. Increase awareness as regards protection of integrity.
- 2.5.3. Provide for a *detailed inventory* of existing equipment in Mamusha health care units; assessment and planning for further improvement. Provide for adequate needs assessment well in advance and improve coordination with the mayor and the budget unit in budget planning so that needs are effectively accounted for. Increase funding for health and support process of decision-making based on evidence.
- 2.5.4. Continually improve physical and technical infrastructure and equipment to attain modern standards. Build a new facility- the second floor of the health care center. Consider investing in improvement of energy efficiency and hot water supply through use of solar water heaters.
- 2.5.5. Support *digitalisation of Health Information System* at local level to reduce opportunities for abusive behaviour and reinforce accountability.

Education, culture and sports

- 2.6.1. Enhance *planning processes*. Provide for optimisation of provision of public pre-primary, primary and secondary education by better alignment of the increasing number of students with the current capacities. *Improve forecasting and assessment processes*, integrate their results with the municipal planning and budget processes. *Improve coordination and communication* with the relevant stakeholders at central level to ensure that needs are properly represented and communicated.
- 2.6.2. Provide for improvement of school infrastructure and further conditions (buildings, sports fields, IT, learning materials, etc.). Support introduction of hygiene programs in appropriate formats.
- 2.6.3. Provide for development and consistent implementation of a *clear and transparent procedure/standards for recruitment of teachers*. Consider opening the process by promoting an opportunity to involve NGOs, other external stakeholders in the interview panels, increase transparency of the interview process, increase publicity of results.
- 2.6.4. Support *periodic training of educational instructors and administrators*. Commit teachers to regular professional refresher training. Include integrity protection in the life- long learning curricula. Actively promote exchange of experiences and knowledge with other schools in Kosovo.

- 2.6.5. To increase transparency and promote citizens' engagement, support establishing of a parent-teacher forums; enable active engagement of parents in ensuring quality and integrity the education process (open door days, etc.)
- 2.6.6. Encourage inclusion of integrity issues into the school-based curriculum.

Economic Development

- 2.7.1. Enhance *governance structure in the Economic Development Directorate*.
- 2.7.2. *Improve capacities of staff involved in economic development planning.* Consider building/ strengthening capacities in the following key areas: territorial economic development, territorial development strategies: tools for analysis, mapping, and strategic framework, governance for territorial economic development, local economic development planning, services for economic development, territorial marketing
- 2.7.3. As appropriate, consider opportunities to strengthen the participatory approach, through the transparent involvement in the decision-making process of the public and social actors. Strengthen links between producers and municipality, among the municipal departments (economy, agriculture, education etc.), and between Mamusha and neighbouring municipalities. Consider establishing a *joint municipal forum for economic development and planning*, including municipality, representatives of business communities, NGOs, experts, with the task of sharing priorities for the annual and multi-annual strategies and plans regarding economic development, and monitoring the implementation. It shall be tasked with identifying the objectives and priorities for development, and for their monitoring.

Geodesy and Cadaster

- 2.7.4. Significantly improve *record management practices* in the cadastre. To this purpose, consider introducing of a workable *system of professional scanning and archiving*, using IT tools as extensively as feasible.
- 2.7.5. *Train staff as necessary*, provide refresher training in the new instructions or frameworks for cadastre measurements. Encourage participation of staff in relevant expert networks, conferences, to encourage good practices and learning.

- 2.7.6. *Strengthen/diversify control mechanisms*, including ad hoc checks, direct suggestion line for cadastre related concerns. Pay special attention to high-risk areas: reception offices- tellers, registration and de-registration of mortgages, etc.

Urbanism

- 2.8.1. Strengthen the institutional and operational framework for operation. Review the existing procedures to consider need to provide additional guidance, and clear operational and decisional criteria to mitigate related integrity risks and prevent subjective decisions.
- 2.8.1. Strengthen *strategic approach in the planning system*, institute midterm planning to link with priorities and prevent from ad hoc decisions. Build/strengthen relevant capacities of staff based on a targeted trainings needs assessment.
- 2.8.1. Significantly *enhance transparency and participatory approaches*. Provide for increased transparency of the urban and rural planning by considering transparency thresholds: minimum information that needs to be published, related deadlines, formats. etc. Where feasible, review/introduce opportunities for more active involvement of citizens, businesses, NGOs and other stakeholders in the planning process

Inspections

- 2.9.1. Enhance governance structure in the Inspection Unit. Further align the organogram with the internal organisation and regulatory frame, provide for clear accountability lines and respective reporting obligations.
- 2.9.2. *Significantly improve resourcing of the inspection function*. Enhance staff professionalism in specific investigative techniques, based on a targeted needs assessment. Where feasible, maintain the rotation and four eyes principles to avoid corruptive relationships emerge and strengthen; Review opportunities to increase job incentives in the current reward system, i.e. work in hazard coefficient.
- 2.9.3. Increase use of ad hoc/ unplanned inspections.
- 2.9.4. Significantly improve *monitoring of activities of the inspection unit*, including implementation of plans for inspections, types of inspections, issues encountered, trends, etc.

Agriculture and Rural Development

- 2.10.1. Improve the *governance structure in the agriculture unit* to analyse where processes are overloaded and could be simplified; Develop an adequate simplified internal procedure/ clear criteria that addresses the key integrity risks in the agricultural sector and prevents subjective decisions; Revise the Organogram.
- 2.10.2. *Strengthen the planning system*, institute midterm planning to link with priorities and prevent from ad hoc decisions. To avoid subjectivism and possibilities for abuse, consider clear criteria to define which sectors to give subsidies. Provide for medium time plans how to allocate means in the agricultural sector.
- 2.10.3. Ensure *staff is adequately trained*.
- 2.10.4. Improve the *coordination and communication system* between units.

Public housing

- 2.11.1. Strengthen transparency and documentation requirements, as well as operational controls in management of public housing processes.
- 2.11.2. Strengthen controls over constructors involved in reconstruction of municipal housing: i.e. quality assurance and check- ups, payments of building contractors.
- 2.11.3. Consider instituting a special feedback mechanism to follow up satisfaction with work of contractors.

Access and Security arrangements

- 2.12.1. Consider strengthening physical security controls, based on a detailed review of the physical security arrangements; i.e. specific focus is physical security over infrastructure, assets and staff.

3. STRATEGIC OBJECTIVE:

Foster openness and transparency and mobilize capacities of key groups of external stakeholders to act as co-owners in the integrity reforms for the benefit of the whole local community

Activity lines and respective measures

3.1. Strengthen participation of key stakeholders in critical processes to promote collective commitment and gain co-ownership in the integrity reforms

Rationale: Timely and meaningful involvement of the citizens, businesses and NGOs in the life of the municipality creates active commitment and enhances willingness to implement regulations introduced and measures planned. In the Municipality of Mamusha, recognition of this potential exists, though means to effectively utilize it for the benefit of local community are yet to mature. This requires formation and implementation of consultation and communication policies that effectively bring stakeholders together towards reaching timely decisions/solutions in the interest of the local community.

- 3.1.1. *Familiarize members of the Municipal Assembly with this Integrity Plan.*
Create conditions and promote participation of Municipal councillors in integrity related awareness/ PR events, to demonstrate leadership support to the administration's reform and modernisation agenda.
- 3.1.2. Consider adopting a *proactive Public Participation Policy and a supporting action plan* for planned periods that entails key events where public consultation is required, i.e. before new budget, regulations and/or economic development projects commence and/or plans are finalized. Consider setting up of a *technical stakeholder committees on specific topics* (education, health, infrastructure, etc.) that have hybrid oversight/consultative roles. Include civil society/businesses with representatives of the relevant municipal departments and service providers. These committees can liaise with the municipality on an as needed basis to build upon its experiences in utilizing civil society to facilitate public oversight.
- 3.1.3. Effectively use *existing opportunities to partner* with the National Association of Municipalities in Kosovo, the Ministry of Local Government and other Kosovar municipalities in the area of integrity and anticorruption, as well as possibilities to obtain relevant technical assistance from donors to foster capacity building and further

integrity related activities. To this purpose, establish a cooperation and communication structure: contact point, ToR, reporting and monitoring mechanisms.

- 3.1.4. Consider maintaining a *secure anti-corruption hotline for citizens and businesses* to provide Municipality with a trusted channel to report integrity violations. Provide for safety of users, timely provision of adequate feedback to complainants. Put an effort to integrate findings/results into the management system based on analysis of trends and measures.

3.2. Maximise transparency outreach

Rationale: The potential of transparency as a key driver to positively influence the quality, intensity and dynamics of the relationships between the municipality and its various stakeholders are proven enormous. Though this is well recognized in the Municipality of Mamusha, it remains an area for further development. Significant improvements may be achieved through ensuring the necessary commitments, resources, policy and operational environment are in place.

- 3.2.1. *Staff adequately the PR and IT functions*, to enable the Municipality to effectively pursue a more active, needs based and client focused external communication policies. Train the staff involved in the IT skills necessary to develop/support websites and maintain user-friendly web transparency.
- 3.2.2. Review the currently implemented Communication and PR Policy/practices to consider opportunities to upgrade them by adding the integrity focus. Publicizing of the integrity commitments of the Municipality, as well as of the implementation of integrity measures at regular intervals, will positively and visibly enhance the image of the Municipality of Mamusha in the field of integrity protection. Align this Policy with the *new administrative instruction on transparency in municipalities*. Ensure its implementation by setting out the necessary internal and procedural framework: rules, responsibilities, monitoring over implementation.
- 3.2.3. Take appropriate care of the institutional *website*, providing for implementation of the instruction on websites of institutions and set up a system to monitor its implementation and regular update. Where appropriate and feasible, publish information about key areas of functioning of the Municipality: relevant laws/regulations; Code of Conduct; 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. Work with municipal departments, NGOs and communications and media experts to identify data held by the municipality which could be published to improve transparency and reduce margin for integrity violations.

- 3.2.4. Consider setting up of *transparency stand for the public* in a place open for visitors—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.
- 3.2.5. Effectively use opportunities to host “*Open-Door Days*” in offices of high-ranking municipal officials, as well as at the sessions of the Municipal Council to enhance public understanding of job functions and responsibilities of leadership and extend visibility reach. To this purpose, set up a list of Open Days in a planned period, allocate responsibilities, publicise accordingly, ensure organisation and monitor implementation. Use these days to get structured feedback on the activities of the administration, including quality of services and integrity performance.

3.3. Strengthen access to public information as a key instrument to ensure transparency and increase accountability

Rationale: Free and easy access to public information represents a critical guardian to ensuring integrity and providing sound citizens' oversight over the activities of the administration. The availability of respective laws and regulations at national level, will not suffice to guarantee protection at local level if there is no or weak implementation structure, and if it is not supported by the necessary resources, competence, rules and monitoring mechanisms. Effective implementation requires also appropriate knowledge, familiarisation and proactive attitudes on the side of the clients of the municipal services. Raising their awareness is also an area where the Municipality of Mamusha may consider further action.

- 3.3.1. Ensure staff is well trained in relevant regulatory and procedural framework that governs access to public information with a focus on responsibilities of the administration.
- 3.3.2. Where feasible, promote stakeholders' awareness of its entitlements as regards access to information.

- 3.3.3. Review the current system of organizing access to public information, further to national regulatory environment. Consider opportunities to upgrade it as to enable free and easy access for all interested parties. This may include, but is not limited to adopting of an internal procedure/ rules for processing applications for access to public information; provisions of necessary templates, information on sites for public information delivery and related costs.
- 3.3.4. Consider creating of a database of requests for access to public documents and information to allow for effective audit trail. Provide for the necessary organisation to monitor of the implementation of the Law on Access to Public Documents by the municipality and allocate respective responsibilities. Take immediate corrective measures where deficiencies are reported/ identified. Report on nonconformities, trends, etc.

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 Mamusha-responsible for implementation of specific measure	Units to coordinate implementation and institutions/ organizations 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	

[illegible]

Foster openness and transparency and mobilize capacities of key groups of external stakeholders to act as co-owners in the integrity reforms for the benefit of the whole local community

[illegible]

