



Government of Montenegro
Office for European Integration



INTEGRITY

IN ACTION

Assessment Report on Enforcement
of Anti-Corruption Measures in the State Administration
and Other Public Authorities



Integrity in action

Assessment Report on Enforcement of Anti-Corruption Measures
in the State Administration and Other Public Authorities

“Integrity in Action: Assessment Report on Enforcement of Anti-Corruption Measures
in the State Administration and Other Public Authorities”

Agency for Prevention of Corruption

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2022

Podgorica, Montenegro

ISBN 978-9940-9774-3-6
COBISS.CG ID 22298628



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Performance index for anticorruption measures	Score
Ministry of Public Administration, Digital Society and Media	76.39%
Secretariat for Legislation	69.44%
Metrology Office	65.28%
Education Office	63.89%
Transport Administration	62.50%
Administration for Statistics	62.50%
Ministry of Capital Investments	61.29%
Directorate for the Protection of Classified Information	59.03%
Hydrometeorology and Seismology Office	55.56%
Ministry of Health	53.47%
Social and Child Protection	52.78%
Ministry of Defense	52.08%
Human Resources Administration	50.00%
State Archives	48.61%
Ministry of Foreign Affairs	47.22%
Parliament of Montenegro	45.83%
Administration for Inspection Affairs	45.14%
Ministry of Justice, Human and Minority Rights	41.94%
Administration for Sports and Youth	41.13%
Office of the President of Montenegro	38.89%
Administration for the Execution of Criminal Sanctions	38.89%
Public Works Administration	38.19%
Ministry of Ecology, Spatial Planning and Urbanism	38.19%
Environmental Protection Agency	38.19%
Ministry of Agriculture, Forestry and Water Management	34.72%
Administration for Cooperation with the Diaspora-Emigrants	33.33%
Ministry of Education, Science, Culture and Sports	29.84%
Administration for the Protection of Cultural Heritage	28.99%
Forest Administration	23.19%
Ministry of Finance and Social Welfare	20.16%
Water Administration	11.11%
Revenue and Customs Administration	10.48%

Introduction

It is stipulated under Article 78 of the Law on Prevention of Corruption that the Agency for Prevention of Corruption shall monitor the adoption and implementation of integrity plans, make recommendations for their improvement and evaluate the efficiency and effectiveness of integrity plans in accordance with this Law.

Integrity Plan is a strategic document based on self-assessment of corruption risks, their assessment and determination of adequate measures for their prevention, in order to improve the quality of work, efficiency, professional standards and ethical culture. An important feature of this preventive mechanism is that the enforcement of other anti-corruption mechanisms can be monitored through its development.

In order to assess the enforcement of anti-corruption measures, the **Methodology for Assessing the Enforcement of Anti-Corruption Measures** was developed in November 2021. Pilot version of the Methodology was applied to the public authorities from two selected sectors: *State Administration and Other Public Authorities and Social and Child Protection*.

The Methodology was finalized through a consultative process, at workshops with representatives of the public authorities from selected systems, in Podgorica on 25-26 October 2021.

Through the Methodology implementation, the efforts made by the public authorities from the two sectors in the implementation of anti-corruption measures were measured, which were included in various systemic laws, as well as those to enforce measures that were not prescribed by law as mandatory, and which contributed to the creation of a culture of resilience to corruption and other irregularities.

Methodology for Assessing the Enforcement of Anti-Corruption Measures

During the development of the Methodology, the recommendations given in the description of the methodology "Assessment of Anti-Corruption Initiatives", implemented by the Anti-Corruption and Civil Rights Commission of the Republic of Korea¹, were considered. One of the recommendations is that countries interested in adopting a similar methodology start with a few simple criteria with quantitative indicators.

The purpose of the Methodology is to assess whether the public authorities are implementing anti-corruption measures, to what extent implementation has led to some change, as well as to encourage the public authorities to be proactive when planning and implementing anti-corruption measures that are not prescribed as mandatory.

The Methodology includes three main categories, nine criteria and 33 indicators of fulfillment (total 72 points) which are to demonstrate whether the public authorities have established institutional mechanisms for corruption risk management, internal control, availability of information on work activities, professional behavior of employees, raising employee awareness of ethics and integrity and preventing conflicts of interest, that is, strengthening ethical culture.

1

For more details see: Introduction to Korea's Anti-Corruption Initiative Assessment (2016)
www1.undp.org/content/seoul_policy_center/en/home/research-and-publications/ACRC.html

Category 4 includes 7 indicators, and points are deducted in case of their fulfillment, in total-18 points; it is used to adjust the fulfillment of indicators from the first three categories. The Methodology was submitted to the public authorities on 19 November 2021, and they were given a deadline until 30 December 2021 to perform a self-assessment of the fulfillment of the set criteria and submit relevant means of verification.

The following was used for the purpose of verification of indicators:

- a. Documents in electronic or printed form submitted by the public authorities to the Agency;
- b. Data from records kept by the Agency; and
- c. Publicly available official data on the work of government authorities.

The performance index for anti-corruption measures for the four common categories was obtained by calculating the percentage of the total number of points awarded to the public authority in relation to the maximum number of points that could be awarded.

In the sector of the State Administration and Other Public authorities, for six authorities which were newly established according to the interpretation of the Agency for Prevention of Corruption,² some elements of the Methodology mostly relating to annual reporting were excluded from the calculation of points in order to assess the impact of the enforcement of measures as objectively as possible. After excluding five indicators (1.1.3, 1.1.4, 1.1.5, 1.2.5, 2.1.3), maximum number of points that a public authority could get was reduced by 10 and amounted to 62, and the excluded indicators are clearly indicated in the report. In addition, for three more public authorities for which the legal conditions had not been met yet for the development of the *Questionnaire for assessing the efficiency and effectiveness of the Integrity Plan*,³ in accordance with Article 76 of the Law on the Prevention of Corruption, the use of indicator 1.1.5 related to the document was excluded, and the total score was adjusted by reducing the maximum number of points from 72 to 69.

Response of Public authorities

Although pursuant to Article 78 of the Law on Prevention of Corruption, the Agency for the Prevention of Corruption assesses the efficiency and effectiveness of integrity plans, 8 public authorities in the system did not respond to the request for submitting a self-assessment report in accordance with the Methodology for Assessing the Enforcement of Anti-Corruption Measures and the related means of verification. The other 32 public authorities submitted documentation within the required deadline, and 17 of them submitted subsequent comments and documentation as a response to the working version of individual reports.

The following public authorities that **did not participate** in the assessment:

- **Secretariat General of the Government;**
- **Ministry of the Interior;**
- **Ministry of Economic Development;**
- **Administration for Maritime Safety and Port Management;**
- **Administration for Food Safety, Veterinary and Phytosanitary Affairs;**
- **Hydrocarbons Administration;**
- **Railway Administration;**
- **Cadaster and State Property Administration.**

Self-Assessment and Comments of the Public authorities on the Draft Versions of the Report

The public authorities had to submit a self-assessment of points gained, along with the means of verification. Most public authorities complied (other than the Ministry of Justice, Human and Minority Rights, Administration for Public Works and the Human Resources Administration). According to the submitted score lists, the public authorities assessed that they gained a total of 1121.5 points in all categories. After verification, it was determined that the public authorities which submitted self-assessment tables scored 893 points, or 20% less than reported in their respective self-assessments (the self-assessments of three public authorities, the Administration for Cooperation with the Diaspora-Emigrants, the Ministry of Health and the Administration for the Execution of Criminal Sanctions, reported less points than determined in the final assessment of points gained).

On 21 March 2022, the Agency for Prevention of Corruption submitted draft versions of individual reports on assessing the enforcement of anti-corruption measures to the public authorities in the sector of the State Administration.

After submitting draft versions of the report, out of 32 authorities, a total of 17 authorities responded and submitted additional comments, clarifications and, in some cases, additional documentation. In the process of detailed analysis of responses received from the public authorities, in several cases, minor corrections were reasonably made in scoring, formulation of recommendations and findings for particular indicators. In certain cases, subsequent statements were not accepted as a sufficient basis for changing the scoring. In some cases, the authorities expressed disagreement or sought further clarification regarding the recommendations made, and in most cases they accepted them and expressed their readiness to implement them through further activities. Based on subsequently submitted documents and statements, the authorities were awarded 41 points more in total, compared to the initial assessment, which in **two cases** led to a level change in the performance index for anticorruption measures (the Ministry of Health and the Ministry of Public Administration, Digital Society and Media).

2 These are the following authorities: Ministry of Finance and Social Welfare; Ministry of Capital Investments; Ministry of Justice, Human and Minority Rights; Ministry of Education, Science, Culture and Sports; and the Revenue and Customs Administration.

3 These are the following authorities: Administration for Cooperation with the Diaspora-Emigrants; Administration for the Protection of Cultural Heritage; Forest Administration; and the Administration for Sports and Youth.

Results of Implementation of Anti-Corruption Measures by Category

Category 1: Putting in place the assumptions for implementing anticorruption legislation

Of the three categories in this assessment, this one is the best rated, as it scored 62.39% of the total number of available points. Within this category, through three special areas (criteria), the use of basic mechanisms referred to in the Law on Prevention of Corruption and the Law on Management and Internal Financial Controls in Public Sector was examined, with results ranging from a high score (almost 90%) to insufficient one (30%) in the third area.

Indicator	Maximum Score	Actual Score	Percentage Score
1 – Putting in place the assumptions for implementing anti-corruption legislation	1056	627	62.39%
1.1. Establish internal mechanisms for corruption risk management	448	359	88.31%
1.2. Establish mechanisms for supervision and control of business processes	448	220	51.37%
1.3 Establish mechanisms to detect and report corruption	160	48	30.00%

Criterion 1.1: Establish internal mechanisms for corruption risk management

The criterion with by far the best results of all nine criteria in the whole assessment is related to some of basic obligations referred to in the Law on Prevention of Corruption, such as the appointment of integrity managers, adoption of the Integrity Plan, implementation reports, questionnaires to assess the efficiency and effectiveness of the Plan. The results show that the public authorities have largely complied with their legal obligations in that regard. The only indicator in this criterion that more deeply analyzes the quality of Integrity Plans in terms of the number of specific areas included by the public authorities is also the least fulfilled part of this criterion. Two indicators in this criterion (1.1.4 and 1.1.5) are excluded from the total score for six institutions that have been newly established according to the interpretation of the Agency for Prevention of Corruption.

Indicator	Maximum Score	Actual Score	Percentage Score
1.1 Establish internal mechanisms for corruption risk management	448	359	88.31%
1.1.1: Integrity Manager Designated	32	32	100%
1.1.2: Integrity Plan Developed – 1 point ** If the adopted integrity plan is entered in the web-based application of the Agency for Prevention of Corruption, the given authority gets one additional point. If it is entered in compliance with the User Manual, the given authority gets yet another additional point. ** If the Integrity Plan was updated at least once over the last two years, the public authority gets one additional point.	128	118	92.19%

1.1.3: Apart from general risk areas, the Integrity Plan contains also the specific ones. one specific risk area- 1 point two specific risk areas- 2 points three and more specific risk areas- 3 points	96	69	71.88%
1.1.4: The Report on the Integrity Plan Implementation for the previous year completed and provided to the Agency: print copy – 1 point through the web-based application – 2 points	78	73	93.59%
1.1.5 The Questionnaire for Assessing the Integrity Plan Efficiency and Effectiveness completed and provided to the Agency in the previous two years: print copy – 1 point through the web-based application – 2 points	69	67	97.10%

Indicator 1.1.1: Integrity manager designated

This is the only indicator in the whole assessment that **scored 100%**, because all public authorities designated an integrity manager. It can be concluded that this measure from the Law on Prevention of Corruption has been fully implemented and is universally followed.

Indicator 1.1.2: Integrity Plan developed

Almost all institutions in the sector have developed an Integrity Plan, so this indicator scored **92.19%**. The only exception is the Revenue and Customs Administration, a newly established institution that merged three previously independent administrations. Another reason why some authorities gained no points under this indicator is due to the fact that a number of authorities (five of them) failed to upload their respective plans in the information system of the Agency for Prevention of Corruption in the manner provided by the user manual. In this way, it was not possible to apply all functionalities of the system in the process of reporting and monitoring the implementation of measures referred to in the Plan.

Indicator 1.1.3: Specific risk areas

The first indicator included in the assessment of the Integrity Plan content also recorded a high performance result of **71.88% points scored**. Exactly half of the authorities, 16 of them, have defined three or more specific risk areas. On the other hand, three authorities (Parliament of Montenegro; Ministry of Agriculture, Forestry and Water Management; Water Administration), have not defined any specific risks at all.

Usually, the ministries have the most specific areas (except for the Directorate for Inspection Affairs) which is at the very top with 9 special risk areas). The record holder is the Ministry of Finance and Social Affairs care with as many as 13 special areas of risk, which are elaborated in detail.⁴

4 The integrity plan of the Ministry includes as many as 13 special areas of risk: Preparation, Planning and Implementation of Budget Spending; Economic and Development policy; Public Debt Directorate; State Treasury Directorate; Directorate for Finance and Contracting of the EU Assistance Funds; Financial System and Financial Technologies; Tax and Customs System; Financial Management, Control and Internal Audit of Public Sector; Property and Legal Affairs; Public Procurement Policy and Monitoring; Control Mechanisms; Retirement and Disability Insurance; Veteran and Disability Protection; Social Welfare and Child Protection.

Followed by the Ministry of Justice, Human and Minority Rights (7 special areas), the Ministry of Health (8 special areas) and the Ministry of Defense (6 special areas).

In most cases, specific risks are typical- authorities usually have two specific areas, that is free access to information and public relations (with the occasional addition of public procurement) processed in a generic way, without detailed elaboration in accordance with the specifics of the authority and its competencies.

It is especially important to point out that the risks related to the **management of state property** are covered only by one authority- the Ministry of Defense, where they are elaborated in detailed with respect to residual risks and prevention and elimination measures.

Indicator 1.1.4: Report on the Integrity Plan implementation

Almost all authorities have prepared a report on the Integrity Plan implementation and submitted it to the Agency, so the performance percentage is high, **93.59%**. This indicator also includes several cases in which the authorities did not prepare the report on the Integrity Plan implementation fully in compliance with the Rules on the Integrity Plan preparation and implementation. *This indicator was not included in the total sum of points for six authorities that were considered newly established according to the Agency's interpretation.*

Indicator 1.1.5 Questionnaire for assessing the Integrity Plan efficiency and effectiveness

All authorities that had that obligation also prepared a Questionnaire to assess the Integrity Plan efficiency and effectiveness, so that this indicator is fulfilled 97.1%. *The use of this indicator is excluded from the total sum of points for six authorities that are considered newly established according to the Agency's interpretation.*

Criterion 1.2: Establish mechanisms for supervision and control of business processes

The score in this indicator is significantly worse than in the previous one. In this criterion, the focus has shifted from the Law on Prevention of Corruption to the Law on Management and Internal Financial Controls in Public Sector, that is with respect to its four important elements: internal audit, risk register, the book of procedures and the system for preventing and eliminating the risk of irregularities and fraud. The results show that the implementation and effectiveness of these systems is low, while formal commitments are mainly fulfilled.

The practice of the authorities shows that the internal audit system still does not give the expected results in a significant part of the administration, with only a few audits, lack of staff capacity and low degree of implementation of the recommendations. This points to the need for a more detailed analysis of causes and systemic actions to make this important system of financial management and control work. Risk registries have not yet been recognized as a true management tool for risk management, and the situation is similar with the book of procedures, while the system for preventing and eliminating the risk of irregularities and fraud, as the most recently introduced novelty, has not yet gone beyond formal execution of legal obligations in practice.

Indicator	Maximum Score	Actual Score	Percentage Score
Criterion 1.2: Establish mechanisms for supervision and control of business processes	448	220	51.37%
1.2.1: Internal audit in place	64	54	84.38%
1.2.2: Internal audit completed (Audit Report) over the last two years	64	24	25.00%
1.2.3: Percentage of internal audit reports followed through over the last reporting period 50% - 70% - 1 point 70% - 90% - 2 points More than 90% - 3 points	96	28	29.17%
1.2.4 Risk Register developed in accordance with Article 14 of the Law on Management and Internal Financial Controls in Public Sector: Register established- 1 point Register established and updated in the last year- 2 points * In case the Risk Register is posted on its website, the authority gets one additional point.	96	57	59.38%
1.2.5: The Annual Report on Notified Suspicions of Irregularities and Fraud and the Action Taken prepared in accordance to Article 53 of the Law on Management and Internal Financial Controls in Public Sector.	26	12	46.15%
1.2.6 In accordance to Article 50 of the Law on Management and Internal Financial Controls in Public Sector, the Book of Internal Procedures: developed- 1 point developed and updated in the last year- 2 points * In case the latest version of the Book of Internal Procedures is posted on its website, the authority gets one additional point.	96	45	46.88%

Indicator 1.2.1: Internal audit in place

This is the most successful indicator under this criterion, with 84.38% fulfillment. **Five public authorities in this sector have no internal audit mechanism in place**, two of which are relatively new authorities (Revenue and Customs Administration; Sports and Youth Administration) and three that cannot be excused due to reorganization (Office for Social and Child Protection; Public Works Administration; Water Administration). The existing Internal Audit Department of the Administration for Public Works was deleted from the new systematization.

In accordance with the Law and bylaws, authorities such as ministries and the Parliament have special units for internal audit, while other authorities have entrusted the performance of this audit to other authorities by signing an agreement. Despite the relatively high fulfillment of this indicator, it has to be pointed out that, even in the case of authorities that have their own internal audit unit, **it is rarely staffed in accordance with the legal minimum** requiring at least three internal auditors. This is also the case with those units to which other authorities have entrusted the audit function and which have a significantly greater responsibility and scope of work. This leads to a relatively small number of performed audits, audited processes and recommendations made.

Indicator 1.2.2: Internal audit completed

This indicator has the worst performance in this area with one of the lowest scores in the entire methodology – got only a quarter of the maximum points. Almost half (13 in total) of 27 authorities that formally have internal audits in place conducted **no audit over the last two years**. Of 15 authorities that conducted audits, only 9 of them conducted two or more audits, while the others conducted only **one** audit in two years.

There are exceptions where a significant number of internal audits is noticeable, such as the **Ministry of Public Administration, Digital Society and Media** (7 audits over the last two years), **Ministry of Defense** (6 audits), **Ministry of Justice, Human and Minority Rights and Ministry of Agriculture, Forestry and Water Management** (5 audits each). It is important to point out that the **Ministry of Education, Science, Culture and Sports**, as a new authority with a newly established internal audit unit, conducted as many as 6 audits in the first year.

It is noticeable that in cases where auditing is delegated by agreement, the number of audits is very low or there are no audits at all. The only exception is the **Human Resources Management Authority**, which delegated the internal audit function to the **Ministry of Public Administration, Digital Society and Media**, which conducted 2 audits over the last two years.

Indicator 1.2.3: Percentage of internal audit reports followed through

Concerning the percentage of internal audit reports followed through, the indicator performance is modest (29.17%) as well. Only seven authorities reported 90% of internal audit reports followed through; this percentage is over 70% for three authorities, and it is over 50% for one authority. A significant number of authorities submitted no statistics on the percentage of internal audit reports followed through, and there was a significant number of cases observed in which internal audits were completed, but the audit reports themselves included no recommendation.⁵

The finding is not in line with the data from the Consolidated Report on Management and Internal Financial Controls in Public Sector of Montenegro in 2020⁶, according to which the percentage of implemented and partially implemented internal audit recommendations equaled 80% for 2020. It has to be noted that statistics on the implementation of recommendations are based on data reported by the authorities themselves, so that it is a self-assessment without external verification.

Indicator 1.2.4: Risk register

In terms of the success, the second ranked indicator in this area is related to the Risk Register, for which in almost 60% of cases there were grounds for awarding points. Only five authorities **did not report establishing the Risk Register**.

However, the Risk Register is rarely updated by the authorities that developed it, and it is common practice that, once adopted, the document will be valid as it is for many years. Additionally, the practice of posting the Risk Register on the authority’s website is even more rare- it has been observed at only seven authorities.

5 It has to be pointed out that accoring to the State Audit Institution’s practice, even in cases of positive opinions, recommendations are made or attention is drawn to issues that are not of great substantial importance or would be good practice or further improve the work of the authority.

6 Report prepared by the Central Harmonization Unit, last published for 2020 and available at <https://www.gov.me/dokumen-ta/f735aa85-b9bf-4b42-8899-e60e228d1809>

Indicator 1.2.5: Annual Report on Notified Suspicions of Irregularities and Fraud

The performance of this indicator scored almost half of the maximum points, having in mind the methodological change of the basic number of authorities.⁷ Of 26 authorities, 12 prepared and submitted the Annual Report on Notified Suspicions of Irregularities and Fraud and Action Taken.⁸ However, all 12 reports are “empty”; i.e. read that there were no notified suspicions of irregularities and fraud in the previous year.

The **Ministry of Capital Investments** was the only authority that submitted a report including notified suspicions of irregularities and fraud for 2021. Their report reads that a total of 33 suspicions of fraud and irregularities were registered, including 13 cases in which the basis for suspicion was identified, i.e. suspicion was confirmed. As the report was submitted outside the monitoring period (for 2021, submitted in February 2022), and it was submitted by a newly established institution, the evidence could not be scored, but it is significant as an example of the functioning of this relatively new legal mechanism (introduced into our system in late 2018).

For a total of 6 authorities, this indicator was excluded from the total sum, because those were newly established authorities according to the interpretation of the Agency for Prevention of Corruption.

Indicator 1.2.6: Book of Internal Procedures

The performance of this indicator equals 46.8%: almost two thirds of the authorities have the **Book of Procedures** and most of them updated it at least once during the monitoring period. Without assessing the quality of the acts included in the Books, it is noticeable that there is a significant number of internal rules, procedures and other documents. Of the total number of authorities that have a Book of Procedures,⁹ **less than half posted it** on their respective websites.

It has to be noted that **12 authorities have no Book of Procedures**.¹⁰ Some authorities (such as the Metrology Office) have some alternatives to this document, specific collections of internal rules that correspond to the specific nature of the authority’s competence, but not to the definition of the Book of Procedures. There are also segments on the websites of some authorities where their internal acts have been published (the check found that the lists were not complete), which was not recognized as a sufficient basis for awarding points under this indicator.

7 The number of authorities based on the assessment was reduced to 26, as this indicator does not apply to newly established authorities.

8 This is an obligation in accordance with Article 53 of the Law on Management and Internal Financial Controls in Public Sector (“Official Gazette of Montenegro,” 075/18 dated 23 November 2018).

9 In accordance with Article 50 of the Law on Management and Internal Financial Controls in Public Sector (“Official Gazette of Montenegro,” 075/18 of 23 November 2018).

10 These are the following authorities: Secretariat for Legislation; Metrology Office; Ministry of Ecology, Spatial Planning and Urbanism; Administration for Protection of Cultural Heritage; Human Resource Administration; Forestry Administration; Environmental Protection Agency; Administration for Execution of Criminal Sanctions; Administration for Public Works; Water Administration; Ministry of Finance and Social Welfare; Revenue and Customs Administration.

Criterion 1.3: Establish Mechanisms to Detect and Report Corruption

In section three of this category, the emphasis is placed on the activities of the authorities related to establishing an efficient reporting system for acting on whistleblowers' reports. At the level of this criterion, this is also an **area with the worst performance within the first category**: with only 30% of the achieved indicator value.

The fulfillment of indicators decreases with each new request: while most authorities have a designated person for receiving and acting upon whistle-blowers' reports, those that have a defined procedure to be followed by that person are much fewer, and only one authority has a defined procedure according to which this person is appointed (or reappointed and subject to performance appraisal at that position).

Indicator	Maximum Score	Actual Score	Percentage Score
1.3 Establish mechanisms to detect and report corruption	160	48	30 %
1.3.1 The person responsible for receiving and acting upon whistle-blowers' reports of harm to public interest indicative of corruption designated	32	21	65.63%
1.3.2 The procedure for acting upon reports of harm to public interest indicative of corruption in place, which provides protection of those who file reports	64	24	40.63%
1.3.3 The procedure with the manner and selection criteria for person responsible to receive and act upon whistle-blower's reports in place	64	3	1.56%

Indicator 1.3.1: The person responsible for receiving and acting upon whistleblowers' reports

A significant number of authorities, 11 in the sample of those who participated in the assessment, **did not report the appointment of a person** responsible for receiving and acting upon whistleblowers' reports of harm to public interest indicative of corruption.

They include the authorities that can be counted among the new ones, in terms of the reorganization of the administration in December 2020 (Ministry of Finance and Social Welfare; Revenue and Customs Administration; Sports and Youth Administration), but also eight authorities¹¹ that cannot cite reorganization as a justification for non-appointment of this person. Among them are the authorities that, according to the size of the budget they manage, number employees or the scope and nature of competencies, can in no way afford to ignore this legal obligation. In addition, it is a legal obligation for the violation of which a significant monetary fine is prescribed for *legal entities*.¹²

On the other hand, in the case of a significant number of authorities that have appointed this person, it is noticeable that the appointments date back to a significantly earlier period, and that there has been no re-appointment or replacement of this person in the meantime.

Indicator 1.3.2: The procedure for acting upon reports of harm to public interest indicative of corruption in place, which provides protection of those who file reports

The performance of this indicator scored almost half of the maximum points- 13 authorities have developed a procedure for acting upon reports of harm to public interest indicative of corruption, which provides protection of those who file reports. A significant number adopted a similar procedure in December 2021 [for details, see Annex 2 - Effects of Methodology and Impact Assessment].¹³

Indicator 1.3.3: The procedure with the manner and selection criteria for person responsible to receive and act upon whistleblower's reports

The percentage of fulfillment of this indicator is the **lowest in the entire methodology** and amounts to **1.56%**. In other words, only one authority has a regulated manner and selection criteria for person responsible to receive and act upon whistleblowers' reports indicative of corruption. It is the **Ministry of Defense** which subsequently, in consultation with the Agency for Prevention of Corruption, prepared amendments to their *Instruction on how to act upon whistle-blowers' reports of harm to public interest indicative of corruption, protection of whistle-blowers and keeping records* dated December 2021, to include a paragraph with indications of this indicator.

Category 2: Strengthening the Institutional Anticorruption Framework

Category 2 recorded a worse performance than Category 1, as the authorities got less than half of the maximum score (44.53%). The key areas it covers are free access to information, human resource management, and more advanced forms of anti-corruption institutionalization and the contents of the Integrity Plan. The results are the best in the area of free access to information, although it is not free of significant issues either, while the results in other areas are at a low level, especially when it comes to improving the internal mechanism of ethical and professional conduct.

Indicator	Maximum Score	Actual Score	Percentage Score
2 - Strengthening the institutional anticorruption framework	832	366	44.53%
2.1 Increase transparency of public authority's work	416	261	70.48%
2.2. Take measures to improve human resource management	224	80	35.71 %
2.3 Take measures to improve the internal mechanism ensuring ethical and professional conduct	192	25	11.46%

¹¹ Those are the following authorities: Transport Administration; Environmental Protection Agency; State Archives; Office of the President of Montenegro; Administration for Execution of Criminal Sanctions; Public Works Administration; Administration for Inspection Affairs; Water Administration.

¹² Article 102, Law on Prevention of Corruption ("Official Gazette of Montenegro," 053/14 of 19 December 2014, 042/17 of 30 June 2017).

¹³ Those are the following authorities: the Ministry of Defense; Ministry of Capital Investments; Administration for Cooperation with the Diaspora-Emigrants; Administration for the Protection of Cultural Heritage; Administration for the Protection of Classified Information; Ministry of Public Administration, Digital Society and Media; Ministry of Agriculture, Forestry and Water Management; Ministry of Health; Secretariat for Legislation; Human Resources Management Authority ; Transport Administration; Statistics Administration; Metrology Office.

Criterion 2.1: Increase transparency of public authority’s work

This criterion addresses the openness of the authority, through proactive publication of information, but also answers to requests for free access to information. Some of the less demanding indicators (publishing plans, reports and enforcement of legal obligations) have a generally high degree of performance, with the exception of issues of publishing reports on the Integrity Plan implementation that are still only partially available to public. By far the weakest results have been achieved in assessing the openness of the authorities regarding the response to requests for free access to information, where only one-fifth of the maximum score was achieved.

Indicator	Maximum Score	Actual Score	Percentage Score
2.1 Increase transparency of public authority’s work	416	261	70.48%
2.1.1 The Integrity Plan posted on the authority’s website- 1 point *In case the document is available in three or fewer clicks, add 0.5 points.	48	40.5	84.38%
2.1.2 The valid Integrity Plan’s Implementation Report posted on the authority’s website- 1 point *In case the document is available in three or fewer clicks, add 0.5 points.	39	24	50%
2.1.3 The authority’s annual Activity Report posted- 1 point *In case the document is available in three or fewer clicks, add 0.5 points.	39	30	62.50%
2.1.4 The Guide for Free Access to Information is posted- 1 point * In case the document has been updated in the last year, add 0.5 points. ** In case the document is available in three or fewer clicks from the homepage, add 0.5 points.	64	51.5	80.47%
2.1.5 Full and updated information in the last 60 days posted online as stipulated by Article 12 of the Free Access to Information Law: - list of civil servants and state employees – 1 point - list of public officials with payroll information, including all income and benefits in reference to their public office- 2 points - information given access as requested – 1 point * In case the document is available in three or fewer clicks from the homepage, add 0.5 points.	144	101	70.14%
2.1.6 Accepted and partially accepted requests for accessing information or the requesting party notified that the information requested is already in the public domain as a share of the total number of free access to information requests received over the last two years: 70 do 90% of all requests received were accepted and partially accepted or the requesting party notified that the information was already in the public domain- 1 point Over 90% of all requests received were accepted and partially accepted or the requesting party notified that the information was already in the public domain- 2 points	64	14	21.88%

Indicator 2.1.1: The Integrity Plan posted on the authority’s website

This is the indicator with the best performance in the area of free access to information, in which the authorities scored as much as **84.38%** of the maximum score. Authorities that have not published their Integrity Plans include Office of the President of Montenegro, Ministry of Finance and Social Welfare, Administration for Protection of Cultural Heritage, Water Administration and the **Revenue and Customs Administration** (which is also the only authority that still has no Integrity Plan). In all other cases, other than the Ministry of Foreign Affairs, the Integrity Plan is also easily accessible, less than three clicks away from the homepage.

Indicator 2.1.2: The valid Integrity Plan’s Implementation Report posted on the authority’s website

The indicator is half-fulfilled, with the performance of 50%. Although all the authorities that had that obligation and adopted the report on the Integrity Plan implementation (25 of them who participated in this assessment, other than the Water Administration), **only 16 of them posted** it on their website and all of them are easily accessible, less than three clicks away from the homepage. The other nine authorities scored no points under this indicator.
The use of this indicator is excluded for six authorities that are considered newly established, according to the interpretation of the Agency for Prevention of Corruption.

Indicator 2.1.3: The authority’s annual Activity Report posted

The performance score of this indicator is **62.5%**. Almost all institutions posted their easily accessible annual activity reports on their respective websites. This is not the case with five authorities (Ministry of Health; Administration for Cooperation with the Diaspora-Emigrants; Office of the President of Montenegro; Administration for the Protection of Cultural Heritage; Water Administration. *The use of this indicator is excluded for six authorities that are considered newly established, according to the interpretation of the Agency for Prevention of Corruption.*

Indicator 2.1.4: The Guide for Free Access to Information is posted

This is the second-best rated indicator in this area, with **80.47%** of the points won out of the maximum number. About half of the authorities (15 of them) not only have a published and easily accessible guide, but it is also updated in accordance with the obligation under the Law on Free Access to Information.¹⁴ Only two authorities have not published a guide for free access information, the Administration for Protection of Cultural Heritage and the Water Administration, which is subject to penal provisions of the Law.¹⁵

14 The authority shall update the guide for free access to information at least once a year, i.e. within 30 days from the date of change in the type of information in their possession and data relevant to access to information, pursuant to Article 11, Law on Free Access to Information (“Official Gazette of Montenegro”, 044/12 of 9 August 2012, 030/17 of 9 May 2017)

15 A fine of €500-20,000 shall be imposed on legal entities for misdemeanor in case they fail to compile, publish or regularly, at least once a year, update the guide for free access information, Article 47, Law on Free Access to Information (“Official Gazette of Montenegro”, 044/12 of 9 August 2012, 030/17 of 9 May 2017)

Indicator 2.1.5: Compliance with Article 12 of the Free Access to Information Law

This indicator assessed the authority's compliance with a part of obligations referred to in Article 12 of the Law on Free Access to Information, which defines proactive disclosure of information - lists of employed civil servants and state employees, lists of public officials and their earnings and other benefits, as well as information to which access has been granted upon request. For this indicator, the authorities have a relatively high-performance score of 70.14%.

Ten authorities had the maximum score, while as many as **five authorities scored no points under this indicator**, which means that they do not publish lists of employees, public officials, requests for free access to information, and their websites clearly show that they do not publish other information referred to in Article 12 of the Law either. These are the following authorities: **Forest Administration; Administration for Cooperation with the Diaspora-Emigrants; Office of the President of Montenegro, Administration for Protection of Cultural Property; Water Administration.**

One of the most common reasons why the authorities lost points in this indicator, apart from absolute non-disclosure that is present in a few cases, is **partial disclosure and misrepresentation of this paragraph concerning the obligation to publish information to which access has been granted upon request**. Namely, the authorities very often publish only the received requests or requests and their own decisions, **but not the information itself to which access has been granted**. Also, in cases of full disclosure, due to the way information is presented, it does not serve its purpose (proactive publishing that will prevent multiple requests for information that has already been published), because requests are published under titles that do not reveal what information is in question, in unsearchable (locked) pdf versions of documents.

One of the factors that influenced the measurement (in particular) of this and other indicators in this area is the fact that many administrations, offices and other authorities are still not part of the redesigned www.gov.me portal, which means that they have kept the now obsolete way of navigating, organizing and displaying data, or have their own websites that are quite specific in terms of domain and design, which is in some cases good news (for example the Environmental Protection Agency) and in other cases bad news (for example the Forest Administration). In addition, the websites of some authorities have been unavailable during the assessment, as was the case of the Water Administration at the time of writing this report.

Indicator 2.1.6: Percentage of accepted requests for free access to information

Through this indicator, the methodology attempts to measure the openness of the authorities in allowing access to information - by measuring the share of approved and partially approved requests for access to information, as well as notices of published information, in the total number of submitted requests in the last two years.

Under this indicator, the authorities were the least successful under criterion 2.1 "Increase transparency in public authorities' work", where they scored **only 21.88%**.

Only two authorities had the share of resolved requests that were approved, partially approved, or addressed by notice of published information, which amounted to over 90% of the total number of received requests (and submitted the related valid documentation). These authorities are the **Metrology Office and the Hydrometeorology and Seismology Office**. Ten more authorities have a share ranging from 70 to 90%, while the share of all other authorities (20 of them) is at a level below 70%, which in some cases drops to one-digit numbers.

Some authorities, usually small ones (the most relevant example is the Secretariat for Legislation), scored no points under this indicator because the requests for information were mostly related to information that was not in the possession of the authority.¹⁶

A large number of authorities did not submit precise records on the statistics of decision-making on received requests for free access to information. The most reliable record in this area is considered to be an excerpt from information system of the Agency for Personal Data Protection and Free Access to Information which, if properly kept, provides the most detailed overview of the structure of decision-making by authorities on requests. In some cases, the authorities provided signed statements on decision statistics or excerpts from own records (which are not related to the information system of the Agency for Personal Data Protection and Free Access to Information), which were accepted as valid only if the figures matched with the number of requests published by the authorities on their websites.

Criterion 2.2: Take measures to improve human resource management

In the field of human resource management, the methodology dictates that various forms of temporary and additional staff engagements must be defined in more detail by the internal acts of the authority itself, and that the Integrity Plan has to identify specific risks and measures related to specific aspects of human resource management. The results show almost equally poor performance in all three indicators in this area, which means that most authorities have no internal acts that define service agreements, part-time and seasonal employment agreements, and secondary employment agreements, and that the Integrity Plans of only a few authorities recognize risks and measures related to the areas of human resource management, in addition to standard measures related to the area of *Human Resource Policies, Ethical and Professional behavior of Employees* that most authorities take over from the Integrity Plan model prepared by the Agency for Prevention of Corruption.

¹⁶ The reason for this methodological dilemma is the fact that many authorities "refuse" access to information even if they do not have such information, while in certain cases in such situations access is granted with an explanation that the authority is not in possession of the requested document or the applicant is notified of the absence of the requested information. In order to cover all borderline cases, it is necessary to cooperate with the competent Agency in order to improve this indicator to be able to capture the diversity of administrative practice in decision-making authorities.

Indicator	Maximum Score	Actual Score	Percentage Score
2.2. Improving human resource management	224	80	35.71%
2.2.1 The authority has adopted the internal rule/procedure with the criteria and measures governing the management, conclusion, execution, monitoring and reporting on service agreements and part-time and seasonal employment agreements	64	22	34.38%
2.2.2 The authority has adopted the internal rule/procedure with the criteria and measures governing the management, conclusion, execution, monitoring and reporting on secondary employment agreements, within the authority.	32	12	37.50%
2.2.3 The integrity Plan includes the risk and measures referring to: - planning new recruitment- 1 point - recruitment procedure- 1 point - performance appraisal and monitoring- 1 point - rewards and sanctions- 1 point	128	46	35.94%

Indicator 2.2.1: Regulation of temporary employment agreements

Performance of the indicator related to the procedures that more closely define two types of temporary employment agreements is at the level of one third or **34.38%**, which is the lowest performance under this criterion. Only nine authorities have a defined procedure/ internal act that defines more closely the manner of managing, concluding, executing, supervising and reporting on service agreements and part-time and seasonal employment agreements. A number of authorities (four of them) have an act that defines **only** service agreements, while part-time and seasonal employment agreements are generally less frequently regulated by internal acts.

Indicator 2.2.2: Secondary employment agreements

The authorities scored 37.5% in the indicator that analyzes internal procedures for forms of additional engagement of existing employees. Only 12 authorities have an internal rule/ procedure with criteria and norms that more closely regulate the manner of managing, concluding, executing, supervising and reporting on **supplementary employment agreements**.

Indicator 2.2.3: Integrity Plan and human resource management

This indicator assesses whether the Integrity Plan includes both risks and measures related to certain aspects of human resource management, such as employment planning, recruitment procedure, performance appraisal and monitoring, as well as rewarding and sanctioning. Only five authorities scored maximum points, meaning that their Integrity Plans include all four categories of required risks and measures¹⁷, while a significant number of authorities do not have Integrity Plans that recognize these risks. Risks and measures related to **rewarding and sanctioning** are recognized to a lesser extent in this sector.

17 These are the following authorities: Ministry of Foreign Affairs, Education Office, Environmental Protection Agency, Secretariat for Legislation, Office of the President of Montenegro.

Criterion 2.3: Take measures to improve the internal mechanism ensuring ethical and professional conduct

One of the areas with the lowest performance puts somewhat more ambitious demands on the authorities – measures their commitment to integrity, ethics and anti-corruption beyond the formal requirements contained in the Law on Prevention of Corruption, as well as whether the Integrity Plans contain more advanced risks and measures related to protection against discrimination in various areas.

The authorities mostly scored no points in this area, whose performance equaled only 11.46%. However, there are authorities that have earned points in both indicators, that is, those that meet even more demanding integrity measures. The Ministry of Defense and the Ministry of Public Administration, Digital Society and Media stand out in this regard.

Indicator	Maximum Score	Actual Score	Percentage Score
2.3 Take measures to improve the internal mechanism ensuring ethical and professional conduct	192	25	11.46%
2.3.1 A designated employee tasked, in addition to their ordinary job description, with matters concerning ethics, integrity and anticorruption, apart from the tasks employees are obliged to perform under the Law on Prevention of Corruption (such as integrity managers, members of the Integrity Plan drafting group, persons responsible for receiving and acting upon whistle-blowers' reports, etc.) - in case of an additional task for the given officer- 1 point - in case of a sole responsibility of an officer, or a separate organizational unit has been established to deal with these issues- 2 points	64	15	20.31%
2.3.2 The Integrity Plan includes the risks and measures concerning the matters governed by the following laws: - Law prohibiting mobbing- 1 point - Law prohibiting discrimination- 1 point - Law prohibiting discrimination of persons with disabilities- 1 point - Gender equality law- 1 point	128	10	7.03%

Indicator 2.3.1: Ethics, integrity and anti-corruption apart from the Law on Prevention of Corruption

Very few authorities managed to score in this indicator that analyzes whether the authority has a special unit, public servant or additional competencies in these areas, other than the tasks that an employee has to perform in accordance with the Law on Prevention of Corruption. The overall performance is at the level of one fifth or **20.31%**.

There are only four authorities that have earned maximum score in this indicator. Ministry of Defense has a special organizational unit, the **Integrity Department** established in 2019, which has competencies in the area defined by the Law on Prevention of Corruption, as well as in many

other special areas related to integrity and the fight against corruption. **Administration for the Execution of Criminal Sanctions** has its own **Ethics Committee** composed of a chairperson and four members, one of which must be the representative of a trade union organization. The **Ministry of Capital Investments** has its own Department for Fight against Corruption with four systematized work positions. The Ministry of Health has a systematized and (recently) filled work position of a **senior anti-corruption advisor** (points awarded based on the fact that it is the exclusive competence of one official).

Five other authorities have defined tasks related to integrity, anti-corruption and ethics, as additional responsibilities of already existing officials, while other authorities (23 of them) scored no points in this indicator.

For this indicator, in several cases, the authorities referred to employees performing some functions prescribed by the Law on Prevention of Corruption, which was not accepted as a basis for scoring.

Indicator 2.3.2: Integrity plan governed by special laws

This indicator, where the authorities' score of 7.03% was among the worst (only Indicator 1.3.3 recorded a worse score- 1.56%), measures whether the Integrity Plan includes risks and measures related to the areas regulated by the Law on Prohibition of Harassment at Work, Law on Prohibition of Discrimination, Law on Prohibition of Discrimination against Persons with Disabilities, and the Law on Gender Equality. Ministry of Public Administration, Digital Society and Media is the only authority that has identified most of these risks in their Integrity Plan. Several other authorities have indications of these risks, for which they scored some partial points,¹⁸ but the prevailing majority (of 27 authorities) does not recognize them in their Plans.

Category 3: Strengthening ethical culture

The lowest results in the whole sector were recorded in this category. Of the three main areas, the lowest performance was recorded in the field of trainings on integrity, ethics and anti-corruption, which are not attended sufficiently by employees, managers in particular. The issue of how to manage gifts is mostly left to be governed by the rules of the Law, with no significant number of authorities that elaborated on the issue in detail in their internal acts, while in several authorities deficiencies were observed in terms of record keeping and reporting on gifts received by public officials. The achieved results are somewhat better with respect to the Existence and enforcement of conflict of interest rules.

Indicator	Maximum Score	Actual Score	Percentage Score
3 - Strengthening ethical culture	416	167	40.14%
3.1 Raising the awareness of managers and employees about ethics and integrity	128	48	37.50%
3.2 Existence and enforcement of conflict of interest rules	192	79	41.15%
3.3 Existence and enforcement of rules on receiving gifts	96	40	41.67%

Criterion 3.1: Raise awareness among managers and staff concerning ethics and integrity

Regarding trainings on ethics and integrity for employees and public officials of the authorities, the lowest performance of all the criteria was recorded in this area, primarily due to the fact that trainings in these areas are very rarely attended by managers. While the performance scored 65.63% in case of trainings attended by employees, the overall performance is decreased due to extremely poor performance of the indicator that monitors the trainings attended by managers (9.38%).

Indicator	Maximum Score	Actual Score	Percentage Score
3.1 Raising the awareness of managers and employees about ethics and integrity	128	48	37.50 %
3.1.1 The number of thematic trainings concerning anticorruption, ethics and integrity attended by the staff over the last two years: a) up to 2 trainings- 1 point b) more than 2 trainings- 2 points	64	42	65.63%
3.1.2 The number of various thematic trainings concerning anticorruption, ethics and integrity attended by managers (heads and senior managers) over the last two years: a) up to 2 trainings- 1 point b) more than 2 trainings- 2 points	64	6	9.38%

Indicator 3.1.1: Staff training

In most authorities, 29 of them in the sector, there was evidence of attending trainings related to the fight against corruption, ethics and integrity in the last two years, for which reason this indicator scored **65.63%**. Only three authorities scored zero in this indicator (Administration for the Execution of Criminal Sanctions, Transport Administration, and Administration for Cooperation with the Diaspora-Emigrants). However, it was noticed in many cases that the only employees who attended such trainings in the authority were usually the integrity managers themselves.

An example of **positive practice and innovative approach** in this area is the Ministry of Defense, whose Integrity Department, in cooperation with the Directorate for Information and Communication Systems and Cyber Security, developed an **online Integrity Test**, designed as a short course with knowledge testing at the end, and all employees of the Ministry of Defense and members of the Army are obliged to take it.

Indicator 3.1.2: Trainings attended by managers

Unlike the previous indicator, the situation with the training of managers is significantly worse, and the indicator scored **9.38%** in terms of performance (only two indicators in the whole assessment have a worse result, 2.3.2 and 3.1.2). The only cases in which it was confirmed that the trainings in the mentioned areas were attended by managers included the Ministry of Capital Investments, Secretariat for Legislation, Metrology Office, Ministry of Ecology, Spatial Planning and Urbanism, Hydrometeorology and Seismology Office, and the Ministry of Agriculture, Forestry and Water Management.

¹⁸ These are the following authorities: Ministry of Health; Ministry of Defense; Sports and Youth Administration; Ministry of Justice, Human and Minority Rights.

Criterion 3.2: Existence and enforcement of conflict of interest rules

The performance in this criterion scored **41.15%**, which makes it medium-ranked in this area, better than integrity and corruption training, but worse than the performance in the criterion on rules related to gifts. The achieved results in this criterion indicate that the authorities generally have no detailed definition of conflict of interest that would be adapted to the specifics of their competencies; an affiliated person is very rarely defined in their internal acts, and an organized system of rules for own employees on performing other tasks (outside the authority) is equally rare. Records of the Agency for Prevention of Corruption show that misdemeanor proceedings have been initiated against one third of the authorities in the sector, due to irregularities in the reporting of income and assets.

Indicator	Maximum Score	Actual Score	Percentage Score
3.2 Existence and enforcement of conflict of interest rules	192	79	41.15%
3.2.1 Internal rules defining conflict of interest	32	10	31.25%
3.2.2 Internal rules defining the notion of an affiliated person	32	3	9.38%
3.2.3 Internal rules for secondary employment of staff (allowed/prohibited jobs, the application procedure, etc.) in place	32	3	9.38%
3.2.4 All public officials employed with the authority subject to asset and income declaration have provided to the Agency their regular annual declarations or reports in case of coming into office as of 01 January of the current year	96	63	65.63%

Indicator 3.2.1: Conflict of interest

Only **ten authorities** have internal rules that define conflict of interest in detail, which is why this indicator scored 31.25%. In many cases, although points were scored, a provision from the Law on Prevention of Corruption was copied, while the concept was not elaborated and adapted to the specifics of the position and competencies of the authority. One example of positive practice is the **Ministry of Public Administration, Digital Society and Media**, which has an internal rule on conflict of interest management policy, which defines in detail the measures for prevention of conflict of interest and the procedures for its management.

Indicator 3.2.2: Affiliated person

Only three authorities (Ministry of Health, Ministry of Capital Investments and Ministry of Defense) have internal rules that define the term “affiliated person,” which is why this is the worst rated indicator in this area, which scored only 9.38%. Although some points were scored, the fulfillment of set requirements was mostly formal. For example, the Ministry of Health adopted the **Instructions on detailed content of the terms conflict of interest, affiliated parties, receiving gifts and fraud to facilitate their identification, prevention and reporting** in December 2021. The Instructions are actually a collection of excerpts/citations from the Law on Civil Servants and State Employees, the Law on Management and Internal Financial Controls in Public Sector and the Law on Prevention of Corruption. There was no additional effort to define these terms in the context of the work and responsibilities of the Ministry of Health and go a step further from general definitions towards bringing the concepts closer to the specific work processes of the Ministry. A similar, albeit less obvious, practice was observed with the other two ministries in this indicator.

Indicator 3.2.3: Execution of other tasks

The low performance of this indicator (**9.38%**) is due to the fact that only three authorities in the whole sector have internal rules for secondary employment of staff (allowed/prohibited jobs, the application procedure, etc.) in place. These are the Ministry of Public Administration, Digital Society and Media, the Administration for Inspection Affairs and the Transport Administration.

Indicator 3.2.4: Asset and income declarations or reports

This indicator focuses on whether all the officials in an institution filed a regular annual report on income and assets, i.e. a report in case of entry into office, in a timely manner. This indicator had the best score under this criterion (**65.63%** point scored). However, **against one third of the authorities that participated in the assessment, that is 11 of them, the Agency for Prevention of Corruption initiated misdemeanor proceedings on this basis¹⁹**, in which case no points were scored.

Criterion 3.3: Existence and enforcement of rules on receiving gifts

The performance of this criterion scored almost half of the maximum points (41.67%); it analyzes the issue of gifts and their records and related procedures. Concerning the manner of disposing of gifts, a significant number of authorities rely only on the norms of the Law on Preventing Corruption and have no internal act that defines this issue in detail. Only one quarter of the authorities have internal acts that regulate this area both for public officials and other employees. A significant number of authorities (almost half of those that participated in the assessment) did not report keeping a record of public gifts received by public officials. One must primarily bear in mind that a failure to submit an excerpt from the records of gifts until the end of March of the current year, for the previous year, is a violation of the Law on Prevention of Corruption.

Indicator	Maximum Score	Actual Score	Percentage Score
3.3 Existence and enforcement of rules on receiving gifts	96	40	41.67%
3.3.1 Internal rules governing receiving gifts and actions to be taken when receiving gifts applied to all staff in the public authority– 1 point *if the records of gifts received are maintained for all staff, the authority gets one additional point	64	22	34.38%
3.3.2 Keeping records of gifts received by public officials	32	18	56.25%

Indicator 3.3.1: Internal rules governing receiving gifts

Having scored only **34.38%**, this indicator assesses whether the authorities have taken a step beyond general legal norms and regulated the issue of receiving gifts, as well as handling and keeping records of gifts. As a special requirement, the recognition of risks in the field of receiving gifts is defined not only for public officials, but also for other employees. **Only 14** authorities

¹⁹ These are the following authorities: Ministry of Health; Ministry of Agriculture, Forestry and Water Management; Ministry of Defense; Ministry of Finance and Social Welfare; Ministry of Education, Science, Culture and Sports; Ministry of Capital Investments; Ministry of Ecology, Spatial Planning and Urbanism; Forestry Administration; Public Works Administration, Administration for Protection of Cultural Heritage, Parliament of Montenegro.

scored in this indicator, including 8 authorities that have an internal rule on receiving gifts and conduct that applies to public officials and all other employees. Six other authorities have such rule that applies only to public officials, while the remaining 18 authorities have no such rule at all.

Indicator 3.3.2: Keeping records of gifts received by public officials

More than half of the authorities scored points in this indicator (bringing the performance to **56.25%**), and yet **as many as 14 authorities did not report on the keeping of records or failed to submit an excerpt from the record of gifts or notification that there were no gifts.**

Category 4: Indicators used for deductible scores

The last category includes the so-called corrective indicators whose fulfillment leads to negative points, i.e. deduction of points. In this way, a total of 144 points were deducted, which means that 12.5% of the points scored by the authorities in the previous three categories were deducted on the basis of this category (before deduction, there was a total of 1158.5 points), which significantly adjusted the overall performance.

By far, the most points scored were deducted due to **final court judgments rendered against the authorities** - a total of 63 points for 21 authorities. This is followed by the complaints filed to the Agency for Personal Data Protection and Free Access to Information due to the silence of the administration against 40% of the authorities in the sector. The third most common basis for deducting points concerned both conditional and negative positions of the State Audit Institution on the work of authorities, as a result of financial and regularity audits, (23 points were deducted in total).

It is important to point out that in this category, apart from publicly available sources for SAI reports, records of the Agency for Prevention of Corruption and annual reports of the Agency for Personal Data Protection and Free Access to Information, the assessment was based on the means of verification provided by the authorities themselves. In many cases, the authorities provided no statements or evidence for this category, so the results need to be taken with some reservations, because only independent verification of data with the authorities mentioned or generating information referred to in indicators under Category 4 can provide accurate data.

Indicator	Total points deducted on this basis	Number of authorities whose points were deducted on this basis
4.1 Final court rulings against the authorities received beginning January 1 st of the current year	-63	21
4.2 From January 1 st of the current year, the Agency for Personal Data Protection and Free Access to Information observed irregularities through inspection control of the authority (regarding the preparation and updating of the Guides for Accessing Information, proactive publication of information and provision of acts and data for the Free Access to Information electronic system)	-10	5
4.3 From January 1 st of the current year, the Agency for Personal Data Protection and Free Access to Information received complaints against the authority on the account of "administrative silence"	-26	13

4.4 From January 1 st of the current year, the Administrative Court passed rulings against the authority on the count of "administrative silence" in cases when the authority failed to adopt an administrative act, failed to decide upon the complaint of a party or failed to take an administrative action, or failed to decide upon the objection of a party	-6	2
4.5 Opinion of the State Audit Institution on financial performance and regulatory compliance in case the authority was audited by SAI over the last five years: a) Conditional opinion:-2 point b) Adverse opinion or disclaimer of opinion:-3 points	-23	10 conditional opinions 1 adverse opinion
4.6 Opinions of the Agency for Prevention of Corruption establishing harm to public interest indicative of corruption issued over the last two years	-12	4
4.7 In the previous 3 years, there were cases in which the statute of limitations for initiating and conducting disciplinary proceedings became obsolete	-4	2

Indicator 4.1: Final court rulings against the authority

There were final court rulings against 21 authorities during 2021, which led to the deduction of a total of **63 points**.

The authorities generally provided no detailed information on the court cases lost. In many cases the authorities failed to report final court rulings during the reporting period, any yet the basis for deducting points was identified through a comparative analysis of the records of budget transactions (monthly data published by the Ministry of Finance and Social Welfare). Namely, by checking data for the budget account **4630000009 Repayment based on court decisions**, many payments in significant amounts by the authorities in the sector were identified, which served as a basis for deduction of points. In one case, a subsequent check with the authority revealed that the execution of decisions concerned unpaid bills for which another authority was responsible (**Administration for Cadaster and State Property**).

Indicator 4.2: Inspection of proactive publication of information

From January 1st of the current year, after inspection, the Agency for Personal Data Protection and Free Access to Information observed irregularities in **5 authorities**, due to which a total of **13 points** were deducted. Those were five ministries: the Ministry of Public Administration, Digital Society and Media; Ministry of Justice, Human and Minority Rights; Ministry of Capital Investments; Ministry of Agriculture, Forestry and Water Management; Ministry of Defense. Irregularities concerned lack of compliance with Article 12 in various respects, failure to update the Guide for Access to Information, inadequate cooperation with the Agency regarding the need to maintain an information system for access to information.

It is necessary to point out that in this indicator, the evaluation of the results relied on the evidence provided by the authorities. The Agency for Personal Data Protection and Free Access to Information has not yet published their annual Report on the state of personal data protection and the state of access to information for 2021, from which details on inspections in this area could

be learned. Certain authorities (for example, the Ministry of Finance and Social Welfare) reported that there was an inspection, but no irregularities were observed, which was not in line with our analysis of proactive disclosure of information for some obligations referred to in Article 12 of the Law on Free Access to Information.

Indicator 4.3: Complaints received by the Agency on account of “administrative silence”

During 2021, numerous complaints were filed to the Agency for Protection of Personal Data and Free Access to Information against the authorities due to the “silence of the administration”, which is why it was the second most common basis for deduction points of the authorities- a total of **26 points in 13 authorities**. Some of the authorities provided explanations reading that all requests had been answered in the meantime, and that the deadlines were not met due to a large number of requests, a significant amount of requested information or a lack of human resources in that area.

Indicator 4.4: Administrative Court rulings on account of “administrative silence”

From January 1st of the current year, the Administrative Court rulings due to “administrative silence” have been rendered in cases when the public authority failed to issue an administrative act, that is failed to decide on the complaint of a party, or failed to undertake an administrative activity, that is failed to decide on the complaint of a party. The authorities included the Ministry of Education, Science, Culture and Sports and the Ministry of Finance and Social Welfare.

Indicator 4.5: Opinion of the State Audit Institution

The basis for deducting points was found for **11 authorities** in this sector, of which in only one case all points were deducted due to a negative opinion (Parliament of Montenegro, 2017 report). A total of 23 points were deducted on this basis. SAI opinion on financial operations and compliance with the regulations was conditional in 10 cases, many of which were not reported by the authorities themselves, but were found during a comparative check of published SAI reports. There were no abstentions. Many authorities were subject to the so-called performance audits which, although not including a standard opinion (positive, negative, conditional), often include negative assessments of the work and performance of authorities, as well as numerous recommendations, and therefore should be taken into account when considering the overall work of the SAI in this sector.

Indicator 4.6: The Agency’s opinion establishing harm to public interest indicative of corruption

According to the records of the Agency for Prevention of Corruption, over the last two years, harm to public interest indicative of corruption was established in **four ministries**. Those were the Ministry of Health, Ministry of Defense, Ministry of Justice, Human and Minority Rights, and Ministry of Education, Science, Culture and Sports. On this basis, a total of **12 points** was deducted from the score of the authorities.

Indicator 4.7: Cases in which the statute of limitations for initiating and conducting disciplinary proceedings became obsolete

The basis for deducting points in this indicator was identified in only **two authorities**, where there were cases in the last 3 years in which the statute of limitations for initiating and conducting disciplinary proceedings became obsolete. These include the Administration for the Execution of Criminal Sanctions and the Ministry of Health. While the Ministry of Health had one such case, the Administration provided proof that the statute of limitations for initiating and conducting disciplinary proceedings became obsolete in four cases during the same period. According to the Administration, the length of the period required for passing judgment by the **Administrative Court** significantly contributes to the obsolescence of the statute of limitations for initiating and conducting disciplinary proceedings, emphasizing that in some cases that period was longer than 1.5 years.

Conclusions and recommendations

In the process of drafting this Report, the Agency prepared individual reports for all 32 authorities that participated in the project from the system of *State Administration and Other Public Authorities*. Individual reports consist of almost **650** pages and include detailed findings specific to the authorities with a total of **603** recommendations given, tailored to the needs of each individual authority.

This sectoral report, instead of repeating the recommendations already made in individual reports, includes directions for possible systemic action to address the issues identified in the report.

Overall, public administration authorities scored 45% of the maximum score, with the best performance in Category 1, and the worst performance in Category 3. The best performance, at the level of 100%, was achieved in Indicator 1.1.1. *Integrity Manager Designated*, and the worst performance, at the level of 1.56%, was achieved in Indicator 1.3.3. *The procedure with the manner and selection criteria for person responsible to receive and act upon whistleblower’s reports*.

Category 1: Putting in Place the Assumptions for Implementing Anticorruption Legislation

Although this category had the best performance, there is significant room for improvement. In terms of the Law on Prevention of Corruption, the analysis of Integrity Plans indicates room for improvement in some specific areas of risk, which are insufficiently used by the authorities to adapt standard forms of integrity plans to their specifics and exposures to specific risks.

The results show that the effectiveness of the systems defined by the Law on Management and Internal Financial Controls in Public Sector is at a low level, although formal obligations have been largely met. The practice of the authorities shows that the internal audit system still fails to deliver the expected results in a significant part of the state administration, with a small number of audits, lack of staff capacity and low the degree of execution of recommendations, and the situation is similar with risk registers and the Book of Procedures, while the system for preventing and eliminating the risk of irregularities and fraud, as the most recently introduced novelty, has not yet gone beyond the formal execution of a legal obligation.

Problems in implementation are particularly pronounced in connection with the establishment of an effective system for acting on whistleblowers’ reports. While most authorities have a

designated person to receive and act on whistleblowers' reports, a significantly smaller number have defined procedures for that person to follow, and only one authority has a defined procedure for that person to be appointed (or reappointed, or subjected to performance appraisal).

Recommendations

1. In the next cycle of drafting Integrity Plans, the authorities necessarily have to pay more attention to defining specific areas of risk, which are specific to their competencies or the specific position they occupy in the state administration, with detailed residual risks and measures for their elimination and prevention.
2. In the process of approving agreements on internal audit delegation, the Ministry of Finance and Social Welfare also has to take into account the capacity of the internal audit unit to whom these tasks are delegated, not to have just a formal coverage that cannot be effectively put into practice due to lack of human resources and a large number of signed agreements.
3. It is necessary for the line Ministry to analyze the implementation of the current decentralized model of internal audit, especially with regard to the restrictions on the number of internal auditors, the organization of this activity at the level of state administration and the quality of audits performed.
4. It is necessary that the authorities fulfill the legal obligation as soon as possible and appoint persons for receiving and acting on whistleblowers' reports of harm to public interest indicative of corruption and notify the Agency accordingly, as well as to prescribe in detail by internal acts the procedure for appointment, re-appointment and evaluation of the performance of persons for receiving and acting on whistleblowers' reports.

Category 2: Strengthening the Institutional Anticorruption Framework

Category 2 recorded a worse performance than Category 1, as the authorities scored less than a half of the maximum score (44.53%).

The performance is the best in the area of free access to information, although it is not without any significant issues either: the performance was low in assessing the openness of the authorities to respond to requests for free access to information.

In the field of human resource management, most authorities have no internal acts that define in detail service agreements, part-time and seasonal employment agreements, and secondary employment agreements. The Integrity Plans of very few authorities recognize the risks and measures related to human resource management, other than the standard measures taken from the Integrity Plan model.

Improving the internal mechanism of ethical and professional conduct is one of the areas with worst performance- the authority's commitment to integrity, ethics and anti-corruption beyond formal requirements contained in the Law on Prevention of Corruption is at a low level, and the Integrity Plans mostly cover no advanced risks and measures related to the protection against discrimination in various areas.

Recommendations

5. Authorities need to pay more attention to meeting the obligations of proactive disclosure of information referred to in Article 12 of the Law on Free Access to Information, in particular having in mind amendments to the Law that are in the parliamentary procedure and that further expand the scope of information whose publication shall be mandatory.
6. It is necessary to strengthen the capacity of the Agency for Personal Data Protection and Free Access to Information to carry out more frequent inspections in the field of proactive disclosure of information.
7. Through the Agency's activities, it is particularly important to establish uniform practices for disclosure of information to which access has been granted, where many cases of misapplication of the Law by the authorities have been observed.
8. It is important that the authorities comply with the obligation to keep records of requests for free access information through the information system of the Agency for Personal Data Protection and Free Access information, as well as to make extracts from such records publicly available, as another a way to increase the level of transparency and avoid duplicating requests for already published information.
9. It is necessary, as soon as possible, to enable administrations, institutes and other authorities that are not yet part of the redesigned www.gov.me portal to have own websites that are part of the new way of navigation, organization and presentation of data, which allows better visibility of content and availability of data.
10. It is necessary to consider the option of prescribing the legal obligation of authorities to have internal acts that regulate in detail the procedures, criteria, norms, records and supervision of all types of temporary employment contracts in the administration.
11. It is necessary that the audited entities, as well as all other authorities that recognize the identified issues in their work, implement the recommendations of the State Audit Institution referred to in the performance audit report "Performance in managing service agreements, part-time and seasonal employment agreements, and secondary employment agreements in the state administration authorities" (2020).
12. In the next cycle of drafting or updating the Integrity Plans, the authorities need to pay special attention to the elaboration of risks related to aspects of human resource management, such as recruitment planning, recruitment process, performance appraisal and monitoring, as well as rewarding and sanctioning.
13. It is necessary to analyze the rare cases of authorities that have systematized special organizational units or jobs for combating corruption, integrity or ethics, in order to see the effects of these attempts and, based on them, collect the lessons learned for other authorities in the sector which, due to their size or competencies, deserve this kind of engagement in the field of integrity.
14. In the next cycle of drafting the Integrity Plans, it is necessary for the authorities to pay attention to the analysis of risks related to the areas regulated by the Law on Prohibition of Harassment at Work, the Law on Prohibition of Discrimination, the Law on Prohibition of Discrimination against Persons with Disabilities, and the Law on Gender Equality.

Category 3: Strengthening ethical culture

This Category recorded the worst performance in the entire sector. Of the three main areas, the lowest performance was recorded in the field of trainings on integrity, ethics and anti-corruption, which were not sufficiently attended by employees, and in particular managers of the authority. The issue of managing gifts was mostly left to the rules referred to in the Law, and the internal acts of no significant number of authorities elaborated on the issue; it was observed that several authorities had deficiencies in the records and reporting about gifts received by officials. The performance was somewhat better in the existence and enforcement of the conflict of interest rules.

Recommendations:

15. It is necessary that the management staff of the authority actively seeks and uses opportunities for advanced training in the field of anti-corruption, ethics and integrity, as well as to enable the same for other employees, especially in those areas that are specific to the work of that authority.
16. It is necessary for the authorities to adopt an internal act/procedure that will define the rules for secondary employment of staff (allowed/prohibited jobs, the application procedure, etc.).
17. It is necessary for the authorities to adopt an internal act that will define in detail the concepts of conflict of interests and affiliated person in the context of specific competencies of the authority, and the risks identified in the Integrity Plan and Risk Register.
18. It is necessary that all public officials who have this obligation submit a regular annual report on income and assets, i.e. report in case of taking office, in a timely manner and in the right way. Although it is a matter of personal responsibility of public officials, this risk needs to be recognized in the authority's Integrity Plan, in addition to designing measures and controls of activities that will affect improving compliance with legal obligations (adoption of internal procedures, keeping records and warning by integrity managers, etc.).

Annex 1 - Score for each authority

	1.1	1.2	1.3	1	2.1	2.2	2.3	2	3.1	3.2	3.3	3	4	Total Score	Index
Maximum Score	14	14	5	33	13	7	6	26	4	6	3	13	-20		
Ministry of Public Administration	14	14	3	31	12	5	4	21	2	5	3	10	-7	55	76.39%
Secretariat for Legislation	14	10	3	27	11	4	4	19	3	3	1	7	0	53	73.61%
Metrology Office	14	5	3	22	12	5	0	17	3	4	1	8	0	47	65.28%
Education Office	12	12	1	25	10	6	0	16	1	3	1	5	0	46	63.89%
Transport Administration	14	7	2	23	12	2	0	14	0	5	3	8	0	45	62.50%
Administration for Statistics	12	12	3	27	8	5	0	13	2	3	2	7	-2	45	62.50%
Ministry of Capital Investments	8	12	3	23	9	3	2	14	3	2	3	8	-7	38	61.29%
Directorate for the Protection of Classified Information	12	8	3	23	7.5	5	1	13.5	2	3	3	8	-2	42.5	59.03%
Hydrometeorology and Seismology Office	13	9	1	23	12	0	0	12	2	4	1	7	-2	40	55.56%
Ministry of Health	14	7	3	24	8.5	6	0	14.5	1	2	3	6	-10	34.5	47.92%
Social and Child Protection Office	10	7	1	18	12	2	0	14	1	3	2	6	0	38	52.78%
Ministry of Defense	14	10	4	28	10.5	0	4	14.5	2	2	3	7	-12	37.5	52.08%
Human Resources Management Authority	12	8	3	23	8	3	0	11	2	3	0	5	-3	36	50.00%
State Archives	12	12	0	24	10	0	0	10	1	3	0	4	-3	35	48.61%
Ministry of Foreign Affairs	14	7	1	22	7	7	0	14	1	3	1	5	-7	34	47.22%
Parliament of Montenegro	11	7	1	19	12	5	0	17	1	0	2	3	-6	33	45.83%
Administration for Inspection Affairs	14	5	0	19	10.5	3	0	13.5	2	5	0	7	-7	32.5	45.14%
Ministry of Justice, Human and Minority Rights	8	11	1	20	8	0	1	9	1	3	3	7	-10	26	41.94%
Sports and Youth Administration	7	4	0	11	8.5	2	1	11.5	2	3	1	6	-3	25.5	41.13%
Office of the President of Montenegro	13	7	0	20	1	4	0	5	1	3	1	5	-2	28	38.89%
Administration for the Execution of Criminal Sanctions	14	4	0	18	9	0	2	11	0	4	0	4	-5	28	38.89%

Environmental Protection Agency	13	2	0	15	8.5	4	0	12.5	1	3	1	5	-5	27.5	38.19%
Ministry of Ecology, Spatial Planning and Urbanism	13	5	1	19	9.5	3	0	12.5	3	0	0	3	-7	27.5	38.19%
Public Works Administration	14	3	0	17	6.5	2	0	8.5	2	1	2	5	-3	27.5	38.19%
Ministry of Agriculture, Forestry and Water Management	9	8	3	20	8	0	0	8	2	0	0	2	-5	25	34.72%
Administration for Cooperation with the Diaspora- Emigrants	10	4	3	17	3	0	0	3	0	3	2	5	-2	23	33.33%
Ministry of Education, Science, Culture and Sports	7	10	1	18	6.5	1	1	8.5	2	0	1	3	-11	18.5	29.84%
Administration for the Protection of Cultural Heritage	11	2	3	16	0	3	0	3	1	0	0	1	0	20	28.99%
Forest Administration	10	3	1	14	6	0	0	6	1	0	0	1	-5	16	23.19%
Ministry of Finance and Social Welfare	8	5	0	13	7.5	0	1	8.5	1	0	0	1	-10	12.5	20.16%
Water Administration	7	0	0	7	0	0	0	0	1	3	0	4	-3	8	11.11%
Revenue and Customs Administration	1	0	0	1	6.5	0	0	6.5	1	3	0	4	-5	6.5	10.48%

Annex 2 - Effects of methodology and impact assessment

The Methodology for Assessing the Enforcement of Anti-Corruption Measures was provided to the authorities on 19 November 2021, and the deadline for submitting self-assessments of the fulfillment of the set criteria was 30 December 2021. Below is a list of activities carried out by the authorities following the Methodology and individual draft reports. The date was determined based on official references on the submitted documents and the authorities' statements. In this period, exactly half of the authorities that filled out the self-assessment questionnaire (**16** of them) adopted **53** documents and carried out **9** other activities (appointments, putting practices in place) related to integrity, anti-corruption and ethics.

Ministry of Public Administration, Digital Society and Media

- Prepared and published the Risk Register;
- Prepared and published the Book of Procedures;
- Prepared and published the Internal Instruction on the procedure for acting on whistleblowers' reports;
- Prepared and published the Internal Rule on Conflict of Interest Management Policy;
- Prepared and published the Rulebook on the content and manner of keeping records of gifts.

The Ministry of Education, Science, Culture and Sports

- Appointed a person to receive and act on reports of suspected fraud;
- Prepared and published the Book of Procedures.

Ministry of Health

- Prepared and published the Risk Register;
- Prepared and published the Book of Procedures;
- Prepared and published the Instructions on detailed content of the terms conflict of interest, affiliated persons, receiving gifts and fraud for easy identification;
- Prepared and adopted the Internal Rule governing in detail the procedure and conditions for secondary employment;
- Adopted decision on the "transfer of powers in matters of duty" from the Code of Ethics for civil servants and state employees dated 2018, tasking a civil servant to ensure implementation of some decisions referred to in the Code of Ethics at the level of the ministry, as an additional responsibility.
- Prepared and adopted the Internal Rule governing in detail the procedure and conditions for service agreements.
- Prepared and adopted the Internal Rule governing in detail the procedure and conditions for part-time and seasonal employment agreements;
- Filled the position of senior advisor for anti-corruption in health care;
- Records of gifts put in place.
- Prepared and submitted an annual report on suspected irregularities and fraud and actions taken.

Ministry of Justice, Human and Minority Rights

- Prepared and published the Risk Register;
- Prepared and published the Book of Procedures;
- Prepared and published Rules for acting on reports, records of corruption reports, and protecting the identity of persons who file reports;
- Prepared and published the Internal Rule on the content and manner of keeping records of gifts;
- Appointed a person to receive and act on whistleblowers' reports of harm to public interest.

Ministry of Finance and Social Welfare

- Prepared and published the Risk Register.

Ministry of Agriculture, Forestry and Water Management

- Risk Register published (prepared in 2018),
- Appointed a person to receive and act on whistleblowers' reports of harm to public interest indicative of corruption;
- Prepared and published the Rulebook on the procedure for acting on whistleblowers' reports.

Ministry of Defense

- Prepared and published the Risk Register;
- Prepared and published the Book of Procedures;
- Prepared and published Instructions on the procedure for acting on whistleblowers' reports of harm to public interest (also updated after the submission of the draft report referred to in Article 6 paragraph 2 "criteria for selection of persons");
- Prepared and published the Instructions for recognizing and acting on conflicts of interest;
- Prepared and published the Internal Rule on the content and manner of keeping records of gifts.

Ministry of Capital Investments

- Prepared and published the Risk Register;
- Prepared and published the Book of Procedures;
- Internal instructions on how to prevent conflicts of interest.

Ministry of Ecology, Spatial Planning and Urbanism

- Prepared and published the Risk Register.

Administration for the Protection of Cultural Heritage

- Prepared and published the Internal Rules on acting on whistleblowers' reports of harm to public interest indicative of corruption;
- Prepared and published the Internal Rule on detailed conditions for secondary employment;
- Internal rule on closer conditions of engagement of persons under an employment contract;
- Internal rule on detailed conditions for recruitment based on service agreements.

Sports and Youth Administration

- Prepared and published the Risk Register;
- Prepared and published the Internal Rule on detailed conditions for part-time and seasonal employment.

Transport Administration

- Delegated internal audit to the Ministry of Capital Investments;
- Prepared and published the Book of Procedures;
- Prepared and published the Instructions on acting on reports of harm to public interest indicative of corruption by civil servants of the Administration;
- Updated the Guide for Access to Information;
- Prepared and published the Internal Rule on detailed conditions for part-time and seasonal employment;
- Prepared and published the Rulebook on the content and manner of keeping records of gifts.

Forest Administration

- Appointed a person to receive and act on whistleblowers' reports of harm to public interest indicative of corruption.

Public Works Administration

- Prepared and published the Internal Rule on defining conflicts of Interest;
- Prepared and published the Internal Rule on the manner of disposing of gifts;
- Appointed a person to receive and act on whistleblowers' reports of harm to public interest indicative of corruption.

Administration for Statistics

- Prepared and published the Risk Register.

Hydrometeorology and Seismology Office

- Started publishing requests for free access to information, in addition to the decisions and information to which access has been granted.

ISBN 978-9940-9774-3-6



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