



REPUBLIKA E KOSOVËS
REPUBLICA KOSOVA | REPUBLIC OF KOSOVO
AGJENCIA PËR PARANDALIMIN E KORRUPSIONIT
AGENCIJA ZA SPREČAVANJE KORUPCIJE
AGENCY FOR PREVENTION OF CORRUPTION



Integrity Plan

(2024-2026)

Prishtina, 2023



“Integrity is the principle of continuously acting in accordance with ethical and professional values”

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GENERAL RISK AREAS

1. Leadership and Management,
2. Human Resources Policy,
3. Financial Planning and Management,
4. Storage and security of digital data
5. Public Procurement of the Agency.

SPECIFIC RISK AREAS

1. Conflict of interest,
2. Declaration of assets,
3. Gifts - Receipt, registration and disclosure thereof,
4. Whistleblowing,
5. Integrity,
6. Corruption risk assessment and assessment of corruption in legislation.

1. INTEGRITY STATEMENT (to be modified by the Director)

Based on Law No. 08/L-017 on the Agency for Prevention of Corruption, namely Article 25, all central administration bodies, independent agencies, as well as municipal authorities in Kosovo are obligated to adopt integrity plans. Furthermore, the same Law obliges the Agency for Prevention of Corruption to issue a uniform Methodology and guidelines for the preparation and implementation of Integrity Plans.

It should be emphasized that integrity is a key component of any successful organization. It is essential for maintaining public trust, preventing fraud and corruption, and ensuring compliance with legal acts.

Therefore, the Integrity Plan is a document that demonstrates the institution's commitment to integrity and sets out the policies and procedures to achieve this goal. The integrity plan should be tailored to the specific needs of the organization but generally include the following elements: defining integrity and its importance, assessing the current integrity risks of the organization, a set of goals and objectives for the integrity plan, policies and procedures to address integrity risks, as well as the process of monitoring and evaluating the effectiveness of the Integrity Plan.

Consequently, the integrity of the institution is important for several reasons. Firstly, it helps build trust with the public and stakeholders because when they trust the institution, they are more likely to engage with it, contribute, and support it. Secondly, integrity helps prevent fraud and corruption because when employees know that the institution is committed to integrity, they are less likely to engage in fraudulent or corrupt behaviour. Thirdly, integrity helps ensure compliance with laws and regulations because when organizations have clear policies and procedures in place, they are less likely to violate laws and regulations.

In conclusion, the Integrity Plan, besides being a legal requirement, is an essential tool for any institution or enterprise that wants to maintain its integrity, enhance its reputation and protect itself from fraud, corruption, and other ethical lapses.

Let us fulfil our legal obligations and contribute to a Corruption-Free Kosovo!

Yll Buleshkaj,

Director of the Agency for Prevention of Corruption

2. INTRODUCTION

Based on Article 25 of Law No. 08/L-017 on the Agency for Prevention of Corruption, all central government bodies, independent agencies, as well as municipal authorities in Kosovo are obliged to adopt integrity plans aimed at identifying sensitive processes susceptible to corrupt behaviour and actions.

As a result, the Agency for Prevention of Corruption developed and approved the Integrity Plan for the period from 1 January 2024 to 31 December 2026.


The Integrity Plan is a document that demonstrates our institution's commitment to integrity and establishes the policies and procedures to achieve this goal.


The Integrity Plan is an operational document that provides risk-based measures to achieve the Agency's integrity objectives.

The Integrity Plan reaffirms the commitment of the Anti-Corruption Agency to enhance and strengthen existing operational controls in all activities, focusing on providing efficient, transparent and citizen-oriented services. The plan describes risk-based measures to achieve the Agency's objectives and strengthen the rule of law, as well as professional values and standards.

With the aim of ensuring the comprehensive involvement of units within the institution in drafting the Integrity Plan and identifying risks from all these units, on 28.09.2023, the Director of the Agency for Prevention of Corruption established a Working Group for drafting the Integrity Plan for the Agency composed of eleven (11) members.

3. DECISION ON THE APPOINTMENT OF THE WORKING GROUP FOR THE DRAFTING OF THE INTEGRITY PLAN FOR THE AGENCY FOR THE PREVENTION OF CORRUPTION

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Në mbështetje të Nenit 12, paragrafi 1, nën-paragrafi 1.5, Nenit 25, paragrafit 2, të Ligjit Nr. 08/L-017 për Agjencinë për Parandalimin e Korrupsionit (*Gazeta Zyrtare nr. 19, datë 21.07.2022*), udhëzimeve për përpilimin dhe zbatimin e planeve të integritetit, të përcaktuara me Metodologjinë për Planet e Integritetit, të miratuar nga Agjencia për Parandalimin e Korrupsionit, me Vendimin Nr. 1476/23, të datës 26.07.2023, Drejtori i Agjencisë për Parandalimin e Korrupsionit, me datë 27.09.2023, nxjerr:

V E N D I M

Për formimin e Grupit Punues për hartimin e Planit të Integritetit për Agjencinë për Parandalimin e Korrupsionit

Doc. No.	01	No. Pres.	1790/23
Doc. No.	02	Doc. No.	28.09.2023

1. Caktohet Grupi Punues për hartimin e Planit të Integritetit, me përbërjen si në vijim:

- Milot Shala – kryesues/koordinator
- Burim Sadiku – anëtar
- Qendresa Berisha – anëtare
- Florije Retkoceri – anëtare
- Mimoza Limani – anëtar
- Frashër Murtezaj – anëtar
- Agron Behrami – anëtar
- Driton Shala – anëtar
- Sebahate Jonuzi – anëtar
- Besnik Dragusha – anëtar
- Gani Nikqi, anëtar/përgjegjës për mbikëqyrjen e zbatimit të Planit të Integritetit;


2. Obligohet grupi Punues të përgatisë një program për hartimin e Planit të Integritetit, sipas udhëzimeve dhe procedurave të përcaktuara me Metodologjinë për Planin e Integritetit, të aprovuar me Vendimin Nr. 1476/23, të datës 26.07.2023. Grupi Punues do të kujdeset që Plani i Integritetit të Agjencisë, të përfshijë të gjitha fazat dhe procedurat e hartimit të Planit të Integritetit, duke filluar nga qëllimi, rëndësia dhe mënyra e hartimit të Planit të Integritetit, deri tek monitorimi dhe mbikëqyrja e Planit të Integritetit.

3. Grupi i Punës përfundon hartimin e Planit të Integritetit jo më vonë se 10 nëntor 2023.

4. Obligohen të gjitha njësitë brenda Agjencisë për Parandalimin e Korrupsionit dhe zyrtarët për bashkëpunim dhe ofrim të të dhënave të kërkuara nga Grupi Punues. Kryesuesi i këtij Grupi Punues, sipas nevojës, mund të kërkojë angazhim të zyrtarëve të tjerë shtesë.

5. Vendimi hyn në fuqi datën e nënshkrimit.

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Arsyetim

Ky vendim nxirret me qëllim të përmbushjes së obligimeve ligjore të përcaktuara me Ligjin Nr. 08/L-017 për Agjencinë për Parandalimin e Korrupsionit (Gazeta Zyrtare nr. 19, datë 21.07.2022), në raport me detyrimet e administratës qendrore dhe agjencitë e pavarura, si dhe autoritetet komunale për miratimin e Planeve të Integritetit.

Prandaj, duke e marrë parasysh rolin dhe rëndësinë e hartimit dhe të miratimit të Planit i integritetit, si një dokument që ka për qëllim krijimin e një mekanizmi institucional, i cili do të kontribuojë në rritjen e efikasitetit dhe efektivitetit të funksionimit të institucionit, Agjencia për Parandalimin e Korrupsionit në këtë drejtim cakton grupin punues si në pikën 1 të dispozitivit të këtij Vendimi, i cili është përgjegjës që gjatë punës së tij të ketë parasysh detyrat dhe përgjegjësitë të përcaktuara si në pikën 2 të dispozitivit, si dhe të veprojë konform udhëzimeve dhe procedurave standarde të përcaktuara me Metodologjinë për Planet e Integritetit, të miratuar nga Agjencia për Parandalimin e Korrupsionit, me Vendimin Nr. 1476/23, të datës 26.07.2023.

Nga ajo çfarë u theksua në arsyetim, u vendos si në dispozitiv të këtij Vendimi.

Yll BULESHKAJ

Drejtor i Agjencisë për Parandalimin e Korrupsionit

Vendimi i dërgohet:

- Grupit Punues;
- Zyrës së Drejtorit;
- Arkivit;

4. INTEGRITY PLAN

The Integrity Plan for the Agency for the Prevention of Corruption has been developed based on the document of the Integrity Plan Methodology, adopted on 26.07.2023.

The Integrity Plan is a three (3) year internal document that identifies the corruption risk assessment and other forms that compromise integrity, as well as preventive measures. As such, the Plan serves to identify risks, analyze and assess risks, and specify measures, according to risks to achieve its integrity objectives, advance integrity performance in the public administration sector and strengthen law enforcement and professional values and standards.

The purpose of the Integrity Plan is also defined in the methodology of integrity plans:

- Identification of processes sensitive to behaviours and actions that may be corrupt;
- Effective integrity management system in the institution, aiming to comply with legal, procedural requirements and internal normative framework;
- Public accountability and transparency to ensure increased public trust in governance and the performance of public sector integrity;
- Institutional resistance to integrity compromises, through improving operational controls in the areas of institutional functioning and corruption risk work processes;
- Integrity risk management planning against the institution, focusing on areas with a high risk of integrity compromise, aiming to integrate this process into institutional culture.

5. INTEGRITY PLAN DEVELOPMENT PROCESS

The drafting of the Integrity Plan for the Agency for the Prevention of Corruption has gone through several phases:

- **Phase one:** On 28.09.2023, the Director of the Agency issued a decision to appoint the Chairperson/Coordinator, Members of the Working Group for the Preparation of the Integrity Plan, as well as the appointment of the person responsible for overseeing the implementation of the Integrity Plan.

During this state, on 02.10.2023, the Chairperson of the Working Group requested via email all members of the Working Group to provide the necessary documentation depending on their responsibilities/divisions they cover, as their analysis is necessary to identify the risk factors compromising the Agency's integrity, which will contribute to the drafting of the Integrity Plan for the Agency.

The documentation included laws, bylaws, rules on organization and systematization, various codes, guidelines, reports, financial reports, audit reports, various local and international reports for the Agency, and some media writings and other documentation.

- **Phase two:** The Working group Conducted a joint workshop on 5 and 6 October 2023, where it examined the legal regulations of all acts in order to identify risks within the institution.

In this workshop, participants were divided into two (2) groups to identify risks for general areas and specific areas, as well as measures for their elimination. At the end of the workshop, many risks and measures for their elimination were proposed.

The proposed risks and measures in this workshop were discussed again with some members of the Working Group, and some proposals were adjusted in the light of the Integrity Plan.

On 31.10.2023, the Chairperson of the Working Group circulated the Draft Integrity Plan to all members of the Working Group in order to again identify or comment on the proposed risks and measures as well as the plan in general.

- **Phase three:** After all this, the Working Group compiled risk tables and proposed measures for managing and eliminating risks, and on 7 November 2023, through the Coordinator of the Working Group, the draft Integrity Plan was submitted to the Office of the Director by email for approval.

At the end of this phase, the Director of the Agency for the Prevention of Corruption approved and published the Integrity Plan for a three (3) year period: (January 2024 - December 2026).

6. Analysis of normative acts

The Working Group conducted an analysis of all normative acts governing the work and obligations of the Agency for the Prevention of Corruption.

Legal acts analyzed:

- Law No. 08/L-017 on the Agency for the Prevention of Corruption;
- Law No. 08/L-108 Declaration, Origin and Control of Assets and Gifts;
- Law No. 06/L-011 on Prevention of Conflict of Interest in Discharge of a Public Function;
- Law No. 06/L-085 on the Protection of Whistleblowers.

The bylaws based on which the work of the Agency is organized and which are approved by the Agency:

- Regulation No. 01/2013 on Internal Organization and Systematization of Jobs in the Agency for the Prevention of Corruption;
- Code of Ethics No. 03/2013 for Employees of the Agency for the Prevention of Corruption;
- Regulation No. 01/2014 of the Agency for the Prevention of Corruption;
- Regulation No. 02/2014 on the Organization, Functioning and Management of the Archive of the Anti-Corruption Agency;
- Regulation No. 01/2018 on Amending and Supplementing the Rules of Procedure No. 01/2014 of the Agency for the Prevention of Corruption;
- Regulation No. 01/2019 on Amending and Supplementing Regulation No. 01/2013 on Internal Organization and Systematization of Jobs in the Agency for the Prevention of Corruption;


7. RISK INTENSITY ASSESSMENT MATRIX

Consequence/Impact	High	10																		
		9																		
		8																		
	Medium	7																		
		6																		
		5																		
		4																		
	Low	3																		
		2																		
		1	2	3	4	5	6	7	8	9	10									
Risk intensity (probability X impact)		Low			Medium				High											
		Probability/Likelihood																		


The risk intensity is obtained by multiplying the probability/likelihood by the consequence/impact, using the Risk Matrix, “impact (1-10) x consequence (1-10)”, as shown in the figure above.

The overall risk assessment of integrity compromise is evaluated on a scale from 1 to 100, as shown in the table below:


Low	Medium	High
1 - 15 points	16 - 48	49 - 100

 **Low-intensity risk** - The possibility of compromising integrity or other forms of integrity damage is very low due to existing control measures (the risk has not occurred in the past or occurs very rarely, so it is unlikely to occur in the same time period in the future).

Risk occurrence impact assessment - The impact on the institution's integrity is insignificant.

 **Medium-intensity risk** - The occurrence of integrity compromise or other forms of integrity damage is possible, but control measures manage this risk (the risk has occurred in a number of cases in the past, so the probability of it occurring in the same time period in the future is moderate).

Risk occurrence impact assessment - The impact on the institution's integrity is significant.

 **High-intensity risk** - Integrity compromise or other forms of integrity damage are already present in this process or are likely to occur (the risk has occurred frequently in the past and there is a high likelihood of it occurring in the same time period in the future).

Risk occurrence impact assessment – The impact on the institution's integrity is highly significant.

8. MONITORING AND REPORTING ON THE IMPLEMENTATION OF THE INTEGRITY PLAN

The implementation of the Integrity Plan will be continuously monitored through appropriate mechanisms, by the officer responsible for overseeing the implementation of the Integrity Plan. It will be periodically reviewed and updated in accordance with relevant normative, institutional, procedural and personnel developments within the external and internal environment of the Agency.

Ongoing monitoring of implementation is crucial to ensure that integrity risk control and treatment measures are effective, both in design and operation and that procedures are understood and that the Integrity Plan is followed.

Additionally, monitoring should determine whether the measures used for risk treatment have produced the planned effects, have detected changes in the external and internal context, including changes in the risk itself that require a review of treatment and risk priorities and have identified lessons to be learned for future planning.

Regular reporting ensures that the implementation of the Plan is done in accordance with the schedule and that the planned results have been achieved. The person responsible for implementing the Integrity Plan reports on the implementation of the Integrity Plan every six (6) months within the institution.

Reporting should be done on the implementation of measures in the following manner:

1. The measure was implemented at the right time;
2. The measure was implemented after the deadline;
3. The measure has been implemented periodically.

9. HAZARD IDENTIFICATION MATRIX

GENERAL RISK AREAS									
Risk identification			Risk intensity			Risk measures			
No.	Risk area	Risk description	Existing control measures	Probability	Impact	Risk assessment	Measures proposed for reducing and eliminating risks	Responsible unit/officer	Deadline for implementation
1.	Leadership and Management	Violation of the principle of transparency	Laws and bylaws	3	5	15	Full transparency of decision-making procedures in all areas under the jurisdiction of institution through their publication on the APC website	Director of APC	Ongoing
2.	Human recourses policy	Unclear, inadequate and out-of-date employee job descriptions	Legal acts and internal bylaws	3	7	21	Review and standardization of job duties, as well as harmonization with the Regulation on Internal Organization and Systematization of Jobs.	Director of APC and Human Resources Unit	Ongoing
		Partial identification		4	5	20	Organization of specific	Director of APC and	Ongoing

		and lack of adequate professional training					professional training based on requirements.	Human Resources Unit	
3.	Finance Planning and Management	The process of donation, disposal of non-financial assets	There are no ongoing procedures.	7	7	49	Drafting an internal act for the donation and disposal of non-financial assets	Director of APC and the Department of Finance and General Services	6 months
		Inadequate budget planning	Laws, bylaws; and internal acts of the institution	5	6	30	Ensure the participation of all relevant parties during budget planning		Ongoing
		Physical storage of official documents.	Lack of sufficient space.	4	6	24	Provision of archive space.		12 months
4.	Storage and security of digital data	Non-classification of data and access control.	Lack of an internal APC act on the data classification and storage.	7	8	56	Drafting of an internal act on the electronic data classification and storage.	Director of APC and IT Unit	12 months
		Ensuring the security of electronic data and digital services of APC.	Lack of sufficient technological resources and IT staff.	3	6	18	Recruitment of IT staff, and establishment of a separate IT unit for continuous professional oversight.	Director of APC and IT Unit	2 years
5.	Public Procurement of the Agency	Inefficient preparation of technical specifications	Laws and bylaws	4	5	20	Identification of training needs for officers involved in public procurement procedures	Human Resources Unit	Ongoing

SPECIFIC RISK AREAS

Risk identification			Risk intensity				Risk measures		
No.	Risk area	Risk description	Existing control types	Probability	Impact	Risk assessment	Measures proposed For reducing and eliminating risks	Responsible unit/officer	Deadline for implementation
1.	Conflict of interest	Lack of specific criteria for case allocation.	The current Rules of Procedure, besides proportional case allocation, do not specify other specific criteria for case allocation.	7	9	63	Define specific criteria (standards) for case allocation to be determined with the drafting of the new regulation.	DPCI and the Director of APC	6 months
		Difficulties in fulfilling the work plan due to staff shortages	There is a Regulation on Organization and Systematization of Jobs, but the positions foreseen by this regulation are not filled.	6	6	36	Filling vacant job positions according to the applicable regulation and adding new positions in line with the dynamics and the new work plan		9 months
		Lack of special Regulation on Prevention of Conflict of Interest within APC	There is a Draft Regulation	4	6	24	Approval of the special Regulation on Prevention of Conflict of Interest for APC officers.		6 months

		Lack of formal criteria for case admissibility	The current Rules of Procedure do not define formal criteria for admissibility of cases	5	7	35	Establishing formal admissibility criteria, with the drafting of the special regulation on administrative investigations.		12 months
		Lack of a functional electronic system for CI	The old database is not suitable according to the new law	4	7	28	Development of a special module for DPCI in the DMSA system		12 months
2.	Declaration of assets	Lack of regulation for conducting full control and developing procedures in DPC	The current Rules of Procedure do not define specific criteria for full control	7	7	49	Drafting of the regulation with the required specifications.	DPC/ Director of APC	6 months
		Difficulties in fulfilling the work plan due to staff shortages	The new Law on Declaration of Assets has increased the number of declaring entities, while the staff remains the preliminary one.	4	5	20	Recruitment of additional staff		9 months

		Storage and archiving of asset declaration files	Currently, files are kept in inadequate places with many people having access to them	5	7	35	Establishment of infrastructure for archiving and digitalization thereof	Director of APC	12 months
		Lack of adequate development of the DMSA system	DMSA not completed	5	7	35	Development and functionalization of modules in DMSA for the DPC needs		3 months
3.	Gifts - Receipt, registration and disclosure thereof	Lack of the APC regulations/guidelines on gifts	Non-existent	7	9	63	Drafting of special regulations/guidelines on gifts	DPC/ Director of APC	6 months
		Storage and recording of gifts	Only one responsible officer is storing them in an inadequate office	4	6	24	Designate a special corner for their storage and disclosure in accordance with the law.	Director of APC	6 months
		Lack of an electronic system for the identification of gifts.	The current database is not suitable to be used for gift registration purposes	4	5	20	Inclusion of gift declaration in the DMSA system		6 months
4.	Whistleblowing	Confidentiality of information and identity of the whistleblower reporting to APC, via e-mail and phone.	Statement on the preservation of official secrecy Law No. Law No. 08/L-017 on the Agency for the	6	8	48	Creating a special - email for receiving whistleblower cases. Establishing a special phone line for receiving whistleblower cases.	Department for Combating Corruption/W whistleblower Protection Unit	9 months

			<p>Prevention of Corruption</p> <p>Law No. 06/L-085 on the Protection of Whistleblowers</p> <p>Regulation (GRK) - No. 03/2021 on Determining the Procedure for Receiving and Handling Cases of Whistleblowing</p>					
		Non-compliance with the deadlines and procedures for dealing with cases	<p>Law No. 06/L-085 on the Protection of Whistleblowers and Regulation (GRK) - No. 03/2021 on Determining the Procedure for Receiving and Handling Cases of Whistleblowing</p>	7	8	56	<p>Strengthening the control system of:</p> <ul style="list-style-type: none"> - Notifications on the acceptance or rejection of whistleblower cases; - Decisions on the continuation of the administrative investigation procedure; - Notifications on the continuation of the administrative investigation procedure; - Notifications on the completion of the administrative 	Ongoing

							investigation procedure.		
		Lack of adequate professional experience among the officers responsible for receiving and handling cases.	Law and relevant regulation on whistleblowing Employer discretion in appointing the officer responsible for receiving and handling cases.	5	5	25	Enhancing the capacities of responsible officers through adequate training for processing and handling whistleblower cases. Improving cooperation between the APC and responsible officers regarding the sharing of best practices.		Ongoing
5.	Integrity	Monitoring and reporting on the implementation of Integrity Plans	There is no regulatory act for reporting and monitoring of Integrity plans	4	6	24	Approval of a Methodology by APC for reporting and monitoring Integrity Plans.	The unit responsible for Integrity and the Director of APC.	6 months
		Lack of adequate professional experience	The current staff lack sufficient experience.	4	4	16	Advancing professional capacities and increasing human resources		Ongoing
6.	Corruption risk assessment and assessment of corruption in legislation	Lack of adequate professional experience	Performance evaluation	6	7	42	Organization of appropriate training sessions/roundtables or workshops	Responsible Unit and Human Resources	Ongoing

