

INTEGRITY INDEX OF PUBLIC INSTITUTIONS

JANUARY 2024



Institute
for Democracy
and Mediation

AUTHORS:

Boris Divjak
Mimosa Agolli

EDITOR:

Rovena Sulstarova

TRANSLATION IN ENGLISH:

Durim Tabaku

DESIGN AND LAYOUT:

Eduart Cani

© 2024 by Institute for Democracy and Mediation. All rights reserved.

Institute for Democracy and Mediation (IDM)

Address: Rr. Shenasi Dishnica, Nd.35, H.1

1017 Tirana, Albania

E-mail: info@idmalbania.org

Website: www.idmalbania.org



Institute
for Democracy
and Mediation



Suedi
Sverige

This document is prepared in the framework of the "Strengthening Integrity for the Improvement of Public Services" Project implemented by the Institution for Democracy and Mediation (IDM) Albania with the financial support of the Swedish Embassy in Tirana. The views and opinions expressed in this document do not necessarily reflect the views and positions of the Swedish Embassy in Tirana.

TABLE OF CONTENTS

INTRODUCTION	5
INTEGRITY INDEX OF PUBLIC INSTITUTIONS	6
METHODOLOGY OF ASSESSMENT OF PUBLIC INSTITUTIONS' INTEGRITY	7
PRACTICAL GUIDELINES ON APPLICATION OF INSTRUMENT	11
REFERENCES	28

INTRODUCTION

Confronting moral challenges characterizes every society, regardless of the level of development. Integrity means respecting these moral and ethical challenges. Therefore, integrity remains a system of values. Building a culture of integrity in the public system is challenging, because the benefits from unethical behavior and decisions, which lead to corrupt acts, are often quite high. Given the variety of responsibilities in the public sector, corrupt acts range from small-scale bribery to state capture. Corrupt practices can occur in various public institutions' activities, including appointment of personnel, procurement of services, issuing and control of permits, licenses or concessions, etc. (Graycar 2015, Graycar and Sidebottom 2012).¹

The legal, sublegal, and administrative framework as well as the nature of corrupt acts will significantly impact the measures to be taken to promote integrity in the public sector. Strengthening public institutions' integrity is a long-term objective that calls for structural reforms, changes in the institutional mindset as well as the adoption and implementation of strong legal frameworks.

Corruption in Albania is reportedly one of the country's biggest obstacles in its endeavor to build the rule of law, develop and integrate to the European Union. According to the Progress Report of the European Commission (2023), the progress of the measures taken to strengthen the integrity of public institutions is positive. Central government institutions and 23 local self-government units have adopted and are implementing integrity plans. Regardless of the progress made, Albania must intensify its efforts to develop, approve and implement integrity plans in all public institutions. The central government must ensure that the measures taken to strengthen integrity are fully implemented and continuously and adequately monitored. (EU Progress Report 2023)

The fight against corruption is not simply a matter of law enforcement. The victim of corruption is the system itself and the moral values. Hence, for this very reason, strengthening the integrity of the national public domain continues to remain an effective measure in the prevention of corruption. The commitment to reforming integrity in public institutions requires coordinated efforts, transparency, and willingness to cooperate in different sectors. This effort is a shared journey, which requires not only the commitment of the government, but also the active participation and support of civil society, businesses, and individuals.

With support from the Government of the Kingdom of Sweden, the Institute for Democracy and Mediation (IDM) has designed a methodology for evaluating the institutional integrity in an effort to monitor the implementation of integrity plans of public institutions and to assess the impact these measures have had on strengthening institutional integrity.

The design of this instrument is based on the experience IDM has already acquired in drafting and implementing integrity instruments (Integrity Plan and Code of Ethics) in several public institutions across the country. The principal author of this instrument is Mr. Boris Divjak, an associate of Transparency International, with rich experience in evaluating the institution integrity in Southeast European countries. This instrument has also been consulted with public institutions whose scope of work includes the fight against corruption, such as the National Anti-Corruption Coordinator, the High Inspectorate for the Declaration and Audit of Assets and Conflict of Interest, and as well as the Commissioner for the Right to Information and Protection of Personal Data. In addition, the instrument was piloted in two public institutions –the Commissioner for the Right to Information and Protection of Personal Data and the Ministry of Health and Social Protection. Thanks to the findings of the testing process, the instrument was finalized and methodological recommendations were provided for the application of this assessment.

1 Adam Graycar and Aiden Sibbentom (2012). Corruption and control: A corruption reduction approach. Journal of financial Crime 19 (4). https://www.researchgate.net/publication/263695877_Corruption_and_Control_A_Corruption_Reduction_Approach

INTEGRITY INDEX OF PUBLIC INSTITUTIONS

This integrity index has been designed to be implemented by civil society actors and/or, experts, who are informed of and involved in the fight against corruption and for good governance. Representatives of civil society are independent actors, who have served as watchdogs of the public good and interest, with the necessary capacities to carry out this assessment in a sustainable manner. The index is designed in such way so as to be valid and representative of all public institutions that have adopted an integrity plan and have implemented it or are in the course of implementing it.

The integrity index is a mechanism that assesses the institutional framework for the promotion of integrity and the fight against corruption; the institutional capacities for fulfilling the integrity objectives set by the institution in its integrity plans; the institution's transparency and accountability to services recipients; and legal compliance of the activities it performs. Bearing this goal in mind, the instrument serves as a source material for public institutions in the performance of their functional duty, in achieving the institutional and integrity objectives as well as in improving the quality of the public services they deliver. The assessment results contribute to strengthening a pro-integrity culture in the public administration, enhancing the transparency and increasing the responsibilities of the results stemming from the implementation of integrity plans in these institutions. Also, this assessment produces abundant information on the methods of planning, implementation, performance, and reporting of integrity plans for evaluators of public institutions (civil society and experts).

The public institutions' integrity index consists of two parts. The first part describes the methodology employed to assess the public institutions' integrity. The second part sets out instructions that guide and facilitate the assessment process for the evaluator. It features the evaluation criteria, guideline documentation, and data sources intended for the evaluation of public institutions.

METHODOLOGY OF ASSESSMENT OF PUBLIC INSTITUTIONS' INTEGRITY

The integrity index of public institutions provides a general framework to analyze and understand what measures an institution has taken to strengthen institutional integrity by including in this analysis the functional processes, the activity of the institution as well as its interaction with other actors, including the public, civil society representatives and interest groups. While much of the analysis is highly qualitative, the assessment is summarized quantitatively by classifying the responses to a set of indicators into quantified indicators.

Taking into consideration the aspects of ethics and integrity in the public sector and the functional processes in the public institutions, the integrity index assesses 5 areas of public institutions' integrity. These areas include:

1. Accountability;
2. Transparency;
3. Strategic approach to integrity;
4. Standards of integrity
5. Meritocracy of human resources.

For each area of assessment, indicators have been defined, which enable the interpretation of existing information or that information obtained from interviews with key informants. The evaluation criteria are intended to be valid, transparent and enforceable.

The integrity areas are evaluated according to two criteria:

1. legal and institutional control;
2. control of practical implementation.

An assessment of the legal and institutional framework is the first criterion required to verify that the legal and institutional prerequisites are in place as well as to ensure institutions with integrity and incorruptible. This criterion will be coordinated between the institution to be evaluated and the evaluator. The practical evaluation of the applicability of the integrity criteria at the institutional level is the second evaluation criterion. In the control of the practical implementation, the evaluator must take into account the good practices (from the guiding questions or statements) and then determine how much they comply with the established standards and how much the latter are respected by the institution under evaluation.

The legal and institutional control is assessed based on the availability of data or the lack thereof in the institution. A legal control will assess whether the internal regulatory and administrative acts, administrative documents and data as well as functional institutional structures are in place to support strengthening of institutional integrity. As necessary, relevant regulations, acts and documents are reviewed and collected.

The control of implementation in practice is slightly different, as this assessment requires a subjective judgment to be made by the evaluator about institutional efforts and achievements in strengthening integrity. It will be based on observations and evidence gathered by the evaluator through interviews² and analysis of documentation and administrative data made available by the institution. The institution will need to organize and approve in advance this control and it will have to work together with the evaluator.

The assessment will be conducted once the indicators for each evaluation area are determined. These indicators are broken down into legal, administrative or (statistical) documents, which serve to document the institution's efforts to improve its integrity. The indicators for each evaluation area are detailed out in Table 3 through to Table 7 provided below. The evaluators will engage with representatives of the institution to collect this information, to analyze and evaluate it to the established evaluation scale. Each evaluation indicator is scored. In addition to creating an archive of administrative and regulatory documents and a descriptive summary of the situation, the assessment provides a quantified, transparent and valid evaluation for the standardization of the instrument as well as a comparative analysis among the evaluated institutions.

The Integrity Index has five evaluation areas. Each area has an equal number of scores – 20 points. Also, the division of scores between the two key criteria –legal control and practical implementation– is equal with 10 points each. Each area gives the institution 20 points. When met, both criteria – the legal control and the practical implementation– award the institution equal points.

Every public institution wants to have the highest possible scores in this assessment. A high score achieved in this assessment shows that the institutions are successful in implementing integrity mechanisms both in legal and institutional terms and in their practical implementation. A low score means that the evaluated institutions need to develop an institutional strategy and intensify their efforts for strengthening their institutional integrity.

An interpretation of the results makes it necessary to divide the points collected for this evaluation into three levels: i) the first level: a total of 0-33 points indicates an institution with basic level of institutional integrity; ii) the second level: 34-66 points means that the institution has reached an intermediate level of development, and, iii) the third level: a total of 67-100 points means that the institution is strong, independent with high integrity, a leader in the regulation and organization of its activities.

Important information on the institutions is also obtained through results according to the evaluation criteria and the results of the assessment of the legal and institutional framework and its practical implementation. The score for each evaluation criterion is divided into three levels as provided for in tables 1 and 2 below. A higher score achieved in the first criterion and a lower score in the second one indicates where the focus is placed to strengthen the institution under assessment.

2 Interviews with independent sources, former staff, CSOs, clients of the institution, citizens' reporting to media, etc.), but the institution cannot rank itself when it comes to implementation in practice.

Table 1. Legal and Institutional Control

Basic level of development of institutional integrity (0-15 p)	Intermediate level of development of institutional integrity (16-30 p)	Advanced level of development of institutional integrity (31- 49 p)
The public institution has adopted rules (regulations and administrative acts) that regulate specific aspects of non-comprehensive institutional integrity; it describes a few, if any, of the elements of the institutional integrity. In some cases, the treatment of legal concepts on issues of institutional integrity is complete lacking.	The public institution has adopted regulations and acts (including administrative acts) that regulate elements of institutional integrity. The public institution generally complies with these regulations and acts in the course of performing its activities and duties.	The public institution has approved internal regulations, administrative acts, operational plans (rules and procedures) and all forms, monitoring mechanisms, etc., in accordance with the requirements of the legislation in force that regulate specific aspects of institutional integrity. They are in a clearly defined format and all units of the institution are clear about how these documents should be used.

Table 2. Control of Practical Implementation

Basic level of institutional integrity development (0-15 p)	Intermediate level of institutional integrity development (16-31 p)	Advanced level of institutional integrity development (32-51 p)
The public institution has adopted several regulations that address few, if any, of the elements of institutional integrity, but there is no comprehensive approach to integrity management, in terms of planning, implementation, reporting, and monitoring.	The public institution applies the standards of integrity for most of the aspects of integrity; most of the administrative processes are based on the principles of integrity; and the rules and procedures of the current internal framework of the institution have been developed, approved and enforced. The functions of planning, implementation, reporting, monitoring, and evaluation are implemented in most of the institution's activity.	The public institution has each of the listed aspects of integrity organized in an orderly manner according to the integrity standards; administrative processes within the institution are conducted according to the principles of integrity, in accordance with the rules and procedures defined by the legal framework in effect, as well as in conformity with the institution's policy documents. The functions of planning, implementation, reporting, monitoring, and evaluation are implemented on regular basis and the institution is an integrity leader with its institutional behaviour.

The public institutions under evaluation can undergo a quantitative comparison by looking at the total score of each of them (the points collected in total from both evaluation criteria), although such a comparison does not indicate the qualitative nature of the ranking (with scores to be possibly shown in brackets for both the institutional and legal control and practical implementation for more details). But for the practical purpose of promoting competition among institutions, rankings will attract public attention.

PRACTICAL GUIDELINES ON APPLICATION OF INSTRUMENT

The instrument is designed with the intention of ensuring it is valid and representative for all central public institutions. It may happen that a request in the instrument does not apply to an evaluated institution. In this case, the evaluation points are given in full to that specific institution, so as not to create gaps in the assessment. The evaluator is expected to cooperate closely with the institution being evaluated, given the assessment is conducted by considering the institution as a whole and by evaluating the information and data that the institution makes available.

Methodology notes (or suggestions) are given in each area presented in the following tables (3-7) for the evaluator to help with the evaluation criteria and relevant evidence. The Integrity Index provides spaces for documentation archiving and data standardization.

Table 3: Integrity Index - Accountability

Legal and Institutional Control	Verification	Score	Methodology Notes
Proactive transparency	Publication of contact info of the Coordinator for the Right to Information on the official website.	2	The expert awards the points if the contacts of the Coordinator for the Right to Information are published.
	Publication of the approved internal regulation of the institution.	2	The expert awards the points if the institution's internal regulation is approved and published.
Consultation framework	Publication of the annual public consultation plan.	2	The expert awards the points if public consultation plan of the calendar year is in place before the assessment is conducted.
	The institution has archived minutes of consultative meetings, feedback received from online public consultation platforms.	2	The expert confirms the existence of minutes of the consultative meetings, according to the annual plan of public consultations. He chooses to evaluate two practices of public consultations (one of which comes from the online platform) in terms of content.
	Publication of the Annual Report for Public Consultation.	2	The expert assesses whether the Public Consultation Report has been published either by the institution itself or as part of the national online consultation platform.

Legal and Institutional Control	Verification	Score	Methodology Notes
Control of practical implementation			
Institutional transparency	The Transparency Program of the institution is populated and updated.	2	The expert analyzes the Transparency Program (TP) of the institution and awards the maximum points if all elements of the TP contain active Internet addresses and information. If the TP turns out to have at least 3 columns without information, the expert awards only half of the scores. If the TP of the institution has more than 5 columns without information, the assessment will be 0 points. It is recommended that the expert conducts an interview with the Coordinators for the Right to Information of the said institution.
	The ratio of requests for information that have been answered vs the total number of requests for information filed with the institution.	1	The expert evaluates/analyzes the register of requests for information, published in the Transparency Program and assesses the ratio of the requests submitted and the requests replied to. If this ratio is less than 90%, the institution is evaluated with zero points. If this ratio is over 90%, it is evaluated with full points.
	Average number of days for response to requests for information.	1	The expert estimates the average number of days to respond to requests for information. This information is found in TP, the request register (average = sum of days for response/total number of requests). If this indicator is up to 10 days, the institution is evaluated with the maximum points, if it is between 10-25 days, it is evaluated with half the points, if it is >25 calendar days, it is evaluated with 20% of the points.
	The institution makes available to the public a dynamic website where updated information is provided and the public is informed in a timely fashion.	2	The expert assesses the official website of the institution. On the official website in the news, activities and reports section, the expert refers only to the budget implementation monitoring report. If the most recent publication is one year old, the institution is evaluated with 0 points, otherwise it receives the full evaluation.

Legal and Institutional Control	Verification	Score	Methodology Notes
<p>Institutionalization of public consultations: deadlines and procedure of public consultation in practice.</p>			<p>The expert must evaluate the institution's public consultation process and its impact on policy making. The expert refers to the public consultation report of a calendar year before the assessment. This report is prepared by the institution. The institution's consultations are also reported by the online platform of public consultations. (https://konsultimipublik.gov.al/Konsultime/ListaeRaporteve) There is a set of indicators that can be extracted and evaluated. To understand and evaluate this component of transparency, it is recommended that the expert conducts an in-depth interview with the Coordinator for Public Consultation in the institution.</p>
	<p>The ratio of the planned consultations of annual plan of the public consultation and conducted consultations.</p>	2	<p>The index of realization of the consultation plan >80%; if not it is evaluated with 0 points.</p>
	<p>The number of public consultation activities reflected in the minutes vs total number of consultation activities organized.</p>	1	<p>When there are minutes for more than 50% of the public consultation activities, the institution is evaluated with full points; if there is <50%, it is evaluated with 0 points.</p>
	<p>The number of feedbacks and suggestions received from the public consultation activities received versus the total number of recommendations/ suggestions given during the public consultation.</p>	1	<p>If this ratio is >25%, the institution is evaluated with maximum points; if the ratio is <25%, it scores 0 points.</p>
Total score		20	

Table 4: Integrity Index – Proactive Transparency

Legal and Institutional Control	Scope of Assessment/ Method of Verification	Score	Methodology Notes
Accountability mechanisms	The Transparency Program contains the approved annual plan and the annual report of the public institution.	1	To be consistent with the objective of this criterion, the expert must prepare a list of planning and reporting documents that the institution must publish. Institutions, depending on their function, may have internal acts, strategic documents and various reports, such as the Institution's Internal Regulations; Annual Activity Report; Medium-Term Budget Plan; PBA Monitoring Report; Annual Procurement Plan. If these documents (of the year before the evaluation) are online and accessible, the expert evaluates the institution with maximum points. If even one document is missing from the list agreed with the institution, the expert evaluates the institution with 0 points.
	Differences are evident in the implementation of activities (compared to the plan). In the annual budget monitoring report, the fact/plan ratio is >85%.	1	Discussions are held with representatives of the institution, which monitoring indicator best represents the report of the realization of the plan. In the absence of suggestions from the institution, the expert evaluates the budget planned and executed spending report of the year before the evaluation. If this index is >85%, the institution is evaluated with full points. If it is lower, it is evaluated with 0 points.
External Audit	The institution has passed an external audit (Supreme State Audit/Supervisory Authorities / EU/ Independent Auditors) in the last three years.	1	If there is such a report in the last three years from the time of the integrity assessment, the institution scores 1 point; otherwise, it gets a score of 0 points.
	The report of the last external audit is published by the institution, including the list of recommendations.	1	The institution that publishes the findings of the last external audit scores points; otherwise, it gets 0 points.

Legal and Institutional Control	Scope of Assessment/ Method of Verification	Score	Methodology Notes
	The institution has prepared the plan for addressing the recommendations based on the last external audit report.	1	The institution has prepared a plan to address the recommendations based on the last external audit report. This plan is made available to the evaluation expert. The institution is awarded points if this plan is in place and is made public.
Internal audit	The Audit Charter document (status of the organization, purpose, mission, work objectives, accountability and responsibilities of the internal audit unit) has been developed and approved.	1	The Audit Unit confirms the existence of the document; the expert verifies and makes the assessment.
	The rules of conduct and principles that should guide the work of internal auditors as well as the work plan have been prepared, approved, and implemented.	1	The expert receives information from the Audit Unit and confirms the existence of: the annual audit plan for the year when the assessment is made; and the annual activity report of the year before the evaluation, approved by the supervisory structures and superiors. If both approved documents are in place, the assessment is considered complete. If one of the documents is missing, the assessment is 0 points.
Measuring customer satisfaction	There is a system of continuous monitoring of customer satisfaction, there is evidence that the findings of this evaluation are included in the operational plan/ work program.	1	The expert evaluates with 0 points if there is no such study in the last 5 years. On the contrary, the expert evaluates the institution with full points.
	Provide evidence that the findings of this evaluation are included in the operational plan/ work program.	2	The expert identifies whether recommendations from this evaluation are included in the institution's annual activity plan. The institution is evaluated with full points if even such a recommendation is evidenced. Otherwise, the institution is evaluated with 0 points.

Legal and Institutional Control	Scope of Assessment/ Method of Verification	Score	Methodology Notes
Functionality of horizontal and vertical accountability mechanisms	Control of practical implementation	10	
	The institution has at least one supervisory authority, to which it reports periodically.	1	The expert evaluates the institution with full points if it is supervised and if it reports on its activity to at least one authority (parliament, supervisory authorities, Council of Ministers, international institutions, etc.). The expert coordinates with the representative of the institution with regard to the reporting authority.
	The institution prepares at least one annual report, which is reviewed and approved by its supervisory authority and then made public.	1	List the reports/documents prepared and submitted by the institution/approved by the supervisory authority. At least this document is in place and the expert evaluates the institution with full points. Otherwise, the institution is evaluated with 0 points.
	The institution prepares a monitoring report of the annual plan or sectoral strategy (at least once every three years) through the external experts.	2	The expert awards all points if at least one monitoring report has been published in the last three years and 0 points if no report has been published.
	An assessment of the report on implementation of the recommendations of the last external audit reveals that 80% of the recommendations have been addressed by means of an approved plan which is made public.	2	The expert conducts an interview with representatives of the audit department and they agree on the list of documentation that the expert will have to evaluate. In principle, the expert can find the audit reports of the institution (the last one carried out) online at the Supreme State Audit; the institution's action plan to address the recommendations of the external audit. The evaluation index builds on the analysis of the documentation. The institution is evaluated with points if 80% of external audit recommendations are addressed, and 0 points otherwise. This assessment aims to capture the extent to which accountability standards are implemented in practice.

Legal and Institutional Control	Scope of Assessment/ Method of Verification	Score	Methodology Notes
	An assessment of the report on the implementation of the internal audit recommendations (one year before) indicates that 80% of the recommendations have been addressed by an action plan of the institution.	2	One of the internal audit reports, randomly selected from the institution's annual audit program (from the previous year), is made available to the expert. The institution must make available to the expert the plan for addressing the recommendations of the internal audit report, from which the expert estimates the percentage of recommendations that have been addressed. The institution is evaluated with points if 80% of internal audit recommendations are addressed, and 0 points if no recommendation is incorporated.
	There are numerous provisions to ensure that the institution performs its public procurement responsibilities in a legal and ethical manner. The institution publishes the Procurement Plan (0.5 points).	0.5	The institution publishes the Procurement Plan and the expert evaluates it with full points. Otherwise, the institution is evaluated with 0 points.
	The ratio between the procurement plan vs realization is over 50%.	0.5	The expert assesses whether the ratio between the procurement plan and fact is over 50%, giving full points to the institution. Otherwise, the expert evaluates the institution with 0 points.
	The ratio of direct procurements (in value) vs total procurements is <25% (0.5 points).	0.5	The expert evaluates whether the ratio of direct procurements (in value) vs total procurements is <25% and evaluates the institution with full points. Otherwise, the institution is evaluated with 0 points.
	The ratio of the number of contracts with problems vs total number of contracts is < 25% (0.5 points).	0.5	The expert assesses whether the ratio of the number of problematic contracts vs total contracts is < 25% and evaluates the institution with full points. Otherwise, the institution is evaluated with 0 points.
		10	
Total score		20	

Table 5: Integrity Index – Strategic Approach

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
Planning of institution's operations	The institution has published the institution's Strategic Development Plan and Action Plan.	2	The expert must agree with the institution under evaluation about the whole set of the strategic documents that represent the institution's mission and vision. In this evaluation phase, based on the consultations with the piloted institutions, the existence of the Institution's Development Strategy and the relevant action plan were considered. If this documentation exists, the institution is evaluated with full points; if it does not exist, it is evaluated with 0 points.
	The institution has published the Standard Operating Procedures (SOPs) or audit trails for the institution's work processes.	2	The expert examines the document and assesses the institution. He evaluates with full points if the institution has published SOPs (even if they are part of strategic documents or internal regulations). If the no SOPs are in place, the institution is evaluated with 0 points.
	The institution has published a monitoring report on the implementation of the Institution's Strategic Plan.	2	The expert evaluates with full points whether the strategic documents exist. The expert prepares a list that he/she has agreed upon with the representatives of the institution. The expert checks whether the cited documentation is archived or published online. If none of the agreed documents exists, the institution is awarded 0 points.
Planning of integrity management	The institution has published an approved and updated integrity Plan.	1	The expert evaluates with full points whether there is an integrity plan or a review of this plan. If the plan does not exist, the institution is evaluated with 0 points.
	The institution has monitored and prepared a Monitoring Report on the Integrity Plan.	1	The institution is evaluated with full points if it has monitored the implementation of the integrity plan in the last three years. If there are no monitoring reports, it is evaluated with 0 points.

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
Implementation of the integrity management system	The institution has established an internal structure (working group/ coordinator) for the implementation of the integrity plan.	2	The institution is evaluated with full points when the structure is established/the responsible person is appointed in the institution. If the no such structure has been established, the institution is awarded 0 points.
Legal and Institutional Control		10	
Control of Practical Implementation			
Organizational management and integrity management are carried out through a strategic approach	The integrity plan for the institution is based on an analysis of integrity risks and contains measures for their management.	2	The expert evaluates the integrity plan and reports on the number of planned measures, the connection of the measures with the identified risks, the implementation plan and monitoring indicators. The institution is evaluated with full points if the integrity plan is published and manifests a clear connection with the risks to the institution's integrity. Otherwise, the institution is evaluated with 0 points.
	The number of measures with high risk against the total of measures is >25%.	2	The integrity plan focuses on institutional integrity risks. This indicator is calculated by means of the Integrity Plan. If it is made clear that the number of measures with high risk compared to the total number of measures is >25%, the institution receives all points. Otherwise, the institution is evaluated with 0 points.
	The institution monitors the implementation of the integrity plan. The monitoring report shows that 60% of its measures for the implementation period under monitoring have been implemented.	2	The expert assesses the monitoring report and analyzes the designed and implemented measures for the period under monitoring. If 60% of the measures have been implemented, the institution gets all the points. Otherwise, the institution is evaluated with 0 points.

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
	<p>The monitoring report contains recommendations (at least one recommendation) for updating the integrity plan.</p>	2	<p>The expert analyzes the monitoring report of the integrity plan and highlights the recommendations for its updating. The expert awards all points if the monitoring report contains at least one recommendation for updating the integrity plan. Otherwise, the institution is evaluated with 0 points.</p>
	<p>The institution has appointed a person responsible for the implementation of the integrity plan. The responsible person exercises the function based on the appointment decision specifying the responsibilities and duties</p>	2	<p>The expert verifies the documentation and awards points to the institution if the structure/responsible person is in place and their duties and responsibilities are clearly described. The expert gives all points to the institution under evaluation if the above definitions exist. Otherwise, the institution is evaluated with 0 points.</p>
Control of Practical Implementation		10	
Score for strategic integrity:		20	

Table 6: Integrity Index – Ethical and Conduct Standards

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
Ethical/ Integrity Standards	The institution has a Code of Ethics/ Conduct or a relevant section in another internal act.	2	The approved Code of Ethics/internal regulation that has a separate section on ethics and integrity in the institution is archived. If any of these two documents exists, the expert evaluates the institution with full points. Otherwise, the institution is rated with 0 points.
	The institution has conducted informative sessions/trainings on the regulatory framework on ethics and integrity with the institution's employees (administration and political staff)	1	The expert confirms that the institution has conducted informative/training sessions, drafted promotional and awareness-raising materials on ethics. Documentation made available by human resource unit that proves the implementation of trainings/ awareness campaigns are carried out is archived. The expert awards full points even if the institution proves at least one single activity/document. Otherwise, the institution is evaluated with 0 points.
	The institution's annual training plan contains training sessions on ethics and integrity.	1	The annual training plan is made available to the expert and trainings with a focus on ethics are recorded. If the training plan contains at least one such activity, the institution is evaluated with full points. Otherwise, the institution is evaluated with 0 points.
Rules and procedures on unethical conduct and whistleblower protection'	The institution has established a responsible and functional unit that files, investigates, and administratively examines reports on suspected corrupt practices or actions;	1	The expert will archive a scanned copy of the institution's decision to establish the unit. If complete documentation exists, the institution is evaluated with full points. Otherwise, the institution will be evaluated with 0 points.
	The institution has developed and approved an internal regulation that defines the procedures for the administrative investigation of whistleblowing cases and confidentiality protection mechanisms.	1	The expert confirms the existence of an internal regulation on whistleblowing and awards all points to the institution. Otherwise, the institution will be evaluated with 0 points. The expert will need to archive the existing documentation.

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
	The rules and procedures on notification, review, disclosure and reporting of deficiencies, non-conformities and unethical violations.	1	As part of the assessment, the expert will check and archive the existence of regulations and procedures that are applied when reporting and investigating problematic situations in the institution. The expert must report/document at least one case treated by the institution in order to award all points. If there is no practice, the institution is evaluated with 0 points.
Rules on conflict of interest	The institution has established the authority responsible for the prevention of conflict of interest and has approved the relevant regulation.	2	The expert must archive a copy of the institution’s internal regulation on the prevention of conflict of interest in the exercise of public functions, as well as the decision to establish the authority responsible for the conflict of interest in the institution. The expert evaluates with full points when both acts exist. If only one of the above documents is missing, the institution is evaluated with 0 points. The expert archives the existing documentation.
	The institution regularly reports to High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests by means of a conflict-of-interest register.	1	In cooperation with the institution, the expert must archive and evaluate the last report submitted to the High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests. The expert gives all points if such a report is made available. If no report is published in the last three years, the institution is evaluated with 0 points.
Legal and Institutional Control		10	
Control of Practical Implementation			
	The number of cases of conflict of interest reported or handled in a year. (Refer to one of the last three years from the period you are conducting the assessment).	2	The expert will refer to the human resource documentation and internal reports of the institution. The institution receives full points if there are <5 such cases per year. The institution is evaluated with 0 points if there are no such reports or when the reported cases are >5 cases per year.

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
	The number of reported cases of bribery, corrupt practices and abuse of office (in one year, refer to one of the last three years from the time you are applying the rating)	2	The expert will refer to the human resource documentation and internal reports of the institution. The institution receives full points if there are <5 such cases per year. The institution is evaluated with 0 points if there are no such reports or when the reported cases are >5 cases per year.
	Number of cases recorded as gifts or hospitality (in one year, refer to one of the last three years from the year you are conducting the assessment).	2	The expert will refer to the human resource documentation and internal reports of the institution. The institution receives full points if there are <5 such cases per year. The institution is evaluated with 0 points if there are no such reports or when the reported cases are >5 cases per year.
Level of existence and application of integrity standards	Internal acts proving that actions are taken according to the Code of Ethics/Conduct or guidelines on the institution's integrity standards.	2	The expert refers to the documentation of human resources, internal reports for the implementation of the Code of Ethics, internal reports of the institution to identify cases of inappropriate conduct dealt with according to the Code of Ethics/ Code of Conduct in the institution. The latter receives full points if there are <5 such cases per year. The institution is evaluated with 0 points if there are no such reports or when the reported cases are >5 cases per year.
	Evaluation of reported cases investigated administratively by the responsible unit (according to Article 13/1 of Law No. 60/2016).	2	The number of cases administratively investigated by the institution under assessment. The institution is awarded all points if it does not report investigated whistleblowing cases or has up to 3 such cases per year. If the institution reports more than 5 cases investigated as revealed by the whistleblower, it will be evaluated with 0 points. The expert archives the available documentation (number of cases as statistics or a practice of an investigative case by removing personal identification data).
Control of Practical Implementation		10	
Score for Integrity Standards		20	

Table 7: Integrity Index- Meritocracy

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
Legal and Institutional Control			
Merit-Based Recruitment	Vacancies in the institution are publicly announced. Meritocracy is reflected in the announcement of the requirements to be met by the incumbents.	2	<p>The expert is given the following data for a calendar year:</p> <ul style="list-style-type: none"> • number of jobs announced (per year) • total number of employees (per year) • the number of vacancies announced but not filled. <p>The expert subtracts the number of announced but unfilled vacancies from the number of announced available vacancies and then calculates the ratio with the total number of employees in the institution.</p> <p>The expert obtains this information from the annual reports of the Department of Public Administration or from the reports/documents of the Human Resource Unit.</p> <p>The expert evaluates the institution with full points if this ratio is 1. The institution is evaluated with 0 points if this ratio is other than 1.</p>
	There is a lack of transparent employment; Some cases are made public in the media.	2	If there is a case of non-meritocratic employment reported in the media, the institution is evaluated with 0 points. (Within a year, refer to the year before the one in which the assessment is being made.) Otherwise, the expert awards all points to the institution.
Staff Performance Appraisal / Analysis	The institution has a practice of conducting an appraisal of staff performance.	2	The expert consults with the Human Resources unit about the existence of the performance appraisal practice that includes guidance to employees on the process, appraisal forms. The institution is evaluated with full points if the expert confirms the existence and archives an evaluation practice. Otherwise, the institution will be evaluated with 0 points.
	The annual employee performance report is prepared, from which guidelines for human resource management are formulated.	2	The institution is rated with full points if the staff performance report exists. (The report is made available to the expert and archived by the latter). If the report does not exist, the expert evaluates the institution with 0 points.

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
Training and continuous education	Annual training plan of the institution.	2	The institution is awarded all points if there is an annual training plan for its employees. (The annual training plan is presented to the expert). The expert gives 0 points to the institution, if the annual training plan does not exist.
Legal and Institutional Control		10	
Control of Practical Implementation			
	Number of dismissed employees to the total number of employees (in %).	2	In his/her evaluation, the expert refers to the report provided by the human resources units or the Department of Public Administration (DPA). The institution is evaluated with full points if this ratio indicator is <15%. The institution is evaluated with 0 points if this indicator is >15%.
	The directors of the directorates act in conformity with their legal functions in the hiring-firing procedures of the staff	2	Interview with representatives of the Human Resources unit in the institution. The evaluation should be carried out by reviewing the report made available by the human resources unit/DPA Report. The institution is evaluated with full points if there is evidence that the managers of a department have powers for the appointment/dismissal of their subordinate employees. In contrast, the institution is evaluated with 0 points.

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
	Do the internal regulations/Code of Ethics ensure the political activity of existing public sector employees (e.g., party membership, expression of political views)?	2	<p>The expert examines the regulatory framework of the institution to gain an understanding of how the political activity of employees is regulated.</p> <p>In addition to reviewing the regulatory framework, the expert obtains data on the cases handled and compares the number of warnings given to staff for inappropriate political activity with the total number of warnings given (in one year).</p> <p>If this ratio is other than zero (that is, when there is at least one case examined), the institution receives full points. The higher this ratio, the more intense the institution's efforts to prevent unethical political activity (prohibited by the regulations).</p> <p>If the institution does not report cases, this report comes out with a null result and the evaluation for the institution will be 0 points. Lack of obvious cases shows that there is no effort on the part of the institution to curb unethical political activity.</p>
	Do managers have the discretion to give employees incentives to perform their work with transparency, accountability, and full commitment, e.g. through prizes, financial incentives, etc.?	2	<p>Evidence of promotional mechanisms applied and the number of employees who have benefited in a year (Report/information provided by human resources which is archived by the expert). The institution is awarded all points if this mechanism is in place and there is evidence of even a single case. The expert must review the case/ procedures to make an assessment. If there is no such mechanism, the assessment is 0 points.</p>

Legal and Institutional Control	Scope of Assessment / Method of Verification	Score	Methodology Notes
	Cases of complaints/ disputes at work addressed to Civil Service Commission (CSC) ³ .	2	<p>The expert has obtained statistics/ indicators from the human resources and the Civil Service Commission report. If the institution has 0 to 3 cases reported to CSC, it is evaluated with all points. If there are more than 3 cases, the institution is evaluated with 0 points.</p> <p>The expert archives the documentation of an inspected case, maintaining anonymity and respecting the right to personal data.</p>
The level of application of meritocracy standards	10		
Total	20		

³ The cases of labor disputes examined by the Civil Service Commission indicate the non-application of best practices of human resource management in the institution. Many cases (more than 3) indicate a conflicting environment and a lack of ethics and integrity.

REFERENCES

- Graycer, A & Sibbentom, A (2012). Corruption and control: A corruption reduction approach. *Journal of financial Crime* 19 (4). (Available at https://www.researchgate.net/publication/263695877_Corruption_and_Control_A_Corruption_Reduction_Approach)
- Institute for Democracy and Mediation (2018) "Methodology of Assessment of Integrity Risk for Central Government Institutions", UNDP
- Monkova, M. (2015) "Manual on Integrity Planning and Integrity Management", Kosovo: UNDP (Available at: <https://www.undp.org/sites/g/files/zskgke326/files/migration/ks/undp-manual-layout-english-version.pdf>)
- Selinsek, Liljana (2015) "Corruption Risk Assessment in Public Institutions in South East Europe Comparative Study and Methodology", Regional Corporation Council, f. 18 (available at: https://rai-see.org/wp-content/uploads/2015/10/CRA_in_public_ins_in_SEE-WEB_final.pdf)