POLICY BRIEF

INTEGRITY IN CENTRAL GOVERNMENT INSTITUTIONS: OPPORTUNITIES, CHALLENGES, AND THE WAY FORWARD

PREPARED BY **NYSJOLA DHOGA, PHD.** AND **ROVENA SULSTAROVA, PHD.**

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1. BACKGROUND

In recent years, the Government of Albania has developed an anti-corruption agenda by undertaking a series of reforms, which include the adoption and strengthening the legal framework, the development and implementation of anti-corruption policies and the establishment of responsible institutional structures. Anti-corruption reforms constitute a key element in the packages of the country's membership in international organizations or for the assessment of progress in the process of accession to the European Union. In this line, Albania remains a party to all international conventions and has improved and strengthened, over the years, its legal and strategic framework against corruption employing a preventive, punitive and sensitizing approach.[1] Strengthening the culture of integrity[2] as a tool to combat corruption is not an innovation in Albania's legislation and public policies. By ratifying the United Nations Convention against Corruption in 2006, Albania committed to strengthening integrity, both in the conduct of every public servant and in drafting and implementing effective and coordinated anti-corruption policies.[3] The Council of Europe has also provided additional instruments for the management of integrity in public administration, especially for the transparency of decision-making processes that resulted in the "Twenty Guiding Principles for the Fight against Corruption".[4] In line with the principles contained in this convention, a package of sectoral laws has been adopted that regulate specific aspects of ethics and integrity in the public sector. [5] Also, acts have been approved to ensure a stable and depoliticized civil service.[6]

At the policy level, as early as 2008, the general vision of the first crosscutting strategy against corruption consisted of progressive and sustainable reduction of corruption, strengthening public institutions' integrity, and promoting values in governance.[7] This strategy included the traditional approach of strengthening punitive measures[8], which has proved ineffective in increasing public trust in institutions. According to Transparency International's Corruption Perception Index for 2021, Albania ranks 110 out of 180 countries.[9] For the same year, the Trust in Government Public Opinion Poll shows that over 83% of Albanians report that petty corruption in Albania and grand or high-level corruption, such as political corruption,

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1   European Commission, Albanian Report 2022, p. 25

2   There is no unique definition of the term 'integrity'. According to OECD term, "Public integrity refers to the consistent alignment of, and adherence to, shared ethical values, principles and norms for upholding and prioritizing the public interest over private interests in the public sector." OECD. (2017). Recommendation of the Council on Public Integrity, https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0435. According to Transparency International, 'Integrity' is "Behaviors and actions consistent with a set of moral or ethical principles and standards that is embraced by individuals as well as institutions. Integrity creates a barrier to corruption." https://www.transparency.org/en/corruptionary/integrity. According to ISSAI 30 – Code of Ethics, Integrity – to act honestly, reliably, in good faith and in the public interest.

3   Law No. 9492, dated 13.3.2006, "On the Ratification of the United Nations Convention Against Corruption", Articles 5, 8.

4   Council of Europe Resolution (97) 24 "On the Twenty Guiding Principles for the Fight Against Corruption", https://polis.osce.org/council-europe-resolution-97-24-twenty-guiding-principles-fight-against-corruption

5   Law No. 9131 dated 8.9.2003, "ON Rules of Ethics in Public Administration"; Law No. 9049, dated 14.4.2003 "On Declaration and Audit of Assets", as amended; Law No. 9367, dated 7.4.2005, "On the Prevention of Conflict of Interests in the Exercise of Public Functions", as amended; Law No. 60/2016, "On Whistleblowing and Whistleblower Protection"; Law No. 119/2014, "On Right to Information"; Law No. 146/2014, "On Notification and Public Consultation".

6   Law No. 152/2013 "On Civil Servant", as amended.

7   DCM No. 1561, dated 3.10.2008, "On Adoption of the Crosscutting Strategy for the Prevention and the Fight against Corruption and for a Transparent Government, 2008- 2013", Chapter 2

8   In 1997, OECD published a set of principles on management of ethics in public service. Organization for Economic Co-operation and Development (1997). OECD Principles for Managing Ethics. Focus. Public Management Gazzette, 9, 1998, https://www.oecd.org/gov/digital-government/1900037.pdf

9   Transparency International, Corruption Perception Index 2021, https://www.transparency.org/en/cpi/2021/index/alb.

are widespread and very widespread.[10] In addition, the country is still categorized as "transitional or hybrid regimes" by Freedom House's Nations in Transition.[11] This means that, regardless of punitive measures taken to prevent corruption, public perception in the country has not changed much.

The lack of effectiveness of the traditional approach in the fight against corruption is also emphasized at the international level, where increased focus is being shifted towards a new approach centered on public integrity. According to the OECD, public integrity should be considered the strategic and sustainable response against corruption, in conditions where the traditional approach based on the adoption of more laws or the strengthening of punitive measures has proved ineffective.[12] Although at first glance, measures to improve public integrity are mainly aimed at the behavior of public institution employees and/or officials representing the public sector, their ultimate goal is to help consolidate an effective public service that fully responds to the needs of citizens. According to Denhartd, "Managing ethics also involves careful analysis of the organizational culture, working to develop a cultural environment that places high value on ethical integrity and developing policies and procedures and systems that enable organization members to act with ethical integrity."[13] The experience of different countries of the European Union but also those of the WB region has testified to the undertaking of concrete measures in reducing the risks of corruption and strengthening the integrity of public institutions, for example through the implementation of ethics codes at the institutional level, the development of integrity plans, digitalization of services, capacity building of public sector employees, etc. [14] In this

context, the integrity risk assessment should be understood as an instrument of good management and good governance of a public institution and the installation of a positive organizational work culture, where integrity risks and their factors are managed responsibly.

The change of approach at the international level on the role of the culture of integrity, no longer as an element alongside other measures, but as a central instrument in the fight against corruption, has been reflected in recent years in Albania as well. The 2018 EU progress report highlighted the overall lack of an integrity management system in public institutions in the context of secondary legislation, as well as the immediate urge to take action in this direction.[15] The Group of States of the Council of Europe against Corruption (GRECO), in the framework of the 2020 evaluation for Albania, found that the legal framework for the prevention of corruption for high officials of the executive branch and the police was comprehensive, but still very complex. Among other things, this report recommended that every ministry should adopt an integrity plan and that ministers, deputy ministers and advisers should be regularly informed about measures to ensure the integrity of these entities.[16] In this vein, the approval of the Crosscutting Anti-Corruption Strategy 2015-2023 and its Action Plan 2020-2023 are considered positive developments for the promotion of the culture of integrity in the public sector. The action plan in pursuance of this strategy has determined the development of integrity plans as anti-corruption mechanisms at the institutional level. Specifically, this document states that "an integrity plan will provide the conceptual framework for policies and measures to prevent violations of good conduct by public

10   Semini, I., & Korçari, I., (2022). Opinion Poll 2021: Trust in Governance. Institute for Democracy and Mediation, https://idmalbania.org/public-opinion-poll-trust-in-governance-2021/

11   Freedom House (2022). Nations in Transit 2022, https://freedomhouse.org/country/albania/nations-transit/2022

12   OECD (2020). OECD Public Integrity Handbook, OECD Publishing, Paris, https://doi.org/10.1787/ac8ed8e8-en.

13   Denhardt, R., B. & Denhardt, J., V. (2010). Public Administration. An Action Orientation. P. 146

14   Zvekić, U., & Roksandić, S., /Global Initiative Against Transitional Organized Crime (2021), https://globalinitiative.net/wp-content/uploads/2020/10/Infrastructure-of-integrity-34-GITOC.pdf

15   European Commission, Albania 2018 Report, https://neighbourhood-enlargement.ec.europa.eu/system/files/2020-10/20180417-albania-report.pdf

16   GREO, (2020). Fifth Evaluation Round. Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. Evaluation Report Albania, Adopted by GRECO at its 86th Plenary Meeting (Strasbourg, 26-29 October 2020), https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a0923d

officials" and that it had to be adopted by every central government institution by 2023.[17]

The new integrity-centered approach is quite complex as it is both comprehensive and specific. It requires on the one hand the internalization and respect by individuals and institutions of a series of universally accepted ethical and moral values and behaviors for the benefit of the public interest, and, on the other hand, the promotion of a culture of integrity specifically, contextualizing it with the concrete challenges of corruption and with the legal framework or institutional structure. The approach to integrity does not exclude reparative or punitive measures. Rather, it encourages a greater internalization of the law and its implementation through the promotion of an ethical climate, i.e., a compatibility between the formal and real culture of the institution.[18]

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17   DCM No. 247, dated 20.3.2015 "On Adoption of Crosscutting Strategy and Fight Against Corruption for 2015-2020"; DCM No. 516, dated 1.7.2020 "On Some Changes and Addenda to DCM No. 247, dated 20.03.2015…", https://www.drejtesia.gov.al/dokumente-strategjike/

18   According Lewis & Gilman, the two approaches, that of the low road of compliance with the law that requires meeting minimum standards and that of integrity that can transcend accountability, must be merged into one common action. Carol W. Lewis, C., W & Gilman, S., C. (2005). The Ethics Challenge in Public Service. A problem-solving Guide. Second Edition, p. 14; The OECD recommendation to enhance public integrity is comprehensive and includes a commitment to strengthen integrity, clarifying responsibilities in the public sector to strengthen the public integrity system, developing an evidence-based strategic approach to mitigating integrity risks, establishing high standards of behavior for public officials, promoting a culture of integrity at the level of the whole society, investing in a leadership with integrity, promoting a professional and merit-based public administration, providing information and training on integrity to public officials, ensuring of an open institutional organizational culture on issues of integrity, the implementation of internal controls and risk management, the implementation of mechanisms for established violations of integrity, strengthening the role of external control, promoting transparency and control of interest groups. OECD, OECD Recommendation of the Council on Public Integrity, https://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf

2. INTEGRITY PLANS AND THE PROCESS IN LINE MINISTRIES

Integrity Plans (IP) for central government institutions should be understood as an educational and preventive instrument and as a strategic and administrative document which relies on the results of the integrity risk assessment process for all work processes in the institution. Through this document, the institution and its employees are committed to strengthen integrity and take measures strengthen integrity and take measures to prevent anti-integrity behaviors and actions.

In EU member states and accession countries, the integrity risk assessment, which is the process that develops the integrity plan, has increasingly become the basis for improving integrity planning. An integrity plan should be developed based on a risk assessment process, which identifies the most pressing integrity risks as well as the relevant control measures.[19] While the methodologies for conducting this assessment varies by country, the core principles remain the same, in accordance with relevant international risk management standards.[20] The focus of interventions in the field of anti-corruption is now directed towards measures that are feasible and produce a high

impact, taking into account the specific context. Such intervention was undertaken by the Ministry of Justice, with the technical assistance of the Institute for Democracy and Mediation (IDM), in the design of the methodological instrument for assessing the integrity risk in the public sector (IRAM).[21] This instrument was formalized in a national methodology for the development of integrity plans in the public sector.[22] The main principles of IRAM aim at: reducing the discretion of the decision-making functions exercised in the institution; increasing transparency at work; increasing responsibility and accountability; improvement of internal supervision and control mechanisms in public institutions; and, simple and streamlined internal procedures.[23]

In order to implement this methodical instrument, with the technical assistance of IDM, the IRAM was first implemented in the Ministry of Justice in 2020, through the approval of an integrity plan for this ministry,[24] to be replicated later in 6 other line ministries, namely: the Ministry of Health and Social Protection, the Ministry of Culture, the Ministry of Education, the Ministry of Tourism and Environment, the Ministry of Infrastructure

19   Minkova, Milena/ United Nations development Programme. 2018. "Guide to corruption Free Local Government: Practical ways to design & Implement Corruption Prevention at the local level"

20   For more reference on the state of the art of Corruption Risk Assessment methodologies see: Transparency International: Corruption Risk Assessment, Topic Guide, USAID, Tools for Assessing Corruption & Integrity in Institutions: a Handbook; Shutina, D., (2010), Project against corruption in Albania (PACA), Council of Europe, NSW Government, Risk Management toolkit for the NSW public sector (Vol 1 and 2); Independent Commission Against Corruption, New South Wales, Australia: Corruption Risk Management and related contents, Blais, D.; Schenkelaars, F.: Institutional Risk Assessment -Best Practices Compendium; ISO 31000:2009, Risk Management: Principles and Guidelines

21   The methodology used is also in line with studies in the field of organizations. Denhardt (2010), p. 145 in the context of promoting ethical practices in organizations suggests first the analysis of the main ideas, beliefs and attitudes that guide the behavior of the members of the organization through an ethical audit, as a methodical review of the organization's activities and values. Second, after the ethical audit, the development of a clearer statement on the values that guide the behavior of individuals, which should include many members of the organization and have full support from its leaders. Third, once you have accepted the appropriate values and drafted a statement that expresses them, training programs or other mechanisms can be developed to communicate these ideals within the organization.

22   Minister of Justice Order No. 334, dated 07.10.2020, "On Approval of the Integrity Risk Assessment Methodology for Central Government Institutions", https://www.drejtesia.gov.al/wp-content/uploads/2021/04/3.-Metodologjia-e-Vler%C3%ABsimit-t%C3%AB-Riskut-t%C3%AB-Integritetit-p%C3%ABr-Institucionet-e-Qeverisjes-Qendrore_AL.pdf

23   Ibidem

24   The Minister of Justice Order No. 333, dated 07.10.2020 "On Approval of Integrity Plan of the Ministry of Justice", https://www.drejtesia.gov.al/wp-content/uploads/2021/04/1.-Plani-i-Integritetit-p%C3%ABr-Ministrin%C3%AB-e-Drejt%C3%ABsis%C3%AB-2020-2023_AL.pdf

and Energy, and the Ministry for Europe and Foreign Affairs.[25] Currently, 11 ministries and 13 subordinate institutions of the Ministry of Justice have adopted an integrity plan at the level of central government institutions. The fact that the integrity plans in some cases were carried out with the support of civil society organizations, specifically the IDM, helped to create the necessary capacity at the initial stage, to be further used during the implementation of the plan, the review and approval of the next plan in these institutions.

In the six ministries that IDM provided assistance to during the period January-April 2022, the integrity risk assessment process was developed by working groups established upon an order of the minister. The working group in all cases consisted of high-level directors and was chaired by the deputy minister as a coordinator. The process started with a training session with the working group on the integrity risk assessment methodology, with the analysis of the legal and regulatory framework for the operation of the institution as well as with the internal and external control mechanisms. The process continued with the identification and analysis of integrity risks based on the findings of the analysis of the above phase as well as the qualitative data of the focus groups with the employees of the component directorates of the ministry. In this assessment, all functions/work positions and work processes were included according to the common fields of

activity provided for in IRAM, namely: i) financial management; ii) human resources management; iii) financial control and audit, iv) transparency; v) archiving, storage and administration of written documents, information, and electronic documents; and other areas of specific activity for each ministry. In addition, the working group, with the technical assistance of the IDM, conducted an independent survey with the employees of the ministry, where by means of an electronic questionnaire, reliable data and information was provided for the evaluation of the integrity management system at the institutional level. Such a methodological approach seeks to mobilize the instruments of accountability and transparency at the public institution and, by combining them with preventive measures, aims to prevent the occurrence of inappropriate conduct by public officials during the exercise of public duties and responsibilities.

The management of public integrity through integrity plans in line ministries is in its initial phases, but the results that are being obtained at this stage seem promising for the continuity of this process in the future. Some of the findings of this process are presented below, seen from the viewpoint of the challenges and opportunities it has offered to line ministries.

25   The Integrity Plans of line ministries may be consulted in https://shendetesia.gov.al/wp-content/uploads/2022/04/urdher-nr.-267-per-miratimin-e-planit-te-integritetit-te-MSHMS-2022-2025.pdf; https://kultura.gov.al/plani-i-integritetit-per-ministrine-e-kultures/; https://www.punetejashtme.gov.al/programi-i-transparences-2/, https://www.infrastruktura.gov.al/rregullore-5/; https://kultura.gov.al/plani-i-integritetit-per-ministrine-e-kultures/; https://turizmi.gov.al/plani-i-integritetit-te-ministrise-se-turizmit-dhe-mjedisit/

3. OPPORTUNITIES OF THE INTEGRITY PLAN DESIGN PROCESS IN CENTRAL GOVERNMENT INSTITUTIONS

Access to integrity requires a commitment and sustained political will, a commitment of the actors involved to undertake the necessary actions to reduce corruption and face the costs that may come from it.[26] It is understandable that Integrity Plans in central government institutions were initiated as a result of a top-down political will. The involvement of the leadership of the ministry from the early stage of integrity planning with the appointment of a deputy minister in the coordinating role of the working group has been a key element of success for the design and implementation of the plan. However, this approach would have been insufficient or unsuccessful if it were not integrated with the demands coming from the bottom-up. Consequently, the methodology for drafting integrity plans in central government institutions builds on the principle of inclusiveness of the institution's staff, which was achieved through focus groups and questionnaires.

Within the framework of these evaluations in the six ministries, several opportunities have been encountered that are in accordance with the field studies, such as the comprehensive approach of the staff and leadership of the institution to the process, the incentives and opportunities of the process, as well as the understanding the mission of the process.[27] Therefore, the integrity plans are presented as internal administrative instruments, which are realized mainly through a bottom-up approach to identify and address the concerns or problems faced by the institution and which prevent the latter from developing the activity with cost-effectiveness, efficiency and efficacy.

Such an approach has provided a number of benefits, including the following:

» **Firstly**, the process of developing integrity plans in itself has carried an educational role both for the level of civil servants and for managers or politicians. Even when employees may be familiar with the legal and regulatory framework on ethics and integrity, integrity plans have served as a process to improve their knowledge of these acts, to internalize the values they convey and to break them down and actualize these values concretely through a strategic plan. The process is important in conditions where "civil servants have rarely had the opportunity to reflect carefully on the competing demands that affect a given situation, freed from the constraints and structures of institutions that impose order and structure on daily life."[28] On the other hand, obtaining data from employees through focus groups or anonymized questionnaires has served to increase the awareness of the management and political level of the institution which are the problems faced by their employees, which issues they prioritize, as well as what measures they consider necessary to ethically improve work processes.

» **Secondly**, the adoption of integrity plans does not mean that ethical discussions have been absent in public institutions prior to the drafting of integrity plans. Ethics and integrity issues may have been part of many discussions and institutional meetings between employees and management staff of

26   U4 (2010), Unpacking the concept of political will to confront corruption, U4, May 2010 – No.1, https://www.u4.no/publications/unpacking-the-concept-of-political-will-to-confront-corruption.pdf

27   Zúñiga, N., (2018), Behavioural changes against corruption, U4 Helpdesk Answer 2018:11

28   Pratchett, L., (2002), The Inherently Unethical Nature of Public Service Ethics, f. 120, in Richard A. Chapman "Ethics in Public Service for New Millennium", pp. 109-123.

institutions before. The legal framework itself clearly defines the role of hierarchical control in the ethical regulation of work processes or the establishment of relevant structures responsible for advising and handling ethical issues near human resources offices, which also serve as authorities responsible for preventing conflicts of interest.[29] However, this traditional role has often proved ineffective as the same structures are also responsible or play an active role in sanctioning disciplinary measures for ethical violations. The combination of the advisory role with the sanctioning role can encourage employees to openly express the ethical dilemmas or concrete problems they face. The promotion of the culture of integrity, on the other hand, requires the creation, alongside traditional or hierarchical roles, of spaces of freedom where employees can express themselves or seek advice without fear of penalty.[30] The drafting of integrity plans in all six ministries is an indication that the creation of such a space for employees through discussion in focus groups or anonymized questionnaires has been successful.

» **Thirdly**, the proactive engagement of all employees of the institution in the process of identifying risks to the integrity and evaluating them through focus groups, anonymous questionnaires, evaluating exciting measures for their management and formulating new control measures, increased awareness of the importance of this process for strengthening institutional integrity and improved confidence in this process, especially among newly hired employees in the ministry.[31] For employees involved in the process, the most important impact and lessons learned include: improved teamwork, increased awareness of the self-assessment and accountability process, adjusted work procedures, increased

transparency and efficiency, as well as better communication. with the public.[32]

» **Fourthly**, the proactive role of the institution's staff in identifying risks and determining measures to minimize them, increases their inclination and awareness of the importance of implementing measures to minimize risks that they have assessed as necessary and priority.

» **Fifthly**, drafting of integrity plans in the six ministries through a joint expertise has also served as an opportunity to share good practices among them, mainly on general areas of activity and regulatory acts. Depending on human and financial resources or support with foreign expertise for special projects, institutions have created good practices, but which have remained isolated within their institutional culture and structure. The sharing of these experiences and good practices among the other ministries involved served as a horizontal coordination and cooperation approach to promote the culture of integrity in the central government as a whole.

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29 For example, the Law on Ethics in Public Administration, the Law on Civil Servants, Law No. 90/2012, "On Organization and Functioning of the State Administration", the Law on the Prevention of Conflicts of Interest, etc., assign the direct superior or the human resources structure with an advisory role on ethical issues and at the same time assign the main role in the disciplinary proceedings to these functions. Indeed, this can make public servants reluctant to share their ethical dilemmas.

30 Lewis & Gilman (2005), p. 204.

31 According to Denhardt et al (2020), p. 520, to ensure successful change managers need to involve people throughout the organization in the change process. Participating in diagnosing the existing situation, planning new strategies and approaches, and implementing change facilitates communication and builds ownership of the change process.

32 Vasilache, A., & Rata, N., (2011). Craiova, Romania Case Study: Strategies to Treat and Prevent Vulnerability to Corruption Through Increasing Local Government Integrity, Efficiency, and Accountability.

4. CHALLENGES AND EXPECTATIONS FOR THE FUTURE

However, it should be emphasized that the design of an integrity-focused strategy, although it shows a good political will from the management staff and a commitment of all employees involved, is merely the first step and insufficient for creating an organizational culture centered on integrity. Integrity Plans will remain more of a document in the wake of numerous acts and policies drafted and approved against corruption that has not produced an effect, if there is a lack of commitment and clear political will to ensure the sustainability of the process, through the promotion of a culture with an integrity center in the institution, ensuring the necessary conditions for the implementation of the measures foreseen for the minimization of risks and following a policy open to the public.

In this framework, as the starting point of an institutional framework at the policy and regulatory level that encourages and supports the culture of integrity, guiding the institutions employees remains a necessary prerequisite. The regulatory framework of the ministries in general has not fully responded to the needs and legal obligations that accompany the responsibilities of public institutions. Some of the common objectives of the integrity plans for line ministries that IDM has assisted are related to the improvement of the internal regulatory framework for aspects of ethics and integrity, through a set of measures such as: approval/improvement of the code of ethics and internal regulations that regulate the regime of conflict of interest and the declaration of assets,

gifts or external activities of ministry employees, obligations after leaving work, the improvement of mechanisms that protect the reporting of acts of corruption and the strengthening of internal control mechanisms.[33] Continuous updating of policies and regulatory acts of the institution to ensure their compliance with changes in the legal framework is a prerequisite for the implementation of the rule of law.

The engagement and support of the political leadership in the integrity planning process for the public institution has proved essential to guarantee the involvement of the entire administrative apparatus.[34] However, the expression of political will also require the dedication of the necessary human and financial resources within the institution, which will enable the improvement of high-risk processes through the implementation of concrete measures related to processes that promote integrity. Sufficient staff and clear division of tasks affects their quality implementation. Training, consulting and internal transfer of knowledge or with the dedication of a special fund for specialized knowledge, would bring a better knowledge of the internal regulatory framework and the solution of ethical dilemmas. Promoting meritocracy not only during the recruitment phase but also in career advancement would motivate the staff.[35] Job descriptions and clear procedures for accomplishing tasks will facilitate the creation of a collaborative environment among employees and will reinforce accountability mechanisms

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33 See the Integrity Plans of the Ministry of Justice and six ministries developed with the assistance of the Institute for Democracy and Mediation.

34 According to Chapman, Ethics in Public Service for the New Millennium, p. 210 "In liberal democracies, it is the political environment that determines the purpose and objectives of public services; it is the political environment that determines the values that must be applied when delivering these services; and it is the political environment that affects the way the public employee works that is the main factor in the differences between public administration and management or administration in other contexts.", in Chapman, R., A. (2002). "Ethics in Public Service for the New Millennium."", pp. 209-222

35 Dahlström et al (2012: 656) point out that the conditions of employment of public employees and especially the extent of their dependence on political leaders are key indicators of why some states have been able to create uncorrupted institutions while others have been mired in corruption. and bad governance. The study concludes that recruitment based on merit is one of the main factors that affects the variables of corruption, since a difference is created between employees recruited on merit and elected officials and thus, the two groups can control each other in the fight against corruption (Ibid.: 665-666)

and identification of responsibilities.[36] Open and transparent institutions to the public will serve the general interest and enjoy the trust of the public. In promoting a culture of integrity, the leadership challenge remains to ensure the reliability and continuity of the process in the institution by leading by example and promoting ethical models.[37]

On the other hand, even the integrity plan itself should not be seen as a static document, in conditions where risks evolve over time. The expertise of the IDM in the first phase was necessary to raise the capacities, but the success of the drafting of these strategic documents will not be sustainable without a mastery of the process by the institutions themselves. This mastery requires a serious commitment from employees of different levels for the organization of the process, its orientation and direction. Also, it requires maintaining and promoting the trust of the institution's employees in the benefits that come through these instruments for the institution itself. The process of assessing integrity risks in line ministries has had to overcome the resistance of different management levels of the administration, in terms of discussing ethical risks and dilemmas in the institution. This experience testifies to the need to change the work culture of public institutions. Cultural changes are transformative as they involve a process of unlearning and relearning.[38] Also, increased attention is required so that the integrity risk assessment is accepted by the institution as a periodic internal process for improving the institution's work and increasing public trust. The integrity risk assessment process should be institutionalized in a standard operating procedure including all positions/functions/structures operating in the institution. Moreover, it requires a commitment from them for the integration of the methodologies used, which create spaces of freedom of expression for employees, such as the separation of the advisory role from the

sanctioning role during meetings or interviews to identify risks, or the use of anonymized questionnaires when monitoring and reviewing existing plans.

Designating a responsible employee, in the capacity of integrity coordinator in the institution, is important for the smooth running of the risk monitoring and review process. This role, due to the need for coordination between the necessary institutional structures, should be at the management level. The practice of coordinating working groups by a deputy minister can also be borrowed from the following process for the actualization of measures to minimize risks as well as for their review and monitoring.

In a broader context, drafting of integrity plans in the six ministries through a joint expertise from IDM served to reduce the isolation of institutions through the identification and sharing among them of good practices of the regulatory or administrative framework. This reconciliation model within the framework of strengthening their culture of integrity can be implemented in the future through the creation and continuous updating of a database by the Ministry of Justice, as the institution monitoring the implementation of integrity plans for the central government and as the coordinating institution in the fight against corruption. This database can serve other horizontal or subordinate institutions to exchange and promote special experiences and practices or to refer to them as a model. Such a practice would bring effectiveness, efficient use and cross-sectoral sustainability of models promoted or designed through expertise or funding from foreign donors.

Also, self-assessment by drafting of integrity plans in central government institutions can and should serve as a self-assessment tool in a wider context to analyze the most frequent or common risks to the culture of integrity in central government

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36   According to Chapman, p. 218, Procedures are important in public institutions and are created to ensure that accountability and responsibility work down the hierarchical scale to elected representatives.

37   According to Schein (2004). Organizational Culture and Leadership, f. 271, Leaders communicate overtly and implicitly through what they pay attention to and what they reward, how they allocate resources, how they model their behavior, how they handle critical issues, and the criteria they use for recruiting, selecting, promoting, and firing. . These behaviors can become part of the culture or subcultures of the organization. By analogy with the private sector, Spillane, J. (2015) refers to the fact that companies spend enormous amounts to train employees to have an ethical behavior, but meanwhile maintain an incentive system this ethical behavior is not taken into consideration, which in end results without any concrete effect on the growth of the ethical climate. Pastin (2017) also emphasizes the importance of an incentive system for ethical behavior, considering the incentive system as the strongest signal that the organization gives on the values it carries.

38   Schein, E., H., (2004). Organizational Culture and Leadership. Third Edition, p. 335

institutions. Such an analysis would enable the undertaking of new state policies or the revision of existing ones with a focus on concrete needs and difficulties that can be solved with a new comprehensive approach.

However, all the measures taken to develop and implement integrity plans will not increase public confidence in the integrity of public institutions without its involvement. Increasing institutional transparency and cooperation with other stakeholders is one of the recurring objectives of integrity plans in several ministries. Publishing complete integrity plans on official websites of public institutions and monitoring reports on their implementation would contribute to increasing the transparency of the institution, which is one of the important principles of good governance. Also, it is essential to coordinate efforts to create a sustainable cooperation between public institutions and civil society organizations. The watchdog role of civil society organizations is necessary to have a real monitoring of the implementation of integrity plans. To this end, it is necessary to enhance civil society organizations' capacities so as to ensure common understanding of the integrity risk assessment process and integrity plans in the public sector as well as to monitor their implementation. In this way, civil society can also build bridges of cooperation with other actors and make the fight against corruption a collective challenge.

5. CONCLUSIONS

The fight against corruption remains a challenge for the Government of Albania, which, in addition to supporting legal initiatives that complement and strengthen the normative framework, has included in its policies, in accordance with the recommendations of the European Union and GRECO, the drafting of integrity plans in central institutions. The public integrity approach is considered more efficient than the traditional approach in the fight against corruption as it goes beyond the compliance of institutional activity with the law. It requires the creation of an ethical culture of employees, the institution and society, which would act as a preventive tool against corruption.

In the exercise of their functions defined by law, public institutions face various risks of corruption, which prevent the accomplishment of the strategic, programmatic or operational objectives of the institution. In this framework, the integrity risk management process is a process through which the institution methodically addresses the integrity risks for work processes/activities (according to functions), with the final goal of strengthening the institutional resistance to corruption and reducing its levels.

The approval of Integrity Plans by line ministries and some other public institutions in the country is indicative of a political will and the commitment of administrative staff to undertake a self-assessment process and to draft a strategic document to minimize integrity risks. Given the risks of integrity and corruption at the central government level, the process in public institutions in the country is in its infancy, but the results that are being obtained at this stage seem promising for the continuity of this process in the future. However, these documents will not produce the intended effect without a genuine commitment to the implementation of the envisaged measures, without political and leadership ownership to lead by model, without focused coordination and monitoring, without ownership of the process for identification and risk management for its review in the future and without an open approach of the institutions to the public and civil society organizations.

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