

CHALLENGES OF LOCAL GOVERNMENT UNITS IN THE FIGHT AGAINST CORRUPTION

*An Assessment of the
Anti-Corruption System in
20 Municipalities of Albania*

Project: CIVILISC – Civil Society Instruments against Corruption, implemented by the Institute for Democracy and Mediation in collaboration with RiskMonitor Foundation, Bulgaria.

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EXECUTIVE SUMMARY

Over the past two years, Albania has reviewed and adopted a number of legal and policy measures related to the fight against corruption and the organization and functioning of local governance. The Crosscutting Anti-Corruption Strategy 2015-2020¹ and its Action Plan foresee a set of actions aiming to strengthen the role of the civil society and increase the participation and cooperation of citizens therein. In addition, the new territorial division² and National Crosscutting Strategy for Decentralization and Local Governance³ call for an effective local administration capable of managing the new responsibilities at municipal level, including the fight against corruption.

Similar to the newly-established local government units (LGUs), civil society is coping with significant challenges in improving good governance and anti-corruption efforts at local level. These challenges and concerns, particularly in view of capacities, knowledge and resources, are more pressing in small and medium local government units.

The fight against corruption at local level should include all societal players and, in this context, the engagement of civil society organizations (CSOs) in anti-corruption initiatives remains a powerful tool to invigorate such efforts under a participatory approach.

1 Approved by Council of Ministers' Decision No. 247, dated 03.20.2015

2 Law No. 115/2014 "On Administrative-Territorial Division of the Local Government Units in the Republic of Albania"

3 http://www.ceshtjetvendore.gov.al/files/pages_files/Decentralisation_Strategy_Final_-_Feb_2015_-_English.pdf

Small/medium LGUs in Albania have not developed instruments (which derive from the current legislation) to tackle and prevent corrupt practices within their municipality. They also lack a clear framework of measures to increase collaboration with local CSOs. Both CSOs and LGUs require capacities to establish and develop relevant mechanism to fight against corruption. While in certain LGUs local CSOs need to enhance their organizational capacity and human resources, in a significant number of small LGUs the civil society organizations are almost non-existent.

Local government units should take immediate action to establish anti-corruption instruments and develop administrative capacity to implement and measure the impact of anti-corruption legal and policy framework. On the other hand, local CSOs should focus their work towards anti-corruption and good governance actions and work to improve their collaboration and cooperation with LGUs.

1. INTRODUCTION

Corruption is a crucial issue for overall society and the fight against it is one of the greatest challenges of governments and society as a whole. It is a dynamic and constant “battle”, which cannot be won only by creating the relevant policy frameworks.

The fight against corruption is one of the five key priorities identified by the European Commission as a condition for the opening Albania’s accession negotiations. National documents⁴ approved by the government in the framework of Albania’s European integration process emphasize the importance of active participation of civil society. The latter plays an important role in raising public awareness and in the fight against corruption.

Studies have revealed that active participation of the civil society in the fight against corruption depends on three key factors (i) existence of a legal framework that enables Civil Society Organizations’ (CSOs) participation without political and legal restrictions (ii) the willingness of the state to engage constructively with the civil society and (iii) the effective engagement of CSOs in the fight against corruption.⁵

Over the past few years, the Government of Albania (GoA) has made significant efforts to address the issue of corruption and encourage

4 The *Roadmap to Addressing the Five Key Priorities* - aiming at the fulfillment of five key priorities set by the European Commission as condition for the opening of accession negotiations and the National Plan for European Integration (NPEI) which serves as a planning tool for measures to meet the obligations arising from the Stabilization Association Agreement (SAA).

5 <https://www.oecd.org/cleangovbiz/CivilSocietyEmpowermentDraft.pdf>

active participation of civil society. In framework of the fight against corruption, the Minister of State for Local Issues is appointed as the National Anti-Corruption Coordinator, whose main duty is to coordinate anti-corruption activities of state institutions and bodies and independent institutions at central and local level. In terms of CSOs engagement in policy-making, legal initiatives are undertaken in the last two years to improve the role of CSOs in this process. One such initiative included the Resolution on Recognition and Strengthening the Role of Civil Society in the Process of Democratic Development of the Country⁶ and the Law “On the establishment and functioning of the National Council for Civil Society”.⁷

In addition to the objectives set forth in the strategic and regulatory documents, the last two European Commission progress reports of 2014 and 2015 emphasized several challenges that confront local governments and civil society in their efforts to fight corruption. EC Report 2014 stated that “Local authorities have not yet developed an inclusive dialogue with civil society and local communities” and “further efforts are needed to strengthen administrative capacity of local government units, to enable them to exercise their authority and enforce legislation”.⁸ The same challenges are still emphasized in EC Report 2015 “...the local government continues to be vulnerable to corruption” and “At the local level, cooperation (with civil society) remains weak”, “The capacity of anti-corruption network in ministries and local level need to be strengthened”.⁹

This report aims to assess the current mechanisms and the needs of both LGUs and CSOs in the fight against corruption at local level. The first section provides an overview of the country’s legal framework, which sets the vision and regulates the fight against corruption at local level. Two other sections of this report provide an outline of the availability of instruments established by 20 targeted municipalities to fight corruption and increase/enable citizens’ participation in decision-making. In addition, in terms of human and management resources, these sections assess the needs of both LGUs and local CSOs to improve their efforts to combat corruption

6 Adopted by the parliament on December 24, 2014

7 Report, Institute for Democracy and Mediation

8 EC Progress Report for Albania, 2014

9 EC Progress Report for Albania, 2015

at local level.

This report is published in the framework of the “CIVILISC – Civil Society Instruments against Corruption” Project, which aims to empower and develop capacities of civil society in small/medium municipalities to promote good governance and fight corruption. This assessment concludes the first phase of the project and contributes to its subsequent capacity development phase as it lays the foundations for designing the relevant, evidence-based and effective CSO capacity development. The data and information obtained in the assessment will also set the baseline for future continuous monitoring and evaluation of anti-corruption efforts undertaken by the LGUs.

2. METHODOLOGY

The methodology for the LGU assessment in framework of the project CIVILISC “Civil society instruments against corruption” is developed jointly by IDM and RiskMonitor (RM), drawing upon the experience of RM in anticorruption policy analysis and corruption risk assessment for the municipal administration of the city of Sofia, Bulgaria’s capital. In 2014-15, RiskMonitor has conducted a critical review of the existing non-repressive measures to curb corruption practices at municipal level and corruption monitoring tools in the municipality. The process involved a desk research of strategic documents, structured interviews with key municipal officers and roundtable discussions with both experts from RM and municipal councilors. The results of the review have informed the design of the first anticorruption strategy for Sofia’s municipal government as well as a series of thematic trainings for the municipal administration. The anticorruption strategy involves a comprehensive risk assessment framework, with indicators for measuring the corruption vulnerability of various areas of municipal operations. Recommendations were also made regarding data collection so as to allow further monitoring and analysis.

The methodology of the following assessment report was specifically designed to:

- Assess the current capacities and preparedness of 20 municipalities¹⁰ in Albania to implement anti-corruption measures in line

¹⁰ The assessment was conducted between January and May 2016 in the municipalities of Klos, Memaliaj, Ura Vajgurore, Cerrik, Gramsh, Divjaka, Tepelena, Libohove, Devoll,

with the National Anti-corruption Strategy and the Decentralization Strategy 2015-2020

- Identify deficiencies in implementation and areas for intervention in the LGUs
- Evaluate capacities of CSOs in the respective LGUs to support anti-corruption efforts
- Contextualize CIVILISC Project's activities aimed at building capacities and impact of CSOs in the fight against corruption at local level.

This assessment combines different research instruments, including desk research, background analysis, structured interviews, and focus group discussions.

Desk research and background analysis consisted on the review of available policy documents and current legislation which define the tools and mechanisms for local government and anti-corruption in Albania. The research team aimed to analyze these documents and answer the research question: does the current policy and legislative framework in Albania enable local government units and local civil society to curb corruption?

Based on the analysis of the legal framework, the research team developed a set of 12 anti-corruption instruments/mechanisms, which should be established by local government units.

The research team also reviewed available online information (i.e. websites of LGUs) and data on socio-economic and development indicators in the target municipalities. Based on this review, a profile for each of the 20 municipalities was developed. The profiles are included in the final part of this report.

The field work aimed to broaden the information generated from the sources reviewed within the background analysis. The set of non-repressive mechanisms designed in framework of this report aim to measure the level of preparedness of 20 municipalities through the establishment of these specific instruments in the fight against corruption in their municipality.

Selenice, Perrenjas, Librazhd, Maliq, Lushnje, Shijak, Belsh, Vora, Bulqize, Vau i Dejes, and Has.

Interviews with the LGU administration

The research team conducted structured interviews with each of the 20 LGUs (addressed at mayors/deputy mayors), to obtain concrete data on the current resources and mechanism committed by LGUs to curb corruption. Each interview¹¹ contained 16 questions (12 questions related to 12 anti-corruption measures/instruments and 4 questions¹² intended to assess the needs about organizational and human capacity and recommendations regarding the role of CSOs to increase good-governance at local level).

Focus groups (FG)

The focus group discussions aimed to gather information on the level of knowledge of CSOs about current anti-corruption mechanism in place at the municipalities, level of understanding of the areas of intervention as well as level of ownership and involvement of CSOs as key actor in fighting corruption and improving good governance at local level.

Civil society organizations and citizens play an important role in combating corruption, especially among their local government units. In addition, collaboration between these two main actors is essential to put in practice the principals of transparency, integrity, accountability and participation.

The specific objectives of this preliminary identification and evaluation of the needs of local CSOs working in the LGUs are:

- Identification of CSOs operating in the LGUs of Klos, Memaliaj, Ura Vajgurore, Cerrik, Gramsh, Divjake, Tepelene, Libohove, Devoll, Selenice, Perrenjas, Librazhd, Maliq, Lushnje, Shijak, Belsh, Vora, Bulqize, Vau i Dejes, and Has.
- Identification of current capacities and knowledge of the CSOs in monitoring municipal performance in fight against corruption
- Assessment of knowledge of local CSOs regarding their role in the fight against corruption and good governance in the respective municipalities.

¹¹ See Annex II– questions of the interview addressed to the municipalities

¹² Questions 13, 14 and 16 are presented in the graphs 2 and 3.

- Identification of the main obstacles to more active CSO involvement in anti-corruption initiatives.

In order to complete the mapping and assessment, IDM conducted focus group discussions in selected towns with representatives of local CSOs.

Focus	Venue	Date	No. of participants	CSOs from municipalities of :
1 ST	Elbasan		15	Librazhd, Prrenjas, Gramsh, Belsh, Cerrik, Devoll, Maliq, Vore, Shijak
2 ND	Bulqiza		11	Bulqiza, Has, Vau i Dejes, Klos
3 RD	Fier		10	Selenica, Lushnja, Divjake, Tepelene, Libohova, Memaliaj, Ura Vajgurore

Methodological Limitations

This assessment targets only 20 out of 61 LGUs (mostly small and medium) hence it is not representative. The identification of local CSOs operating in the selected municipalities of the project was a challenge as a result of the confusion at finding reliable data and lack of a solid database of CSOs. Information about CSOs operating in Albania is found in the website of the Parliament (Electronic register of CSOs¹³) and website of Agency for Support of Civil Society.¹⁴ Other data were found in other reports published by different CSOs and research studies. Most CSOs are based in Tirana or in other major cities of Albania. The research team tried to reach out to most local CSOs and convene them in focus group discussions conducted in framework of this report. Difficulties were encountered in finding local CSOs based in new municipalities established from the new territorial division in Albania. From a thematic coverage, the majority of CSOs participating in the focus groups are ac-

¹³ <https://www.parlament.al/transparenca/regjistri-elektronik/>

¹⁴ <http://www.amshc.gov.al/web/ojf/>

tively involved in some areas, such as human rights, gender issues, youth, environment, media and agriculture. Additionally, the activity of existing local CSOs is project driven. Hence, thematic coverage and sustainability of local CSOs is limited.

Regarding the current instruments established by LGUs, it is important to mention the fact that, as result of the territorial-administrative reform undertaken by the Government of Albania, all 61 newly-created municipalities went through reorganization.¹⁵ This was accompanied by the relevant amendments to legislation regulating local governance and many municipalities are still in the process of adopting anti-corruption legislation and respective legal instruments. Thus, it is still too early to identify and assess experience of local government units in anti-corruption.

¹⁵ Law No. 115/2014: "On Administrative-Territorial Division of the Local Government Units in the Republic of Albania".

3. LOCAL SELF- GOVERNMENT IN ALBANIA, POLICIES, REGULATORY FRAMEWORK AND STRUCTURES OF THE FIGHT AGAINST CORRUPTION

This section offers a general assessment of local self-governments in Albania and, more specifically, of their policies, regulatory frameworks and structures for the fight against corruption, as provided for by the Law on Local Self-Governance.

3.1 A Legislative Overview of LGUs

Local governance emanates from the Constitution,¹⁶ which regulates and sets forth the principles and tiers of local governance, specifies their rights and powers, and stipulates the functions of their representative bodies. Specifically, Articles 108 through to 115 of the Constitution determine that:

- The municipality is the basic unit of local self-government and Qark/Regions comprise the second level.
- Self-government in local units is exercised through their representative bodies and local referendums
- Councils of local governments are elected during the general elections through direct and secret voting. Councils regulate and administer in an independent manner local issues within their jurisdiction.
- The Mayor (elected directly by citizens) is the executive body of the municipality.
- European Charter of Local Autonomy ratified in 1999 sets out the obligation to implement the European norms and standards for self-government within the Albanian domestic legislation.
- Law “On Local Self-Government”¹⁷ regulates the mission and the rights of local government. Furthermore, it sets regulations regarding the authority and functions, resources and costs, cooperation and coordination of local government units with other government institutions. Albania has 61 municipalities and 12 regions (qarks).¹⁸

3.2 Policies, Regulatory Framework and Structures of the Fight against Corruption

The fight against corruption is a dynamic process, a constant battle

¹⁶ Law no 8417, date 21.10.1998, “Constitution of the Republic of Albania”, adopted by referendum on 22 November 1998 and amended on 13 January 2007

¹⁷ Law No. 139/2015, “On Local Self-Governance”

¹⁸ Law No. 115/2014 “On Administrative-Territorial Division of the Local Government Units in the Republic of Albania”

largely based not only on creating and consolidating the principles of transparency, participation, accountability and integrity. For this reason, the assessment report of policies, regulatory framework and the structures of the fight against corruption will include an assessment of the above principles cited in national and local level.

3.2.1 Policy Framework on the Fight against Corruption

Several strategic documents have formulated policies, set targets, goals, and measures in framework of the fight against corruption.

The Crosscutting Anti-Corruption Strategy 2015-2020¹⁹ and its Action Plan set the major goals to prevent, punish, and raise awareness about corruption. Within its preventive approach, this strategy includes several objectives, which essentially are in line with the goals and objectives of local self-government itself: (i) increase transparency and improve citizens' access to information; (ii) strengthen the ICT infrastructure; (iii) strengthen the integrity of public servants (iv) set up a track-record system for the registration of corruption-related investigations. Regarding the role of civil society, this strategy highlights that "it is very important to include the civil society stakeholders in the drafting process as well as to allow it to monitor the application of the government's anticorruption measures."

The Crosscutting Strategy for Decentralization and Local Governance 2015-2020²⁰ represents the government's vision to strengthen local governance and democracy as well as enhance the decentralization process. This Strategy has identified four strategic goals related to good governance and the fight against corruption,- even though the word "corruption" is mentioned only once. The strategy states that "the principles of open governance, transparency and accountability will be obligatory principles, which should be applied by local governments units... Accountability at the local level should be promoted through the implementation of performance manage-

19 Approved upon Council of Ministers' Decision No. 247, dated 03.20.2015

20 Approved upon Council of Ministers' Decision No. 691, dated 07.29.2015

ment's systems... The government also will encourage independent monitoring of strategy by involving civil society organizations or international partners."

The Resolution on Recognition and Strengthening the Role of Civil Society in the Process of Democratic Development of the Country²¹ appreciates "the contribution of civil society in terms of respecting and promoting freedom and human rights, strengthening the rule of law and a fair, open and democratic elections in our country..." and engages in "the promotion and support initiatives aimed at strengthening and promoting cooperation between civil society and public institutions, in particular with local governments, encouraging to develop dialogue, trust and a constructive climate between them."

3.2.2 Regulatory framework on the fight against corruption

The organization and functioning of public institutions, including local self-government are regulated by a set of regulations and relevant structures established to execute the above mentioned principles regarding good-governance and fight against corruption. Analysis of the following acts respects the hierarchy rank of the legal norms.

3.2.3 International Documents and Conventions

European Charter of Local Self-Government²² has an important place in the domestic law and serves as a model for the implementation of European norms and standards into domestic legislation. The Charter set out that self-efficiency is essential for democracy and appreciates "the right of citizens to participate in the conduct of public affairs is part of the democratic principles common to all member states of the Council of Europe"²³. The additional protocol of the European Charter of Local Self-Government has a particu-

21 Adopted by the Parliament of Albania on 24.12.2014

22 By Law 8548, dated 11.11.1999, the Parliament ratified the "European Charter of Local Autonomy".

23 http://www.coe.int/t/congress/Texts/conventions/charte_autonomie_en.asp

lar importance related to the right of citizens to participate in the affairs of a local authority (CETS n° 207). The Council of Ministers has adopted this protocol in principle. However, for unknown reasons, it is not ratified by the Parliament. Consequently, Albania has not deposited to the General Secretary of the Council of Europe the instruments of ratification, acceptance or approval.

Code of good practice for citizen participation in decision-making processes is an important document which defines general principles, guidelines, tools, and mechanisms for citizens' participation. Albania has not adopted a manual for the implementation of the code of good practice at local level. Local government lacks legal practices governing dialogue and partnership.

Albania has ratified two international conventions: The United Nation Convention against Corruption²⁴ and Civil Convention "On Corruption".²⁵ The country is committed to undertake appropriate measures to promote active participation of individuals and groups such as civil society, non-governmental organizations, and community-based organizations in the prevention of and fight against corruption. Other measures are intended to raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption.

3.2.4 National Legislation

Law "On Local Self-Government"²⁶ regulates the organization and functioning of local self-government units in Albania. It defines the functions, authority, rights and duties of their respective bodies. This law regulates the transparency, consultation and participation. According to this chapter, local self-government bodies are obliged to:

- Ensure public transparency of their activities.
- Ensure public participation in the decision-making process.
- Appoint a coordinator for transparency

24 Ratified by Law No. 9492, dated 03.13.2006

25 Law "On the ratification of the Council of Europe Civil Law convention on corruption" - No. 8635, date 06.07.2000

26 Law No. 139/2015, "On Local Self-Governance" adopted on 12.17.2015

- Adopt transparency program
- Appoint a coordinator for public notification and consultation
- Publish every act at their official website
- Post the acts and announcements in public places

The Municipal council should organize public consultations sessions with the community prior to the approval of acts. These counseling sessions are mandatory when the municipal council:

- Approves internal regulation of the functioning of the municipal council;
- Approves the budget and its subsequent amendments;
- Adopts changes to the ownership of permission to use (usufruct) its property for third parties;
- Set local taxes and fees;
- Sets the norms, standards and criteria for the regulation and enforcement of the functions and for ensuring the protection of the public interest.

The municipal council should have norms that regulate the participation of citizens in the council meeting; the system of consultation with the community; ways and rules for public information, and ways and forms of presentation civic initiatives and the procedures for their review and approval.

The Law “On the Right to Information”²⁷ guarantees public’s understanding of the information, in the framework of exercising individual’s rights and freedoms in practice, and forming views on the state and the society, fostering integrity, transparency and accountability of public authorities. Within their activity, local government units have the obligation to guarantee the right to information as a legal and constitutional obligation. To ensure their transparency, the law defines two ways to disclose information, (i) with and (ii) without request. This law elaborates the required rules, procedures, and structures. Bodies of local government units must:

- Prepare and adopt the transparency programs not later than 6

²⁷ Law No. 119/2014, “On the Right to Information” adopted on 18.09.2014

months from the entry into force of the law²⁸ or of their creation.

- Make available to the public via their Internet webpage 16 categories of information in an easily understandable format and accessible.
- Maintain and make public a special “Register of Requests and Responses” in which all requests for information and the information contained in their response are reflected.
- Appoint one of the officials as coordinator for the right to information, who coordinates the work to guarantee the right to information.

The law has addressed or regulated the format of the “request for information”, ways of sending, receiving, recording and specification; the cost of the service; deadline for receiving information; restrictions on the right to information; administrative violations and sanctions.

The Law “On Notification and Public Consultation”²⁹ defines the rules to ensure transparency and public participation in policy and decision making processes. Also, it aims to promote transparency, accountability and integrity of public authorities. Local governments units must appoint a person as coordinator of notification and public consultation, to be responsible for the coordination and overall management of their work.

This law regulates the process of:

- Notification. The draft acts can be notified through the electronic register. Other forms of notification can be used such as (email, public notification, media announcement, publications in newspapers, etc.)
- Publication. Each draft act should be published in the electronic register for public notification and consultation. The register is an official website, which serves as a focal point for consultation. It offers: (i) open access and free information, printing and reuse of documents published in it for all users, stakeholders; (ii) transparency program; (iii) annual plans of public bodies related to

28 Law No. 119/2014, “On the Right to Information” adopted on 18.09.2014

29 Law No. 146/2014, “On Notification and Public Consultation” adopted on 30.10.2014

the decision-making process. The electronic register is managed through www.konsultimipublik.gov.al.³⁰

- Consultation. The law provides two forms of public consultation through electronic register and open public meetings
- Formulating comments and recommendations. The coordinator of notification and public consultation gathers opinions, comments and recommendations provided in the process of consultation.
- Reports on transparency in the decision making process. The law states that public institutions are required to prepare and publish annual reports on transparency in the decision making process.

The Law “On Cooperation of the Public in the Fight against Corruption”³¹ seeks to promote public participation to report corruption, protect and promote people who report corruption practices from public authorities (including self-government authority). The law determines the rules and procedures for reporting and recording of corrupt practices. It provides that detailed rules for the registration, documentation, evaluation, and transfer of denunciations are defined within the internal regulations of each institution. A specific online portal www.stopkorrupsionit.al is created for reporting and recording corrupt practices. This website focuses on coordinating and managing reported corrupt practices in a single page and facilitates reporting by any interested person. The webpage of this portal operates under a regulation adopted by the Prime Minister.

3.3 Financial Regulatory Framework

An analysis of the financial legal framework is focused on the evaluation of procedures in terms of transparency, public participation and anti-corruption procedures applied by local governments. The financial issues of local governance are regulated by a comprehensive legal package such as the Law “On Management of Budgetary System in the Republic of Albania”³², Law “On Public Financial In-

30 DCM No. 828, “On Adoption of Regulation on Creation and Administration of Electronic Register for Public Notifications and Consultations”, approved on 07.10.2015

31 Law No. 9508, dated 3.4.2006, “On Cooperation of the Public in the Fight against Corruption”

32 Law No. 9936, dated 26.6.2008, “On Management of Budget in the Republic of Albania”

spection”³³, Law “On Local Borrowing”³⁴ and Law “On Public Financial Management and Control”.

The legal framework on finance *pays special attention to the transparency of actions and acts of local government*. In this context, “The budgets of local government units are published in the Bulletin of Public Notifications concerned 15 days after the approval”.³⁵ “In case of issuing the Debt, a notice of the meeting at which the Resolution shall be considered for approval by the Council shall be published in a newspaper of general circulation within the Local Government not less than fifteen (15) days prior to the date of the meeting of the Council. A Local Government may incur long term Debt pursuant to a Resolution duly adopted by the Council of the local government and approved by a majority of the members of such Council at a meeting of the Council that is open to the public.”³⁶ “All documentation relating to local Debt, including, but not limited to, the Resolution and any Financing Agreement, are official documents and shall be available to the public in compliance with the Law on the Right to Information on Official Documents.” In terms of design, adoption, and use of anti-corruption procedures, the Manual for Financial Management and Control provides that “The Heads of the unit are responsible for setting the rules and procedures for notification, review, disclosure and reporting administrative weaknesses, inconsistencies and violations that create ground for corruption, fraud, or irregularities.”³⁷

The documents that establish the policy framework for the fight against corruption can be defined as documents which formulate policy of the country’s European integration and the decentralization process in Albania. Moreover, the above-listed documents encourage and create an enabling legislative environment to fight corruption and support the strengthening of the role of civil society. The legal framework reviewed in the first section serves as a baseline (or guideline) for the next issues analyzed in the following sections.

33 Law No. 112/2015, “On Public Financial Inspection”

34 Law No. 9869, dated 4.2.2008, “On Local Borrowing”

35 Article 33 of the Law No. 9936, dated 26.6.2008, “On Management of Budget in the Republic of Albania”

36 Article 7 and 28 of the law No. 9869, dated 4.2.2008, “On Local Borrowing”

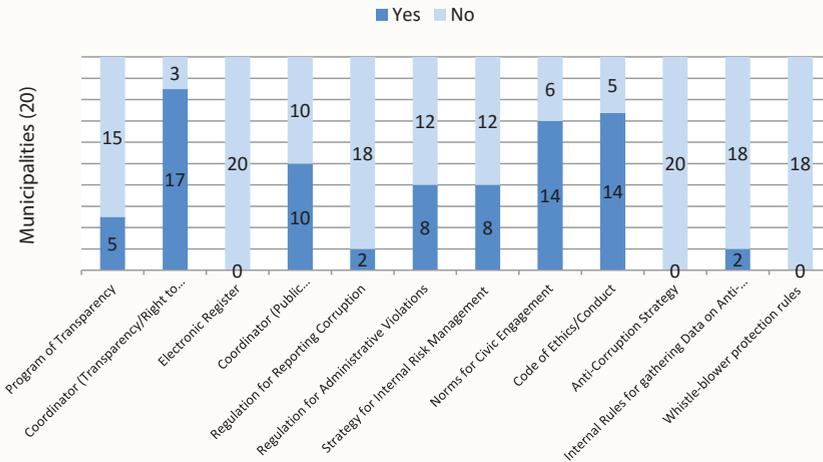
37 Manual for Financial Management and Control

4. ANTI-CORRUPTION INSTRUMENTS OF LOCAL GOVERNMENT UNITS

This section seeks to assess the availability of instruments established by 20 municipalities targeted in this report for the fight against corruption.

The main findings show that local government units have not adopted the majority of the anti-corruption measures derived from the legislative framework. Respondents from the municipalities highlighted their commitment to establish these instruments/measures in the near future. Furthermore, they justified the lack of these instruments with the short time of the establishment and the changes in the organization and functioning triggered by the administrative-territorial reform and the decentralization reform. The table below presents the municipalities that have adopted or have failed to adopt the anti-corruption measures.

Graph 1. LGUs Anti-Corruption Resources



Program of Transparency: The information obtained from 20 municipalities shows that the program of transparency is adopted by 5 out of 20 municipalities (Municipalities of: Ura Vajgurore; Shijak,³⁸ Cerrik,³⁹ Librazhd,⁴⁰ and Vorë⁴¹). Respondents from municipalities which already have approved the program stated that the process for adopting the transparency program was carried out without the participation of civil society organizations.

The Program of Transparency is not adopted by municipalities of Bulqize, Klos, Belsh, Gramsh, Prrrenjas, Lushnje, Divjake, Libohove, Tepelene, Memaliaj, Maliq, Devoll, Has, Vau i Dejes, and Selenice). Some of the respondents highlighted that they were in the process of adopting such program during the second half of the year 2016 (Municipalities of Gramsh, Lushnja, Tepelena, and Vau i Dejes).

Coordinator (Office or Person) for Transparency/Right to Information: Regarding the appointment of a coordinator (office or person) for transparency and right to information, 17 out of 20 municipalities provided a positive answer (Municipalities of Ura Vajgurore, Bulqize, Shijak, Cerrik,⁴² Gramsh, Librazhd, Prrrenjas, Lushnje, Divjake,

38 Order No. 1384, dated 12.10. 2015

39 Order No. 94, dated 26.11.2015

40 Approved on 07.01.2016

41 <https://files.acrobat.com/a/preview/bda4d1d6-7b95-429a-9449-7522d39d6f73>

42 Responsible person: Ms. Arta Xhika

Libohove, Tepelene⁴³, Memaliaj,⁴⁴ Devoll, Has, Vau i Dejes, Vore⁴⁵ and Selenice). A considerable number of municipalities have assigned the function of the coordinator for transparency/right to information to the specialist/office of public relations (Municipalities of Bulqize, Shijak, Tepelene, Memaliaj). In other municipalities, this position is performed by other public officers working in the municipality, such as the lawyer of the municipality (Municipality of Shijak) or as an added function to the Deputy Mayor of the municipality (Municipality of Has).

The municipalities of Klos, Belsh, and Maliq responded that they did not have such a coordinator yet. Due to lack of the official websites, the contact information of the coordinator for transparency/right to information is missing in the majority all municipalities targeted in the project, except for the Municipality of Vore.⁴⁶

Electronic Register for Public Notifications/Consultations: None of the municipalities have established an electronic register for public notifications and consultations. Some of the municipalities stated that they were in process of preparing it (Municipalities of Ura Vajgurore, Klos, Cerrik, Prrenjas, Libohove, Selenice, and Vore).

Some LGUs have adopted other tools for notification and public consultations such as by:

- Publishing notifications in public places of the municipality or through the notifications in local media (i.e. Municipalities of Klos, Cerrik and Memaliaj),
- Using e-mail as a communication tool (Municipality of Belsh),
- Dissemination of notifications (Municipality of Divjake),
- Public hearings (Municipalities of Ura Vajgurore and Memaliaj).

The preparation of the electronic register is a process closely related with the municipality's website, which is missing roughly in all the municipalities targeted by the project, excluding the municipali-

⁴³ Responsible person: Mr. Aleksandër Toti

⁴⁴ Responsible person: Ms. Matilda Sula

⁴⁵ <http://bashkiavore.gov.al/sq-al/Services/Pages/Programitransparencesperbashkinevore.aspx>

⁴⁶ Ibid

ties of Lushnje⁴⁷ and Vore.⁴⁸

Coordinator for Public Notification/Consultation: 10 out of 20 municipalities have answered positively regarding the position of a coordinator for notification and public consultation within the administrative structure of the municipality (Municipalities of Ura Vajgurore, Bulqize, Klos, Cerrik,⁴⁹ Gramsh, Prrenjas, Lushnje, Memaliaj,⁵⁰ Vau i Dejes, and Vore).

As in the case of the coordinator for transparency/right to information, the coordinator for public notification/consultation is often considered similar or performed by the specialist/office for public relations (i.e. Municipalities of Bulqize, Gramsh, Lushnje, and Memaliaj). Consequently, it must be noted that in these cases the specialist of public relations is responsible for the positions of two coordinators: that for transparency/ right to information and that for public notification/consultation. In other cases, the function of the coordinator for public notification/consultation is performed by other staff members, i.e.: the responsible persons for this position in the municipality Klos are the Deputy Mayor and the Secretary of Municipal Council.

The municipalities which have not appointment a coordinator for public notification/consultation are: Shijak, Belsh, Librazhd, Divjake, Libohove, Tepelene, Maliq, Devoll, Has, and Selenice.

Regulation to report cases of corruption: 2 out of 20 municipalities have incorporated rules on the registration, documentation, assessment and delegation of the reported cases of corruption within their internal regulation of the municipality (Tepelene, Klos). Municipality of Ura Vajgurore has established a toll-free number (08007161), which seeks to encourage citizens to report cases of corruption encountered with municipality's administration. Other 18 municipalities do not have a specific regulation for reporting cases of corruption. In addition, the municipalities of Divjake, Memaliaj, Bulqiza, Cerrik, and Vore are in the course drafting such regulation.

Regulation for Administrative Violations: Each municipality should

47 www.bashkialushnje.gov.al

48 www.bashkiavore.gov.al

49 Responsible person: Mr. Evis Bica

50 Responsible person: Ms. Matilda Sula

establish regulations and set sanctions for administrative violations. Such regulations should draw up rules and procedures for the notification, examination and reporting of administrative shortcomings, discrepancies and violations that create ground for corruption, fraud or irregularity. Eight out of 20 targeted municipalities (Municipalities of Ura Vajgurore, Klos, Cerrik, Gramsh, Prrenjas, Divjake, Tepelene, and Vore) have taken measures to adopt these rules within their internal regulation. Other 12 municipalities (Municipalities of Bulqize, Shijak, Belsh, Librazhd, Lushnje, Libohova, Memaliaj, Maliq, Devoll, Has, Vau i Dejes, and Selenice) questioned in the framework of this report has answered negatively about the existence of this regulation.

Strategy on Internal Risk Management: Local government units should design their own strategy for Risk Management and update it at least triennially. This strategy should be drafted by the coordinator for risk management or another authorized officer of the local government unit. The Ministry of Finance has published the manual for Financial and Control Management⁵¹ and relevant templates assisting public institutions for the preparation of the strategy. Only 8 out of 20 municipalities interviewed for this report stated to have adopted such a strategy. These municipalities include Ura Vajgurore, Cerrik, Prrenjas, Lushnje, Divjake, Has, Vore, and Selenice.

Out of 20 municipalities, 12 units do not have a Strategy on Internal Risk Management. Some of them, such as Bulqize and Memaliaj, declared that they were in the process of adopting one, whereas in other municipalities (Klos, Memaliaj) the internal risk management is carried out by the internal audit.

Norms for Civic Engagement: Norms of civic engagement which regulate the procedure of submission, review and approval of the citizens' engagement are defined in the Law "On Local Self-Government". Fourteen out of 20 municipalities have adopted such norms within the internal regulation of the municipality (Municipalities of Ura Vajgurore, Bulqize, Klos, Cerrik, Gramsh, Prrenjas, Lushnje, Divjake, Libohove, Devoll, Has, Vau i Dejes, Vore, and Selenice). On the other hand, the municipalities of Shijak, Belsh, Librazhd, Tepelene, Memaliaj and Maliq have not adopted these norms yet.

⁵¹ Approved by the Order of the Minister of Finance, No. 8980, dated. 15.07.2010

Code of Ethics/Conduct: The municipalities were asked about the existence of the Code of Ethics/Conduct for both municipal council and administration. Fourteen out of 20 municipalities confirmed to have a code of ethics/conduct in place. Out of these municipalities:

- The Municipality of Ura Vajgurore has adopted an ethics code for both municipal council and administration,
- The municipalities of Librazhd, Prrenjas, and Tepelene have included this code in their internal regulation,
- The municipalities of Belsh⁵² and Lushnje have adopted the Code of Ethics only for the administration but not for the municipal council.

Five out of 20 municipalities⁵³ did not provide such a code (Municipalities of Shijak, Cerrik, Memaliaj, Maliq, Has). Of these municipalities:

- The Municipality of Memaliaj is in the process of drafting this code,
- Some other municipalities regulate the norms of ethics based in reliance of the Law “On Rules of Ethics in the Public Administration” (Municipalities of Cerrik and Has).

Anti-Corruption Strategy: None of 20 municipalities in the project have approved such a Strategy. The municipalities of Bulqize, Cerrik, and Vore responded that they were in the process of drafting the Anti-Corruption Strategy.

Internal rules for regular data collection on risk of corruption: 2 out of 20 municipalities have internal rules for regular data collection on corruption risks (Municipalities of Gramsh and Prrenjas⁵⁴). Eighteen out of 20 municipalities (Ura Vajgurore, Bulqize, Klos, Shijak, Cerrik, Belsh, Librazhd, Lushnje, Divjake, Libohove, Tepelene, Memaliaj, Maliq, Devoll, Has, Vau i Dejes, Vore, and Selenice) do not have internal rules for regular data gathering about corruption risks at local level. In addition, they did not follow a system of indicators for monitoring corruption risks. The same municipalities did not provide guidelines/manuals/trainings on this issue except for

⁵² Internal Order No. 138, dated 13.10.2015.

⁵³ Excluding the Municipality of Bulqiza - did not answer this question.

⁵⁴ Internal Regulation of the Municipality.

the municipalities of Gramsh, Divjake, and Prrenjas.

These municipalities use other forms for data gathering about corruption including:

- Reporting corruption cases at municipality offices (Municipality of Belsh),
- Formulation and incorporation of specific statements within respective internal regulation (Municipality of Prrenjas),
- Use of in other legal acts as handbooks of the High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests (Municipality of Memaliaj),
- Internal audit (Municipality of Has),
- Undertaking the process of adopting such rules (Municipality of Vore)

Whistleblowers' protection rules: 18 out of 20 targeted municipalities (Ura Vajgurore, Bulqize, Klos, Shijak, Cerrik, Belsh, Gramsh, Librazhd, Lushnje, Libohove, Tepelene, Memaliaj, Maliq, Devoll, Has, Vau i Dejes, Vore, and Selenice) have not adopted rules on the protection of whistleblowers and two of these municipalities (Municipalities of Bulqize and Vore) declared that they were in the process of adopting these measures based on the respective legislation.⁵⁵ The municipalities of Prrenjas and Divjake did not answer this question.

⁵⁵ Law "On Administrative Procedures" and other laws/legal acts in force.

5. LEVEL OF ACTIVENESS AND PREPAREDNESS OF LOCAL CIVIL SOCIETY ORGANIZATIONS IN THE FIGHT AGAINST CORRUPTION

The active participation of civil society in good governance at local level in Albania remains a challenge. The following section aims to outline the current status concerning collaboration between local government units in Albania and CSOs acting at local level. Additionally, it seeks to identify potential obstacles and opportunities to an active and effective contribution of local civil society at promoting integrity and fighting corruption in 20 small/medium municipalities of the country.

Studies have shown that, while many civil society organizations in Albania have limited capacities and resources to deal with corruption issues on a national scale, they started to increasingly focus on local government and issues of accountability, corruption and budgeting.⁵⁶ Irrespective of the progress made during the two last decades, the civil society organizations in Albania are still coping with difficulties in their role as communication bridges between government and citizens. The new Law on Local Self-Government” sets a new vision regarding civic engagement compared to the previous Law “On Organization and Functioning of Local Governments”.⁵⁷ The new aspects defined in its articles include: The right of civic engagement,⁵⁸ the right to request, complain and remark⁵⁹ under the chapter IV for “Transparency, Consultancy and Civic Engagement”.

5.1 Knowledge and Capacities of CSOs in Fight against Corruption at Local Level

Low level of active participation is noted in small/medium municipalities. Respondents of focus groups stated that this level gave path to lack of trust of interest groups or community at large towards local CSOs. Moreover, this built up “apathy” among CSOs to operate and undertake initiatives especially those related to local governance and anti-corruption. Most CSOs responded that their work was project-based and forced to expand the focus of their mission and areas of their actions. They were prompted toward anti-corruption and good-governance actions by interest from international and local donor organizations providing funding for projects in the field. CSOs demonstrated basic concepts of good-governance and had basic information about their right to participate in the municipal council meetings as a result of actions and awareness raising campaigns enabled from infrequent projects in the past.

56 “Anticorruption reloaded”- Assessment of Southeast Europe, Southeast Europe Leadership for Development and Integrity (SELDI), 2014

57 Law No. 8652, dated 31.07.2000

58 Article No. 20- “Law for local self-government”, 2015

59 Article No. 19- “Law for local self-government”, 2015

CSOs participating in the focus groups displayed lack of knowledge regarding the existence of specific regulations in respective municipality as well as lack of information about the Law on Local Self-Government, which enables their participation at local level. CSOs representatives did not have information about the regulation for continuous communication with citizens that should be established from the municipalities in order to ensure transparency of municipal work. This statement was pointed out by all the respondents in the focus groups and *“since the establishment of new municipalities, CSOs do not have any contact with the new local administration”*. The majority of CSOs were not aware of current anti-corruption structures and mechanisms of LGUs. CSO representatives reasoned that the mechanisms of cooperation, if any, with local institutions were just a formality.

CSOs operating in small/ medium municipalities possess weak professional capacities for monitoring the performance of the municipality, its work in the field of good-governance, and its fight against corruption. Only 1-2 CSOs among participants of the focus groups affirmed their capacities to act in the monitoring process. Roughly all CSOs confirmed that they possessed human capacities and less than half of them admitted to have enough capacities to be engaged in anti-corruption initiatives. This expression was more common from CSOs in Bulqiza, Tepelena, Memaliaj, Belsh, Devoll, Gramsh, and Has. Furthermore, a few CSOs based in the cities of Lushnja, Librazhd, and Ura Vajgurore showed good practices related to their initiatives in the past.

Besides their lack of knowledge, respondents were able to list several interventions, which are needed to raise public awareness and contribute to improvement of efforts of the local administration in fight against corruption in their municipality. Respondents considered youth as the most important actor who would and could progress the work of the civil society at local level. Some of the CSOs were aware of the role youth could play and the opportunity they could give to improve integrity and good-governance in their municipality. CSOs suggested general actions that would increase information among citizens and facilitate the communication between CSOs/citizens and local government institutions:

- Participation in the municipal council meetings
- Delivery of trainings to local administration on transparency, accountability and integrity
- Organisation of informational and discussion meetings with citizens especially among youth/ student of high schools
- Publication in advance of the working agenda of municipal council meetings and online broadcasting at local media (radio or TV). This will increase information among citizens and will serve as a non-repressive measure
- Awareness raising campaigns (using flyers, posters, videos) aiming to increase understanding and responsibility among citizens regarding their role in good governance through public awareness actions
- Preparation of questionnaires or evidence based studies and design of relevant recommendations to be presented to the Municipal Council.

In the same line, LGUs were requested to give specific interventions of what local government institutions should undertake in promoting good governance and the fight against corruption.

- Increase of professional capacities of the administration in the field of anti-corruption and good governance.
- Increase of collaboration between LGUs and local CSOs
- Increase and development of capacities of local civil society organizations on anti-corruptions activities, local government, and civic engagement.
- Increase of transparency of the work of LGUs

5.2 Obstacles and Challenges

When speaking of needs and challenges confronting the civil society organizations operating in small/medium municipalities, the most immediate need is the increase of capacities of the organizations with regard to their own mission and expertise on good gov-

ernance issues.

In this preliminary need assessment, CSOs demanded trainings on capacity building to strengthen their capabilities to plan, develop, and implement projects, on legislative framework in fight against corruption and local government, and on lobbying, advocacy and monitoring.

Box 1. Obstacles of CSOs at local level

- Lack of organizational and development capacities
- Lack of funding and sustainability
- Lack of motivation
- Lack of collaboration between CSOs and LGUs
- Unwillingness for networking among CSOs

The main challenge for the CSOs remains to be funding. They believed that they are penalized because they are small organizations. The respondents expected greater support from the donor community and “decentralization” of funds from big CSOs in central/big municipalities to local CSOs.

Besides this, respondents emphasized that citizens did not trust the work of local government and the work and functioning of CSOs anymore. So,

they needed to be consistent in their work to build and regain trust of citizens. Lack of collaboration, networking among local CSOs and lack of voluntarism were other obstacles identified by the respondents.

In terms of level of collaboration between local government institutions and CSOs, respondents attributed the failure and/or success to the Mayor. They pointed out the lack of communication between local CSOs and the municipality as this gap was increasing on yearly basis. Respondents were clear that cooperation between them was crucial to the sustainability and future of the civil society sector and to the development of society in general. CSOs believed that lack of professional capacity and lack of interest were the main reasons that led to this low level of collaboration.

6. RISK OF CORRUPTION IN LOCAL GOVERNMENT UNITS: PERCEPTIONS OF CIVIL SOCIETY ORGANIZATIONS

Besides their low level of participation in good governance and decision-making, representatives of CSOs were able to assess and observe the needs of specific sectors within local government institutions in terms of capacities and risk of corruption. The new territorial reform sets new and greater responsibilities for local government units. The 61 municipalities assumed more powers and responsibilities in the local governance system. In providing quality services to their communities, they must also develop efficient and

sound anticorruption and integrity mechanisms, in line with country's Anticorruption Strategy and action plan. Efforts and actions in this regard by the municipalities must be developed through an open and inclusive approach. Perceptions from respondents are based on their own or their relatives' experiences and cases whilst they have been constrained to take contact with some offices/sectors. All respondents from focus groups emphasized lack of professional administration, which was one of the main obstacles of local government unit for better and open governance. It is essential to underline in this report that CSOs did not have information about the internal organisation/structure of the respective municipalities.

Perception of training needs by sectors: Respondents deemed that the sectors within the local institutions which immediately need to be trained about the legislative framework for anti-corruption and local government include:

- Urban Planning Office
- Office for Public Relations and Information
- Office of Agriculture
- Public service utilities
- Finance office
- IT office to increase transparency and dissemination of information on the activity of the municipality
- Procurement office
- Social insurance office

Participants from Bulqiza, Has, Tepelena, and Devoll deemed that media was an important player which needed to be assessed through trainings. Close collaboration with media would increase civic participation and push local government to collaborate with local CSOs so as to increasing accountability and transparency. Likewise, they emphasized that trainings with media should be focused on legislative framework on anti-corruption, local governance, and capacity building on good governance issues.

In the same line, CSOs connected the lack of professionalism with the high level of corruption. Asked about the municipal depart-

ments/ policy areas with highest corruption risk, respondents listed the same sectors/department of local government units mentioned above in relation to their professional capacities and need for trainings on the legislative framework for local government, integrity of administration, and relevant instruments to be implemented in the framework of the fight against corruption.

- Urban planning Office
- Office for Public Relation and Information
- Office of Agriculture
- Enterprise for public services
- Finance office
- IT office- to increase transparency information as regards the work of the municipality
- Procurement office
- Social insurance office

7. LOCAL CIVIL SOCIETY ORGANIZATIONS AND LOCAL GOVERNMENT UNITS- TOWARDS A COMMON APPROACH

This report aims to identify the level of commitment from both CSOs and LGUs towards a positive collaboration and draw recommendations from both actors for future interventions. Respondents from 20 municipalities showed commitment to cooperate with local civil society organization in the CIVILISC Project and other initiatives.

Training remains one of the most important areas of intervention which LGUs considered help the most for CSOs to fight corruption. This very statement was highlighted by CSOs respondents regard-

ing the administration of the local government institutions.

Figure 1: Areas in which assistance to civil society organization would be provided (in the form of training or other) in order to increase their capacities to improve good governance and integrity in local government institutions

Capacity building & trainings	Information technology (IT)	Information & transparency	Reporting cases of corruption
Budget with participation	Trainings in legislation for anti-corruption	Domestic violence	Public services
Economic development	Environment protection	Urban planning	Networking & advocacy & monitoring

The two tables below provide a summary of (i) the most important areas recommended by LGUs in which CSOs may be assisted to increase their capacity and actions and (ii) recommendations suggested by CSOs regarding the immediate/future interventions to be undertaken by the LGUs.

Table 1: Recommendations for Civil Society Organizations (CSOs) in Promoting Good Governance and Fighting Corruption

LGU	Recommended Actions for Civil Society Organizations
Ura Vajgurore	<ul style="list-style-type: none"> • Draft a Joint Action Strategy at municipal level • Undertake monitoring actions regarding the performance and the work of local government unit. • Raise awareness and strengthen collaboration with the media and other actors at local communities
Bulgize	<ul style="list-style-type: none"> • Implement actions to improve information and transparency of public funds • Design a joint action plan on fight against corruption between LGUs and CSOs • Increase organisational and human capacities which help organisations to work in a professional way and focus on transparency and accountability issues

LGU	Recommended Actions for Civil Society Organizations
Klos	<ul style="list-style-type: none"> • Increase Information among CSOs regarding drivers to corruption • CSOs increase their participation at the consulting meetings, particularly on budgeting issues • CSOs provide trainings to the municipal administration on certain issues such as: fight against corruption tools, code of ethics. • CSOs conduct awareness raising campaigns on local good-governance issues using flyers and leaflets as tools of dissemination of the information.
Shijak	<ul style="list-style-type: none"> • Undertake awareness raising campaigns among citizens-aiming to encourage them report cases of corruption
Cerrik	<ul style="list-style-type: none"> • Increase cooperation between CSOs and citizens in designing local strategies in the fight against corruption. • Increase capacities and support to local CSOs in promoting good governance and fighting corruption actions. • Set up an annual program of joint activities between LGUs and CSOs and conduct public hearings in this process. • CSOs provide trainings for local administration in relation to good governance issues.
Belsh	<ul style="list-style-type: none"> • CSOs need to be more active and offer trainings to local administration on this issue
Librazhd	<ul style="list-style-type: none"> • Increase actions of CSOs in monitoring, trainings to local administration and raising awareness
Prenjas	<ul style="list-style-type: none"> • CSOs carry out every action related to transparency and good governance
Lushnje	<ul style="list-style-type: none"> • CSOs undertake actions on issues of transparency and public information
Divjake	<ul style="list-style-type: none"> • CSO undertake initiatives to identify and report cases of corruption by the local administration
Libohove	<ul style="list-style-type: none"> • Report any act that violates legislative provisions and principles. • Increase cooperation with LGUs, undertake awareness campaign with citizens on transparency issues.
Tepelene	<ul style="list-style-type: none"> • Increase participation of CSOs in consultations meetings with LGU
Memaliaj	<ul style="list-style-type: none"> • CSOs conduct trainings to local administration and build regular communication

LGU	Recommended Actions for Civil Society Organizations
Devoll	CSOs undertake action to: <ul style="list-style-type: none"> • Increase reporting of corruption cases and civic voluntarism • Increase participation in public hearings and consultations sessions regarding the draft decisions of the local government
Has	<ul style="list-style-type: none"> • CSOs increase collaboration with LGUs by improving transparency in all actions of administration and management of public funds and services
Vau i Dejes	<ul style="list-style-type: none"> • Organize open and frequent meetings to public as regards role of civil society and citizens to fight corruption
Vore	<ul style="list-style-type: none"> • Actions and awareness campaigns to increase reporting of cases of corruption • CSOs strengthen their own independence, networking among other CSOs at local level. • CSOs focus their mission toward transparency and encourage local administration to take actions on this issue and improve technology of information
Selenice	<ul style="list-style-type: none"> • Support to CSO-s to increase participation and implement projects focusing on good-governance. • Raise awareness on reporting cases of corruption • Provide trainings to local administration on transparency and integrity • Increase cooperation between CSOs and municipality and encourage regular exchange of information • CSOs formulate concrete recommendations for consideration by the municipality

Some recommendation of CSOs on non-repressive measures/actions that municipality should develop to prevent corrupt practices include:

- Establish e-government tool (especially official websites of municipalities) aiming to increase transparency and publish all documents defined by the law. E-government will increase information of citizens on the work of the municipality and improve accountability.
- Establish regular communication tools by involving local CSOs and citizens in decision-making process.

- Hold regular public hearings and open municipal council meeting aiming to build trust of CSOs and citizens.
- Increase capacities of public administration on professionalism through capacity building trainings
- Promote integrity and transparency as well as raise awareness among citizens and local CSOs about their role in monitoring the fight against corruption
- Encourage collaboration with CSOs to implement actions related to anti-corruption and good governance as a common approach at local level that will contribute to sustainable development of the region.

8. CONCLUSIONS AND RECOMMENDATIONS

This report came to certain conclusions on legal environment of the fight against corruption, level of anti-corruption instruments established by LGUs to fight corruption at local level and level of preparedness of local civil society organisations to act in their local community for improving good governance.

The analysis of policies, regulatory framework and structures enables a positive setting regarding the fight against corruption at national and local level. However, enforcement of the current legislation remains a challenge, particularly regarding the establishment of specific control mechanisms to curb corruption and improve civic engagement at municipal level.

Albania has not yet ratified the Additional Protocol which supplements the text of the European Charter of Local Self-Government “The right to participate in the affairs of a local authority denotes the right to seek to determine or to influence the exercise of a local authority’s powers and responsibilities... The Protocol also requires measures be taken which are necessary to ensure that the ethical integrity and transparency of the exercise of local authorities’ powers and responsibilities are not jeopardized by the exercise of the right to participate...”⁶⁰

⁶⁰ <http://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/207>

Local government units require legal practices governing the dialogue and partnership in the decision-making processes. In addition, the legal manual for the implementation of the code of good practice for citizen's participation in the decision-making process should be developed.

Small/medium municipalities, particularly the newly-established ones, are still in the process of reorganization following the new territorial reform and the strategy of decentralization. Hence, the fight against corruption is considered a challenge in terms of setting up a control system for anti-corruption and establishment of a professional administration. Local CSOs in small/medium organizations are very few or inexistent. The existing local civil society organizations confront difficulties related with their organizational and human capacities. Nevertheless, funding remains their main concern, which limits the frequency of CSOs' activity and "command" the focus of their interventions. However, apart from the obstacles and challenges they face in their respective municipality, local CSOs should focus on the fight against corruption, increase their knowledge and capacities in monitoring and raising awareness on good governance.

Key findings of this report regarding the efforts of LGUs to fight against corruption conclude that local government institutions do not have enough professional capacities to exercise their authority and enforce the applicable legislation. Consequently, LGUs, especially specific sectors within the municipality, should increase transparency, efficiency, and comprehensiveness. On the other side, civic engagement in the fight against corruption is a necessity and needs to be improved. CSOs need to focus their activities toward monitoring the progress in implementation of anti-corruption measures by their local government.

This report recommends that:

- Local government units should strengthen their administrative capacities through capacity building trainings on local governance and anti-corruption issues and increase their knowledge regarding the current legislation.
- Local government units targeted in this report should increase

transparency by taking concrete actions as defined in relevant legislations, such as improving citizens' access to information and strengthen the electronic infrastructure of the municipalities.

- CSOs operating at local level need to increase their organisational capacities and call for assistance to enhance their capacities on issues of anti-corruption and good governance.
- Civil Society actors should focus their work in good governance and anti-corruption actions, increase organizational capacities and work to design, manage and implement their own projects in their municipalities, enhance their knowledge and expertise on anti-corruption and good governance through frequent capacity building trainings, raise awareness among citizens about their role in local democracy, focus in monitoring the municipality's activity and effectiveness, promote voluntarism and networking, and improve cooperation among different actors of local community.
- LGUs should:
 - o Establish concrete instruments to prevent, control and record corruption.
 - o Approve regulation for reporting cases of corruption
 - o Establish strategy for Anti-Corruption
 - o Implement their own performance management systems
 - o Establish internal rules for track data on corruption cases
 - o Set rules and procedures for notification, review, disclosure and reporting administrative weaknesses, inconsistencies and violations that create ground for corruption, fraud, or irregularity
 - o Establish website as a tool for transparency, accountability and will increase and facilitate information to citizens
 - o Adopt the Transparency Program and appoint a Coordinator of Transparency who should guarantee the right to information
 - o Appoint a Coordinator on Notification and Public Consultation to guarantee the right of notification and public consultation

Both CSOs and LGUs comprise two important pillars at ensuring and strengthening democracy at local level. At the moment of writing this report, LGUs and CSOS at local level show very limited capacities in term of institutional and human capacities. Furthermore, cooperation between LGUs and CSOs at local level is very limited. Hence, LGUs and CSOs need to put more efforts on developing joint action plans and advance their cooperation by building communication bridges with other actors, such as media and local community as a whole.

LIST OF ANNEXES

Annex I. Profiles of Municipalities

Municipality of Ura Vajgurore

The Municipality of Ura Vajgurore is located in central Albania and is part of Berat Region. It is composed by 4 administrative units, 1 city and 34 villages⁶¹ and has a population of 27.295 inhabitants.⁶² As regard the administrative classification, the Municipality of Ura Vajgurore is classified by 53.5% urban and 46.5% rural.⁶³ Data on educational attainment⁶⁴ shows that 69.1% (58.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 22.1% (29.85% region, 31.4% country) - Upper secondary education; 4.1% (6.8% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 67.3% employed people work in the agriculture, followed by service sector 22.1%, and industry 10.6%.⁶⁵ The main source of income for households is paid work or self-employment 67.8% and pensions 29.3%, followed by remittances 13.7% and social assistance and benefits 7.5%.⁶⁶ The unemployment rate in Ura Vajgurore is 18.8% of the labor force aged 15 and above.⁶⁷ Meanwhile, unemployment among young people aged 15-24 amounts to 41.5%.⁶⁸ Household internet access ratio is 3.3%.⁶⁹ The unconditional budget cash transfer for the municipality of Ura Vajgurore in 2016 is 91.895 thousand ALL.⁷⁰ The representative body is the Municipal Council composed by 21 members⁷¹ (14 males and

61 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

62 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

63 INSTAT, A new urban-rural classification of the Albanian population

64 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

65 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

66 Ibid.

67 Ibid.

68 Ibid.

69 Ibid.

70 <http://www.financa.gov.al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

71 <http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/>

7 women). The Municipality of Ura Vajgurore does not have an official website.

Municipality of Bulqiza

The Municipality of Bulqiza is located in eastern Albania and is part of Dibër Region. It is composed by 8 administrative units, 12 city and 64 villages⁷² and has a population of 31.210 inhabitants.⁷³ As regard the administrative classification, the municipality of Bulqiza is classified by 26.9% urban and 73.1% rural.⁷⁴ Data on educational attainment⁷⁵ shows that 69.3% (65.8% region, 52.1% country) of the population has concluded only primary and lower secondary education; 22.7% (24.26% region, 31.4% country) - Upper secondary education; 4.0% (5.2% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 36.7% employed people work in services, followed by agriculture 34.5% and industry 28.7%.⁷⁶ The main source of income for households is paid work or self-employment 41.2% and pensions 34.7%, followed by social assistance and benefits 31.1% and remittances 8.7%.⁷⁷ The unemployment rate in Bulqiza is 38.5% of the labor force aged 15 and above.⁷⁸ Meanwhile, unemployment among young people aged 15-24 amounts to 64.3%.⁷⁹ Household internet access ratio is 2.2%.⁸⁰ The unconditional budget cash transfer for the municipality of Bulqiza in 2016 is 196.658 thousand ALL.⁸¹ The representative body is the Municipal Council, composed by 21 members⁸² (18 males and 3 women). The Municipality of Bulqiza does not have an official website.

Municipality of Klos

The Municipality of Klos is located in eastern Albania and is part of Dibra Region. It is composed by 4 administrative units, 1 city and 30 villages⁸³ and has a population of 16.618 inhabitants.⁸⁴ As regards the administrative classification, the municipality of Klos is classified by 22.8% urban and 77.2% rural.⁸⁵ Data on educational attainment⁸⁶ shows that 68.5% (65.8% region, 52.1% country) of the population has

rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

72 Law No. 115/2014 "On Administrative-Territorial Division of the Local Government Units in the Republic of Albania".

73 <http://instatgis.gov.al/#/!l/prefectures/population/prefpop1>

74 INSTAT, A new urban-rural classification of the Albanian population

75 <http://instatgis.gov.al/#/!l/prefectures/population/prefpop1>

76 <http://instatgis.gov.al/#/!l/prefectures/population/prefpop1>

77 Ibid.

78 Ibid.

79 Ibid.

80 Ibid.

81 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

82 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

83 Law No. 115/2014 "On Administrative-Territorial Division of the Local Government Units in the Republic of Albania".

84 <http://instatgis.gov.al/#/!l/prefectures/population/prefpop1>

85 INSTAT, A new urban-rural classification of the Albanian population

86 <http://instatgis.gov.al/#/!l/prefectures/population/prefpop1>

concluded only primary and lower secondary education;⁸⁷ 20.6% (24.26% region, 31.4% country) - Upper secondary education;⁸⁸ 4.1% (5.2% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 68.6% employed people work in the agriculture, followed by service sector 23.2% and industry 8.2%.⁸⁹ The main source of income of income for households is from pensions 39.4% and paid work or self-employment 38.4%, followed by social assistance and benefits with 35.5% and remittances 6.4%.⁹⁰ The unemployment rate in Klos is 31.2% of the labor force above.⁹¹ Meanwhile, unemployment among young people aged 15-24 amounts to 58.5%.⁹² Household internet access ratio is 0.4%.⁹³ The unconditional budget cash transfer for the municipality of Klos in 2016 is 105.643 thousand ALL.⁹⁴ The representative body is the Municipal Council, composed by 21 members⁹⁵ (18 males and 3 women). The Municipality of Klos does not have an official website.

Municipality of Shijak

The Municipality of Shijak is located in west-central Albania and is part of Durrës Region. It is composed by 4 administrative units, 1 city and 25 villages⁹⁶ and has a population of 34.513 inhabitants.⁹⁷ As regards the administrative classification, the municipality of Shijak is classified by 100% urban and 0.0% rural.⁹⁸ Data on educational attainment⁹⁹ shows that 64.4% (654.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 25.7% (31.48% region, 31.4% country) - Upper secondary education; 5.4% (9.7% region, 11.8% country) - University and post university education. The economy relies on services and industry sectors. 52.0% employed people work in services, followed by industry 24.7% and agriculture 23.3%.¹⁰⁰ The main source of income for households is paid work or self-employment 57.8% and pensions 31.5%, followed by remittances 13.0% and social assistance and benefits 5.5%.¹⁰¹ The unemployment rate in Shijak is 25.9% of the labor force aged 15 and above.¹⁰² Meanwhile, unemployment among young people aged 15-24 amounts to 46.8%.¹⁰³ Household internet

87 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

88 Ibid.

89 Ibid.

90 Ibid.

91 Ibid.

92 Ibid.

93 Ibid.

94 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

95 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DT1_-_keshilltaret_2015.htm

96 Law No. 115/2014 "On Administrative-Territorial Division of the Local Government Units in the Republic of Albania".

97 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

98 INSTAT, A new urban-rural classification of the Albanian population

99 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

100 Ibid.

101 Ibid.

102 Ibid.

103 Ibid.

access ratio is 8.8%.¹⁰⁴ The unconditional budget cash transfer for the municipality of Shijak in 2016 is 96.760 thousand ALL.¹⁰⁵ The representative body is the Municipal Council, composed by 21 members¹⁰⁶ (14 males and 7 women). The Municipality of Shijak does not have an official website.

Municipality of Cerrik

The Municipality of Cerrik is located in central Albania and is part of Elbasan Region. It is composed by 5 administrative units, 1 city and 28 villages¹⁰⁷ and has a population of 27.445 inhabitants.¹⁰⁸ As regards the administrative classification, the municipality of Cerrik is classified by 100% urban and 0.0% rural.¹⁰⁹ Data on educational attainment¹¹⁰ shows that 66.2% (59.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 23.6% (26.63% region, 31.4% country) - Upper secondary education; 4.3% (8.0% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 61.6% employed people work in agriculture, followed by service sector 23.7% and industry 14.7%.¹¹¹ The main source of income for households is paid work or self-employment 51.2% and pensions 31.0%, followed by remittances 21.4% and social assistance and benefits 11.8%.¹¹² The unemployment rate in Cerrik is 17.8% of the labor force aged 15 and above.¹¹³ Meanwhile, unemployment among young people aged 15-24 amounts to 35.3%.¹¹⁴ Household internet access ratio is 4.8%.¹¹⁵ The unconditional budget cash transfer for the municipality of Cerrik in 2016 is 105.932 thousand ALL.¹¹⁶ The representative body is the Municipal Council, composed by 21 members¹¹⁷ (12 males and 9 women). The Municipality of Cerrik does not have an official website.

Municipality of Belsh

The Municipality of Belsh is located in central Albania and is part of Elbasan Region. It is composed by 5 administrative units, 1 city and 34 villages¹¹⁸ and has

¹⁰⁴ Ibid.

¹⁰⁵ <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

¹⁰⁶ http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

¹⁰⁷ http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

¹⁰⁸ <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

¹⁰⁹ INSTAT, A new urban-rural classification of the Albanian population

¹¹⁰ <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

¹¹¹ Ibid.

¹¹² Ibid.

¹¹³ Ibid.

¹¹⁴ Ibid.

¹¹⁵ Ibid.

¹¹⁶ <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

¹¹⁷ http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

¹¹⁸ http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

a population of 19.503 inhabitants.¹¹⁹ As regards the administrative classification, the municipality of Belsh is classified by 0.0% urban and 100% rural.¹²⁰ Data on educational attainment¹²¹ shows that 71.4% (59.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 19.4% (26.63% region, 31.4% country) - Upper secondary education; 2.9% (8.0% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 66.8% employed people work in the agriculture, followed by service sector 20.7% and industry 12.5%.¹²² The main source of income for households is paid work or self-employment 62.7% and remittances 31.2%, followed by pensions 27.2% and social assistance and benefits 7.8%.¹²³ The unemployment rate in Belsh is 16.6% of the labor force aged 15 and above.¹²⁴ Meanwhile, unemployment among young people aged 15-24 amounts to 37.7%.¹²⁵ Household internet access ratio is 2.1%.¹²⁶ The unconditional budget cash transfer for the municipality of Belsh in 2016 is 91.156 thousand ALL.¹²⁷ The representative body is the Municipal Council, composed by 21 members¹²⁸ (13 males and 8 women). The Municipality of Belsh does not have an official website.

Municipality of Gramsh

The Municipality of Gramsh is located in central Albania and is part of Elbasan Region. It is composed by 10 administrative units, 1 city and 94 villages¹²⁹ and has a population of 24.231 inhabitants.¹³⁰ As regards the administrative classification, the municipality of Gramsh is classified by 34.9% urban and 65.1% rural.¹³¹ Data on educational attainment¹³² shows that 59.5% (59.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 27.8% (26.63% region, 31.4% country) - Upper secondary education; 7.7% (8.0% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 57.4% employed people work in agriculture, followed by service sector 34.4% and industry 8.2%.¹³³ The main source of income of households is paid work or self-employment 54.2% and pensions 31.8%, followed by social assistance and benefits with 22.7% and remittances 6.2%.¹³⁴ The

119 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

120 INSTAT, A new urban-rural classification of the Albanian population

121 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

122 Ibid.

123 Ibid.

124 Ibid.

125 Ibid.

126 Ibid.

127 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

128 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTL_-_keshilltaret_2015.htm

129 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

130 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

131 INSTAT, A new urban-rural classification of the Albanian population

132 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

133 Ibid.

134 Ibid.

unemployment rate in Gramsh is 31.5% of the labor force aged 15 and above.¹³⁵ Meanwhile, unemployment among young people aged 15-24 amounts to 49.4%.¹³⁶ Household internet access ratio is 4.7%.¹³⁷ The unconditional budget cash transfer for the municipality of Gramsh in 2016 is 160.347 thousand ALL.¹³⁸ The representative body is the Municipal Council, composed by 21 members¹³⁹ (16 males and 5 women). The Municipality of Gramsh does not have an official website.

Municipality of Librazhd

The Municipality of Librazhd is located in eastern Albania and is part of Elbasan Region. It is composed by 7 administrative units, 1 city and 52 villages¹⁴⁰ and has a population of 31.892 inhabitants.¹⁴¹ As regards the administrative classification, the municipality of Librazhd is classified by 19.8% urban and 80.2% rural.¹⁴² Data on educational attainment¹⁴³ shows that 64.1% (59.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 22.9% (26.63% region, 31.4% country) - Upper secondary education; 7.3% (8.0% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 62.2% employed people work in agriculture, followed by service sector 29.7% and industry 8.2%.¹⁴⁴ The main source of income of households is paid work or self-employment 58.3% and retirement pensions by 31.4%, followed by social assistance and benefits 23.1% and remittances 10.7%.¹⁴⁵ The unemployment rate in Librazhd is 20.2% of the labor force aged 15 and above.¹⁴⁶ Meanwhile, unemployment among young people aged 15-24 amounts to 40.3%.¹⁴⁷ Household internet access ratio is 4.7%.¹⁴⁸ The unconditional budget cash transfer for the municipality of Librazhd in 2016 is 169.887 thousand ALL.¹⁴⁹ The representative body is the Municipal Council, composed by 21 members¹⁵⁰ (13 males and 8 women). The Municipality of Librazhd does not have an official website.

135 Ibid.

136 Ibid.

137 Ibid.

138 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

139 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

140 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

141 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

142 INSTAT, A new urban-rural classification of the Albanian population

143 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

144 Ibid.

145 Ibid.

146 Ibid.

147 Ibid.

148 Ibid.

149 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

150 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

Municipality of Prrenjas

The Municipality of Prrenjas is located in eastern Albania and is part of Elbasan Region. It is composed by 4 administrative units, 1 city and 25 villages¹⁵¹ and has a population of 24.906 inhabitants.¹⁵² As regards the administrative classification, the municipality of Prrenjas is classified by 73.3% urban and 26.7% rural.¹⁵³ Data on educational attainment¹⁵⁴ shows that 62.9% (59.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 26.9% (26.63% region, 31.4% country) - Upper secondary education; 5.1% (8.0% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 55.8% employed people work in agriculture, followed by service sector 31% and industry 13.3%.¹⁵⁵ The main source of income of households is paid work or self-employment 47.9% and pensions 30.2%, followed by social assistance and benefits 24.0% and remittances 8.7%.¹⁵⁶ The unemployment rate in Prrenjas is 29.1% of the labor force aged 15 and above.¹⁵⁷ Meanwhile, unemployment among young people aged 15-24 amounts to 56%.¹⁵⁸ Household internet access ratio is 1.6%.¹⁵⁹ The unconditional budget cash transfer for the municipality of Prrenjas in 2016 is 117.256 thousand ALL.¹⁶⁰ The representative body is the Municipal Council, composed by 21 members¹⁶¹ (16 males and 5 women). The Municipality of Prrenjas does not have an official website.

Municipality of Lushnje

The Municipality of Lushnje is located in central-west Albania and is part of Fier Region. It is composed by 11 administrative units, 1 city and 85 villages¹⁶² and has a population of 127.438 inhabitants.¹⁶³ As regards the administrative classification, the municipality of Lushnje is classified by 28.7% urban and 71.3% rural.¹⁶⁴ Data on educational attainment¹⁶⁵ shows that 56.7% (57.7% region, 52.1% country) of the population has concluded only primary and lower secondary education; 31.3% (30.04% region, 31.4% country) - Upper secondary education; 7.8% (7.4% region, 11.8% country) - University and post university education. The economy relies on

151 http://www.reformateritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

152 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

153 INSTAT, A new urban-rural classification of the Albanian population

154 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

155 Ibid.

156 Ibid.

157 Ibid.

158 Ibid.

159 Ibid.

160 <http://www.financa.gov.al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

161 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

162 http://www.reformateritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

163 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

164 INSTAT, A new urban-rural classification of the Albanian population

165 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

agriculture and services sectors. 59.3% employed people work in the agriculture, followed by service sector (31.2% of) and industry (9.6%).¹⁶⁶ The main source of income for households is paid work or self-employment 67.0% and pensions 29.2%, followed by remittances 10.6% and social assistance and benefits 6.0%.¹⁶⁷ The unemployment rate in Lushnje is 18.3% of the labor force aged 15 and above.¹⁶⁸ Meanwhile, unemployment among young people aged 15-24 amounts to 36.9%.¹⁶⁹ Household internet access ratio is 6%.¹⁷⁰ The unconditional budget cash transfer for the municipality of Lushnje in 2016 is 284,765 thousand ALL.¹⁷¹ The representative body is the Municipal Council, composed by 41 members¹⁷² (23 males and 18 women). The official website of the Municipality of Lushnje is www.bashkialushnje.gov.al.

Municipality of Divjaka

The Municipality of Divjaka is located in western Albania and is part of Fier Region. It is composed by 5 administrative units, 1 city and 36 villages¹⁷³ and has a population of 34,254 inhabitants.¹⁷⁴ As regards the administrative classification, the municipality of Divjaka is classified by 54.0% urban and 46.0% rural.¹⁷⁵ Data on educational attainment¹⁷⁶ shows that 68.5% (57.7% region, 52.1% country) of the population has concluded only primary and lower secondary education; 23.3% (30.04% region, 31.4% country) - Upper secondary education; 3.6% (7.4% region, 11.8% country) - University and post university education. The economy relies on agriculture and services sectors. 78.1% employed people work in agriculture followed by service sector 14.6% and industry 7.3%.¹⁷⁷ The main source of income of households is paid work or self-employment 78.4% and pensions by 27.7%, followed by remittances 16.0% and social assistance and benefits with 3.9%.¹⁷⁸ The unemployment rate in Divjaka is 6.7% of the labor force aged 15 and above.¹⁷⁹ Meanwhile, unemployment among young people aged 15-24 amounts to 21.7%.¹⁸⁰ Household internet access ratio is 2.5%.¹⁸¹ The unconditional budget cash transfer for the municipality of Divjaka in 2016 is 154,086 thousand ALL.¹⁸² The represen-

166 Ibid.

167 Ibid.

168 Ibid.

169 Ibid.

170 Ibid.

171 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

172 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTL_-_keshilltaret_2015.htm

173 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

174 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

175 INSTAT, A new urban-rural classification of the Albanian population

176 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

177 Ibid.

178 Ibid.

179 Ibid.

180 Ibid.

181 Ibid.

182 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

tative body is the Municipal Council, composed by 31 members¹⁸³ (20 males and 11 women). The Municipality of Divjaka does not have an official website.

Municipality of Libohova

The Municipality of Libohova is located in southern Albania and is part of Gjirokastra Region. It is composed by 3 administrative units, 1 city and 17 villages¹⁸⁴ and has a population of 3.667 inhabitants.¹⁸⁵ As regards the administrative classification, the municipality of Libohova is classified by 100% urban and 0.0% rural.¹⁸⁶ Data on educational attainment¹⁸⁷ shows that 59.4% (49.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 27.2% (32.27% region, 31.4% country) - Upper secondary education; 6.9% (13.3% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 39.6% employed people work in service sector, followed by agriculture 36.5% and industry 23.9%.¹⁸⁸ The main source of income of households is paid work or self-employment 58.9% and pensions 45.1%, followed by social assistance and benefits 5.9% and remittances 3.8%.¹⁸⁹ The unemployment rate in Libohova is 29.5% of the labor force aged 15 and above.¹⁹⁰ Meanwhile, unemployment among young people aged 15-24 amounts to 45.6%.¹⁹¹ Household internet access ratio is 7.5%.¹⁹² The unconditional budget cash transfer for the municipality of Libohova in 2016 is 35.241 thousand ALL.¹⁹³ The representative body is the Municipal Council, composed by 15 members¹⁹⁴ (10 males and 5 women). The Municipality of Libohova does not have an official website.

Municipality of Tepelena

The Municipality of Tepelena is located in southern Albania and is part of Gjirokastrë Region. It is composed by 4 administrative units, 1 city and 24 villages¹⁹⁵ and has a population of 8.949 inhabitants.¹⁹⁶ As regards the administrative classification, the municipality of Tepelena is classified by 36.3% urban and 63.7% rural.¹⁹⁷

183 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

184 http://www.reformateritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

185 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

186 INSTAT, A new urban-rural classification of the Albanian population

187 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

188 Ibid.

189 Ibid.

190 Ibid.

191 Ibid.

192 Ibid.

193 <http://www.financa.gov.al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

194 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

195 http://www.reformateritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

196 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

197 INSTAT, A new urban-rural classification of the Albanian population

Data on educational attainment¹⁹⁸ shows that 51.1% (49.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 32.1% (32.27% region, 31.4% country) - Upper secondary education; 11.1% (13.3% region, 11.8% country) - University and post university education). The economy relies on services and agriculture sectors. 60.5% employed people work in services, followed by agriculture 25.7% and industry 13.8%.¹⁹⁹ The main source of income of households is paid work or self-employment 53.2% and pensions 39.9%, followed by social assistance and benefits 12.3% and remittances 6.3%.²⁰⁰ The unemployment rate in Tepelena is 37.1% of the labor force aged 15 and above.²⁰¹ Meanwhile, unemployment among young people aged 15-24 amounts to 67.3%.²⁰² Household internet access ratio is 6.2%.²⁰³ The unconditional budget cash transfer for the municipality of Tepelena in 2016 is 62.243 thousand ALL.²⁰⁴ The representative body is the Municipal Council, composed by 15 members²⁰⁵ (8 males and 7 women). The Municipality of Tepelena does not have an official website.

Municipality of Memaliaj

The Municipality of Memaliaj is located in southern Albania and is part of Gjiro-kastër Region. It is composed by 6 administrative units, 1 city and 53 villages²⁰⁶ and has a population of 10.657 inhabitants.²⁰⁷ As regards the administrative classification, the municipality of Memaliaj is classified by 100% urban and 0.0% rural.²⁰⁸ Data on educational attainment²⁰⁹ shows that 60.1% (49.6% region, 52.1% country) of the population has concluded only primary and lower secondary education; 26.4% (32.27% region, 31.4% country) - Upper secondary education; 7.2% (13.3% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 50.0% employed people work in agriculture, followed by services 38.2% and industry 11.8%.²¹⁰ The main source of income of households is paid work or self-employment 44.3% and pensions 41.6%, followed by social assistance and benefits 13.9% and remittances 7.4%.²¹¹ The unemployment rate in Memaliaj is 21.2% of the labor force aged 15 and above.²¹² Meanwhile, unemployment among young people aged 15-24 amounts to 36.3%.²¹³

198 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

199 Ibid.

200 Ibid.

201 Ibid.

202 Ibid.

203 Ibid.

204 <http://www.financa.gov.al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

205 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

206 http://www.reformateritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

207 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

208 INSTAT, A new urban-rural classification of the Albanian population

209 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

210 Ibid.

211 Ibid.

212 Ibid.

213 Ibid.

Household internet access ratio is 2.1%.²¹⁴ The unconditional budget cash transfer for the municipality of Memaliaj in 2016 is 82.220 thousand ALL.²¹⁵ The representative body is the Municipal Council, composed by 21 members²¹⁶ (13 males and 6 women). The Municipality of Memaliaj does not have an official website.

Municipality of Maliq

The Municipality of Maliq is located in eastern Albania and is part of Korçë Region. It is composed by 7 administrative units, 1 city and 80 villages²¹⁷ and has a population of 41.757 inhabitants.²¹⁸ As regards the administrative classification, the Municipality of Maliq is classified by 91.2% urban and 8.8% rural.²¹⁹ Data on educational attainment²²⁰ shows that 71.2% (56.5% region, 52.1% country) of the population has concluded only primary and lower secondary education; 20.5% (29.42% region, 31.4% country) - Upper secondary education; 3.1% (9.5% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 65.8% employed people work in agriculture, followed by service sector 20.6% and industry 13.6%.²²¹ The main source of income of households is paid work or self-employment 62.8% and pensions 34.8%, followed by social assistance and benefits 13.3% and remittances 8.1%.²²² The unemployment rate in Maliq is 18.4% of the labor force aged 15 and above.²²³ Meanwhile, unemployment among young people aged 15-24 amounts to 38.1%.²²⁴ Household internet access ratio is 4.2%.²²⁵ The unconditional budget cash transfer for the municipality of Maliq in 2016 is 204.938 thousand ALL.²²⁶ The representative body is the Municipal Council, composed by 31 members²²⁷ (20 males and 11 women). The Municipality of Maliq does not have an official website.

Municipality of Devoll

The Municipality of Devoll is located in southeastern Albania and is part of Korça Region. It is composed by 5 administrative units, 1 city and 44 villages²²⁸ and has

214 Ibid.

215 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

216 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

217 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

218 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

219 INSTAT, A new urban-rural classification of the Albanian population

220 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

221 Ibid.

222 Ibid.

223 Ibid.

224 Ibid.

225 Ibid.

226 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

227 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

228 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

a population of 26.716 inhabitants.²²⁹ As regards the administrative classification, the Municipality of Devoll is classified by 23.4% urban and 76.6% rural.²³⁰ Data on educational attainment²³¹ shows that 64.6% (56.5% region, 52.1% country) of the population has concluded only primary and lower secondary education; 24.4% (29.42% region, 31.4% country) - Upper secondary education; 7.3% (9.5% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 56.1% employed work in agriculture, followed by service sector 28.5% and industry 15.3%.²³² The main source of income of households is paid work or self-employment 62.3% and pensions 38.6%, followed by remittances 9.0% and social assistance and benefits 6.1%.²³³ The unemployment rate in Devoll is 15.6% of the labor force aged 15 and above.²³⁴ Meanwhile, unemployment among young people aged 15-24 amounts to 33.7%.²³⁵ Household internet access ratio is 6.9%.²³⁶ The unconditional budget cash transfer for the municipality of Devoll in 2016 is 139.873 thousand ALL.²³⁷ The representative body is the Municipal Council, composed by 21 members²³⁸ (15 males and 6 women). The Municipality of Devoll does not have an official website.

Municipality of Has

The Municipality of Has is located in northeastern Albania and is part of Kukës Region. It has 4 administrative units, 1 city and 29 villages²³⁹ and has a population of 16.790 inhabitants.²⁴⁰ As regards the administrative classification, the Municipality of Has is classified by 30.3% urban and 69.7% rural.²⁴¹ Data on educational attainment²⁴² shows that 64.6% (59.4% region, 52.1% country) of the population has completed only primary and lower secondary education; 24.8% (29.05% region, 31.4% country) - Upper secondary education; 6.5% (7.4% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 60% employed people work in service sector, followed by agriculture 28.8% and industry (11.30%).²⁴³ The main source of income of households is social assistance and benefits with 47.6% and pensions 29.9%, followed by paid work or self-employment 29.6% and remittances 6.2%.²⁴⁴ The unemployment rate

229 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

230 INSTAT, A new urban-rural classification of the Albanian population

231 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

232 Ibid.

233 Ibid.

234 Ibid.

235 Ibid.

236 Ibid.

237 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

238 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

239 http://www.reformateritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

240 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

241 INSTAT, A new urban-rural classification of the Albanian population

242 <http://instatgis.gov.al/#!/l/prefectures/population/prefpop1>

243 Ibid.

244 Ibid.

in Has is 63.1% of the labor force aged 15 and above.²⁴⁵ Meanwhile, unemployment among young people aged 15-24 amounts to 83.3%.²⁴⁶ Household internet access ratio is 9.6%.²⁴⁷ The unconditional budget cash transfer for the municipality of Has in 2016 is 108.340 thousand ALL.²⁴⁸ The representative body is the Municipal Council, composed by 21 members²⁴⁹ (20 males and 1 women). The Municipality of Has does not have an official website.

Municipality of Vau i Dejës

The Municipality of Vau i Dejës is located in northeastern Albania and is part of Shkoder Region. It is composed by 6 administrative units, 1 city and 47 villages²⁵⁰ and has a population of 30.438 inhabitants.²⁵¹ As regards the administrative classification, the Municipality of Vau i Dejës is classified by 44.2% urban and 55.8% rural.²⁵² Data on educational attainment²⁵³ shows that 69.6% (59.4% region, 52.1% country) of the population has concluded only primary and lower secondary education; 21.9% (29.05% region, 31.4% country) - Upper secondary education; 3.5% (7.4% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 43.4% employed people work in agriculture, followed by service sector 37.5% and industry 19.0%.²⁵⁴ The main source of income of households is paid work or self-employment 45.6% and pensions 28.3%, followed by social assistance and benefits 20.0% and remittances 8.9%.²⁵⁵ The unemployment rate in Vau i Dejës is 43.9% of the labor force aged 15 and above.²⁵⁶ Meanwhile, unemployment among young people aged 15-24 amounts to 65.9%.²⁵⁷ Household internet access ratio is 7%.²⁵⁸ The unconditional budget cash transfer for the municipality of Vau i Dejës in 2016 is 154.016 thousand ALL.²⁵⁹ The representative body is the Municipal Council, composed by 21 members²⁶⁰ (15 males and 6 women). The Municipality of Vau i Dejës does not have an official website.

245 Ibid.

246 Ibid.

247 Ibid.

248 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

249 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

250 http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf

251 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

252 INSTAT, A new urban-rural classification of the Albanian population

253 <http://instatgis.gov.al/#!/prefectures/population/prefpop1>

254 Ibid.

255 Ibid.

256 Ibid.

257 Ibid.

258 Ibid.

259 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

260 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

Municipality of Vora

The Municipality of Vora is located in central Albania and is part of Tirana Region. It is composed by 3 administrative units, 1 city and 18 villages²⁶¹ and has a population of 25.511 inhabitants.²⁶² As regards the administrative classification, the Municipality of Vora is classified by 32.6% urban and 67.4% rural.²⁶³ Data on educational attainment²⁶⁴ shows that 61.2% (38.9% region, 52.1% country) of the population has concluded only primary and lower secondary education; 28.3% (36.52% region, 31.4% country) - Upper secondary education; 5.9% (20.6% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 54.6% employed people work in service sector, followed by industry 34.8% and agriculture 10.6%.²⁶⁵ The main source of income of households is paid work or self-employment 64.2% and pensions 28.7%, followed by remittances 10.1% and social assistance and benefits 4.7%.²⁶⁶ The unemployment rate in Vora is 29.4% of the labor force aged 15 and above.²⁶⁷ Meanwhile, unemployment among young people aged 15-24 amounts to 48.6%.²⁶⁸ Household internet access ratio is 7.8%.²⁶⁹ The unconditional budget cash transfer for the municipality of Vora in 2016 is 86.140 thousand ALL.²⁷⁰ The representative body is the Municipal Council, composed by 21 members²⁷¹ (12 males and 9 women). The official website of the Municipality of Vora is www.bashkiavore.gov.al.

Municipality of Selenica

The Municipality of Selenica is located in southeastern Albania and is part of Vlora Region. It is composed by 6 administrative units, 1 city and 47 villages²⁷² and has a population of 18.476 inhabitants.²⁷³ As regards the administrative classification, the Municipality of Selenica is classified by 100% urban and 0.0% rural.²⁷⁴ Data on educational attainment²⁷⁵ shows that 65.5% (49.2% region, 52.1% country) of the population has completed only primary and lower secondary education; 23.3% (33.26% region, 31.4% country) - Upper secondary education; 4.4% (12.3% region, 11.8% country) - University and post university education. The economy relies on services and agriculture sectors. 47.4% employed people work in agriculture, followed

261 [http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_](http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf)

Fletore_zyrtare.pdf

262 <http://instatgis.gov.al/#/l/prefectures/population/prefpop1>

263 INSTAT, A new urban-rural classification of the Albanian population

264 <http://instatgis.gov.al/#/l/prefectures/population/prefpop1>

265 Ibid.

266 Ibid.

267 Ibid.

268 Ibid.

269 Ibid.

270 <http://www.financa.gov.al/al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

271 http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

272 [http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_](http://www.reformaterritoriale.al/images/presentations/Ligji%20ndarja%20territoriale_Fletore_zyrtare.pdf)

Fletore_zyrtare.pdf

273 <http://instatgis.gov.al/#/l/prefectures/population/prefpop1>

274 INSTAT, A new urban-rural classification of the Albanian population

275 <http://instatgis.gov.al/#/l/prefectures/population/prefpop1>

by service sector 37.0% and industry (15.6%).²⁷⁶ The main source of income of households is paid work or self-employment 50.5% and pensions 31.6%, followed by remittances 9.5% and social assistance and benefits 5.7%.²⁷⁷ The unemployment rate in Selenica is 29% of the labor force aged 15 and above.²⁷⁸ Meanwhile, unemployment among young people aged 15-24 amounts to 54.7%.²⁷⁹ Household internet access ratio is 1.4%.²⁸⁰ The unconditional budget cash transfer for the municipality of Selenica in 2016 is 129.843 thousand ALL.²⁸¹ The representative body is the Municipal Council, composed by 21 members²⁸² (13 males and 8 women). The Municipality of Selenica does not have an official website.

Annex II. Interview Addressed to LGUs

1. Does your LGU have an approved transparency program? If yes, when was it approved and during its approval process, did CSOs participate and contribute to it?
2. Does the administrative structure of your LGU have a coordinator (office or person) for transparency/the right to information?
3. Has your LGU created the electronic register for public notifications and consultations? If yes, how many projects have been subject to public consultation procedure through the electronic register?
4. Does your administrative structure of your LGU have a coordinator of notification and public consultation?
5. Does your LGU have an approved regulation for the registration, documentation, evaluation and transfer of denunciations?
6. Does your LGU have an adopted regulation for the notification, examination, detection and reporting of administrative shortcomings, discrepancies and violations that create ground for corruption, fraud or irregularity?

²⁷⁶ Ibid.

²⁷⁷ Ibid.

²⁷⁸ Ibid.

²⁷⁹ Ibid.

²⁸⁰ Ibid.

²⁸¹ <http://www.financa.gov.al/raportime/buxheti/buxheti-i-pushtetit-vendor-2016>

²⁸² http://www.cec.org.al/Portals/0/Documents/CEC%202013/zgjedhje-vendore/2015/rezultatet/keshilltaret/151210_-_DTI_-_keshilltaret_2015.htm

7. Does your unit have a Strategy for Internal Risk Management?
8. Does the regulation of organization and functioning have norms that regulate the procedure of submission, review and approval of the citizens' initiative?
9. Is there a Code of Ethics/Conduct for the Municipal Council and the administration in your institution?
10. Does your LGU have an Anti-Corruption Strategy? If yes, when was it approved and during the process of its approval did civil society organizations participate and contribute to it?
11. Are there internal rules for regular data gathering on risks of corruption in your municipality? Does the municipality follow a system of indicators for monitoring the risk of corruption/for municipal administration on how to prevent/neutralize corruption? Are there any guidelines/manuals/training on this issue?
12. Does your administration have rules for the protection of whistleblowers?
13. What actions by CSOs and citizens will help the local administration to improve its efforts to curb corruption?
14. In what areas would be more necessary to provide assistance to civil society organizations (from training or other) in order to increase their capacity to support the growth of good governance and integrity in local government institutions?
15. Is your LGU willing to cooperate with CSOs in the framework of the CIVILISC Project?
16. Please provide some recommendations on forms and necessity of the CSOs involvement in promoting good governance and fighting corruption.

Annex III. Summary of Responses from LGUs to Interviews

Local Government Unit	Program of Transparency	Coordinator Transparency/ Right to Information	Electronic Register	Coordinator (Public Consultation Notification)	Regulation for Reporting Corruption cases	Regulation for Administrative Violations	Strategy for Internal Risk Management	Norms for Civic Engagement	Code of Ethics/Conduct	Anti-Corruption Strategy	Internal rules for Gathering data on Anti-Corruption	Whistle-Blower protection rules
Ura Vajgur.	√	√	X	√	√	√	√	√	√	X	X	X
Bulqiza	X	√	X	√	X	X	X	√	N/A	X	X	X
Klos	X	X	X	√	X	√	X	√	√	X	X	X
Shijak	√	√	X	X	X	X	X	X	X	X	X	X
Cerrik	√	√	X	√	X	√	√	√	X	X	X	X
Belsh	X	X	X	X	X	X	X	X	√	X	X	X
Gramsh	X	√	X	√	X	√	X	√	√	X	√	X
Librazhd	√	√	X	X	X	X	X	X	√	X	X	X
Prrenjas	X	√	X	√	X	√	√	√	√	X	√	N/A
Lushnja	X	√	X	√	X	X	√	√	√	X	X	X
Divjaka	X	√	X	X	X	√	√	√	√	X	X	N/A
Libohova	X	√	X	X	X	X	X	√	√	X	X	X
Tepelena	X	√	X	X	√	√	X	X	√	X	X	X
Memaliaj	X	√	X	√	X	X	X	X	X	X	X	X
Maliq	X	X	X	X	X	X	X	X	X	X	X	X
Devoll	X	√	X	X	X	X	X	√	√	X	X	X
Has	X	√	X	X	X	X	√	√	X	X	X	X
Vau i Dejës	X	√	X	√	X	X	X	√	√	X	X	X
Vora	√	√	X	√	X	√	√	√	√	X	X	X
Selenica	X	√	X	X	X	X	√	√	√	X	X	X

The Table above presents 12 Anti-Corruption Instruments described in the questionnaire conducted in 20 LGUs. Answers received are marked:

√ Municipality HAS adopted the respective anti-corruption instrument

X Municipality HAS NOT adopted the respective anti-corruption instrument