



INTEGRITY PLAN

Municipality of Gjilan/Gnjilane

2015-2017

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INTEGRITY STATEMENT

This statement is meant to provide an overarching declaration that informs clearly our specific policies, procedures and operational measures as regards integrity, ethics, transparency, and accountability.

We, in the Municipality of Gjilan/Gnjilane have a tradition of ethical conduct spanning our history. We believe we have a special mandate and an outstanding remit that goes beyond that of an ordinary local authority.

We look after the City of Gjilan/Gnjilane on behalf of its over 90,015 residents, who live here, as well as on behalf of the many others who work and visit. We strive to provide modern, efficient and quality services to over 3,000 registered private businesses operating in the municipality. We support and promote the City as an administrative center of the District of Gjilan/Gnjilane of Kosovo and care about the economic regeneration in the surrounding boroughs. We are also a key local employer with responsibilities extending to over 8,500 people.

We integrate our mission with our responsibilities. The more far-reaching, important and complex our responsibilities become, the more opportunities for abusive corruptive behaviour occur. Municipal officials enjoy considerable discretionary powers and monopoly over public services such as local economic development, health, education, housing, land, water, etc. Closer interactions at the point of service delivery may invite numerous opportunities for corruption. Uncontrolled interface with local power interest groups and political parties at local level may significantly affect professional integrity and encourage biased decisions. Nepotism and favouritism in local communities may pose a challenge for any decision maker at all levels of service. Further to corruption opportunities and threats, the normative framework, as well as its application may lack consistency and focus and thus, additionally facilitate potential integrity violations. Burdensome administrative procedures come to present an extra threat to effective and efficient services. Lack of effective interface and feedback from our stakeholders and clients of our services may prevent us from taking on time appropriate corrective measures. All this may not only bring financial losses, but also seriously and negatively affect our creditability as an organisation. Compensation of damage, including deficits of trust may appear hard to compensate.

Given the above, we fully understand our mandate for fighting corruption locally. Integrity is our conscious choice, both as individuals, as well as an organization to consistently adhere to ethics and professional standards, and act according to applicable rules and regulations, norms, culture, values and ethical standards regulated by law and society's values. We as a municipality aspire to a higher level of commitment throughout the entire organization and at every level, towards improving the level of integrity throughout the public service in the execution of its duties as an accountable government, operating in accordance with its integrity policy and the principles of good governance.

In doing so we are determined to:

- Act at all times with honour and integrity, and in a transparent manner that will bear the closest public scrutiny; an obligation that may go beyond simply acting within the law.
- Uphold and implement both the letter and the spirit of all municipal policies and procedures.
- Never use municipal official role, as well as entrusted access to public resources, including access to information, for the personal profit of ourselves or others, or for the purpose of gaining promotion, or misusing public time in the pursuit of such objectives.
- Take consistently all possible steps to prevent and resolve any real, apparent or potential conflicts of interest between their official responsibilities and their private affairs in favour of the public interest.
- 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.
- Avoid nepotism and favouritism in fulfilling professional duties.
- Apply a straightforward “zero tolerance” to corruption policy; duly investigate all detected integrity violations, and where required, institute appropriate actions against those found responsible.
- Significantly improve our corruption prevention policies by enhancing our management practices to ensure a customer focus, effectiveness and efficiency of operations, as well as be effective risk based integrity management that eliminates or visibly reduces opportunities for abusive behaviour.
- Support the development of, a well-trained, honest, reputable, impartial, structured public service, rooted in the principles of integrity, capable of professionally serving and meeting the needs, as well as expectations of our citizens and businesses
- Refrain from any conduct that may detract from the image of integrity or professionalism of the Municipality of Gjilan/Gnjilane.

Our integrity statement has been translated into operational measures in the current Integrity Plan. We believe that this is a critical step, and we will do all necessary to make sure that measures are implemented, risks are periodically reassessed and informed integrity risk taking becomes part of the organisational culture of the Municipality of Gjilan.

I, hereby, declare my full and unconditional support and firm commitment to all efforts to strengthen and continuously improve the integrity management system within the Municipality of Gjilan/Gnjilane.

Mayor of Gjilan
Lutfi Haziri

2015

INTEGRITY PLAN

The Integrity Plan is a strategic, as well as operational document that resulted from the risk assessment process undertaken within the Municipality of Gjilan/Gnjilane. The Plan restates the commitment of the Municipality 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 pivotal role for the Municipality of Gjilan/Gnjilane 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 Gjilan/Gnjilane, that has been initiated in November, 2014 and has been conducted in September-October, 2015. 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 Gjilan/Gnjilane;
- Surveyed the relevant to the Municipality strategic, regulatory and operational framework;
- Analysed data from integrity performance, monitoring and implementation;
- Analysed client satisfaction and perception of corruption in the local government sector surveys, including surveys/reports commissioned by international organisations;
- 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 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.

A special budget for implementation of this Integrity Plan will be allocated as per the Action Plan developed and annexed (Annex 1). The Municipality shall provide for periodic structured monitoring of its implementation 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. 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 Gjilan/Gnjilane.
- 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 Gjilan/ Gnjilane. These are based on the assessed integrity risks, lessons learnt and relevant good practices. The Plan oprovides 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 basis to further improve the integrity management system in the Municipality of Gjilan/Gnjilane (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 Giilan is currently undergoing an intense modernisation process. 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 four core areas:

- Getting the governance right: strengthen policy and institutional framework for effective integrity risk management;
- Getting the risk management practices right: upgrade operational controls for specific high-risk areas of operation;
- Getting the resources right: ensure adequate and appropriate capacities of staff to lead, implement, monitor and re-enforce integrity reforms;
- Getting the environment right: enhance the external environment to reinforce and widen the integrity aspects in the modernization and reform processes by improved co-ordination and communication processes, as well as by maintaining high levels of transparency and stakeholder engagement.

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.

STRATEGIC OBJECTIVE 1:

Getting the governance right: strengthen policy and institutional framework for effective integrity risk management

Activity lines and respective measures

1.1. Further develop a risk based integrity management system (policies, rules and practices) as a critical part of the entire organizational management system

Rationale: The municipality of Gjilan/Gnjilane, similar to other municipalities in Kosovo faces significant integrity risks. They arise due to internal factors (e.g. attributed to exercised wide discretion, complex service delivery, broad and sometimes incoherent normative, institutional and operational framework, deficient controls, political influence, inadequate capacities and supporting infrastructure, etc.) as well as to external factors (e.g. new and dynamically developing legislation and standards, changing stakeholders' expectations, controversial interests, pressure from interested parties, etc.). In this context, to identify, evaluate and mitigate existing integrity risks, the municipality implemented integrity risk assessment and produced this Integrity Plan. Nevertheless, the Plan alone is not sufficient to solve the many serious issues related to integrity and corruption. To achieve sustainable results, the municipality should develop/ strengthen the supporting integrity management system. This requires to (1) plan its integrity policies/ measures; (2) implement the plan and the related operational controls;(3) check: monitor and measure key characteristics of operations that determine integrity performance; and (4) take actions to continually improve the integrity performance and the integrity management system. Although the integrity management system cannot provide absolute assurance that no corruption has occurred or will take place in relation to the Administration, it can help the municipality prevent and detect abusive practices. It demonstrates that the Municipality of Gjilan/Gnjilane has implemented reasonable and proportionate measures to assist it in complying with its legal obligations and ethical aspirations.

MEASURES:

1.1.1. Through implementing/updating the integrity policy and integrity plan, maintain an integrated strategy for integrity prevention and control that is to ensure an appropriate balance between developing an ethical values-based organisational culture and enforcing robust controls, recognising that neither should be pursued to

the exclusion of the other.

1.1.2. Ensure all staff is well aware of the Integrity Policy and Integrity Plan, including measures, responsibilities and respective timeframes. Consider communicating the Plan to the Municipal Council and the Committees. If found appropriate, consider communicating the Plan or parts of it to key

local stakeholders

1.1.3. Develop an ownership structure in integrity management and corruption prevention and control from the top to the bottom of the organisation. This requires to clearly and explicitly allocate related responsibilities and authority for the integrity compliance function in the municipality, including responsibility and authority for overseeing implementation of the Integrity Plan and related reporting.

1.1.4. Considering a range of additional resources such as a free advice line or ethics counselling to assist staff in ethical decision making. To function effectively, such instruments need a structured format, with procedure and respective authorisation in place. Special measures to be introduced to protect confidentiality. All staff shall be informed periodically of the set mechanisms so that they may refer to them when needed. The integrity counselling function shall be staffed by personnel who have the appropriate competence, creditability, status, and authority.

1.1.5. Further to the existing legal regulation on gifts, require that staff records details of all gifts, benefits and hospitality offered, so that municipality can monitor external approaches. Through regular trainings and awareness events, made all staff fully understand its legal obligations as regards gifts. Maintain the legally required Gift Register of the Municipality of Gjilan/Gnjilane and ensure all staff is aware of its existence.

1.1.6. Review existing internal regulations on CoI to identify need for their further upgrade so that a full coverage of the related integrity matters is being achieved. Make sure all staff is well familiarized with the CoI rules and related procedures. Consider testing at planned intervals of the staff understanding of CoI.

1.1.7. Develop appropriate information and communication systems as regards integrity management including: on what it will communicate; when to communicate; with whom to communicate; how to communicate. Collect and analyze feedback on the functioning of this system as to improve its effectiveness.

1.1.8. Review reporting mechanisms to allow staff and the public to make municipal leadership aware of suspected corruption. Invest in and promote effective reporting mechanisms such as anonymous third-party complaint lines. Maintain a Whistleblower Policy and/or Integrity Line for receipt of reports of serious wrongdoing. To ensure confidential reporting of integrity violations, further to the relevant national regulations, set out a whistleblower procedure which must be followed in order to report any incidents of fraud and / or corruption. Ensure its periodic communication to all staff, to support coherent understanding, positive attitudes and effective enforcement.

1.1.9. Promote audits and other controls to staff as an opportunity to learn and improve rather than a punitive exercise. Plan/conduct tests of systems: i.e. secret client operations, ad hoc audits, to test resilience and identify possible deficiencies in the system. Effective risk management requires effectiveness of the controls applied, including their application and review. Provide advice and guidance on internal controls to prevent fraud or corruption. Continual quality improvement reviews of internal control and compliance measures. Report on status of the integrity control and corruption prevention strategy to the municipal leadership.

1.1.10. Maintain an internal investigative capability including qualified investigator and up-to-date investigation manual. Provide specialised training in investiga-

tive techniques in corruption detection for relevant personnel. Provide specialist external investigatory expertise where felt necessary.

1.1.11. Monitoring the implementation of code of ethics in the municipality by applying the adopted criteria. Train and develop capacities for persons responsible to monitor principles of ethics and transparency in the municipality.

1.1.12. Maintain a database of fraud or corruption incidents and provide trend analysis 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.

1.1.1. Actively promote the integrity risk management policies through the municipality. Ensure Re-assessment of integrity risks, i.e. at the end of the planning period, and/or after the reviews of the activities of the units with controlling functions in the areas with high levels of risk. Periodic review and update of integrity plan for resolution of shortfalls in any of these preventative measures.

1.1.2. Ensure that strategic integrity risks are on the agenda for periodic meetings of senior management. Regular review of the integrity framework supporting a culture of integrity and intolerance of fraud or corruption. Internal reporting of outcomes and escalation where appropriate.

1.2. Strengthen overall management practices, by reinforcing quality and information management, customer focus, transparency, effective and efficient processes, to limit opportunities for integrity violations and optimise integrity performance

Rationale: The IMS does not operate in vacuum, but it is closely linked with the way the municipality manages important to integrity aspects such as quality of service delivery and security of information. Given the holistic nature of the municipal management system, higher standards of integrity performance come into direct correlation with quality, accountability, transparency, effectiveness and efficiency of operation. Thus, further to the operated IMS, other instruments may be applied, based on the same TQM principles, i.e. P-D-C-A cycle. These include among others functional reviews, ISO 9001, ISO 27001, CAF, EFQM, Citizens Service Charters, etc. Compliance with international standards will provide a focused to quality and integrity internal operational framework. Adequate concern about information security challenges will effectively limit opportunities for integrity violations in this area. Integrated approach will allow for more efficient use of resources and enable integrated planning. Recognition through certification (ISO 9001 and/or ISO 27001) or registration and verification (CAF and EFQM) provides additional incentives and reward. 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.

MEASURES:

1.2.1. Consider possibilities to plan/implement a functional review of the municipal administration to explore opportunities for increased effectiveness and efficiency of processes, avoidance of duplicated functions/ responsibilities, possibilities for increased coordination and accountability.

1.2.2. Review the organisation of the municipality, and ensure the Organogram clearly and comprehensively covers positions, and the respective responsibility and accountability lines to achieve maximum transparency and efficiency of operations.

1.2.3. To increase efficiency and accountability, adopt a Regulation on internal organization and job classification, and their systematization based on the Catalogue of Jobs adopted by the government. Continue adjusting job positions with responsibilities deriving from new regulation on internal organisation and systematization of jobs in institutions and with the model defined by the job catalogue.

1.2.4. Plan/implement a structured effort towards developing a process based management system that can effectively promote quality and efficient services. To this purpose, identify key strategic, operational and support processes, list them in a Register of municipal processes and review how well they are covered with internal procedures. Where deficits, consider developing such procedures, to reduce risk of errors, deviations and integrity violations. Communicate these procedures to all staff involved. Train staff if necessary.

1.2.5. Maintain a structured monitoring of processes and implementation of procedures, by considering introducing performance measurement indicators as well. Organise staff is adequately trained and results are documented, and integrated into

the decision making processes.

1.2.6. Further to the Organogram, the Regulation on the Internal organisation, systematisation of jobs, and the operational procedures, revisit existing job descriptions. Check periodically whether they are consistent with actual processes and corresponding acts, make sure they are aligned and communicated to relevant staff.

1.2.7. Continue efforts towards developing a system and a culture of user-friendly public service delivery. To strengthen customer focus, demonstrate commitment to high professional standards of service and maximize opportunities for citizens oversight, consider developing/ implementing a TQM based management tool. Based on a feasibility assessment, consider for 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.

1.2.8. Establish mechanisms and instruments for systematically measuring public opinion about the quality of services that are provided to them by the administration. To this purpose, where feasible, plan and implement customer satisfaction surveys; ad hoc checks, secret client operations, etc.

1.2.9. Provide for a Road map to introducing security of information protective system based on the available international standards: OECD Guidelines for the Security of Information and Networks, and the management standard ISO/IEC 27001. Resource the process by building adequate expertise for information security management (i.e. trainings in ISO 27001 for relevant staff). Provide for security statement that promotes the information security

aspects at strategic level; risk assessment, as well as for specific operational controls to ensure the selection of adequate and proportional security controls that protect information assets. Consider 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.

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

STRATEGIC OBJECTIVE 2:

Getting the risk management practices right: upgrade operational controls for specific high-risk areas of operation

Activity lines and respective measures

2.1. Strengthen integrity risk operational controls in key high-risk management and support processes

Municipal Assembly

Rationale: The integrity management system in the Municipality of Gjilan/Gnjilane operates in close interface with the directly enacted Municipal Assembly that is the highest body in municipal context. Further to the LLSG and the Municipal Statute, key strategic decisions in high-importance risk areas are within the direct control of the Assembly; 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). Due to the limitations of horizontal accountability in the case of the Municipal Assembly, restricting the scope of the IMS, its responsibility to the municipal IMS is actually limited to ensuring the commitment of the Municipality to implement it. The Municipality as an executive body is responsible for ensuring the suitability of the IMS, and for implementation of and compliance with it.

MEASURES:

2.1.1. Further to available good practices, promote adopting a Code of Ethics/ Code of Conduct/ Integrity Rules by the Municipal Assembly.

2.1.2. Encourage participation of Municipal councillors in integrity related awareness/ PR events, as well as in the integrity management review meetings so that they demonstrate leadership in preventing and detecting corruption within their areas of responsibility.

2.1.3. Ensure the rules and procedures of the municipal assembly on public participation in budget planning are effectively implemented. Ensure municipal budget is published in the media in a timely manner.

2.1.4. Consider creating a committee, staffed by local government representatives and independent NGO observers, to monitor budget implementation on a regular basis, i.e. each semester. Organize public debates/ forums to inform citizens about budget implementation, publish reports on budget implementation publish quarterly expense reports.

2.1.5. To prevent CoI and increase citizens oversight, propose to consider inclusion of representatives of local NGOs, business associations, other relevant stakeholders in oversight committees for projects financed by the Municipal Assembly.

Cabinet of the Mayor

Rationale: The people in leadership positions set the ethical tone of the Municipality and therefore play a pivotal role in building organisational integrity and corruption resistance. It is essential that managers not only communicate expected conduct and desired values to staff, they must also demonstrate the conduct and act in ways that are consistent with the values the municipality wishes to see in all staff. By leading from the front, political leadership can help to instill greater confidence in employees to report and comply with policies, knowing that their leaders will take timely and appropriate action in response to valid complaints and enforce penalties in the event of policy breaches. Excellent coordination and communication policies are the channels to ensure messages from top management are adequately spread at relevant levels and functions.

MEASURES:

2.1.1. Review the existing coordination and communication systems, compared against perceived needs, best practices and local feasibilities/ restraints, to identify opportunities for improvement. Put a structured effort to formalize procedures for internal vertical and horizontal coordination, as well as external coordination with various categories of stakeholders: central government, municipalities, businesses, NGOs, etc. 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. Balance e-based with traditional coordination and communication tools. To provide incentives and create co-ownership, municipal leadership is to meet municipal employees regularly, so as to give them the assurance that they have a pivotal role to play in the municipality. Directorates meetings shall be encouraged, they to cascade down to all operational units. This will ensure a proper dissemination of information, thus putting everyone up to speed with the activities of the municipality.

2.1.2. Consider implementing Electronic Document and Records Management System, that will lead to 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. Such system is currently developed by the government, whereas its application will increase accountability, efficiency and effectiveness of processes, reduce costs, and provide clear audit trail.

2.1.3. Consider implementing a log to register all complaints direct requests, emails, incoming paper correspondence 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 (bi-annual 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.

Financial management system. Registration and management of assets

Rationale: Financial controls are critical to ensure effective prevention against integrity violations, related losses and a range of further damages. The integrity risk assessment conducted outlines a good understanding of staff of the vulnerabilities and complexities of the budget management processes in the municipality. High-risk areas are seen in the following: Lack of asset register results in misappropriation of asset; Processing of payments to creditors in return for favours; Misuse of Municipal vehicles for personal benefit; Processing of duplicate payments to suppliers. To minimise related risk levels, operational integrity controls that are proven effective and may be reviewed for application include among others: rigorously implementing a 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. The Municipality, further to the applicable legal regulations, will try to consistently integrate and implement the above controls in its internal financial management procedures and practices.

Measures:

2.1.1. Provide for implementation of public internal financial control framework, ensuring the managerial accountability principle is well embedded in management practices. To this purpose, consider developing comprehensive internal procedure(s) on budget management with clear description of related processes/activities, reporting and accountability lines. They shall be aligned with the Regulation on internal organization and job classification, and their systematization and ideally, be based on a functional review to determine existing opportunities for achieving a higher level of efficiency, effectiveness and accountability.

2.1.2. Based on functional review, and the existing internal framework, put a structured effort to resource the financial management function by allocating the

staff necessary (numbers and competence), as well as by securing adequate internal professional capacities of staff through specialized training. Given the costs of this training, consider using all existing opportunities, including trainings organized by central bodies, KIPA, donors, etc.

2.1.3. Where feasible, work with external auditors in the detection of fraud.

2.1.4. 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. Monitor and reconcile all credits on a monthly basis. Analysis of management accounting reports to identify trends

2.1.5. Develop/maintain an asset register. Organize its regular update and mon-

itor it on a monthly basis.

2.1.6. Enhance internal controls around multiple finance systems, including post-transactional review. Implement routine data analytics over areas identified as inherently susceptible to fraud, corruption and other integrity violations.

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

2.1.8. To minimise opportunities against integrity violations in using municipal vehicles for personal benefit, consider one or more of the following measures: 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.

2.1.9. Design grants/outsourcing/expenditure arrangements to include due diligence and evidence of delivery requirements.

Public procurement

Rationale: Through the process of awarding public sector contracts, the municipality and its officials, are at risk of being targeted by third parties seeking to corrupt procurement systems for financial gain. The Municipality is committed to preventing, identifying and tackling corruption in public procurement. Prevention and detection of irregularities is not only part of wider good governance and public administration, but is also necessary in order to protect public finances. The results of the risk assessment demonstrate a high level of awareness of staff of the complexities related to integrity protection in the procurement area. Strengthened Operational controls are thought to be needed in the following stages of the procurement processes (rated according to risk levels): evaluation of tenders; formulation of selection criteria; Control over implementation of 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 terms and conditions of the contracts.

Measures:

2.1.1. Increased transparency of public procurement procedures/ practices. Ensure relevant, easy to access and easy to use procurement information available for the public: i.e. procedures, selection and evaluation criteria; information about events that occur post-award, such as justification for awarding contracts, contract modifications. Obligations to advertise, aids transparency and discourages malpractice. Monitor implementation of transparency requirements and report periodically thereof.

2.1.2. Adequately resource the public procurement function by targeted capacity strengthening of relevant staff, effectively utilizing all existing training opportunities. Increase understanding of the Public Procurement Law's technical requirements, more sophisticated understanding of the nature and use of tender evaluation criteria, better understanding of the concept of best value for money and how to control quality of goods/services/works received through tender practices and procedures.

Full comprehension of the procedures for protection of tenderers' rights and correct application of that procedure at the municipality level.

2.1.3. Enable an effective and resource efficient process of preparation of bids where limited resources are best used. To this, purpose, consider general standardization and use of model tender documentation. Consider including model contract terms to have specific provisions, including contract cancellation, to deal with corruption and related issues. Create and use of e- based specifications database to facilitate preparation of future tenders. Uniform non-cost criteria need to be established by technical experts and verified by procurement specialists (to ensure they do not proscribe all but one supplier) to allow for non-subjective bid evaluation that ensures quality and the best value for money.

2.1.4. Where appropriate, bid preparation, evaluation and contract management to be jointly administered by the procure-

ment department as well as the relevant technical department to ensure TORs are adequately detailed but do not encourage collusion.

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

2.1.6. Require conflict of interest declarations from all tenderers, tender evaluation panel members and staff involved in a specific procurement process.

2.1.7. Develop more clearly defined chains of responsibility and transparent process in tender handling practices 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, certification of the receipt of goods and services, and payment verification

2.1.8. 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.

2.1.9. Confirm periodically the bona fides of continuing vendors and customers by 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.

2.1.10. Allow for 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 significant risks of mismanagement and corruption; maintaining the requirement that selection committees who are actually selecting the winning tender, to be staffed by local government representatives and independent NGO observers.

2.1.11. Integrate robust fraud control mechanisms into procurement policies and procedures (e.g. internal control and audits, and review systems), depending on the value, complexity and sensitivity of the public procurement. Track and compare usage or ordering levels from year to year to identify excessive orders for particular resources.

2.1.12. Improve financial management and payment procedures for public procurement contracts.

2.1.13. Enhance quality controls over implementation of contracts through intensifying ad hoc controls, using commissions where feasible and stricter requirements to documenting quality check ups and acceptance of results/ deliverables.

2.1.14. Implement 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.

Internal audit

Rationale: Auditing provides for a systematic review of processes and practices to identify corruption vulnerabilities and potential for integrity violations. An effective auditing regime can serve as both an early warning system to identify emerging risks and procedural weaknesses, and a detection mechanism to identify specific instances of misconduct or corruption. Increased quality of the audit function at the Municipality of Gjilan/Gnjilane shall cover among other measures a strengthened policy, regulatory and operational framework; implementation 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. The role of the internal audit and the over control framework as indispensable for an effective integrity protection has been well internalized by all staff, as evident based on the risk assessment. 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 to increase the effectiveness of the audit process as far as integrity is concerned.

MEASURES:

2.1.1. Take a structured effort to enhance functional operability, and improve the effectiveness, efficiency and transparency of the internal audit management practices. To this purpose, consider implementing a functional review, to determine possibilities for process improvements and determine the necessary resources to guarantee efficient operation.

2.1.2. Strengthen policy and regulatory framework for internal audit. Review the existent operational procedure, to provide with a clear SOP that covers all key phases/steps; 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 the procedure to relevant staff.

2.1.3. Ensure effective audit planning on annual basis. Ideally, auditing schedules should be informed by a thorough risk assessment, which focuses on the prevalent high fraud and corruption risks. Increase frequency and diversify audits; increase use of ad hoc audits (not expected/planned) on a random basis to follow up recent audits and verify the findings/ procedures used. Monitor implementation of the audit plan and provide for immediate corrective measures in case of failures.

2.1.4. Review the Organogram to ensure its coherency with functions performed and related regulatory and operational framework, and align the job descriptions of the audit personnel with the revised operational procedures.

2.1.5. Develop an internal audit human resource strategy that puts forward the pivotal role of the audit function in assur-

ing compliance. Further to that, utilize any emerging opportunity to train staff and increase internal audit unit professional capacities. Increase areas of specialised training to cope with the up-to-date requirements to the audit instruments: conducting specific audits (e.g. – fraud audits, IT audits, Quality management audits), application of audit procedures (sampling, interviews, sufficiency of evidences, etc.). Review opportunities to increase job incentives for auditors in the current reward system, i.e. work in hazard coefficient.

2.1.6. Where possible, encourage participation of internal auditors in practitioners networks. Facilitate their participation in relevant seminars, conferences, and other experience sharing forums. To this purpose, set up a contact point who will coordinate with central ministries, KIPA, donors on training and awareness opportunities.

2.1.7. 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. To this purpose, set clear requirements, require submission of CoI declaration and conduct random check on their effective implementation.

2.1.8. Strengthen effectiveness of communication system (information flow)

between the internal audit unit and other relevant municipal structures. To this purpose, review possibilities for improvement, including extended use of ICT technologies, and devise an operational framework for implementation with respective measures, responsibilities and deadlines.

2.1.9. Strengthen and structure control over implementation of audit findings/recommendations. To this purpose, consider setting up of an e- based 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.

2.1.10. Monitor the Internal control system to assess the quality of the system's performance over time. On-going monitoring occurs in the ordinary course of operations, and includes regular management and supervisory activities, and other actions personnel take in performing their duties that assess the quality of internal control system performance. The scope and frequency of separate evaluations depend primarily on an assessment of risks and the effectiveness of on-going monitoring procedures. Internal control deficiencies should be reported upstream, with serious matters reported immediately to management.

2.2. Strengthen integrity risk operational controls in high-risk areas of operation

Rationale: 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 points at major integrity risks in the context of the core functions of the Municipality, in the areas: implementation of building regulations and building control standards; 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; urban and rural planning; land use and development; 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 ; 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 developmen. Among the delegated competences of the Municipality most vulnerable to integrity violations (corruption prone) have been assessed to be cadastral records; voter registration; distribution of social assistance payments (excluding pensions); and 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. Facing the above challenges, the Municipality has identified short and long term priorities and structured operational controls in various forms, such as elaboration of relevant specific policies and procedures to cover high risk area, 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.

MEASURES:

Public services

2.2.1. Develop a phased-in Road Map to create “One Stop Shop” and online applications for public administration services in line with government priorities and modernisation agenda. Assign responsibilities for implementation. Try to secure necessary infrastructure and mobilise commitment from local stakeholders. Learn from experience of others. This service will increase efficiency of municipal administration and will facilitate access to services for citizens and businesses. Within the technical infrastructure for Information and Communication Technology, MPA, respectively Agency for Information Society has 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 Gjilan/Gnjilane shall use this current architecture of this infrastructure as a basis for delivering electronic services to citizens and for modernization of public administration.

2.2.2. Identify public services that are provided by the municipality and establish a register of services. Analyse public services. Revise the process flow to identify possibilities to improve effectiveness, efficiency and transparency. Revise the existent operational procedures, to provide

with clear SOPs. Align job descriptions of the involved personnel with the revised operational procedures and systematisation of jobs.

2.2.3. Improve the process of informing citizens on development and delivery of public services, on their rights and how they can be realized. To this purpose, consider publishing a list of administrative services, as well as detailed information: address where service is delivered, responsible officer, list of services delivered, procedures and conditions, cost of service delivery, duration of service delivery, the right of appeal in case the service recipient is not satisfied with the quality of delivered service.

2.2.4. Strengthen capacities of staff in delivering of public services and administrative procedures

2.2.5. Develop/ implement instruments for measuring public opinion on municipal public services that are delivered on the quality and accessibility of public services.

2.2.6. 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)

Cadaster, Geodesy and Assets

2.2.7. Revise the organogram to ensure legality, consistency with internal organisation and regulatory frame, functional effectiveness, clear accountability lines and respective reporting obligations.

2.2.8. Provide for an in-depth analysis of the process flow in the cadastre unit, to identify possibilities for functional improvements. On this basis, develop adequate and clear the operational procedure as a basis for accountability and effectiveness.

2.2.9. Determine personnel needs and ensure staff is adequately trained in the new instructions or frameworks for cadastre measurements. Facilitate participation of staff in relevant meetings, expert networks, conferences, to encourage good practices dissemination and experiential learning.

2.2.10. Increase use of modern technologies to raise effectiveness, efficiency and transparency of cadastre processes. Where feasible, develop/maintain a workable system of professional scanning and archiving

2.2.11. Strengthen/diversify control mechanisms, including ad hoc checks and secret client operations. Pay special attention to high-risk areas: reception offices-tellers, registration and de-registration of mortgages, etc.

2.2.12. Consider instituting a separate direct suggestion line for cadastre related concerns.

Inspections

2.1.1. Review possibilities for improving the organisation of the inspection function to increase its effectiveness, accountability and transparency and thus, enhance resistance to corruption and integrity violations. Provide for an in-depth analysis of the process flow, to identify possibilities for functional improvements. On this basis, review existing practices and develop adequate and clear operational procedure as a basis for accountability and effectiveness. Make sure it covers as minimum: risk based inspections planning, documentation and reporting requirements; allocation of respective responsibilities, internal deadlines depending on the risk and importance of inspections, risk management, specific control actions, inspections performance assessment and quality assurance. Ensure staff is aware of these through targeted capacity building.

2.1.2. Upgrade the organogram of the inspection unit to ensure legality, consistency

with internal organisation and regulatory frame, functional effectiveness, clear accountability lines and respective reporting obligations.

2.1.3. 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.

2.1.4. Increase use of ad hoc inspections.

2.1.5. Set up a robust system of a structured monitoring of activities of the inspection unit, including implementation of plans for inspections, types of inspections, issues encountered, trends, etc.

Urbanism and environmental protection.

2.1.6. Strengthen the institutional and operational framework for operation. Review the Organogram to ensure consistency with internal documents and functions, and clearly describe reporting and accountability lines. Improve the operational environment by setting up comprehensive internal procedure/ clear operational and decisional criteria to mitigate related integrity risks and prevent subjective decisions. Review the possibility to develop operational guidelines that will guide staff in complex matters.

2.1.7. 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.

2.1.8. Where feasible, review/introduce opportunities for more active involvement of citizens, businesses, NGOs and other stakeholders in the planning process. Try to set up this involvement as a system, rather than accidental exercise.

2.1.9. 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.

2.1.10. Strengthen monitoring and controls: consider introducing special controls for decisions of high value/ impact: i.e. commissions, with participation of other stakeholders; oversight committees with participation of business and NGO repre-

sentatives; ad hoc controls at sample basis and post issuance follow up audits.

2.1.11. Diversify/ strengthen channels to receive feedback from external stakeholders, including integrity concerns and improvement suggestions.

Finances, economy and development. Agriculture and Rural Development

2.1.12. Review the process flow 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.

2.1.13. Strengthen the planning system,

institute midterm planning to link with priorities and prevent from ad hoc decisions
Definition of which sectors to give subsidies; Medium time plans how to allocate means in the agricultural sector.

2.1.14. Ensure staff is adequately trained.

2.1.15. Improve coordination and communication system..

Education and culture

2.1.16. 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.

2.1.17. Develop clear procedure/standards for emergency reconstruction of schools with explicit criteria and requirements; increase transparency of the decision process.

Land use and development

2.1.18. Develop an adequate internal procedure/ criteria to addresses key integrity risks in land use and development process and prevents subjectivism.

2.1.19. Strengthen the planning system,

institute midterm planning to link with priorities and prevent from ad hoc decisions

2.1.20. 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

2.1.21. Develop an adequate internal procedure/ clear criteria that addresses the key integrity risks in the licensing processes and prevents subjective decisions.

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

Public housing

2.1.23. Strengthen the strategic approach to set up a straightforward procedure for management of public housing that will minimise opportunities for subjective decisions and integrity violations. Insert clear formal criteria, transparency requirements, operational controls..

2.1.24. Review/upgrade the system of controls over constructors involved in reconstruction of municipal housing: i.e.

handing over and payment of contractors' claims, checks over quality of work; payments of building contractors. Provide robust documentation requirements. Intensify checks over compliance with relevant rules/regulations.

2.1.25. Consider instituting a special feedback mechanism to follow up satisfaction with work of contractors. Allocate relevant responsibilities.

Economic Development

2.1.26. Review the Organizational Chart of the Economic Development Directorate. Consider the possibility of setting infrastructure 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.

2.1.27. Strengthen the strategic planning system to establish an appropriate framework for sustainable local economy. Enhance strategic approach by considering drafting a global strategic plan for municipal economic development, in the short- and long-term perspectives.

2.1.28. Increase staff capacities for economic development policy development, and formulating proposals for measures for municipal economic development.

2.1.29. Enhance integrity controls in development of tourism policies, and their implementation. 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 basis. This requires monitoring of such businesses which may request more advantages than eligible, in order to ensure a higher level of responsibility and transparency.

Security arrangements

2.1.30. Maximise 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 over infrastructure, assets and staff.

STRATEGIC OBJECTIVE 3:

Getting the resources right: ensure adequate capacities of staff to lead, implement, monitor and re-enforce integrity reforms

Activity lines and respective measures

3.1. Ensure adequate resources to managing, i.e. controlling integrity risks through appropriate hiring and promotion policies

Rationale: If the municipality is to be successful in preventing integrity violations, it must have effective policies that not only minimize the chance of hiring or promoting individuals with low levels of competence and honesty, especially for positions of trust, but also motivate people. Each employee has a unique set of values and personal code of ethics. When faced with sufficient pressure and a perceived opportunity, employees will face an ethical dilemma. Adequate municipal human resource management practices are indispensable to maintain high levels of personal and institutional integrity. The risk assessment conducted in the Municipality of Gjilan/Gnjilane demonstrated high level of awareness of all staff about the critical importance of adequate operational controls in 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, carrier 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, Conflict of Interest declarations of all members of the commission signed; check of qualifications and diplomas before recruitment. Opportunities for improvement of the carrier development system in order to prevent against favouritism, nepotism and other integrity violations are seen to be present in the following integrity operational controls: 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 integrity operational controls: 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 counsellor on deficiencies of the assessment process.

3.1.1. Implement policies and procedures to ensure that candidates for management roles are vetted for an education and skill-set appropriate to the role. Focus on ethical considerations in the recruitment process, and contract terms and conditions for senior managers.

3.1.2. Provide for implementation of the Human Resource Information Management System in the Civil Service (HRIMS)–built and managed by Department of Civil Service Administration (MPA) and to be extended to all institutions of public administration at local level. This will allow the municipality to plan and monitor implementation of policies in the civil service. Ensure accuracy of information.

3.1.3. Enhance recruitment by determining clear and comprehensive testing and admission criteria and systematic monitoring over their implementation. Qualification criteria required for the respective position will need to specify comprehensively the respective qualification and professional field to an appropriate level of detail to avoid broad discretion recruitment committee. Enhance transparency of recruitment by setting up of minimum standards of transparency in recruitment; strictly monitor and report on implementation.

3.1.4. Enhance the accountability requirements for recruitment and selection committees by considering submission of CoI declarations by all members, inclusion of line managers, HR or an independent observer in the committees, strengthened documentation requirements: each member taking notes, handled to HR and filed on the applicant’s file; ad hoc audit of activities of recruitment commissions, etc.

3.1.5. Implement robust employment screening program. Consider using thorough pre-employment and security clearance of candidates for sensitive high-risk positions: verify previous employment, qualifications, and criminal records before employment.

3.1.6. Provide for implementation of the new performance system that is to be adopted centrally. This system 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.

3.1.7 In key operational processes, implement a robust system for declaring conflict of interest by all employees and consider keeping a centralised record thereof.

3.1.8. Strengthen controls over working time management: i.e. consider using work time registration system, ad hoc surveillance actions; complaint system, etc.

3.1.9. Strengthen controls over business trip management; ensure all business trips are made according to accepted well defined criteria, be public and bound to terms.

3.1.10. Consider incorporating into regular performance reviews an evaluation of how each individual has contributed to creating an appropriate workplace environment in line with the municipal values and code of ethics

3.1.11. Initiate periodic survey to monitor satisfaction of staff with work and integrity environment as an “early warning system” to detect issues and trends.

3.1.12. Consider creating anonymous hotline specifically for hiring and employment concerns.

3.2. Develop capacities of all staff to understand integrity issues and implement controls and measures

Rationale: If policies and leadership are the basic building blocks, education and information are the vehicles to ensure that employees understand why integrity prevention is important and the role they play in assisting their municipality. Employees need to be informed and reminded of their internal procedures for identifying risks, making reports and generally playing their part in safeguarding municipal assets, information and resources. The risk assessment process conducted in the Municipality of Gjilan/Gnjilane has identified as opportunities for further improvement the following integrity operational controls: 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. Although the majority of staff has not undergone a specialize integrity training, the need for anticorruption education and training as a key instrument in integrity protection has been well internalized.

3.2.1. Ensure that existing officers with management roles have proper skills in and understanding of the function and duties of effective supervision and integrity risk management by taking actions to build/strengthen and periodically assess effectiveness of these actions. Provide senior and mid management with adequate training in integrity planning and risk management to ensure that the integrity management process in the Municipality is well resourced.

3.2.2. Provide for a strategic approach in professional development by planning and delivery of training based on actual needs. Ensure training needs of all staff as regards integrity matters and risk management are assessed periodically through using structured approach and are well documented in reports and training plans. Ensure these are periodically reported to KIPA, as well as to other responsible stakeholders.

3.2.3. 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, respon-

sibilities and reporting mechanisms.

3.2.4. Provide for appropriate system to monitor training related concerns, including selection of trainees for participation in trainings and study tours. Analyse trends and report them to responsible senior management.

3.2.5. 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.

3.2.6. Develop and deliver a code of conduct and ethics awareness and education program. Provide induction and periodic training of all employees about the organisational values and code of ethics, as well as in integrity prevention mechanisms. This 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.

3.2.7. Arrange workshops to educate

staff and create awareness on integrity and corruption, as well as to reinforce the related expectations of the municipality leadership with regards to their ethical conduct.

3.2.8. Include relevant aspects of the Code of Ethics in further awareness presentations, training sessions and communication programmes to foster awareness amongst internal and external stakeholders

3.2.9. Regularly present case studies and ethical dilemmas to help employees understand the specifics of corruption and encourage ethical behaviour

3.2.10. Provide for a regular reporting on trainings conducted, with analysis of trends. Put evaluation strategies in place to measure the effectiveness of staff education and awareness training in relation to corruption and risk management. Communicate and publish results, as appropriate.

3.2.11. Assess integrity culture through targeted staff surveys. Reporting on trends in relation to a range of issues allowing senior management to detect adverse developments so that appropriate action can be taken general.

STRATEGIC OBJECTIVE 4:

Getting the environment right: enhance the external environment to reinforce and widen the integrity aspects in the modernization and reform processes by improved co-ordination and communication processes, as well as by maintaining high levels of transparency and stakeholder engagement.

Activity lines and respective measures

4.1. Increase substantive engagement with citizens, civil society and business to promote collective commitment and co-ownership in the integrity reforms

Arsyetimi: Komuna e Gjilanit vazhdon të ballafaqohet me sfidën e decentralizimit, kapacitetet adekuate për buxhetim në harmoni me politikën dhe planet e implementimit duhen zhvilluar, në mënyrë që të sigurohet që përcaktimi i prioriteteve dhe ndarja e resurseve financiare reflekton udhëzimin strategjik. Potenciali për përfshirjen domethënëse të palëve të jashtme të interesit si partnerë zhvillimorë duhet përdorur më me efikasitet. Kjo kërkon formimin dhe implementimin e politikave për konsultim dhe komunikim që me efikasitet bashkojnë palët e interesit drejt arritjes me kohë të vendimeve/ zgjidhjeve në të mirë të komunitetit lokal.

4.1.1. Require well publicized public consultation periods before new budget, regulations and/or economic development projects commence and/or plans are finalized. To this purpose, adopt appropriate policy and supporting procedures on inclusion of key stakeholders in the work of the municipality. Monitor and account periodically for their implementation.

4.1.2. Create 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.

4.1.3. Host “Open-Door Days” in offices of high-ranking municipal officials, to improve public understanding of job functions and responsibilities of leadership.

4.1.4.

Facilitate a jointly implemented Integrity Forum where officials, civil servants and NGOs collaborate and create a citizen-focused information campaign. All parties would create a cohesive citizen information campaign, ensuring that the municipal government and civil society are sharing the same information through their respective outlets.

4.1.5. Explore opportunities for cooperation with the National Association of Municipalities in Kosovo, the Ministry of Local Government and other Kosovar municipalities in the area of integrity and anticorruption.

tion, 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.

4.1.6. Consider maintaining a secure anti-corruption hotline for citizens and businesses to provide Municipality with a trust-

ed 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.

4.1.7. Consider using social media to diversified/increased communication outreach.

4.2. Ensure high-level transparency outreach

Rationale: High level of commitment to transparency and increasing substantive engagement with civil society and citizens, municipality can substantially change the dynamics of the relationships between the stakeholders and help achieve better policy outcomes at lower costs; stricter compliance with decisions reached, shared responsibility for service delivery and a shared role for enhancing integrity.

4.2.1. Provide for a rigorous implementation of the new administrative instruction on transparency in municipalities through adequately resourcing the function, allocating responsibilities, and continuous monitoring over implementation.

4.2.2. Provide for integrity aspects in the external communication strategy by adding the focus on integrity to convey the AC message to all external stakeholders.

4.2.3. Consider setting up of a one-stop-shop for the public – consolidation of all municipal information where the public would expect to find it. For some services (for personal documents, business registration), consider producing booklets with general information. Set up a structured system, with diversified channels to continuously inform citizens about their rights and how to realize those rights, delivered public administrative services, ways how to access them and other issues that may

be of interest for them. Consider placing a separate Transparency Board 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.

4.2.4 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 opportunities for integrity violations.

4.2.5. Ensure adequate implementation of the requirements of administrative 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. Consider including relevant information as regards the integrity enhancement policies/measures/achievements of the Municipality, i.e. the Integrity Statement, Integrity Plan and the

reports on their implementation.

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

4.3. Facilitate environment to enable free access to public information

4.3.1. The right of access to public documents is a key instruments to ensure transparency and increase accountability. Develop/maintain appropriate internal framework to ensure stakeholders have free and easy access to public information, further to national regulatory environment. To this purpose, consider adopting a targeted internal procedure/ rules for processing applications for access to public information; the forms, sites for public information delivery and related costs.

4.3.2. Creating the database of requests for access to public documents and information to allow for effective audit trail.

4.3.3. Train staff in relevant legal provisions and procedural requirements.

4.3.4. Monitoring the implementation of permissions to access public documents. Provide adequate and professional monitoring of the implementation of the Law on Access to Public Documents 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 Gjakova- re- sponsible for implementa- tion of specific measure	Units to coordinate implementation and institutions/ organizations that partner fati i fundit për implementim	The anticipated time to complete the implementation of specific action	Indicators which serve to verify the im- plementation of the action	Presents the budget needed to implement the relevant action from the budget of Kosovo or dif- ferent donors

STRATEGIC OBJECTIVE 1

Getting the governance right: strengthen policy and institutional framework for effective integrity risk management

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

STRATEGIC OBJECTIVE 2

Getting the risk management practices right: upgrade operational controls for specific high-risk areas of operation

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

STRATEGIC OBJECTIVE 3

Getting the governance right: strengthen policy and institutional framework for effective integrity risk management

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

STRATEGIC OBJECTIVE 3

Getting the resources right: ensure adequate capacities of staff to lead, implement, monitor and re-enforce integrity reforms

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



November 2015