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MINISTRIA E MBROJTJES
MINISTARSTVO ODBRANE-MINISTRY OF DEFENSE

INTEGRITY PLAN

(2019-2022)

JULY, 2019

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Content

Foreword

Integrity is one of the highest human moral values, in both individual and organizational terms. The quality of being "honest" means possessing the strong moral principles towards every individual. In institutional terms, this value has been treated and addressed at a very high level in leadership mechanisms during the leadership and management process in all structures of the Ministry of Defense and the Kosovo Security Force. Thus, the main objectives of the Ministry and the Forces, since their establishment and throughout the preparatory phase for transition to the military mission, have been to promote good governance and to implement the principles of integrity, transparency and accountability in accordance with international norms and practices.

We, the Ministry of Defense and the Kosovo Security Force, in the framework of our long-term vision, have the central goal of building and operability of our institutional mechanisms and policy development in full compliance with those of NATO, in order to be ready for full interoperability, at the appropriate time, when we either adhere to the Partnership for Peace Program or become a member. NATO has awarded special attention to the development of strategies, plans and programs for the purpose of cultivating and strengthening integrity within its organizational structure. Its program of integrity building in defense and security institutions is now a mandatory policy implemented by all its member countries and partners.

For several years now, the Ministry of Defense and KSF are ranked as the most trustworthy institutions by the public in all of the country's most credible surveys. Such recognition both honors us, and also adds to our responsibility to advance to the structured stage the policies against negative phenomena and other unethical phenomena, as the standard of our management, administrative and operational work at all functional levels of the Ministry and the Force. Same as in the last three years, we forward the new edition of the 2019-2022 Integrity Plan to our structured and functional mechanisms for human, material and financial resource management, as well as the internal control mechanisms, which are the mechanisms responsible for its implementation.

Our Integrity Plan is a tool for establishing and verifying the integrity of our institution. It reflects a documented process for assessing the level of sensitivity of our organization, and its exposure to unethical and corrupt practices. The main purpose of the Integrity Plan is to strengthen the integrity and anti-corruption culture in the public sector, by identifying risks, planning and implementing appropriate measures. Establishing an overall anti-corruption system, in addition to the Integrity Plan, will result in strengthening the rule of law and people's trust in institutions. With the drafting of this plan, the Ministry of Defense and the KSF continue to be dignified members of the large group of countries that have developed, or are in the process of developing a similar strategy, and at the same time they will be a model for the departments, agencies and other domestic governmental organizations for the relevant policy.

Finally, I would like to express my gratitude to the Working Group for their engagement in drafting the relevant Plan. Also, I am particularly grateful to the Center for Integrity in the Defense Sector (CIDS) of the Ministry of Defense of the Kingdom of Norway for their overall support in the implementation of the this project in the wake of policies on meeting one of the main priorities of the government program of the Republic of Kosovo and ministerial plan of the Ministry of Defense in the transition process. I am fully confident that we have the professional capacities, and that all responsible officials and officers for implementing the relevant plan will do their job under the motto: "For the Ministry and the Force with the proper integrity".

Thank you!

Mr. Rrustem Berisha

Minister of Defense

Acronyms

KIA	Kosovo Intelligence Agency
ACA	Anti-Corruption Agency
EU	European Union
CIDS	Centre for Integrity in the Defence Sector
CSD	Cooperation and Security Department
FIND	Finance Department
Difi	Agency for Public Management and e-Government
ISD	Intelligence and Security Department
CD	Communication Department
LEGD	Legal Department
LOGD	Logistics Department
OTD	Operations and Training Department
PERD	Personnel Department
PROCD	Procurement and Contracts Department
KSF	Kosovo Security Force
KIPA	Kosovo Institute for Public Administration
INSP	KSF Inspectorate
CE	Council of Europe
LFC	Land Forces Command
PPRC	Public Procurement Regulatory Committee
PPL	Public Procurement Law
MPA	Ministry of Public Administration
HRM	Human Resources Management
MoJ	Ministry of Justice
MoF	Ministry of Finance
MoD	Ministry of Defense
MIA	Ministry of Internal Affairs
NALT	NATO Advisory and Liaison Team
NATO	North Atlantic Treaty Organization
IB	Integrity Building
IAU	Internal Audit Unit
GSSU	General Support Services Unit
UN	United Nations
OSCE	Organization for Security and Cooperation in Europe
NAO	National Audit Office
PAP-DIB	Partnership Action Plan on Defence Institution Building

Introduction

Institutional Integrity Building continues to be one of the most important aspects in the state-building process. Lack of investment in integrity may result in the exposure of public institutions and officials to negative actions, resulting in misuse of public funds and mismanagement of the institutional system. In addition to budget implications, negative phenomena may arise in other cases, e.g., if the non-merit system is indicative of the human resources management system or when there are occurrences of conflict of interest. Thus, negative phenomena should not be considered solely from the monetary point of view, but from a wider context of actions or omissions that undermine democratic values and the rule of law. The concept of integrity, though disaggregated at different levels, is best suited to the definition that frames integrity as “the actions of officials to perform well even when they are not under supervision.”

The Republic of Kosovo and its institutions are also committed towards the international institutions in which they intend to adhere, that they will strongly implement institutional integrity as a fully-integrated concept, policy and practice into their daily work. This very important aspect has been addressed even earlier by the Republic of Kosovo with special policies, and it is now addressed with a special national strategy, such as the National Anti-Corruption Strategy (2019-2022).

In this regard, enhancing defense capacities requires specific oversight measures to build integrity, due to the nature of classified information that this institution possesses, but also because of the purchase of high-value equipment. In fact, national security issues should not ignore accountability measures that require, first and foremost, increasing integrity. Even in democratic states, the defense sector is categorized among “suspicious” institutions due to political and administrative practices that lead to abuse of power and sometimes also to collusion with organized crime, making this sector non-immune to corrupt behavior.

The MoD and KSF have continued with the development of contemporary NATO policies, hence the integrity building policy, despite listing the issue of integrity in their normative acts, and also addressing it in a special provision within the Code of Ethics as one of the key values and standards of their functioning, and being recognized as leading institutions in terms of public trust for years on end in surveys conducted by professional organizations. The integrity building policy was adopted at the NATO Summit in Warsaw in 2016, and covers the civil and military structures of this organization[1]. This policy, in this edition too, will continue to be in the function of strengthening the value of integrity as an important norm in the current transformation process under the strategic objective for integration into Euro-Atlantic structures.

The (2019-2022) Integrity Plan (hereafter the “Plan”) presents the principal document of the Ministry of Defense (MoD) with a view to reducing and eliminating potential corruption risks in the institution. The document is a continuation of the First Integrity Plan (2016-2018)[2] and is fully in line with the existing legal basis of Kosovo, which promotes good governance and the principle of merit in the

1 NATO Building Integrity Policy, Endorsed by the Heads of State and Government at the NATO Summit in Warsaw, 8–9 July 2016.

2 :http://rebirthmedia.com/cids/wp-content/uploads/2016/06/Integrity-plan-MKSF_2016.pdf

management of human and material resources, as well as in public money expenditures. This Plan is also in line with the National Anti-Corruption Strategy (2019-2022), both conceptually and substantively in the general field. The plan continues to take full account of the international legal standards that Kosovo has unilaterally adopted, despite the fact that the state is not yet part of several international organizations such as: the United Nations (UN), the Organization for Security and Cooperation in Europe (OSCE), the Council of Europe (EC), etc. The plan particularly reflects Kosovo's aspirations for integration into Euro-Atlantic structures, especially in the European Union (EU) and the North Atlantic Treaty Alliance (NATO).

This Plan is in line with the objectives defined in the exchange of letters between the NATO Secretary and Kosovo Prime Minister of 2016[3], where the strengthened interaction between NATO and the KSF, among other issues is also focused on integrity issues. Moreover, NATO's Integrity Building Program (IB) represents a basic document through which the institution should harmonize efforts to minimize corruption risks. The program was established by the Euro-Atlantic Partnership Council in November 2007 within the Partnership Action Plan for Defense Institution Building (PAP-DIB), which helps partners develop effective and efficient defense institutions under civil and democratic control[4]. The absence of contractual cooperation between Kosovo and NATO does not affect the commitment of the MoD to implement the principles and best practices of NATO and its members. The MoD takes into account the IB advice and suggestions provided by the NATO Advisory and Liaison Team (NALT) to the MoD at a bilateral level. The plan aims to make possible improvements within the MoD, although it can be said that legal loopholes are often outside the sector, and therefore relate to administrative and governance capacity issues. Thus, the document as such is not isolated solely within the MoD, but is in line with national anti-corruption policies, as well as with future integrity plans in other Kosovo ministries and agencies. In particular, this Plan is in line with the recommendations of the National Anti-Corruption Strategy (2019-2022), in which the MoD was and is an active participant during its design, and will normally be throughout its implementation process.

This version of the Plan, as the previous one, is a living document that can be updated or amended in the future, depending on the trend of developments in national policies in general and defense policies in particular. Its implementation will be followed by an awareness-raising campaign within and outside the institution, in order to ensure that integrity is understood in a proper and consistent way, and is therefore accepted, based on its overarching meaning. Moreover, the Plan foresees a range of capacity building measures within the institution, the implementation of which should be reported every six months. The deadlines and structures responsible for implementing the Plan are set out in the Implementation Measures Matrix, which is an integrated annex within this document.

3 MKSF/KSF Annual Work Report for 2017, pg. 18

4 NATO Building integrity - Integrity, Transparency and Accountability in the Defense and Security Related Sector, Newsletter#02 - December 2017

Degree of implementation of the Integrity Plan (2016-2018)

The Integrity Plan (2016-2018) has been one of the core frameworks for enhancing integrity in the Ministry's past mandate. As part of its implementation, various instruments have been used, noting the great dynamics of all departments for the implementation of the 24 defined measures. Of these measures, 17 were fully implemented and 7 were partially implemented. This constitutes a great institutional success, due to the fact that a number of measures have been quite complex, and some have been interrelated with inter-institutional activities, therefore were not always dependent on the work of the Ministry of Defense.

Based on the evaluation of the three-year period of the implementation of the determined measures and activities, a very high level of delivery of most of the planned activities has been achieved. These activities consist in:

- Amending the necessary legislation and procedures in the human resource management system with a focus on the acts/procedures enabling the enforcement of measures to prevent and eliminate conflicts of interest; improving the quality of the selection process for recruitment, education, training, appointments and promotions.
- Improving the quality of procedures and frameworks in the area of drafting purchase requests, preparing the necessary technical specifications and developing proper procurement and contracting procedures. Along with this process, significant improvements have been made in the contract management system, overall asset management and functional systems in the MKSF/KSF.
- Awareness raising through information campaigns and trainings, courses, seminars, conferences, and study visits to partner countries in the field of integrity building, have been systematic at ministry and force level.

The concrete challenges in terms of implementing the measures were:

- The Government of the Republic of Kosovo did not draft the Regulation on procurement for defense and security purposes, which regulates procurement conditions and procedures for special equipment from the defense industry. The absence of this Regulation also prevented the issuance of the Internal Guidelines on explaining the procurement procedures deriving from the Regulation on Revocation Procedures of Article 3 of the Public Procurement Law.
- The inability to recruit officials with professional knowledge in the field of defense industry, proficient in English and other languages, to research the international market;
- The inability to increase the number of staff in the IAU and the General Inspectorate, due to the inability to increase the number of staff as a result of the limitations in changing the organizational structure.

Purpose

The main purpose of the Integrity Plan is to strengthen the integrity and anti-corruption culture in the MoD and KSF. This goal is intended to be realized by identifying, analyzing and assessing the risks, as well as by planning and addressing them through adequate measures and actions.

Principles

The plan is based on three general principles:

a) Necessity of definition of objectives of the integrity building function;

b) Need to establish an institutionalized environment based on control and accountability;

c) Recognizing integrity as an inherent part of good governance in the MoD/KSF.

By *defining objectives and sub-objectives*, the MoD is expected to implement a range of measures and actions aimed at reducing potential negative phenomena and corruption risks. These measures and actions derive from analyses and assessments, and cover concrete areas within the scope of the MoD and KSF.

By *creating an institutional framework for control and accountability*, the preconditions for assessing negative occurrences and addressing them through control instruments in order to prevent potential corrupt and fraudulent activities, would be created.

Recognizing *integrity as an inherent part of good governance*, the document ensures the incorporation of the concept of integrity within the governing framework of the MoD. Consequently, integrity continues to be considered as a norm established and applied at all levels of the MoD/KSF.

Methodology

The initial point of the Plan is the general agreement that the development of the policy framework should be based on an understanding of the problems and challenges in the areas of institutional functioning. In the case of this document, problems have been identified, analyzed and evaluated by functional field authorities, based on a wide range of professional analysis and assessments.

The key findings of the analysis have identified Kosovo's clear vision for EU and NATO integration. This path is manifested in the process of developing a good legal framework in the area of integrity and internal control mechanisms, line with international standards and harmonized with EU legislation (*acquis communautaire*). While the mechanisms are already established, however, the existing anti-corruption capacities at country level are yet to achieve the desired level. The need to support the building of integrity and the reduction of corruption potential in institutions has found great support.

The team has analyzed the legal and institutional basis for the integrity framework in Kosovo. During this process, there has been a common conclusion that there is already knowledge in place about the concept of integrity. During the implementation of the previous plan, a large number of MoD and KSF staff benefited from training and organized campaigns in the function of awareness about corruption risks.

According to existing international standards, lack of integrity is a situation in which corruptive phenomena jeopardize the institutional capacity to exercise functions in an accountable and impartial manner. It is considered that the risk of corruption and abuse of authority arises especially in situations where a large part of the decision-making power is highly centralized and decision-making is outside of transparency and accountability frameworks. In all the Ministries of Defense of democratic countries, the prevalence of corruption weakens the performance of institutions to such an extent that it deeply endangers the combat readiness of the defense institutions.

During the research and analysis phase, the MoD integrity framework was assessed, based on a predefined methodology applied to nine South East European countries[5]. This methodology is based on the ten standard principles of credible organizations, such as CIDS and Transparency International Defense[6], and they are:

1. Act under the highest standards of ethics and integrity;
2. Ensure best practice of governance and oversight of anti-corruption program;
3. Accountability to stakeholders through transparency and public reporting;
4. Ensure that human resources policies and procedures support the anti-corruption program;
5. Draft anti-corruption program based on full risk assessment;
6. Implement detailed policies and procedures to combat the major corruption risks;
7. Manage relationships with third parties to ensure that they perform under an anti-corruption standard equivalent to that of state institutions;
8. Use communication and training to introduce the anti-corruption program;
9. Provide safe and accessible advice and whistleblowing channels;
10. Monitor, assess and continuously improve the implementation of the anti-corruption program.

5 DiFi, Defence against corruption: The risk of corruption in the defense sector of 9 countries in South East Europe, p.12

6 ANTI-CORRUPTION PRINCIPLES FOR STATE-OËNED ENTERPRISES, A multi-stakeholder initiative of Transparency International

Drafting process

In order to better oversee and coordinate the Plan's drafting process, the Minister of Defense established the Advisory Group (MoD 44/01/2019), which is composed of the Secretary General of the MoD, the representative of CIDS and the NATO Advisory Liaison Team Leader (NALT). The Advisory Group exercised advisory functions for the needs of the technical working group throughout the process.

Also, to assure an effective process of research, analysis, assessment and implementation of the Plan, the MoD established a technical working group which was tasked with the substantive and technical design of the Plan and its implementation Matrix. The group was established by a decision of the Secretary General (MoD 66/04/2019), composed of members of the MoD/KSF, representatives from the field of policies and plans, procurement and contracting, personnel, logistics, finance, internal audit, legal office and the KSF inspectorate. In the technical working group were also included one representative each from the Ministry of Public Administration and Anti-Corruption Agency, as well as two advisers of the NATO Advisory Team in the MoD. All members have provided valuable inputs in their respective fields, making the process extremely analytical and interactive.

2019-2022 Strategic objectives

The setting of objectives was the outcome of the systematized research, identification and assessment process, combined with contemporary practices, our experiences, as well as those of our partners. The plan lists five achievable objectives, focused on the functional areas most sensitive to unethical phenomena, which should be further improved and developed through defined measures and actions, as a manner for strengthening institutional capacities and reducing and eliminating possible negative phenomena.

By creating an institutional framework for control and accountability, the preconditions for assessing corruption risks and addressing them through control instruments in order to prevent potential corrupt and fraudulent activities, are created.

Recognizing integrity as an inherent part of good governance, the document ensures the incorporation of the concept of integrity within the governing framework of the MoD/KSF. Consequently, integrity is considered as a norm established and applied at all levels of the MoD/KSF.

The main objectives of the Integrity Plan (2019-2022) are:

1. ***Advance the human resources management system;***
2. ***Prevention of conflict of interest;***
3. ***Advance the procurement and contracting system;***
4. ***Improve the material, financial resources and asset management system;***
5. ***Strengthen internal control mechanisms.***

1. Advance the human resources management system

Human Resource Management (HRM) is a sector of special importance for assessing the degree of strengthening of professional values and standards and ethical values, with integrity being one of them. Applying the merit principle to the staff recruitment and promotion process strengthens the integrity of the HRM system. The merit principle implies that appointments should be made on an impartial basis, under fair and open procedures, and in accordance with the assessment of the level of competence to perform that task.

The MoD/KSF have made significant progress in the development of advanced HRM policies, in civilian and military positions. However, HRM should further strengthen its mechanisms to eliminate eventual patronage and politicization elements, which jeopardize the HRM integrity building efforts. It is necessary to build an efficient performance assessment system, merit-based recruitment for both military and civilian staff, and increase transparency in the ranking process.

The advancement of the human resources management system as a strategic objective includes the following sub-objectives, measures and actions:

1.1. *Promote the integrity and accountability of all officials in the MoD* - Integrity, as and institutional value and standard, is highly considered in all organizational and functional segments of the MoD - and KSF. It has also been designated a special provision in the Code of Ethics of the MoD and KSF. Despite the fact that integrity is treated and respected as a standard norm, a greater engagement is required to raise awareness among all MoD and KSF officials through various instruments, such as lectures, trainings, workshops, conferences, print and electronic materials, etc.

1.2. *Increase transparency in the recruitment and promotion process through technology identification and application* - During the staff recruitment and promotion process, the Recruitment Commission conducting candidate selection procedures, shall complete a written report of the recruitment process, from its launch until the final selection phase. The interviewing commission that conducts oral interviews shall take notes and enter comments on the assessment forms of the interview process. At the end of the interviews, Commission members shall sign the evaluation forms and draft the final report.

The MoD/KSF will provide conditions for digital recordings of spaces where recruitment and promotion processes are conducted at the level of testing, interviewing and selection boards/commissions for military and civilian personnel. The purpose of this methodology is to promote meritocracy and strengthen the rule of law in recruitment, selection and promotion processes.

1.3. *Increase efficiency through regeneration of skills and professional capacities* - This process applies to military positions through the rotation and transfer practice for assessed positions for this practice. According to the provisions of the KSF Career Development Regulation, a KSF member is assigned to different positions for the purpose of professional benefit from the diversity of duties, in accordance with his/her capacities and qualifications.

Service in various positions creates development opportunities for both the KSF and its members. The same rotation practice is also targeted at several civilian positions, especially in the broader fields of procurement, finance, logistics and human resources. These areas may reflect risks to institutional integrity.

1.4. *Minimize Special Services Agreements* - The MoD/KSF are encouraged to minimize Special Services Agreements or Work Contract for Specific Tasks - (formerly known as Works Contract). The MoD/KSF may exceptionally use such agreements/contracts only for specific tasks that cannot be covered by its structures, whereas the duration should be determined based on the applicable legal acts and by-laws.

1.5. *Process of changing the members of the recruitment and promotion boards* - The application of the periodic change of the composition of the MoD/KSF recruitment and promotion boards is focused on appointing professional staff in equivalent fields. In order to be improve efficiency, the practice of changing Board members, as well as the delivery of preliminary trainings for the staff of the respective recruitment and promotion boards, will continue.

1.6. *Revision of Corruption Reporting Mechanisms, ensuring confidentiality in reviewing complaints*

In order to provide the opportunity to exercise the right to complaints under conditions of anonymity, in the Ministry and in all KSF facilities, complaints boxes will be placed to enable officials/members of all levels to express their complaints/reports on eventual corruption cases in their unit. For the purpose of reviewing them in accordance with the applicable legislation, special commissions will be appointed to deal with the review of complaints and eventual reporting of corruptive occurrences in the MoD/KSF. This process will be structured, and the relevant commission will identify, address and report on eventual complaints about relevant phenomena, with a view to preventing and combating negative phenomena, as well as preserving the complainants' confidentiality.

2. Prevention of conflict of interest

Conflict of interest means the state of disagreement between the public duty and the private interests of the official/officer when he/she has direct or indirect private, personal or property interests that may affect, influence or appear to affect his/her legality, transparency, objectivity and impartiality during the exercise of public functions. For this reason, the necessary measures to prevent the conflict of interest are foreseen:

2.1 *Declaration of withdrawal in case of conflict of interest* - consists in strengthening the procedures for declaring the withdrawal in case of conflict of interest. The practice may recognize different instances of implication, either voluntarily or inadvertently, in cases of conflict of interest. Although current legislation largely regulates cases of conflict of interest, our institution is committed to strengthening mechanisms for preventing and avoiding eventual cases. More specifically, we will revise the relevant provisions of the Code of Ethics applicable to the MoD/KSF for the declaration of withdrawal in case of conflict of interest, which will be harmonized with the relevant legislation and the specifics of the defense mission.

2.2. *Revision of normative acts on secondary employment issues* - Secondary employment means any employment, engagement or other regular or occasional activity outside the institution, paid or free of charge. MoD Officials/active KSF members cannot engage in other secondary employment outside the institution, which hinders or may hinder the performance of their duties, and which violates in any way the achievement of the institution's objectives. Secondary employment shall not be permitted if it may constitute a factual or visible conflict of interest between the official duties, the private or financial interests of the active member, or adversely affect in any way the ability of the member to perform his/her duties and responsibilities. For this reason, among the foreseen measures is the strengthening of the procedures for secondary employment issues, respectively the revision of the MoD/KSF Secondary Employment Regulation in terms of the prohibition of secondary employment and secondary employment issues in accordance with the defense mission. In order to protect the interests of the institution and eliminate the cases of exploitation and misuse of know-how, and based on Article 17 of Law no. 04/I-051 on Prevention of Conflict of Interest in the Exercise of Public Functions, the procedures on eliminating the misuse of professional know-how by the military and civilian personnel of the MoD/KSF for the period of their engagement/employment after release from duty in cases of conflict of interest, will be established.

2.3 *Information and awareness-raising on conflict of interest prevention* - Along with these measures, information and awareness campaigns on prevention of conflict of interest, secondary employment and engagement/employment after release from office, are foreseen. The respective campaign will be organized and implemented by the instructors, who will be developed through the process of building professional capacities in the respective fields.

3. Advance the procurement and contracting system

The advance of the procurement and contracting system ensures the integrity and responsibility of public officials, civil servants and other persons involved in or performing a procurement activity, by requiring that the decisions of such individuals and the legal and factual basis for such decisions shall not be affected by personal interest, shall be characterized by non-discrimination and a high degree of transparency, and shall abide by the procedural and legal requirements.

3.1 *Improve and strengthen the procurement claims design system in the MoD/KSF* - The MoD/KSF also use, in accordance with the applicable public procurement law, the electronic system that guarantees a transparent process and provides the conditions for an open and impartial competition between participating economic operators. In this system, all public procurement procedures, including small value procurements, and the first phase of procurement procedures, are carried out electronically, according to the respective legislative provisions. Along this system, the MoD/KSF are in the process of procurement of the digital system of the procurement procedures cycle, i.e. the internal Information Management System (IMS), which will enable the quality, rationality and confidentiality of the purchasing system of their weapon systems and equipment. Because of the importance of this system, adequate measures are required to protect this system against potential dangers.

3.2. *Strengthen the Market Research System* - Market Research Approaches and Methods, in order to easily approach markets, require experienced experts in analyzing the regional, continental and global market of defense industry systems, projects and software, recognizing defense and security policies, currently applied military doctrines, as well as long-term security, defense and military strategies. For this reason, professional development of market research officials/officers is required for defense and security purposes, so that the armaments, equipment and services systems are maximally functional in fulfilling the constitutional mission and legal duties, as well as at minimal financial cost.

3.3. *Improve the contract management process* - consists mainly in strengthening the capacity and enhancing controls/monitoring in the field of contract management. Contract management means the steps that enable the MoD as a contracting authority to fulfill their obligations within the contract, in order to achieve the objectives set out in the contract. This means receiving the products they have planned and that were bid at the set price. To ensure quality under contract terms, the MoD/KSF aim at a successful contract management process through raising the awareness of contract managers on their role and responsibilities. Technical Acceptance Commissions in the field of infrastructure, shall assure the Contracting Authority that the quality of works, services or goods, is the same as the quality promised in the contract, including all other terms of the contract.

4. Improve the material, financial resources and asset management system

The proper management of material, financial resources and assets, as a structured decision-making process by the MoD and the KSF, aims at maximizing the quantitative and qualitative provision of supplies and services thereof, while aiming at minimizing costs and eventual corruption risks throughout the life-cycle of use of these resources and assets.

4.1. *Strengthen financial and logistic planning and management* - The planning of funding and preparation of technical and functional requirements remains a goal in the function of efficient management of logistical support. To improve asset management, all normative and procedural asset management acts will be revised, aiming at the most contemporary practices and standards of the respective system.

4.2. *Analysis of projects and preparation of technical specifications* - In order to increase the quality of contracted supplies, services and construction works, expert commissions will be established to evaluate requirements in terms of planning, market research and drafting of technical and functional specifications. The activity of these commissions will result in the most accurate estimates between planned and marketed prices, as well as reduced technical uncertainties in the requirements for the solicited equipment or services, in order to reduce the risk of project failure.

4.3. *Improve asset management* - One of the concrete measures is the revision and completion of the Asset Management Guide, focusing on the revision of the recording procedures, as well as the responsibilities of performing the tasks. Asset and fleet management should be done through recording and creating a better accountability system. The guidelines shall include aspects of digitization of recordings during the equipment maintenance process, as well as visual monitoring through cameras.

5. Strengthen internal control mechanisms

The consolidation of an effective system of good governance and internal controls is essential for a sustainable advancement and long-term improvements to institutional mechanisms. For this reason, the MoD is constantly engaged in strengthening such structures. To respond to new challenges and requirements, management and administration are required to further strengthen the capacities of internal control mechanisms that cover all activities of the MoD and KSF. Contemporary practices in the conduct of internal audit as a mechanism of good institutional governance, are reflected in the definition of adequate measures and actions related to risk management and the reduction and elimination of potential future risks.

5.1. *Strengthen internal controls* - The Internal Audit Unit of the MoD and the KSF Inspectorate have the responsibility to record the internal control system, as well to report the inconsistencies and violations that create grounds for corruption, fraud or irregularities.

5.1.1. Delivery of ad hoc audits and inspections by Minister's decision in the field of integrity - The delivery of ad hoc audits and inspections in the field of integrity, by Minister's decision, will continue to be an effective measure. At the end of the processes, reports on the audited and inspected activities in the field of integrity will be drafted by the IAU and the KSF Inspectorate. For potential findings, professional recommendations are issued for audited and inspected subjects, whose implementation is required within the defined time frames.

5.2.1. *Risk Management* - means identifying, analyzing and assessing risks from corruption. The objective-setting process in all MoD/KSF units, includes a description of the strategic and operational objectives, which will be the basis for defining the level of risk of the organizational units at the level of the MoF and KSF. Process managers are responsible for monitoring the objectives of work processes and managing the most important risks that may impact the achievement of the objectives. The military mission of the KSF determines the need for the MoD to revise the Internal Risk Management Guide, and adapt it to the specifics of the management, administrative and functional system, as well as the specific sectoral scope of the MoD and KSF

Integrity plan implementation process

After implementing the conceptual and planning part of the strategic objectives, their implementing instruments have been defined in the form of concrete measures and activities that together form the Action Plan, the so-called Matrix of measures and activities for the implementation of the action plan. This matrix has been compiled in a clear and precise way, and all actors involved in the implementation, either as main responsible party or as cooperating party, are aware of their duties and responsibilities. The process of implementing the relevant matrix will be systematically monitored and assessed, and regular reports will be issued every 6 months by the MoD Planning and Assessment Department. Due to the change in the general management and administrative trends of state institutions, and in particular in defense policies, there may be a need to revise the Matrix for the implementation of the Integrity Plan with eventual amendments. This process is recommended to be conducted during the annual assessment process at each end of the year, following the implementation progress report. The Minister of Defense and the Chief Administrative Officer in the MoD should appoint a permanent commission to monitor, analyze and assess the extent to which the measures and activities set out in the matrix are implemented. The data from this process will be reported by this commission in narrative form, through statistical methods, in tables and charts. In parallel, the commission will also be responsible for proceeding in the same manner with regards to activities under the authority of the MoD of the Action Plan for the Implementation of the National Anti-Corruption Strategy (2019-2022).

The quality and veracity of the data of relevant reports can be verified by the National Audit Office (NAO), authorities designated by the intergovernmental level to monitor and assess the implementation of integrity plans (if established as a separate mechanism by the MPA), or the ACA's Investigation and Strategy Division, as the main responsible party for achieving the objectives of the National Anti-Corruption Strategy (2019-2022).

Matrix of Measures and Activities for Implementation of the Integrity Plan of the Ministry of Defense (2019-2022)

OBJECTIVE I
ADVANCE THE HUMAN RESOURCES MANAGEMENT SYSTEM

No	Sub-objective	Measures	Activities	Time frame	Main responsibility	In cooperation	Success indicators/ report	Assessment: Delivered	Assessment: Partially delivered	Assessment: Not delivered	Note
OBJECTIVE -I	**1.1 Promote the integrity and accountability of all officials in the MoD**	1.1.1 Organize training on integrity	1. Engagement for participation in trainings to promote integrity, and awareness-building through the anti-corruption campaign	Ongoing.	HRD	ACA KIPA CIDS					
	1.2 Increase transparency in the recruitment and promotion process through technology identification and application	1.3.1 Guarantee equal access to staff recruitment and promotion	1. During the staff recruitment and promotion process, the recruitment commission conducting candidate selection procedures, shall complete a written report of the recruitment process, from its launch until the final selection phase. The commission that conducts oral interviews shall take notes and enter comments on the assessment forms of the interview process. At the end of the interviews, commission members shall sign the evaluation forms and draft the final report. The MoD/KSF will provide conditions for digital recordings of spaces where recruitment and promotion processes are conducted at the level of testing, interviewing and selection board/commission for military and civilian personnel.	Ongoing.	HRD	HRO LEG-D MPA, IOBK					

OBJECTIVE -I	**1.3 Increase efficiency through regeneration of skills and professional capacities**	1.4.1 Application of the rotation and transfer practice to the positions assessed for this practice	1. Recommendation of internal control mechanisms for positions requiring rotation and transfer based on merit principle and level of competence	End of every year	HRD	MoU GSKSF					
		1.4.2 Minimize Special Services Agreements	1. Minimize cases of personnel coverage with contracts for Special Services Agreement. The application can be made only for the necessary and specific areas not covered by the MoD/KSF structure, and their coverage is made with foreseen legal procedures.	Ongoing	HRD	G1GSKSF and Organizational Units MoU					
		1.4.3 The process of changing members of recruitment and promotion boards	1. The application of the periodic change of the composition of the MoD/KSF recruitment and promotion boards focused on appointing professional staff in equivalent fields	Ongoing	HRD	G1GSKSF, Special Commission					
			2. Development of preliminary training for the staff of respective boards in the field of recruitment and promotion	Ongoing	HRD	G1GSKSF, Special Commission					
	1.4. Revision of Corruption Reporting Mechanisms, ensuring confidentiality in reviewing complaints	1.4.1 Set up complaints boxes to enable officials at all levels to express complaints/reports on corruption in their institution	1. Establish commissions that will deal with complaints/reporting on corruption in institutions	Ongoing	SECR-MOD COMKSF-KSF						
		1.4.2 Evidence of complaints	1. Addressing and reporting corruption complaints with a view to preventing and combating corruption and negative phenomena, as well as preserving the complainants' confidentiality	Ongoing	HRD						

OBJECTIVE II
PREVENTION OF CONFLICT OF INTEREST

No.	Sub-objective	Measures	Activities	Time frame	Main responsibility	In cooperation	Success indicators/ report	Assessment			Note
								Delivered	Partially delivered	Not delivered	
OBJECTIVE II	2.1 Declaration of withdrawal in case of conflict of interest	2.1.1 Strengthen procedures for declaring a withdrawal in case of conflict of interest	1. Revision of the procedure (Code of Ethics) applicable to the MoD/KSF for the declaration of withdrawal in case of conflict of interest, harmonized with the relevant legislation.	December 2019	HRD	LEG-D GSKSF, ACA NALT					
	2.2 Revision of normative acts on secondary employment issues	2.2.1 Strengthen procedures for secondary employment issues	1. Revision of the procedure (KSF Secondary Employment Regulation) for the prohibition of secondary employment and secondary employment issues, and their minimization only for those cases where they do not present conflict of interest, and the establishment of procedures for eliminating the misuse of professional know how	December 2019	HRD	HRD, LEG-D GSKSF, ACA NALT					
	2.3 Information and awareness-raising on conflict of interest prevention	2.3.1 Establish professional capacities in the area of conflict of interest prevention	1. Deliver trainings in the field of conflict of interest prevention	Ongoing	HRD	LEG-D ACA, KIPA MPA CIDS	MoD, ACA CIDS				

OBJECTIVE III
ADVANCE THE PROCUREMENT AND CONTRACTING SYSTEM

No.	Sub-objective	Measures	Activities	Time frame	Main responsibility	In cooperation	Success indicators/ report	Assessment			Note
								Delivered	Partially delivered	Not delivered	
OBJECTIVE III	3.1 Improve public procurement and contracting	3.1.2 Improve and strengthen the system for drafting procurement requests in the MoD/ KSF	1. Development of the digital system of the cycle of procurement procedures through the Information Management System (IMS)	March 2019 - December 2022	SCID	PROCD FIND LOGD G4/8 GSKSF MoD MPA					
		3.1.3 Strengthening the market research system	1.Recruitment and professional development of officials/officers for market research for defense and security purposes	2019 - December 2022	HRD	LOGD PROCD MPA NALT					
		3.1.4 Conduct procurement procedures according to the regulation on defense and security purposes (Article 3 exemptions of the Public Procurement Law)	1. Classification of projects based on the purpose of the regulation, with an analysis and assessment by the relevant commissions, justifying the use of procurement procedures for defense and security purposes	2020-2022	Minister of MoD	MoU GSKSF					

OBJECTIVE III
ADVANCE THE PROCUREMENT AND CONTRACTING SYSTEM

No.	Sub-objective	Measures	Activities	Time frame	Main responsibility	In cooperation	Success indicators/ report	Assessment			Note
								Delivered	Partially delivered	Not delivered	
OBJECTIVE III		3.1.5 Improve the contract management process	1. Strengthen capacities and enhance controls/ monitoring in the field of contract management	Ongoing	PROCD	LOGD IAU INSP FIND, GSSU, G4-GSKSF					
			2. Continuous training in the field of contract management	Ongoing	HRD	PROCD IAU PPRC NALT					
		3.1.6 Quality assurance under the terms of the contract.	1. Contract Managers shall ensure that contractors fulfill all performance obligations under the contract management plan, pursuant to the LPP, and prepare a summary report on the correctness and quality of contract implementation.	Ongoing	Contract Managers	Secretary General PROCD					
		3.1.7 Appointment of commissions for technical acceptance	1. Technical Acceptance Commissions are experts in the field of infrastructure and assure the contracting authority that the quality of works, services or goods, is the same as the quality promised in the contract, including all other terms of the contract	Ongoing	SECRETARY GENERAL	MoD/KSF					

OBJECTIVE IV
IMPROVE THE MATERIAL, FINANCIAL SOURCES AND ASSET MANAGEMENT SYSTEM

No.	Sub-objective	Measures	Activities	Time frame	Main responsibility	In cooperation	Success indicators/ report	Assessment: Delivered	Assessment: Partially delivered	Assessment: Not delivered	Note
OBJECTIVE IV	4.1 Strengthen material & financial planning & management	4.1.1 Analyze projects (requirements) and prepare technical requirements	1. Establishment of expert commissions to assess requirements, analyze costs, research market and technical specifications, whereby the aim is to reduce the difference between planned and marketed prices, as well as to reduce technical uncertainties in the requirements for the solicited equipment or services, in order to reduce the risk of project failure.	Ongoing	LOGD	MoU GSKSF					
		4.1.2 Advance the preparation of technical specifications	1. Professional development for personnel who prepare technical specifications	Ongoing	HRD, LOGD	MoU KSF KIPA NALT					
		4.1.3 Improve asset management	1. Review of normative and procedural asset management acts and continuous professional upgrading of staff (revise and amend the Asset Management Guide). This guide should be revised in terms of the identification procedure, as well as in the responsibilities for carrying out the duties	Ongoing	LOGD IAU INSP	PROCD, FIND, GSSU, G4-GSKSF, NALT					
			2. Development of the internal digital system for asset registration in order to avoid the possibility of double registration of assets in KFMIS and E-assets	March 2019 - December 2022	SCID	LOGD PROCD FIND GSSU G4-GSKSF					
		4.1.4 Improve budget planning and execution	1. Review Budget Planning and Execution Guidelines	January 2020 - December 2020	FIND	LOGD PROCD GSKSF					

OBJECTIVE V
STRENGTHEN INTERNAL CONTROL MECHANISMS

No.	Sub-objective	Measures	Activities	Time frame	Main responsibility	In cooperation	Success indicators/ report	Assessment			Note
								Delivered	Partially delivered	Not delivered	
OBJECTIVE V	5.1 Strengthen internal controls	5.1.1 Carry out ad-hoc audit by minister's decision in the field of integrity	1. Report on audited activities in the field of integrity by IAU	Ongoing	IAU	MoU					
			2. Implement MoD/KSF recommendations coming from the IAU on the area of integrity	Ongoing	IAU	MoD/KSF					
		5.1.2. Inspection according to the plan, as well as unannounced inspections, by Decision of the Minister and at the request of the KSF Commander	1. Preparation and approval of the report in the field of implementation of the integrity plan by the KSF Inspectorate	Ongoing	INSP	MoD/KSF					
			2. Monitoring the implementation of recommendations provided by INSP	Ongoing	INSP	MoD/KSF					
	5.2 Strengthen anti-corruption mechanisms in the MoD	5.2.1 Identification, analysis and assessment of corruption risks	1. Identification, analysis and assessment of corruption risks at departmental level	Ongoing	MoU	PROCD LOGD HRD FIND					

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