



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



INTEGRITY PLAN METHODOLOGY

Pristina, July 2023



Dear colleagues,

Pursuant to the Law No. 08/L-017 on the Agency for Prevention of Corruption, respectively Article 25, all central administration bodies, independent agencies, and the municipal authorities of Kosovo are obliged to adopt the integrity plans. While the same law obliges the Agency for Prevention of Corruption to issue uniform methodology and instructions for 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.

Hence, the integrity plan is a document that shows the commitment of the institution to integrity and defines the policies and procedures that will be used to achieve this goal. The integrity plan should be adapted to the specific needs of the organization, however, it should generally include the following elements: definition of integrity and its importance, assessment of the organization's current integrity risks, a set of goals and objectives for the integrity plan, policies and procedures to address integrity risks, and the process of monitoring and evaluating the effectiveness of the integrity plan.

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

Finally, the integrity plan, in addition to 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's implement the legal obligations and contribute to corruption-free Kosovo!

Yll Buleshkaj,

Director of the Agency for Prevention of Corruption

Table of Contents

Legal basis for development and implementation of Integrity Plans in Kosovo.....	3
Definition of terms	3
1. The concept, objective and purpose of the Integrity Plan.....	5
1.1. What is Integrity Plan?	5
1.2. Objective of the Integrity Plan.....	5
1.3. Purpose of the Integrity Plan.....	5
2. Content of the integrity plan.....	6
3. Process of drafting the Integrity Plan	6
4. Institutional Risk Assessment Process.....	7
4.1 General risk assessment.....	8
4.2. Risk priorities	8
5. Selection of measures.....	9
6. Deadline for the implementation of measures.....	9
7. Structure of the Integrity Plan.....	9
8. Adoption of the Integrity Plan.....	10
9. Responsible person for reporting the implementation of the Integrity Plan	10
10. Reporting on the implementation of Integrity Plan	10
11. Integrity Plan Review	11
12. Monitoring and supervision of the Integrity Plan	11
13. Conclusion section	12
Annex No. 1 Risk Assessment Matrix	13
Annex No. 2 – The decision model for the appointment of the Working Group for the drafting of the Integrity Plan.....	14
Annex No. 3- Program for drafting and implementing the Integrity Plan	16
Annex No. 4 - Minutes of the of the Working Group meeting for drafting of Integrity Plan	18
Annex No. 5 – Notification to employees.....	19
Annex No. 6- Decision on the approval of the Integrity Plant	21

LEGAL BASIS FOR DEVELOPMENT AND IMPLEMENTATION OF INTEGRITY PLANS IN KOSOVO

Law No. 08/L-017 on the Agency for Prevention of Corruption (hereinafter: Law), obliges the Agency for Prevention of Corruption (hereinafter: APC) to issue uniform methodology and instructions for the preparation and implementation of Integrity Plans.

Article 25 of the Law obliges the central administration bodies, independent agencies, as well as municipal authorities of Kosovo, to approve integrity plans six (6) months after the approval of the Integrity Plan Methodology by the Director of the Agency for Prevention of Corruption. After the approval of the Integrity Plan, the institutions have 30 days to submit it to the Agency.

According to the Law, the Integrity Plans of the institutions mentioned in Article 25 must contain the following elements:

- a self-assessment on the exposure of the institution to corruption and other forms of violation of integrity;
- information on the scope of work of the institution and human resources engaged in the institution;
- types of risks of corruption and other forms of violation of integrity;
- existing control measures;
- prevention measures for reduction of the risk of corruption and other forms of violation of integrity and deadlines for their application;
- information on the person responsible for the management of drafting and implementation of the integrity plan;
- other data, in accordance with the instructions for drafting and implementation of the integrity plan.

DEFINITION OF TERMS

Integrity: individual honesty, behaviour in accordance with moral values and principles, institutional integrity, compliance and consistency in actions.

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

Risk in the context of the Integrity Plan: the possibility of damage occurring due to a current or future event, which endangers the integrity of an institution, i.e. impact on the emergence of corruption, unacceptable ethical and professional practices and other irregularities.

Risk impact: the value of damage to the protected public good or value (risk impact can be low, medium or high).

Risk probability-likelihood: the consequence of damage caused to a protected good or public value (the risk can be low, medium or high).

Risk assessment: assessment of the current state of exposure of an institution to a specific risk in a given area, of a low, medium or high intensity, and results from the risk assessment impact and risk probability.

Current risk management measure: eventual measure applied by an institution, which serves to reduce the risks of corruption in a given area.

Improvement measure: measure which, after evaluating the current risk management measures, can reduce the risk of corruption in a given area/process.

Activity: actions to be taken to implement the improvement measure.

Area: a key area in functioning of an institution, i.e. in the implementation of its mandate, which due to its nature may be exposed to a risk of corruption.

Process: a set of interrelated activities required to operate within an area, e.g. competence, while process is a more specific term than area i.e. each area consists of a set of related processes (risk).

Questionnaire: is a research instrument designed to collect the necessary information to achieve the intended research goals.

1. THE CONCEPT, OBJECTIVE AND PURPOSE OF THE INTEGRITY PLAN

1.1. What is Integrity Plan?

Integrity Plan is a three (3) year internal document, which determines the corruption risk assessment and other forms that violate integrity and the preventive measures. As such, the Integrity Plan serves to identify risks, to analyse and assess risk and to specify measures according to risks in order to achieve its integrity objectives, advance integrity performance in the public administration sector and strengthen the rule of law and the professional values and standards.

The Integrity Plan must be reviewed periodically and updated in accordance with relevant normative, institutional and procedural developments.

1.2. Objective of the Integrity Plan

The objective of the Integrity Plan is:

- Simplifying or eliminating complicated and unnecessary procedures;
- Avoiding conflict of interest situations;
- Supervising and reducing of discretionary rights of managers;
- Monitoring transparency at work;
- Establishing standards;
- Creating of a more efficient internal control system;
- Eliminating of practices inconsistent with regulations;
- Creating an accountable organizational culture;
- Ethical behaviour of managers and employees.

1.3. Purpose of the Integrity Plan

The purpose of the Integrity Plan is:

- Identification of processes sensitive to behaviours and actions that may be corruptive;
- Effective integrity management system in the institution, which aims to comply with legal, procedural requirements and the internal normative framework;
- Public accountability and transparency to ensure the increase of public trust in governance and in the integrity performance of the public sector;
- Institutional resistance to integrity violations, through the improvement of operational controls in the function areas of the institution and work processes with a risk of corruption;

- Integrity risk management planning in the institution, with a focus on areas with a high risk of integrity violations, aiming to integrate this process into the institutional culture.

2. CONTENT OF THE INTEGRITY PLAN

The Integrity Plan contains areas which are considered to be more exposed to the corruption risks and the integrity violation forms. In the process of developing a plan, the identified areas are divided as follows:

- a) **Common areas** – include the following areas:
 - Human Resource Management;
 - Public Resources and Public Finance Management;
 - Information Technology Security;
- b) **Specific areas** refer to the scope and specific competencies of each institution.

3. PROCESS OF DRAFTING THE INTEGRITY PLAN

The process of drafting the Integrity Plan begins with the appointment of the Coordinator and members of the Working Group for development of the Integrity Plan by the head/responsible person of the institution.

Drafting of the Integrity Plan goes through several phases:

- **First phase:** The head/responsible person of the institution takes a decision on the appointment of a Coordinator and Working Group for drafting the Integrity Plan. This Working Group consists of a reasonable number of members, depending on the complexity of the institution or the number of employees. The Working Group examines the legal framework (regulations, plans, internal audit control, systematization and description of jobs, as well as other sources of information concerning work areas and processes).
- **Second phase:** The Working Group prepares a comprehensive questionnaire, and conducts interviews in order to process the self-assessment survey. Based on the results of the questionnaire, identification of risks and risk areas are determined.
- **Third phase:** The Working Group uses the data provided to draft the risk tables, address the integrity vulnerability and to propose improvement measures. Finally, the institution publishes the Integrity Plan and approves the measures to improve the integrity for the period of three (3) years.

4. INSTITUTIONAL RISK ASSESSMENT PROCESS

The institution through a structured self-assessment process realizes:

- a) **Identification of risks** in work processes, human resources and institutional organization exposed to integrity violations. This phase ends with a comprehensive list of risks affecting the activities of the institution.
- b) **Assessment of risks** determines the probability of occurrence and consequences of integrity violation and other forms of illegal behaviour.

Through the risk assessment, the possibility of occurrence and the level of consequence are determined, which can be: low/medium/high. The final level of risk is determined according to the risk matrix, in the combination form between possibility and consequence.

Figure 1. Risk assessment matrix


Consequence / Impact	High	10																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
----------------------	------	----	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

The risk intensity is obtained by multiplying the probability/likelihood with the consequence/impact, using the risk matrix, "impact (1-10) x consequence (1-10)", shown in the Figure above.


4.1 General risk assessment

The general risk assessment of the integrity violation is evaluated from 1 to 100, as shown in the table below:


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

 **Low intensity risk** – the occurrence of integrity violation or other forms of integrity damage is very small due to existing control measures (risk has not appeared in the past or appears very rarely, so it is unlikely that this will happen in the future).

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

 **Medium intensity risk** – the occurrence of integrity violation or other forms of integrity damage is possible, however the control measures can manage such risk (the risk has occurred on a number of occasions in the past, so the probability of occurrence in the same time period in the future is moderate).

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

 **High intensity risk** – the integrity violation or other forms of integrity damage are already present in the process or are likely to occur (the risk has occurred frequently in the past and there is a high probability that this will occur in same time period in the future).

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

4.2. Risk priorities

Risk priority implies the ranking of integrity risks, ranging from the most primary risks that have a substantial impact on the integrity of the institution and that may jeopardize its effectiveness and reputation, to low risks that may not need measures but it suffices to be monitored continuously.

After determining the possibility of occurrence of risks and the consequences of risks, the risk level is determined by determining all risks identified and assessed, according to the risk matrix (in Figure No. 1). The ranking of risks is done according to importance, and includes the assessment between the possibility of occurrence or occurrence of a risk and its impact / impact on the integrity of the institution.

5. SELECTION OF MEASURES

Based on the identification and assessment results, and risk priorities, the Working Group chooses the adequate appropriate measures to meet the following goals:

- Strengthening transparency;
- Proactive publication of information on websites;
- Implementation of legal obligation for access to public documents;
- Transparency in decision-making;
- Transparency in budget funds expenditure process;
- Elimination of external impact on the performance of employees;
- Protection of personnel who report corruption, conflict of interest, other forms of illegal or unethical behaviour,
- Implementation of code of ethics;
- Recording of gifts receives by employees;
- Other measures to improve integrity.

6. DEADLINE FOR THE IMPLEMENTATION OF MEASURES

The deadlines for the implementation of measures must be set in accordance with the risk intensity, or in accordance with the fact that the risk is of low, medium or high intensity.

Deadlines can be set in two ways:

- a. By specifying an explicit deadline, such as approval of an internal act,
- b. By choosing a periodic deadline, such as determining the deadline for the achievement/implementation of measures.

7. STRUCTURE OF THE INTEGRITY PLAN

The structure of the Integrity Plan must contain measures that affect the reduction of corruption risks and other forms of integrity violation during various work processes within the institution, defined by columns for data input regarding the following:

- Area of risk;
- Description of risk;
- Existing control measures and their efficiency in overcoming risks;
- Consequence assessment results and the probability of the risk occurrence;
- Anticipated measures for risk elimination/mitigation;
- Person responsible for the implementation of measures;
- Deadline for the implementation of measures.

8. ADOPTION OF THE INTEGRITY PLAN

The coordinator/head of the Working Group presents the Integrity Plan to the Head/Responsible person of the institution with the adoption proposal.

After reviewing and addressing possible remarks, the Head/ Responsible person of the institution signs the adoption of the Integrity Plan.

The Head/Responsible person of the institution informs the employees about the adoption of the Integrity Plan.

The adoption decision and the Integrity Plan will be submitted to the Agency for Prevention of Corruption not later than thirty (30) days from the day of approval.

9. RESPONSIBLE PERSON FOR REPORTING THE IMPLEMENTATION OF THE INTEGRITY PLAN

The responsible person for reporting the implementation of the Integrity Plan is appointed by the Head/Responsible Person of the Institution. The decision on the appointment of the responsible person, with the necessary contact details, will be submitted to the Agency, along with the decision on the adoption of the Integrity Plan.

All employees are obliged to inform the responsible person about the situation, actions, measures for which they are engaged to perform.

At least once a year, at the request of the head of institution, the responsible person must submit a report on the implementation of the Integrity Plan.

10. REPORTING ON THE IMPLEMENTATION OF INTEGRITY PLAN

The responsible person for the implementation of Integrity Plan shall report every six (6) months to the Agency for Prevention of Corruption regarding the implementation of the Integrity Plan.

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

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

For measures that have not been implemented, the potential answers will be as follows:

1. The measure was not implemented due to inadequate process management;
2. The measure was not implemented due to inadequate institution management;

3. The measure has not been implemented due to the lack of human resources;
4. The measure was not implemented due to lack of budget;
5. The measure was not implemented due to other reasons;
6. The measure was not implemented because the deadline for the implementation of measures has not yet been reached.

For those reporting on the implementation of measures, it is important to distinguish between inadequate process management and inadequate institution management. The first reason places the responsibility on managers and/or employees in individual organizational units of the institution, who, for whatever reason, have not taken the appropriate actions to comply with the measure. The other reason indicates that the non-implementation of measures is the responsibility of the head of institution, who for whatever reason has not foreseen that the activities leading to the observance of the measures are fully implemented.

11. INTEGRITY PLAN REVIEW

The Integrity Plan can be amended, in accordance with the institution needs, developments and interests.

The Integrity Plan review is done annually, in accordance with Article 25.5 of the Law, taking into consideration the implementation results of the proposed risk reduction measures.

After the review, the measures that proved insufficient in practice are removed and new measures are introduced.

12. MONITORING AND SUPERVISION OF THE INTEGRITY PLAN

Agency for Prevention of Corruption has a legal mandate to monitor and supervise the implementation of Integrity Plans, and from direct control in institutions, it can develop the administrative investigation procedure of reports on the implementation of Integrity Plans that a particular institution will submit to the Agency, and subsequently, it can provide opinions/recommendations for the prevention of corruption and other forms of integrity violation.

The institutions envisaged by law shall be obliged to draft and submit to the Agency the annual report on the implementation of the Integrity Plan prior to January 31 of the following year.

The Agency drafts an annual report on the monitoring of Integrity Plans.

13. CONCLUSION SECTION

The institutions, in accordance with this Methodology, will adopt integrity plans within six months from the date when the methodology is published in the Official Gazette of the Republic of Kosovo. The adopted plan is submitted to the Agency in the required format.

The detailed method of recording and submitting the integrity plan and the report on the implementation of the integrity plan in physical/electronic form is regulated by a separate decision/instruction.

This Methodology will enter into force on the date it is published in the Official Gazette of the Republic of Kosovo.

The annexes attached will be an integral part of this Methodology

ANNEX NO. 1 RISK ASSESSMENT MATRIX

[illegible]

ANNEX NO. 2 – THE DECISION MODEL FOR THE APPOINTMENT OF THE WORKING GROUP FOR THE DRAFTING OF THE INTEGRITY PLAN

Name of institution: _____

Number: _____

Date: _____

Venue: _____

Pursuant to Article 25 of Law No. 08/L-017 on the Agency for Prevention of Corruption (*Official Gazette of the Republic of Kosovo / No. 19 / 21.07.2022*), instructions for preparation and implementation of Integrity Plans, determined with the Integrity Plans Methodology and approved by the Agency for Prevention of Corruption, on ..., the Head of the institution issues:

DECISION

1. Appointing the Working Group for drafting of the Integrity Plan, in accordance with the preparation and implementation of Integrity Plans, consisting of:

- Mrs., Mr., (name and surname), _____ (position) coordinator/chairman;
- Mrs., Mr., (name and surname), _____ (position) member;
- Mrs., Mr., (name and surname), _____ (position) person responsible for supervision the implementation of Integrity Plan;

2. The Working group shall be obliged to prepare a program for drafting of the Integrity Plan, through which it shall inform the employees on the purpose, importance and method of drafting the Integrity Plan, evaluate the current situation of functioning of the institution and analyse the existing measures for corruption risk management, assess the corruption risk intensity, propose deadlines and persons responsible for the implementation of improvement measures that mitigate the corruption risks, as well as inform employees about the situation in the institution by assessing the corruption risk intensity and the implementation plan for remedy measures. The Working Group may include other employees of the institution in drafting of the Integrity Plan.

3. The Working Group shall complete drafting of the Integrity Plan not later than _____.

4. The responsible person for approval of the Integrity Plan is _____ (Head of the institution).

5. This Decision shall enter into force on the day of its approval.

R e a s o n i n g

This Decision is issued in order to meet legal obligations defined by the Law No. 08/L-017 on the Agency for Prevention of Corruption (*Official Gazette no. 19, dated 21.07.2022*), in relation to the obligations of the central administration and independent agencies, as well as municipal authorities for the approval of Integrity Plans.

Therefore, taking into account the importance and purpose of drafting and approving the Integrity Plan, as a document which presents the self-assessment result of the institution exposed to corruption and other forms of integrity violation, the purpose of which is to maintain and improve the integrity of the institution by simplifying procedures, strengthening accountability, control and discretionary powers, education, strengthening ethics, creating an effective control system and eliminating inefficient practices.

The Working Group, as in point 1 of the enacting clause of this Decision, shall be responsible to take into account all the duties and responsibilities defined under point 2 of the enacting clause, as well as to act in accordance with instructions and standard procedures defined by the Integrity Plans Methodology approved by the Agency for Prevention of Corruption, on.... All this, with the aim of establishing an institutional mechanism, which will contribute to increasing the efficiency and effectiveness of the institution operations.

In view of the aforementioned reasoning, it is decided as in the enacting clause of this Decision.

(The Head of Institution)

The decision is sent to:

- *Members of the Working Group;*
- *Agency for Prevention of Corruption;*
- *Archives;*

ANNEX NO. 3- PROGRAM FOR DRAFTING AND IMPLEMENTING THE INTEGRITY PLAN

Institution:

Responsible person:

Members of the Working Group:

Approval date:

Start date:

Step 1

No.	Drafting phases	Activity	Responsible person	Meeting date	Deadline
1	Preparatory phase	The Head by decision appoints the Working Group	Head of Institution		
2		Working Group prepares the Integrity Plan and Implementation Program	Working Group		
3		Informing workers about the Integrity Plan	Working Group		

Step 2

No.	Development phase	Measure/ Activity	Responsible person	Meeting date	Deadline
1	The assessment and improvement rate of the current work situation - risk exposure assessment	Preparing the questionnaire	Working Group		

2		Developing the Integrity Plan	Working Group		
3		Informing workers about the Integrity Plan	Working Group and Head of Institution		

Step 3

No.	Development phase	Measure/ Activity	Responsible person	Meeting date	Deadline
1					
2		Drafting of final report	Working Group		
3		Appointment of a person responsible for implementation of the Integrity Plan	Head of Institution		

**ANNEX NO. 4 - MINUTES OF THE OF THE WORKING GROUP MEETING FOR
DRAFTING OF INTEGRITY PLAN**

Meeting Date:

Venue:

Present:

Absent:

Meeting commenced at _____.

Agenda:

Next meeting date _____

Meeting ended at _____.

The Working Group Coordinator

ANNEX NO. 5 – NOTIFICATION TO EMPLOYEES

Honourable,

We would inform you that _____ (name of the institution) has started drafting of the Integrity Plan, in accordance with Article 25 of the Law No. 08/L-017 on the Agency for Prevention of Corruption (*Official Gazette of the Republic of Kosovo / No. 19 / 21.07.2022*), in relation to the obligations of the central administration and independent agencies, as well as municipal authorities for the approval of Integrity Plans. Therefore, concerning our obligations for drafting of Integrity Plan within the legal deadlines, the deadline for drafting of the Integrity Plan is _____.

Taking into account the concept and purpose of drafting the Integrity Plan, a document which presents the self-assessment result of the institution, exposure to risks of the emergence and development of corruption and other irregularities, the establishment of such mechanism will ensure efficiency and effectiveness in the operation of the institution, increasing responsibility and accountability, simplifying complicated procedures, increasing transparency and accountability in decision-making, controlling discretionary powers, strengthening ethics, eliminating inefficient practices and unenforceable regulations, thus building an efficient supervisory and control system.

Drafting of the Integrity Plan will be carried out in three phases:

First phase is a preparatory phase in which the Head of the Institution takes a decision on drafting and implementation of the Integrity Plan and appoints a Coordinator, Working Group members and a person responsible for implementation of the integrity plan.

Second phase is concerning the assessment of the current situation of the institution areas exposed to risk and the development of unacceptable practices from the ethical and professional point of view, corruption and other irregularities. The assessment phase includes determining the existence of appropriate measures to eradicate the risk of corruption, including employees in the institution.

Third or final phase is designed to define the measures, deadlines and persons responsible for the implementation of measures. After the approval of the Integrity Plan, the Head of the Institution appoints a person responsible for its implementation. The responsible person monitors the process, efficiency and results of the implementation of measures proposed for the integrity of the institution.

On _____, we commenced the first phase of drafting the Integrity Plan, approving the decision on drafting and implementing the Integrity Plan and appointing the Working Group members. The appointed Working Group members are:

Working Group shall prepare a program for drafting the Integrity Plan, shall notify the employees on the purpose, importance and manner of development of Integrity Plan, and on the assessment of the current state of risk exposure in the areas of operation of the institution.

At the assessment phase of the institution exposure to risks and emergence and development of corruption and other irregularities, in case of proposing additional appropriate measures and activities to reduce and eradicate the identified risks, the Working Group Coordinator may include employees from the institution various operation areas.

In drafting of the Integrity Plan, it is important to ensure the participation of the employees considering that they know the functioning of the work processes they perform, they can assess the risks in the best way, and they can propose adequate measures to prevent and eradicate such risks.

During the second phase, the employees and officials will complete an anonymous questionnaire which will be determined later.

(Venue and date)

Working Group shall prepare a program for drafting the Integrity Plan, shall notify the employees on the purpose, importance and manner of development of Integrity Plan, and on the assessment of the current state of risk exposure in the areas of operation of the institution.

At the assessment phase of the institution exposure to risks and emergence and development of corruption and other irregularities, in case of proposing additional appropriate measures and activities to reduce and eradicate the identified risks, the Working Group Coordinator may include employees from the institution various operation areas.

In drafting of the Integrity Plan, it is important to ensure the participation of the employees considering that they know the functioning of the work processes they perform, they can assess the risks in the best way, and they can propose adequate measures to prevent and eradicate such risks.

During the second phase, the employees and officials will complete an anonymous questionnaire which will be determined later.

(Venue and date)

ANNEX NO. 6- DECISION ON THE APPROVAL OF THE INTEGRITY PLAN

Name of the institution: _____

Number: _____

Date: _____

Venue: _____

Pursuant to Article 25 of Law No. 08/L-017 on the Agency for Prevention of Corruption (*Official Gazette of the Republic of Kosovo / No. 19 / 21.07.2022*), instructions for preparation and implementation of Integrity Plans, determined with the Integrity Plans Methodology and approved by the Agency for Prevention of Corruption, on ..., the Head of the institution issues:

DECISION

1. Approving the Integrity Plan drafted by the Working Group, and determined with Decision No... on...
2. Mrs./Ms., _____ (name and surname), _____ (job position), is appointed as responsible person for monitoring the implementation of the Integrity Plan.
3. This decision enters into force on the day of its approval.

Reasoning

This Decision is issued in order to meet legal obligations defined by the Law No. 08/L-017 on the Agency for Prevention of Corruption (*Official Gazette no. 19, dated 21.07.2022*), in relation to the obligations of the central administration and independent agencies, as well as municipal authorities for the approval of Integrity Plans.

In this regard, according to the instructions for preparation and implementation of integrity plans of the Integrity Plans Methodology, approved by the Agency for Prevention of Corruption, on ..., the Head of the institution issues a decision on the approval of the Integrity Plan, drafted by the working group, determined with Decision No..., of..., highlighted as in point 1 of the enacting clause of the Decision.

Ms./Ms., in accordance with point 2 of the enacting clause of this Decision, a person responsible for monitoring the implementation of the Integrity Plan is appointed, who shall be responsible to monitor the process in accordance with the integrity plan, the implementation of improvement measures by the institution, to prepare indicators for efficiency assessment and evaluation of the results of the measures proposed for the improvement of integrity.

In view of the aforementioned reasoning, it is decided as in the enacting clause of this Decision.

(The Head of Institution)

The decision is sent to:

- Members of the Working Group;
- Responsible person;
- Agency for Prevention of Corruption.