INTEGRITY PLAN
MUNICIPALITY OF PRISTINA
2014 – 2016

ACKNOWLEDGMENTS

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INTEGRITY STATEMENT

We, in the Municipality of Pristina, recognize integrity as a vital dimension of the local government, so that the latter becomes what the citizens of Pristina would like it to be and trust it: a democratic, open, transparent, effective and efficient local government. Through its policies and measures, our Municipality is currently making a strong effort to increase the efficiency, coverage and the quality of public services and thus, to visibly and significantly improve the conditions for living and doing business of the local community.

We are aware of the scale and complexity of the corruption and integrity issues which we, as a Municipality, face. Because of the vast area of service provisions and the municipal expenditure accounting for a relatively high proportion of GDP, there is a serious potential for undue exercise of monopoly power that we need to manage in an accountable, responsible and efficient manner. Further to that, municipal government consists of tying more closely service provision to local needs, which allows local officials to exercise greater discretion. This invites for stricter monitoring and controls. Third, we as a local government, unlike central government ministries, are more and directly accountable to our electorate, because municipal leadership is directly elected by its neighbours and community members. Each of these three elements – namely the potential for monopoly power, the exercise of discretion by public officials, and local political accountability – has impact on local corruption.

We also understand well our mandate for fighting corruption locally. The Municipality of Pristina, having an ultimate responsibility for ensuring the access, quality, equity and effectiveness of public services, delivered at local level, is expected by citizens and businesses to effectively act as a pillar of anticorruption and a real driver in the integrity reforms. Reducing opportunities for corruption and increasing the effectiveness of public expenditure will unquestionably result in improved services, enhanced transparency and accountability, increased stakeholder participation in the life and the future of the community and most likely, into increased trust.

In view of the above, the Municipality is determined to consistently maintain a firm "zero tolerance" to corruption when detected, and to ensure that corruption, fraud, maladministration or any other integrity offences of a similar nature are not tolerated. All potential violations will be investigated where required, and actions will be instituted against those found responsible. These may include further the laying of criminal charges, of civil and administrative actions and the institution of recoveries where applicable.

It is the responsibility of our entire staff to report all incidents of fraud and corruption, or any other integrity violations of a similar nature to the upper/senior management. Alternatively, such reports can be made by way of submitting information through the prescribed whistle blowing mechanism. They will be treated with the strictest confidentiality and will not be disclosed or discussed with parties other than those charged with investigation into such reports. In order to obtain information from diversified channels of citizens' control, to become basis of an informed risk taking, we encourage anticorruption hotline as a functional reporting mechanism.

Our greatest ambition, however, is to implement a responsible, pro-active, well-targeted and risk-based preventive policy to make sure we effectively minimize opportunities to corruption and also maximize the incentives of our staff not to engage in violations. To this purpose, we as a Municipality have put a structured effort to elaborate this Integrity Plan. It codifies the objectives, activity lines and measures to be taken to further enhance its preventive anticorruption policies and practices and strengthen its organizational resistance to corruption. We perceive this Plan to be the operational foundation of the functioning integrity management system in the Municipality of Pristina, which we would like to achieve, sustain and further improve. We believe in its preventive potential and in the fact that, through its measures, it increases the chance of success and reduces both the probability of failure and the level of uncertainty associated with achieving the objectives of the Municipality.

Therefore, this Plan is considered as an important part of the overall organizational development planning process, tied to the strategic institutional development plan and added to its integrity risk management aspect. On a broader level, it complements the effective implementation of the Kosovo Anti-Corruption Action Plan 2012-2016 in its part related to local government. We believe that by being a forerunner in integrity planning, we may demonstrate a good example, act as a leader, share all lessons learned, further transcend valuable know-how to other municipalities and thus, meaningfully influence the anti-corruption and integrity agenda in the Kosovo local government sector as a whole.

We understand that to be successful, integrity risk management should not be a one-time exercise, but rather a continuous process that supports the development and implementation of our Integrity Plan. Therefore, we are committed to not only implement the planned measures, but also make a successful effort to incorporate integrity risk management into the culture of the Municipality of Pristina in a sustainable way. This will include mandate, leadership and commitment from the top, but will also involve every single employee that will have to act as a risk manager within his/her area of responsibility and competence. All of us are ultimately responsible for the effective prevention, timely detection, and for the investigation of corruption, fraud or any other breaches of integrity in the Municipality of Pristina.

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

Shpend Ahmeti
Mayor of Pristina

31 July 2014

INTEGRITY PLAN

The Integrity Plan is a *strategic* document, seen as an important preventive tool to strengthen institutional integrity. It is being understood in the Municipality of Pristina as a strict adherence to moral values, professional standards, and applicable normative rules. The Plan is also an *operational* document, providing *risk-based measures for achieving the integrity objectives of the Municipality*.

The Plan is expected to meaningfully contribute to:
- Increasing the likelihood that the Municipality achieves its organizational objectives by putting forward a proactive rather than reactive integrity risk management. This will improve organizational resistance to corruption and reduce/ eliminate opportunities for corruption;
- Maintaining a focus on priorities, based on informed risk identification and assessment that will help the Municipality effectively allocate the available resources for anticorruption towards their best perceived use;
- Improving operational controls to integrity violations which will raise effectiveness, efficiency and transparency of all processes, including service provision;
- Maintaining a system in place to attain compliance with relevant legal and procedural requirements and standards;
- Resourcing a conducive internal environment for anticorruption through targeted training and awareness raising; as well as by encouraging a co-ownership of all staff in the process of developing, implementing and monitoring integrity plans;
- Further enhancing external and internal stakeholders' confidence and trust in the commitment to integrity demonstrated by the Municipality.

Finally, we believe that by implementing this Plan, the Municipality of Pristina will be better placed to ensure the effective, efficient, transparent and ethical delivery of its intended outcomes, including improved public services and increased satisfaction of stakeholders. We see this Plan to be a beginning of a long-term journey and aim at a *functioning integrity management system (hereinafter, IMS).* It is the system, rather than its isolated elements, the key to reduce outstanding economic and human costs of integrity violations, enforce continuous organisational improvement, boost reputation and creditability.

Further to the Kosovo Anti-corruption Strategy and Action Plan, this Integrity Plan shall be implemented throughout the period of 2014-2016, aligned with the next anti-corruption strategic planning cycle.

The Plan is based on the *results of a comprehensive integrity planning and risk assessment process* undertaken within the Municipality of Pristina in the period April - June 2014. 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:

- Reviewed the relevant strategic, regulatory and operational framework, i.e. the institutional development plan, the local government strategy, etc;
- Analysed data from integrity performance, monitoring and implementation;
- Analysed client satisfaction and the perception of corruption in the local government sector surveys, including surveys/reports commissioned by international organisations;
- Developed a reference organisational survey- self-assessment to provide insight and valuable input to the assessment of the integrity management system in the Municipality, analysed results, perceived risk areas and identified improvement areas (Self-Assessment of the organisational integrity framework developed);
- Used workshop brainstorming, structured interviews with key personnel and staff consultations channel techniques to identify and assess integrity risks and list preventive measures (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.

Now, after having gone through the integrity-risk identification, assessment and planning process, we believe that it has been the process rather than the concrete measures developed that meant most to us and to our organisation. Integrity planning has contributed to organisational learning and provided a platform to discuss risks and take informed decisions how to optimize existing controls. Knowledge and skills have been obtained by all staff who participated, and a positive risk sensitive culture has been encouraged.

In light of the above, we see the Integrity Plan as not a static, but a living document, that will be assessed and updated as needed.

A special budget for the implementation of this Integrity Plan will be allocated as the *Action Plan* developed and annexed (Annex 1).

Its implementation shall be monitored in a planned format, periodically reviewed and updated in accordance with the relevant normative, institutional, procedural and personnel developments within the changing organizational external and internal environment. The *ongoing monitoring of implementation* is important to ensure that the integrity risk control and treatment measures turn out effective in both design and operation; that procedures are understood and the integrity plan followed. Further to that, monitoring should also

determine whether the risk-treatment measures adopted produced the planned effects; detect changes in the external and internal context including changes to the risk itself, which can require the revision of risk treatments and priorities; identify what lessons could be learned for future planning.

Responsibilities for regular monitoring of the Plan are assigned to_____.

Regular reporting will ensure that the implementation of the Plan is following the schedule and planned results are being achieved. The _____ shall be responsible to report periodically to the Mayor of the Municipality of Pristina on the progress of 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 Pristina.
- **Integrity Plan** explains the background, scope, purpose, objectives and the methodology used for developing the Integrity Plan. It presents key aspects of the relevant implementation, monitoring, and reporting procedures.
- **Strategic objectives, activity lines and measures** outline key strategic objectives and summarise action areas that are aimed to strengthen the integrity defence in the Municipality of Pristina based on the assessed integrity risks, lessons learnt and relevant good practices. The Plan offers 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.

STRATEGIC OBJECTIVES, ACTIVITY LINES AND MEASURES

Current progress of the Municipality of Pristina, as well as the commitment of top management and the involvement of staff, provides a sound basis for advancing integrity management in the coming years. Moving forward, the Municipality shall reinforce measures to enhance integrity and prevent corruption by focusing on the following four core areas:

- Increased efficiency, effectiveness and transparency of the overall municipal management system through integrating integrity risk management as a core element of management responsibility to manage integrity and corruption risks;
- Increased effectiveness, efficiency, quality and transparency of municipal operations through optimised integrity controls at operational level;
- Enhanced human resources framework to lead and support integrity reforms, manage the integrity system and implement integrity objectives/ measures through significantly improving the integrity aspects of the HRM and HRD function;
- Enabling external environment to promote modernisation and sustain a collective commitment to integrity through improved co-ordination with stakeholders, increased quality of awareness and communication events, enhanced transparency and citizen engagement and dissemination of good practices.

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:

Increase efficiency, effectiveness and transparency of the overall municipal management system through integrating integrity risk management as a core element of management responsibility to manage integrity and corruption risks

Activity lines and respective measures

1.1. Turn integrity planning into a sustained and well-resourced practice aimed at finding the best use of the available resources for anti-corruption based on a systematic and informed risk assessment.

Rationale: The Municipality of Pristina is currently undergoing a structured process of integrity planning. Challenges, however, lie ahead. To ensure sustainability, the Municipality shall make further consistent efforts to strengthen internal capacities for integrity planning and management; provide regular monitoring and reporting in implementation, as well as periodic re-assessment. Integrity planning shall become adequately resourced and part of the routine management practices. Its added value shall be fully internalised by the whole staff.

Measures:

1.1.1. *Communicate the current Integrity Plan* to all staff, including allocation of responsibilities as regards its implementation and respective deadlines.

1.1.2. *Strengthen capacities of all staff* to understand integrity issues and implement integrity measures through *phased-in*, *targeted further integrity training and awareness raising.* Focus on *senior and mid- level management* exerting strategic influence on organizational change.

1.1.3. Develop *a systematic approach to internally monitor, evaluate and communicate the results of the implementation of integrity measures*, including *reporting* on integrity measures as part of annual management reports. *Allocate necessary responsibilities* to report on the implementation of anti-corruption measures. Maximize opportunities to communicate results of implementation to a wide range of stakeholders through appropriate communication formats: publications on the website, briefings, etc.

1.1.4. *Ensure Re-assessment of Integrity Risks in planned intervals*, i.e. periodic reviews of the activities of the units with controlling functions in the areas with highest levels of risk, where necessary.

1.2. Progressively ensure a transition from integrity planning towards a functioning integrity management system that will strengthen overall municipal organisational resistance to corruption, minimize residual risk levels and effectively prevent from integrity violations

Rationale: Integrity planning is the *first step* towards effective integrity risk management. To sustain a functioning integrity management system, will require the Municipality to implement a full-fledged Plan-Do-Check-Act (PDCA) continual improvement framework and incorporate integrity management into routine management practices. This requires to (1) **plan** its integrity related policies, code of ethics and integrity plan; (2) **implement** the measures of the plan and the related operational controls; (3) **check:** monitor and measure key characteristics of operations that determine organizational performance as regards prevention of corruption and integrity against the integrity policy and objectives, report the results; and (4) **take actions** to continually improve organizational integrity performance and the integrity management system.

Measures:

1.2.1. *Allocate clear responsibilities* as regards planning, implementing, monitoring and improving the integrity management system (IMS). Effectively *communicate* these to all staff;

1.2.2. Ensure *effective and structured internal communication* as regards corruption and integrity across functions and levels within the organisation. *Integrate integrity aspects* into the *internal communication policies/ practices.*

1.2.3. Introduce a system that enables *confidential reporting* of integrity violations, including breaches of the law or professional standards or ethics, in good faith and on reasonable grounds. To this purpose, adopt a *Whistle Blowing Policy of the Municipality of Pristina,* setting out the detailed procedure which must be followed in order to report any incidents of fraud and/or corruption. This policy shall be designed to comply with the provisions of the Law No. 04/L-043 on protection of informants that govern protection of whistle blowers in Kosovo. It shall be communicated at all levels, to support adequate understanding, positive attitudes and effective enforcement.

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

1.2.5. Institute *integrity management system review,* to *review within planned intervals* (i.e. annually) data input as regards performance of the IMS (i.e. implementation of objectives and measures, results from monitoring of integrity performance, internal audit results, challenges and recommendations for improvement, etc.) and *take decisions* as regards enhanced effectiveness of the IMS.

1.3. Progressively integrate Integrity Management System aspects into the organisational quality management systems in line with the TQM approach and the relevant good management practices.

Rationale: Currently, the Municipality is undergoing a process for developing and implementing a quality management system in line with SO 9001:2008 system requirements. It is also implementing a self-assessment under the Common Assessment Framework. TQM based instruments have proven effective in enhancing public sector governance in most EU countries as they reinforce the continuous improvement principle in all work, from high level strategic planning and decision-making, to detailed execution of work elements on operational level through improving capabilities, people, processes, technology and infrastructure. Their distinctive feature is the Customer Focus that will help the Municipality of Pristina to improve service relationship with internal customers, quality of service, customer driven standards, dealing with suppliers/ subcontractors. Whilst both USO 9001 and CAF are designed to be used independently, they may be aligned or integrated with other management systems as they are based on the same principles/ instruments. *Integrating IMS aspects with quality management* will *optimize integrity performance and effectively limit opportunities for integrity violations*; allow for building effective management system along a full-fledged P-D-C-A cycle, re-enforcing quality and integrity. It will *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:

    1.3.1. *Progressively introduce a process-oriented quality management system and extend its existing scope to cover the whole Municipality*, in line with the best practice of the EU Member States and compatible with Quality Management System standards. This will improve quality and transparency of service, accountability and traceability, as well as dealing with suppliers. In some municipal departments, steps have been made already towards introducing a process based management system. To allow for scale effect, plan extension of the scope of the system, resource and further implement this plan.

    1.3.2. Develop a *complete and comprehensive register of processes* of the Municipality. *Cover all key processes* that are important to quality and integrity by adequate documented *internal operational procedures*, to reduce risk of errors and deviations. *Communicate these procedures* to all staff so that they become effectively in use. Train staff if necessary.

    1.3.3. Develop *appropriate operational, managerial and strategic performance indicators* of all key municipal processes that will permit to assess the progress on the impact of reforms, identify problems, support decision-making/ operational process etc. If feasible, establish an automated system to monitor specified performance indicators.

    1.3.4. *Use feedback from service users* as instrument to enhance organisational integrity performance and quality of service. To this purpose, plan and implement customer satisfaction surveys; ad hoc checks, secret client operations, etc.

1.4. **In line with the building up of strong quality and integrity management systems, further enforce a customer oriented service concept by developing a Client Service Charter to describe the minimal level of service a client can expect from the Municipality of Pristina and ensure consistent client focus in the routine course of business**

Rationale: A Client Service Charter shall describe the minimal level of service a client can expect from the Municipality in clear terms and simple language. It informs customers how to make a complaint or a suggestion (including, if appropriate, forms of external redress/appeal), and include contact details. It demonstrates commitment to service standards, and supports on-going evaluation of performance with open reporting of results. It may significantly contribute to raising the image of the Municipality as an organization with high standards and a demonstrated commitment to quality and transparency of public service.

Measures:
1.4.1. Re-enforce the customer oriented service concept by developing a *Client Service Charter of the Municipality of Pristina* in line with the Municipality modernization efforts and the available good practices. Include a commitment to maintain professional excellence and high standards of conduct, the rights and obligations of citizens, information on channels available for complaints, compliments and feedback to create a more holistic understanding of the interaction between public officials and citizens.
1.4.2. *Display* the Client Service Charter in key public areas (i.e. service delivery areas) and make it accessible through print and electronic media and web.
1.4.3. *Make all staff aware* of the standards of service contained in the Charter.

1.5. **To best ensure that the critical integrity risks related to security of information assets are effectively managed, progressively upgrade the information security management system that is currently in function within the Municipality to achieve a greater degree of compliance with the available good practices and the relevant standards, in particular ISO 27001:2013 Requirements to information security management systems**

Rationale: The Municipality is upgrading its information management systems which offers considerable advantages but also requires a stronger emphasis on security of information and integrity. Given the pervasiveness of the information system and the possibilities to harm third parties, ethical conduct should be promoted that recognizes security needs and respects the legitimate interests of others. Protection of personal information and protection of confidential information is critical. Good practices (i.e. OECD Guidelines for the Security of Information and Networks, and management standard ISO/IEC 27001) suggest that all are responsible for the security of

information. To this purpose, a large scope of the obligation to submit a declaration of confidentiality and a non-disclosure of official information will be considered. Risk assessment, security design, security management and re-assessment are integral components of a sound information security system. To guarantee results, the application of the system has to be strictly controlled, monitored, and regularly audited.

Measures:

1.5.1. Develop a *Manual on Securing the Integrity and the Security of Information at the Municipality of Pristina* based on OECD Guidelines for the Security of Information and Networks, and management standard ISO/IEC 27001 and integrate it into the current information security policies;

1.5.2. Adequately *resource the process* of managing security of information through *creating/ strengthening municipal capacities for information security management* (i.e. trainings in ISO 27001 for selected staff)

1.5.3. Conduct a *targeted gap assessment* of the existing information management system against *ISO/IEC 27001* that defines requirements for establishing, implementing, operating, monitoring, reviewing, maintaining and improving a documented Information Security Management System. Based on results, *devise and implement a phased-up Action Plan on Information Security* with concrete measures to ensure the selection of adequate and proportional security controls that protect information assets, increase organizational creditability with stakeholders and prevent integrity violations.

1.5.4. Ensure that all employees are sensitized on a regular basis to the fraud and corruption risks associated with information security and the utilization of computer resources, in particular – access control, and ensure that systems are developed to limit the risk of manipulation of computerized data. To this purpose, *set up a system of regular trainings/awareness events/mentoring channels*.

STRATEGIC OBJECTIVE 2:

Increased effectiveness, efficiency, quality and transparency of municipal operations through optimised integrity controls at operational level

Activity lines and respective measures

2.1. Strengthen rules / practices in the key integrity defence areas: conflict of interest, outside work performance, asset declarations, gifts and hospitality and ensure that these rules are understood and followed

Rationale: Clear internal rules on integrity controls are critical to effective integrity management. They need to comply with the current legal framework, as well as with the the available best integrity standards. Sufficient level of familiarity with these rules of all staff is absolutely necessary to ensure effective implementation.

Measures:

    2.1.1. Review the need to *develop internal rules on disclosure of interest, outside work performance, asset declarations, gifts and hospitality* in addition to the Code of Conduct and the applicable national regulations. Develop such rules if considered necessary and/or modify the existing Code to cover all integrity protection areas.

    2.1.2. Ensure *sufficient level of familiarity* of all staff with all existing rules on *conflict of interest, outside work performance, asset declarations, gifts and hospitality* through appropriate training and awareness-raising events.

    2.1.3. Set up a *register of gifts* in the Municipality of Pristina in accordance with the relevant regulations (Chapter III (Gifts) of the Law No. 04/L-050 on declaration, origin and control of property of senior public officials and on declaration, origin and control of gifts of all public officials). Ensure staff is aware of the Register and the latter is well maintained.

2.2. Enhance resistance to integrity violations through strengthening integrity operational controls in the public procurement processes

Rationale: Public procurement is a high risk, high complexity sector where direct private-public interface offers lucrative opportunities for rentseeking. Procurement corruption entails fiscal losses, efficiency losses from distorted market competition, and welfare losses related to the deteriorated access to and quality of public goods and services. In Kosovo, similar to most new EU MS, procurement corruption risks are attributed to the relatively new and fast-growing in time of crisis procurement market, where many integrity operational controls have not yet reached effective enforcement. Strenghtening these controls becomes a vital element in integrity management.

Measures:

2.2.1. *In line with the national regulations, develop and enforce minimum standards for transparency in public procurement in the Municipality of Pristina* as a threshold and monitor their implementation. Transparency is essential as regards tender opportunities, selection criteria, the evaluation process, the award decision and its justification, the terms and conditions of the contracts and all its amendments, the implementation of the contract, dispute and settlement mechanisms and procedures.

2.2.2. Strengthen capacities for managing public procurement through setting up and implementing a *continuous professional development* program for public procurement officers (focus on professional standards and integrity).

2.2.3. Where feasible, enforce *separation of duties in key phases of public procurement*- quotations, award, and control over contract implementation, receipts and payments.

2.2.4. Where feasible, practice *regular staff rotation* in public procurement and contracting unit to avoid the establishment and the strengthening of potential corrupt relationships.

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

2.2.6. Ensure *effective citizens' control* over the public procurement process through maintaining the requirement that selection committees who are actually selecting the winning tender, to be staffed by local government representatives and independent NGO observers. This will open up the process and ensure that the process is being conducted legitimately.

2.2.7. Strengthen operational controls in *receipt and processing of tender documentation:* Tender submissions should be accepted by at least two people or placed in a tender box. Tender Box should be locked at all times and submitted tenders are to be collected by two specifically authorised personnel – one person should not be able to open the tender box alone. All received tenders should be registered and filed for record purposes with the successful tender and the subsequent adjudication result.

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

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

2.2.10. Adopt and maintain a *blacklist of suppliers/ subcontractors* who failed to adhere to the set by the Municipality internal integrity standards, to guide potential debarment decisions.

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

2.2.12. Set up *post procurement award audits* on tenders above a specified threshold to review adherence to specified procedural standards.

2.3. Improve organisational resistance to integrity violations in major service delivery operational areas

Rationale: The Municipality shall use operational controls to manage the identified major integrity risks, ensure compliance with legal requirements, and avoid or minimize integrity risks. When identifying needs for operational controls, the Municipality has considered all of its operations, including those related to management functions (i.e. purchasing, financial management, etc.); and these related all key day-to-day process operations. The risk assessment undertaken points at major integrity risks in the context of the core functions of the Municipality, in the areas: urban and rural planning; the implementation of building regulations and building control standards; land use and development; the 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; local economic development; public health; the provision and the maintenance of public services and utilities, including water supply, sewers and drains, sewage treatment, waste management, local roads, local transport, and local heating schemes. Among the delegated competences of the Municipality most vulnerable to integrity violations (corruption prone) are considered cadastral records; business registration and licensing; civil registries; voter registration; the distribution of social assistance payments (excluding pensions); and forestry protection on the municipal territory. Facing the above challenges, the Municipality has identified short and long term priorities and structured operational controls in various forms, such as procedures, work instructions, physical controls, the 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 the integrity significance of the operation itself.

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

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

2.3.3. Implement the *electronic system of document management*; the electronic allocation and the monitoring of documents; the electronic processing of petitions, the creation of an electronic inter-face in order to obtain information about petitions related to the files' status

Cadastre

2.3.4. Undertake effective steps to *adequately resource the cadastre function* with appropriate *competent personnel*

2.3.5. Ensure *adequate professional training* for staff in the cadastre directorate, i.e. training in integrity management and ethics

2.3.6. Undertake *radical re-organization of the process work flow* in the *reception offices – tellers* with strong integrity controls embedded

2.3.7. Strengthen *control mechanisms in the reception offices- tellers*, including ad hoc and secret client operations

2.3.8. To enhance integrity in the registration of real property in the cadastral department*, take steps to improve communication between judicial authorities, Housing Directorate, PAK, KPA and cadastre directorate*

2.3.9. To enhance integrity in the registration of real property in the cadastral department, introduce and maintain a *workable system of professional scanning and archiving*

2.3.10. Take steps to facilitate/ maintain *effective collaboration between the Chamber of Notaries of Kosovo, the Chamber of Private Enforcement Agents, Courts and relevant Ministries* as regards the registration of real property matters

2.3.11. Put in place *adequate control mechanisms in the area of registration and of the deregistration of mortgages* in the cadastre department, including ad hoc and secret client operations

2.3.12. To enhance integrity controls in the registration of division and in the joining of lots in the cadastre department *increase collaboration between KCA, Association of Kosovo Geodesy Experts, and the cadaster directorate*.

2.3.13. Provide *adequate information and training on the new instructions or frameworks for cadaster measurements*

2.3.14. Strengthen/ diversify *internal control mechanisms as regards the registration of division and the joining of lots* in the cadastre department

Local economic development and agriculture

2.3.15. Develop *clear guidelines (i.e. criteria and procedure) to effectively guide the allocation of subsidies* and to prevent arbitrary decisions and corruptive practices

2.3.16. Develop *medium time strategic policy and action plan on how to allocate means in the agricultural sector*. This shall be aligned with the overall local development policies and the related feasibilities. Ensure the effective monitoring of implementation, the periodic reporting and communication of results and the need for corrective measures.

2.3.17. Improve the *internal structure and organization of the communication flow between the Economic development and the Agricultural sectors* to remove fractions and facilitate the efficient flow of information.

Urban and rural planning

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

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

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

Land-use and development

2.3.21. Develop an adequate *internal procedure/ criteria* to address key integrity risks in *land-use and development process* and to prevent subjectivism

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

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

The 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

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

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

Public services

2.3.26. Develop and enforce *by-laws and related work plans to clearly define the procedures to issue permits for respective services* and their complete and satisfactory execution

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

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

2.3.29. Increase *controls and inspection of the application of decisions* to assess conformity with the regulations

2.3.30. Institute and maintain a *structured system of periodic regular reporting* on the execution of duties and projects based on the respective work plans.

Allocation of Housing

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

2.3.32. All applicants for housing are to be entered into a *register* at the Municipal Offices and should be *available for inspection by applicants*

2.3.33. *Strengthened controls over the procedure for handing over and payment of contractors' claims*: checks over quality assurance of buildings; Building contractors are only to be paid following submission of a progress certificate signed by an authorized building inspector; completed houses to be handled over by the builder in the presence of the occupant and the Municipal inspector; contractor certificated claims are to be reconciled to budgets prior to any payments being rendered.

Physical security arrangements

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

2.4. Further strengthen the integrity controls in the internal control, audit and inspection functions

Rationale: Raising the quality of the internal audit and inspection functions has been identified as a key priority in the integrity planning process. To effectively act as a pillar of the IMS within the Municipality, the currently operated system is perceived in need of a radical change. This will involve among others a comprehensive reorganisation/introduction of a risk assessment-based audit and inspection planning system (i.e. internal audit environment assessment; auditing system risk assessment (risk criteria factors and risk criteria assessment methods; auditing system prioritization; internal audit strategy, etc); adequate staffing and professional development of staff involved; rigorous monitoring procedures and specific integrity controls.

Measures:
2.4.1. Radically *reorganise the existing system of internal audit and inspections* to increase its effectiveness, accountability and transparency and thus, increase resistance to corruption and integrity violations.
2.4.2. Develop appropriate *operational guidelines* to cover the planning, exercise, monitoring and the follow-up of the auditing and inspection function. Address issues such as risk management, specific control actions, internal audit/ inspection planning, internal audit/ inspection resourcing, internal audit/ inspections performance assessment and quality assurance. Communicate these guidelines to all staff.
2.4.3. *Improve the system of communication (information flow)* between the internal audit unit and other municipal bodies. For this purpose, a quality information system should be implemented in all work processes.
2.4.4. Ensure *effective audit planning* sensitised by results of risk assessment. Monitor the implementation of the audit plan and provide for immediate corrective measures in case of failures.

2.4.5. Increase the use of *ad hoc audits* on a random basis to follow up recent inspections and verify the findings/ procedures used.

2.4.6. Adequately *resource* the control, inspection and audit function through careful consideration of existing capacity gaps. Where feasible, maintain the rotation and four eyes principle to avoid corruptive relationships emerge and strengthen.

2.4.7. Ensure the *efficient application of conflicts of interest* in the audit and inspection processes to ensure that staff selected to perform such 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.

2.4.8. Further *develop the professional competencies* of all staff involved in control, inspection and audit functions. To this purpose, set up and implement a specialized training programme for auditors and inspectors and/or consider training opportunities offered by KIPA and other specialized training providers. Areas: conducting specific audits (e.g. – fraud audits, IT audits, Quality management audits), application of audit procedures (sampling, interviews, sufficiency of evidences, etc.).

2.4.9. Develop and maintain a *Monitor-web* as an electronic system which monitors the follow-up of internal audit and inspection activities to ensure that all instances of suspected violations are satisfactorily resolved. The system will address both internal and external audit recommendations and register the progress made in implementing them and will function as a single dashboard for public managers to monitor and evaluate internal control actions.

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

2.4.11. Further develop the existing *internal and external compliments/complaints processing system* as a management instrument to increase accountability. Consider implementing a log to register all complaints for follow-up purposes; appointing a specific senior official to be charged with monitoring complaints and their resolution. Ensure results are communicated on time to the complainant. Ensure periodical (biannual and annual) analyses of the signals, suggestions and complaints, related to the quality of the services and the observance of the standards for the services provided.

2.4.12. Further *enhance communication system* as regards the *results of inspections* to effectively prevent a case, where information can be difficult to access, making it hard for other departments to fulfil their functions.

2.5. Strengthen integrity controls in the financial management system and the registration and management of assets

Rationale: The financial management, the registration and the management of assets are the strong pillars of a sound integrity management system to prevent the waste of public

resources and the abuse of entrusted power. Any deficits in the above will result not only in the misuse of resources, but will also lead to inefficient implementation of set targets and aims. Based on the risk assessment conducted, related risk levels have been assessed major. This requires targeted enhancement measures and a consistent follow-up of their implementation.

Measures:

2.5.1. Introduce and maintain an *adequate mechanism for the follow-up of budget expenditures* on a monthly basis that provides an effective possibility to trace the dynamics of budget implementation.

2.5.2. Enhance *external supervision over budget implementation* by setting up a *committee, to be staffed by local government representatives and independent NGO observers, to monitor budget implementation* on a regular basis, i.e. each semester. This will open up the process and ensure that the process is being conducted effectively.

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

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

2.5.5. As a safeguard against the misuse of vehicles for personal benefit, *vehicle register, GPS and logbooks* should to be introduced and monitored.

2.5.6. *Connect the database between the cadaster and urban planning*, allowing access to the cadastre records.

2.5.7. Introduce *clear procedure for blocking the accounts of irregular tax payers* who failed to pay their taxes to avoid subjective and arbitrary decisions. Monitor its implementation, ad hoc random checks inclusive.

2.5.8. *Strengthen monitoring and control mechanisms* over the *application of the instruction on conditioning municipal services*

2.5.9. Provide the *uniform interpretation* of the relevant for the municipality provisions of the *Law on property tax* through issuing interpretation guidelines and provision of internal trainings. Develop proposals for amendments to the Law on property tax and submit them to the competent legislative bodies.

2.5.10. *Enable access to cadastre information* for the *property tax section*

STRATEGIC OBJECTIVE 3:

Enhanced human resources framework to lead and support integrity reforms, manage the integrity system and implement integrity objectives/measures through significantly improving integrity aspects of the HRM and HRD function

Activity lines and respective measures

3.1. Further strengthen the high level strategic and controlling function within the Municipality of Pristina through codifying integrity rules in the functioning of the Municipal Assembly

Rationale: Municipal Assembly is the highest body of the Municipality, which exercises its functions in local government as set in LLSG and the Municipal Statute. Its members exercise critical competences, that entail high-risk levels from integrity perspective: i.e. such as those related to the approval of the budget and investment plans; the level of municipal charges, tariffs and fees; decisions related to the municipal property; approval and amendment of: Municipal Development Plan (MDP); Urban Development Plan (UDP) and Urban Regulatory Plan (URP). The Assembly is directly elected, in accordance with provisions of the Law on Local Elections. Because of this vertical accontability, traditional horisontal integrity prevention instruments find limited applicabilty. This, however, does not exclude the Municipal Assembly from the overall integrity prevention platform, as it has a special role as an integrity pillar in the municipality's functioning.

3.1.1. Consider the added value of developing a *Code of Ethics/ Code of Conduct/* Integrity Rules to address *Members of the Municipal Assembly.* In line with the available standards in the field, that will send a clear and positive message to the local community as regards integrity commitments of the municipal counsellors.

3.1.2. Consider involving members of the Municipal Assembly in Anticorruption Days, Open Forums and other public events related to transparency and anticorruption.

3.2. Increased enforceability of the Code of Conduct for all staff

Rationale: Standards of conduct are recognized as essential for guiding the behaviour of public officials in line with the public purpose of the organisation in which they work. Their effective enforcement requires a supporting capacity development and awareness, as well as a structured monitoring system.

3.2.1. Ensure *appropriate level of familiarization of all staff with the Code of Conduct* (i.e. induction and refresher trainings). Familiarise new employees with the Code of Conduct (i.e. signing of acknowledgement that they have read and understood the code as set out; with rules concerning overtime and travel; procedures applicable to the use of municipal assets)

3.2.2. Where appropriate, apply the code of conduct to *service providers* as well, (i.e. inserting relevant provisions of the code into contracts)

3.2.3. Introduce *ethics counselling or Integrity Committee* within the Municipality to ensure coherent understanding of the Code of Conduct and integrity rules and help solve ethical dilemmas

3.1.1. Make publicly available the *results of the breach investigations* of the Code of Conduct within the Municipality by disclosing trends/ drivers.

3.3. Strengthen further the resistance to integrity violations in executing the HRM and HRD function in the Municipality of Pristina

> **Rationale:** All other measures notwithstanding, it is the human parameter that determines the final profile of the organisational integrity management system. People are the biggest asset that the Municipality actually has, and they are both at the front door as well as at the back door of all processes. Few measures may compare in final effects with these that take appropriate care of the management and development of staff.

3.3.1. Further enhance *recruitment and selection* processes through strengthening internal rules on recruitment, the definition of minimum standards of transparency; strict monitoring on vacancy notices, including the implementation of transparency requirements, the registration of applications and acknowledgement letters; clear rules on the functioning of selection committees (CoI declarations signed by all members, interviews with prospective candidates to be held by line managers and HR, each member taking notes, handled to HR and filed on the applicant's file); ad hoc audit of activities of recruitment commissions, ensuring audit trail and effective complaint mechanisms registration of applications and acknowledgement letters. Retain interview notes made by each member of the selection committee on the recruitment file. Include independents from outside the Municipality on the selection panel.

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

3.3.3. Include the selection and recruitment of personnel as a risk to be assessed in the *internal audit plan*. Conduct *ad hoc checks* of randomly selected recruitment procedures*.

3.3.4. Ensure *job descriptions* clearly and comprehensively define individual responsibilities in accordance with the relevant regulations for internal organization and systematization of jobs; ensure they are known to all staff.

Employees whose job specifications involve any form of critical decision making or any form of expenditure authorisation, should be obliged to complete a CoI declaration (to be reviewed on an annual basis and updated and monitored by HR).

3.3.5. Further to the relevant regulations, implement an internal policy regarding *the acceptance of outside employment* whilst working for the municipality.

3.3.6. Further enhance *personnel appraisal* and ensure merit-based promotion policies: Develop clear and comprehensive *indicators* for assessing the quality of work, provide a clear audit trail in the assessment; communicate results timely and provide fair opportunities for appeal.

3.3.7. Continuously improve *rewarding system* as part of HRM, in accordance with objective criteria. Establish a *quality system of rewarding and motivating staff, as well as performance indicators*. Maintain appropriate level of transparency of the operation of the system.

3.3.8. Develop a policy and implement a *system to periodically measure satisfaction of staff* through conducting surveys as an "early warning system" to detect issues and trends.

3.3.9. Develop a reliable system of *Training Needs Analysis (TNA)* to determine actual training needs and guarantee effectiveness of training process. Conduct targeted random check-ups to ensure that participation in training opportunities has been decided on a need and merit basis and not based on arbitrary/subjective grounds.

3.3.10. Further *enhance the format of training*: focused practice related professional training required, especially for specialized professions, exchange of practical experience. Ensure requirements are successfully transcended to training providers and they have customized trainings according to needs. Use trainees' feedback to correct related inefficiencies.

3.3.11. Introduce a *reliable system of evaluation of training* that covers besides measuring perceptions/reaction to training, also transfer to the job and organizational impact. Communicate results to top management.

STRATEGIC OBJECTIVE 4:

Enabling external environment to promote modernisation and sustain a collective commitment to integrity by improved co-ordination with stakeholders in the public, private and NGO sectors, awareness and communication events, enhanced transparency and citizen engagement and dissemination of good practices

Activity lines and respective measures

4.1. Strengthen formal and informal consultation and communication mechanisms with key external stakeholders; promote citizens' engagement as a basis of social participation and supervision; involve media, NGOs and business groups as social partners in the integrity agenda

Rationale: Cooperation between municipal administrations and NGOs, private sector operators, media turns out a significant factor in the success of the reform and modernisation agenda. The change in the orientation of municipality from a primary emphasis on its role as enforcer and collector of revenues to one of a service-provider, incorporating effective service delivery with its revenue mobilization responsibilities, requires strong support from the local community. Such support can be sustained by a deliberate outreach program to all target groups, including periodic high-level consultative meetings.

4.1.1. Increase *transparency* and ensure *consultation with external stakeholders while developing the municipal regulations and the budget.* Use proactively diversified channels to encourage meaningful public participation and invite comments (i.e. posting of draft regulations on the website, initiation of public discussions, web based forums, focus groups, etc.)

4.1.2. Ensure stakeholders consultation to be undertaken and public submissions to be given due consideration before the release of key strategic planning and policy documents of the Municipality (i.e. Strategy of the Municipality).

4.1.3. Demonstrate a focus on integrity in the *external communication strategy*. It shall not only provide information to clients, but also promote the achievements of Municipality as far as integrity reforms are being concerned. Strengthen/focus the AC message to the external stakeholders.

4.1.4. Develop *partnerships with the civil society in anticorruption*. Develop an Integrity Outreach Program between the Municipality and well-known CSOs active in the field of anticorruption. Consider development of councils for local transparency (semi-formal organizations, acknowledged by the local public administration), that reunite at local level, the local public administration with the CSOs that have generated an increase in public administration transparency, of the civil society involvement in decisional

processes, and also an active monitoring of the public procurement process and of the budgetary exercise.

4.1.5. Establish technical *risk management working groups* sensitive and vulnerable to corruption areas and ensure the involvement of civil society as a "citizens' watch" in their functioning

4.1.6. Enhance consultation mechanisms with businesses by a deliberate *outreach program to the private sector*, including periodic high-level consultative meetings in specified areas

4.1.7. Facilitate strengthening mass media at the local level – especially radio – as a vehicle to educate citizens about their rights, as well as an outlet for investigative journalism about corruption issues. Consider partnering with relevant local associations of journalists in the integrity awareness field. Enhance the flow of information towards the media and the public concerning corruption prevention and fighting activities;

4.1.8. Enhance inter-institutional collaboration in anticorruption; through contacts with other municipalities. Consider setting up an *integrity network in the local government sector* to support information and experience sharing and build a collective commitment

4.1.9. Promote development of a grassroots civic education program in schools to raise responsible citizens.

4.2. Promote transparency as essential for enhancing the accountability and external supervision of Municipality

Rationale: Transparency and stakeholder's engagement can facilitate: better policy outcomes at lower costs; higher compliance with decisions reached, shared responsibility for service delivery, as well as co-ownership in enhancing integrity. The full transparency of regulations, decisions and implementation results, performance indicators, and statistics, will be most important in convincing the local community of the scale of the municipality's anticorruption effort.

4.2.1. Pursuant to relevant regulations, ensure that citizens and businesses are provided with *sufficient accurate, consistent, accessible and user-friendly information* to allow them to meet their obligations. To this purpose, implement a proactive approach to inform citizens through using diverse channels: i.e. leaflets, website tutorials/ helpers, etc. Maintain and regularly update the publicly available documents to describe expected standards of performance; ensure relevant regulations are displayed in user friendly format and allow easy and proper use.

4.2.2. Consider the added value of introducing *Transparency Portal* to integrate information on: relevant laws and regulations; the Code of Conduct; the Charter of Citizens' Services; annual management reports; budget execution; external audit reports; procurement; recruitment and vacancies; administrative contracts; travel and per diem; anticorruption hotline.

4.2.3. Provide citizens with *timely information via the web on the activities and decisions taken by the municipal assembly and its administrative bodies* as well as on budgets and program outcomes. Publish 'easy-to-understand budget reports' which provide a simple overview of financial operations, including public procurement contracts and asset declarations of municipal officials.

4.2.4. Monitor the implementation of the established mechanisms for the submission of citizens' inquiries and complaints (i.e. anticorruption hotline); ensure data and trends are analysed and communicated to top management. Ensure citizens are informed of the follow-up measures undertaken.

4.2.5. If necessary, provide IT-skill trainings necessary to maintain user-friendly web transparency.

4.2.6. Provide adequate and professional monitoring of the implementation of the *Law on Free Access to Information* by the Municipality.

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	Kosovo Anti – Corruption Agency responsible for implementation of specific measure	Units to coordinate implementation and institutions/o rganizations that partner	The anticipated time to complete the implementation of specific action	Indicators which serve to verify the implementation of the action	Presents the budget needed to implement the relevant action from the budget of Kosovo or different donors

STRATEGIC OBJECTIVE 1

Increased efficiency, effectiveness and transparency of the overall municipal management system through integrating integrity risk management as a core element of management responsibility to handle integrity and corruption risks

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

STRATEGIC OBJECTIVE 2

Increased effectiveness, efficiency, quality and transparency of municipal operations through optimised integrity controls at operational level

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

STRATEGIC OBJECTIVE 3

Enhanced human resources framework to lead and support integrity reforms, manage the integrity system and implement integrity objectives/ measures through significantly improving the integrity aspects of the HRM and HRD function

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

STRATEGIC OBJECTIVE 4

Enabling external environment to promote modernisation and sustain a collective commitment to integrity through improved co-ordination with stakeholders, increased quality of awareness and communication events, enhanced transparency and citizen engagement and dissemination of good practices

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