INTEGRITY PLAN

Municipality of Gračanica/Graçanicë

2016 – 2020

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May 2016

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INTEGRITY STATEMENT

Our integrity policy is inspired by our vision: „Municipality of Gračanica, opulent with antic and medieval treasures and natural beauties–modern environment with developed economy and infrastructure where everyone enjoys the same rights and freedoms". In view of the above, this integrity statement sets out the basis of our integrity risk policy, integrity risk governance and integrity risk management.

At the Municipalty of Gračanica/Graçanicë, we value the opportunity to work, learn, and develop in a community of 25.000 inhabitants with multi-ethnic structure, comprised of Serbs, Albanians, Roma, Ashkali, Egyptians, and other, with young people making up 35-40% of the population. We strive to embrace the diversity of individuals and ideas, including ethnicity, religion, national origin, age, gender, socioeconomic background, political affiliation, and intellectual perspective. Being a new municipality ourselves, since the establishment and the start of our functioning on 29.12.2009, we have progressively managed to become one of the most successful municipalities in Kosovo. We are proud with our rich religious and cultural heritage, natural resources, clean and healthy environment, as well as with our competitive advantages as a centre of tourism and economic development.

As a local government, we are determined to become both progressive society and economically developed community through improved service delivery and effective administration which can effectively support the over 500 businesses operating in our municipality, as well as the growing number of potential investors wishing to start a business, especially in the "Triangle of economic development of Kosovo" zone. We pursue our development aims by simplified and favourable administrative procedures, investment in local infrastructure, creating inter-disciplinary partnerships; strategizing long-term investment plans and striving to decrease long-term unemployment.

To effectively bring together people, partnerships and opportunities for a strong and vibrant Gračanica/Graçanicë, we are committed to ethical and responsible conduct in all our own actions, as well as to developing the same commitment in our staff and partners to foster a climate of ethical conduct, respect, responsibility, and trust. For achieving this we focus on and commit to:

Integritetit: duke praktikuar standarde të larta të sjelljes etike dhe duke udhëhequr veten me një gjithëpërfshirje dhe transparencë që frymëzon besimin.

- **Integrity:** practicing high standards of ethical behaviour and conduct ourselves with an openness and transparency that inspires trust.

- **Community leadership and innovation:** extending horizons and actively guiding Gračanica/Graçanicë toward a higher quality of life.

- **Partnership and collaboration:** building internal and external relationships to achieve common goals and resolve differences.

- **Respect:** striving to create an environment where people are included, valued and treated with dignity.

- **Service quality and professionalism:** further developing our professional workforce and setting and achieving high professional standards in everything we do

- **Responsiveness:** expanding our services to exceed customer expectations and offer customer-focused service that is accessible, user-friendly, respectful and efficient.

- **Accountability:** being accountable – individually and in teams – for our behaviors, actions and results.

At Gračanica/Graçanicë, we believe it is critically important for all staff to understand and embrace our integrity policy. To turn our vision into reality, the municipal leadership is determined to:

- Lead by example in accordance with the municipality's core values and demonstrate integrity in professional conduct, including dealings with staff, government structures, citizens, businesses and all other stakeholders; demonstrate by actions a deep appreciation for the community's past, responds to current needs and plans for our collective future

- Develop and maintain a straightforward integrity risk policy that responds to our local community context, and is consistent with the overall public modernisation agenda;

- Progressively enhance our integrity risk management practices, making sure they are adequate to current vulnerabilities and risks facing municipality, and provide for effective operational controls, systematically implemented and carefully monitored;

- Continually seek improvement in our operational effectiveness and rethink practices and procedures as to increase the level of protection against integrity violations; provide the highest quality service to all clients equally in the most efficient and responsive manner possible with a skilled team of staff dedicated to the needs of our clients and committed to excellence, fiscal responsibility and professional management.

- Promote honest, safe and ethical conduct by all means, every day, and refrain from any conduct that may bring financial losses, or detract from the image of integrity or professionalism of the Municipality of Gračanica/Graçanicë ;

- Assure compliance with existing laws, rules and regulations; as well as appropriate protection of all assets;

- Consistency apply a straightforward "zero tolerance" to corruption policy; effectively cooperate with responsible institutions in the field of anticorruption;

- Build trust and confidence of the people with whom we work, promote incentive-developing policies and practices, involve people, seek their views, listen actively to what they have to say and represent these views honestly.

- Keep people well informed as regards integrity matters, be clear on what is expected, keep commitments to stakeholders, and provide feedback on developments in appropriate format;

- Be accountable for our actions and hold others accountable for theirs.

I, hereby, declare my full and unconditional support and firm commitment to all efforts to strengthen integrity protection within the Municipality of Gračanica/Graçanicë.

Vladeta Kostić
Mayor of Gračanica/Graçanicë
2016

INTEGRITY PLAN

The Integrity Plan has been built on the results of the integrity risk assessment process undertaken within the Municipalty of Gračanica/Graçanicë in October, 2015- February, 2016. The process involved an identification of the organizational vulnerabilities to integrity violations, and their analysis and assessment by considering (1) the damage in material and nonmaterial terms that respective potential violations cause, and the (2) likelihood that such events can occur seen through the current organizational resistance substantiated in the relevant regulations, procedures, codes, practices and involvement of staff.

The Municipality has undertaken the following actions:

- Setting up of Working Group led by the Mayor of Gračanica/Graçanicë to manage the process of integrity planning;

- Targeted survey of the relevant strategic, regulatory and operational framework to align strategic priorities with perceived needs in integrity protection ;

- Processed a reference organisational survey- self- assessment to provide insight and valuable input to the assessment of the integrity management system in the Municipality; based on results, identified risk areas and improvement operational lines and measures (Self-Assessment of the organisational integrity system developed);

- Used workshop focus groups, and processed special risk tables to address specific risks in key administrative units and high risk areas to identify and assess integrity risks and list enhancement measures (workshop and interviews held; Integrity Risk Register/Risk Matrix developed);

- Used integrity development related documents/ guides of the UNDP, Integrity Best Practices Compendiums, TI handbooks, ISO 31000 and FERMA risk management standards, BS 10500 Specification for an anti- bribery management system; Australian/ New Zealand Standard for anti- corruption - AS 8001-2008;- ISO 26000 Guidance on social responsibility; Transparency International's Business Principles for Countering Bribery; ISO 9001 quality management system requirements and ISO 27001 Information Security Management, as a reference to support the measures proposed.

This document is both strategic and operational. It codifies our commitment to further enhance the organisational resilience as regards effective counteraction and prevention of integrity related violations; and specifies risk based measures for achieving objectives and reinforcing the rule of law and professional standards.

Through this Plan, the Municipalty of Gračanica/Graçanicë strives to:

- Provide with an organisation wide integrity risk policy to inform our specific policies, procedures and operational measures as regards integrity, ethics, transparency, and accountability:

- Strengthen integrity risk governance system to ensure integrity protection is delivered in a well sequenced format of planning, implementation, checking and further action, in line with relevant legal and procedural requirements and leading

international management standards;

- Further strengthen operational risk management processes with a strategic focus on high-risk areas; reduce/ eliminate opportunities for corruption and improve overall resilience to corruption.

To support implementation, a specific Action Plan has been developed and annexed (Annex 1). Budget for implementation of this Integrity Plan has been allocated as well.

Based on the understanding that the Integrity Plan requires careful follow up to ensure that planned activities reach their intended outcomes, the Municipality is committed to periodic monitoring of its implementation. Respective responsibilities are assigned to_____.

Regular reporting on the implementation of the Plan is to ensure that the schedule has been followed and planned results achieved. The _____ shall be responsible to report periodically to the Mayor on the implementation. The minimum frequency of reporting is within six months period. Reporting allows the Mayor to undertake on time adequate corrective/ preventive measures in case where implementation of particular measure(s) poses difficulties/ delays.

The Integrity plan shall consist, in particular, of:

- Integrity Statement to confirm the commitment to integrity of the Municipality of Gračanica/Graçanicë.

- Integrity Plan- explains the background, scope, purpose, objectives and the methodology.

- Strategic objectives, activity lines and measures outlines key strategic objectives and action areas, along with a brief justification/ rationale of the activity lines planned, further supported by measures to guide implementation.

- Action Plan outlines in details all measures that shall be taken to achieve the objectives set, as well as the relevant timeframe and organisational responsibilities for implementation. Indicators of success for each measure have been defined, supported by the necessary resource/financial numbers.

Further to the leading international management standards in the field, and the current good practices in the municipal context of Kosova, this Integrity Plan is seen as the strategic basis to further improve the integrity management system in the Municipality of Gračanica/Graçanicë (hereinafter, IMS). Such system is perceived as a key to reduce outstanding economic and human costs of integrity violations, enhance future business and boost organizational reputation and creditability. Though implementation and its consistent follow up are critical to results and sustainability, integrity planning as the first important step in setting the planned foundations of the actions necessary, remains its fundamental pillar.

STRATEGIC OBJECTIVES, ACTIVITY LINES AND MEASURES

In an effort to raise effectiveness, efficiency, transparency of its processes, increase quality of infrastructure, modernize service provision and consistently and effectively reinforce a client centered provision of services, the Municipality of Gračanica/Graçanicë is currently undergoing series of modernization measures. Along this path, our young municipality faces numerous challenges, resulting from the complexities of the external, as well as the internal environment, any of these having their further impacts/specifics in the context, in which we operate. Beyond these limitations, however, we see the opportunities for further development and prosperity. Important part of these relate to strengthening adherence to high professional standards and integrity protection. They are rooted in our achievements so far, and inspired by successful international practices. In this context, our administration shall strive to further advance its integrity management practices by focusing on the following three core areas:

- Progressively introduce adequate risk policy and risk governance framework to effectively provide for reduction of integrity risk levels in the short run, improvement of integrity performance in the mid run and sustainable integrity risk prevention culture in the long run;

- Strengthen resilience to integrity violations in key processes;

- Raise quality of participation and involvement of stakeholders in decision making and implementation of integrity measures; support visibility of integrity prevention measures, promote openness and transparency with guaranteed access to public information.

The following is to present and explain the above strategic objectives, and translate these objectives into concrete policy and management action activity lines and measures to support their achievement.

STRATEGIC OBJECTIVE 1

Progressively introduce adequate risk policy and risk governance framework to effectively provide for reduction of integrity risk levels in the short run, improvement of integrity performance in the mid run and sustainable integrity risk prevention culture in the long run.

Activity lines and respective measures

1.1 **Further structure and continuously improve integrity risk policy, integrity governance and integrity management system to provide an appropriate framework for strengthening resilience to integrity violations and to guarantee sustainable process of integrity prevention**

Rationale: For building the capability to achieve its goals and objectives, and turn vision into reality, our Integrity statement needs a framework. First of all, this framework includes integrity management and planning to identify and bring integrity risks affecting the Municipality under management. That is how this Integrity Plan has become a basis for effective integrity risk management. Further to that, to enable planned integrity measures produce their intended effects, the Municipality needs a functioning integrity management system (IMS) as a risk governance framework. This system is to pro-actively ensure for the continuing suitability of the planning process through periodic reassessment, as well as for the implementation, monitoring and measurement of key characteristics of operations that determine integrity performance. It entails also taking necessary follow up actions to continually improve the integrity performance and the integrity management system. In this field there are leading management practices, including anti-bribery standards and regulations. They serve as a guidance, as well as a source of inspiration for our organisation. Being determined to upgrade its integrity management practices, in line with the relevant best standards, the Municipality of Gračanica/Graçanicë shall progressively strengthen various key pillars of the integrity management system, currently being operated. It believes that a stronger system will mean more protection, will inspire staff to maintain a risk based thinking, and effectively minimise opportunities for corruption and related vulnerabilities.

1.1.1 Communicate integrity statement to all relevant stakeholders, external and internal, as considered appropriate. Ensure it is regularly checked for continuing suitability, revisit if needed.

1.1.2. Resource the process of integrity management in the Municipality with allocating the necessary resources for the implementation of the measures in the Integrity Plan, check regularly for their adequacy.

1.1.3. Make sure that roles and responsibilities of staff as regards integrity management are clearly defined in relevant internal documents, understood and known within the Municipality.

1.1.4.   Progressively introduce and maintain risk-based approaches and risk-based thinking as a key baseline of decision making, to effectively utilize opportunities and plan actions to prevent/minimise threats. Maintain periodic revision of the Integrity Plan, including in cases where key developments require reassessment, as well as in the end of the planning period.

1.1.5.   Ensure key instruments of integrity prevention, including the Code of Ethics, regulation on Conflict of Interests, gifts, secondary employment, mandatory disclosure are well and adequately understood in the Municipality. Raise familiarity and awareness of all staff of the importance of monitoring the implementation of the Code of ethics in the Municipality. To this purpose, familiarise staff with the monitoring criteria, developed by the central government to be applied in the context of Code of Ethics. Train and develop capacities for persons responsible to monitor principles of ethics and transparency in the municipality.

1.1.6.   Ensure that the normative regulations on gifts are actually enforced, maintain the Gift Register of the Municipality of Gračanica/Graçanicë as appropriate and make it known to all staff.

1.1.7.   Familiarise all staff with the whistle blowers protection matters, including regulations and procedures, so that everyone understands the importance of internal reporting and protection of whistle blowers. Ensure whistle blowers protection is well organised in the municipality.

1.1.8.   Maintain an effective system of detection, registration, investigation, analysis and evaluation of integrity related incidents. Review internal controls following detection of a fraud or corruption incident. Check for consistent application of the disciplinary procedures for detected incidents, document and communicate these checks. Report and publish trends on annual basis.

1.2   Enable a functioning integrity management system through ensuring all personnel is adequately trained and aware of its role in managing integrity.

Rationale: To enable effective operation of the integrity management system, as well as consistent implementation of the Integrity Plan, the Municipality needs appropriate support and commitment by all staff. Indispensable to this effort is also the adequate competence of employees in integrity matters. The risk assessment conducted, demonstrated significant opportunities in this respect. Levels of familiarity with integrity risks, integrity management and integrity instruments need to be strengthened, in particular, for the senior and mid management that is expected to lead integrity modernisation efforts. To provide for effective enforcement of relevant legal and ethical norms, familiarity with these at all levels becomes critical.

1.2.1   Ensure staff in leading and senior positions is competent in risk management, familiar with best practices and strives to translate knowledge into action. Wherever feasible, use conferences/ workshops and other formats of experience sharing to excel knowledge and experience of staff in this field.

1.2.2.   Provide inception and periodic awareness training in integrity related issues and integrity management for all staff. This includes, but is not limited to the existing Code of Ethics and normative regulation of Conflict of Interests, gifts, secondary employment, mandatory disclosure. To this purpose, consider training and awareness formats as appropriate, as well as periodic testing of knowledge of employees.

1.3   Effectively improve the internal coordination and communication system as regards integrity issues.

Rationale: Communication and coordination are vital in streamlining integrity goals and ensuring objectives are achieved in a timely manner. A strong intra- and interdepartmental cooperation when implementing the Integrity Plan helps ensure that all stakeholders' issues and needs are adequately addressed. By increasing knowledge sharing, communicating integrity related successes, as well as failures, and developing functional coordination platforms, municipal decision-makers place themselves in a better position to develop measures that best address the needs of the Municipality, or community. A functioning coordination and communication system contributes to effective and informed decision making at all levels of implementation, and creates co-ownership in the reform and modernisation effort.

1.3.1   Improve internal communication as regards matters of integrity by setting out the necessary structure and mechanisms, as well as clear rules on what, how, with whom to communicate. Where appropriate and feasible, set up/ maintain/ continually improve a digital internal communication system using the IT infrastructure to enable more efficient data exchange and communication across units.

1.3.2   Raise effectiveness and efficiency of coordination amongst units, as well as with various categories of external stakeholders: central government, municipalities, businesses, NGOs, etc. Consider optimising the system for cascading down management meetings to decentralize tasks to all operational units. Where appropriate and feasible, set up/ maintain/ continually improve a digital internal coordination system using the IT infrastructure to enable more effective and efficient coordination across units.

1.4   Ensure effectiveness of the audit and control system as a key pillar in a functioning integrity management system

Rationale: The risk assessment in the Municipality of Gračanica/Graçanicë identified strengthening the audit and control system as a major opportunity for improvement. The role of the internal audit and control framework as a key pillar of the IMS that enable detection of corruption cases, highlights vulnerabilities, and serves as an early warning system, appears well recognized. The challenges, however, lie ahead. In this respect, increased frequency, ad hoc audits (not expected/planned), increased control over audit findings, Increased professionalism of the audit team, clear audit trail have been seen as appropriate operational controls that may enhance effectiveness of the audit process as far as integrity is concerned.

1.4.1 Provide for appropriate organisation of the audit unit by allocating the director's authority as required.

1.4.2. Devise and implement a targeted capacity strengthening program for auditors that will help continually update the required professional knowledge, including licensing of professional competence with the Ministry of Finance. Consider various forms of capacity building/ strengthening, including participation in professional networks, seminars, donor funded projects, etc. to compensate deficiencies if trainings offered.

1.4.3. Further strengthen risk based planning of audits, which focuses on the prevalent high fraud and corruption risks. Increase frequency and diversify audits. Ensure strict monitoring of the implementation of the audit plan, with effective corrective measures, if and when necessary.

1.4.4. Further strengthen and structure control over implementation of audit findings/ recommendations. To this purpose, consider setting up of an e- based database to trace follow up both internal and external audit recommendations and register the progress made in implementation and will function as a single dashboard for public managers to monitor and evaluate internal control actions.

1.4.5. Promote the analytical aspects in reporting of audits, audit results and implementation of recommendations to make sure trends are identified, lessons are learnt and the necessary correction and preventive actions are taken. To this purpose, consider strengthening requirements on reporting, with a focus on analysis and evaluation.

1.5. **Effectively improve the management system in the Municipality of Gračanica/ Graçanicë by bringing more focus on quality and security of information aspects, to reduce opportunities for abuse of integrity and professional standards**

Rationale: The risk assessment has clearly identified improvement opportunities as regards adoption of a client centred quality management practices, as well as protecting security of information. The latter becomes an area of increased concern worldwide, due to the importance of information security assets and the general inadequacy of their protection in most organisations. To significantly enhance its performance in quality and information security management, the Municipality may consider a range of available instruments, that support organisations deliver more value to their clients. As far as enhanced quality management is concerned, these include, among others, functional reviews, implementation of ISO 9001 quality management system standard, excellence schemes as CAF-Common Assessment Framework and EFQM, Citizens Service Charters, etc. In the field of security of information, relevant schemes include the OECD Guidelines for the Security of Information and Networks, and the management standard ISO/IEC 27001.

Decisions to consider one instrument or a combination of these are rooted in the understanding of the organisation about the value added of having a conformant management system in place, and must be built on a serious needs and feasibility analysis, rather than on a mechanic transfer of ready-to-go practices. To serve these needs, the Municipality shall build a structured, phased-in approach that builds the necessary competence and awareness of personnel, studies the available national and international experience with the above instruments and takes up what is considered appropriate and feasible in relevant action plans. Various instruments have different costs of implementation, and may bring different effects either. Thus, compliance with international standards will consistently provide an internal framework that entails a strong customer focus and is process and risk based. Recognition through certification (ISO 9001 or ISO 27001) or registration and verification (CAF and EFQM) provides additional incentives and reward to staff in local government. Citizens Charters convey a strong message to both internal and external clients of a clear management commitment to integrity and to a client oriented and transparent service.

1.5.1. In implementation of the priorities of the national modernisation agenda, consider adopting a Regulation on internal organization and job classification, and their systematization based on the Catalogue of Jobs adopted by the government. Ensure that the Organogram and subsequently, all job descriptions are periodically revisited for continuing suitability to achieve maximum accountability, transparency and efficiency of operations.

1.5.2. To raise effectiveness and efficiency of operations, consider a phased-in Plan for introduction and implementation of a process based quality management system. This will require the Municipality to progressively determine its key strategic, operational and support processes; the relevant inputs required and the outputs expected; their sequence and interaction. The Municipality shall review the need these processes to be covered with comprehensive SOPs, that further specify the criteria, methods, measurements, and related performance indicators needed to ensure that both the operation and control

of these processes are effective. These procedures, when developed, will need to be properly communicated to all staff for implementation. The resources necessary for these processes need to be determined and provided; necessary responsibilities and authorities will have to be assigned. A functioning process approach will further require to implement actions necessary to achieve planned results; as well as to monitor, analyse and change, if needed, these processes ensuring that they continue to deliver the intended outputs.

1.5.3.   Reconfirm raising quality of services as a key development point. To promote an effective quality management approach, actively research and explore relevant best practices. In line with the vision of the Municipality and its ambitions as regards quality enhancement, consider for progressive implementation one or more of the proven worldwide instruments to maximise effectiveness and efficiency of service delivery, including ISO 9001:2015, Common Assessment framework, EFQM excellence scheme, Client Service Charters, etc. Based on this decision, adopt respective time frame and provide for implementation. Consider sharing quality management practices with other municipalities in relevant forums to excel possibilities for learning. Explore opportunities for support in the introduction of quality management practices, including certification for compliance, that exist in the donor network.

1.5.4.   Adopt a client faced, improvement oriented measurement approach to survey public opinion about the quality of services provided by the Municipality. Where feasible, plan and implement customer satisfaction surveys; ad hoc checks, secret client operations, etc. Ensure periodical (biannual and annual) analyses of the signals, suggestions and complaints, related to the quality of services and the observance of the professional standards in the context of the Municipality.

1.5.5.   Promote awareness of the importance of protection of security of information as a key integrity risk area in all staff. To this purpose, consider trainings in information security management for relevant senior personnel, as well as general familiarity sessions for all staff. Include utilization of computer resources and access controls as areas to cover.

1.5.6.   Further to the results of the risk assessment, consider optimising the existing system of information security management. To provide the necessary baseline, survey the best available international guidelines: i.e. OECD Guidelines for the Security of Information and Networks, and the management standard ISO/IEC 27001. In line with the above, as well as considering priorities and feasibilities in national and local context, draft a long-term Plan for information security management to include strategic priorities, urgent activity areas, and measures. Allocate respective resources and assign responsibilities.

1.5.7.   In cooperation with the relevant IT personnel, consider developing internal procedure (s) on information security management, to cover management of confidential information, security controls, access to organized internal domains, etc. Ensure absolute familiarity of staff with the relevant procedure and strict monitoring over its implementation.

STRATEGIC OBJECTIVE 2

Strengthen resilience to integrity violations in key processes

Rationale: The risk assessment, conducted in the Municipality of Gračanica/ Graçanicë has considered critical strategic, operational and support processes, aimed to identify relevant improvement fields/ measures that are thought to contribute at most to minimising vulnerabilities, optimising protection and strengthening resilience. As regards major integrity risks in the context of the core functions of the Municipality of Gračanica/Graçanicë, optimized controls are needed in the following areas (listed according risk levels: from higher to lower):

- implementation of building regulations and building control standards;

- urban and rural planning; land use and development;

- local economic development;

- protection of human rights;

- public housing;

- provision and maintenance of public services and utilities, including water supply, sewers and drains, sewage treatment, waste management, local roads, local transport, and local heating schemes.

Among the delegated competences of the Municipality most vulnerable to integrity violations (corruption prone) have been assessed to be:

- cadastral records;

- voter registration.

The major threats to integrity protection are seen in the areas as follows:

- purchasing/ procurement/ contracts;

- budgets and budget management;

- financial management/use of public monetary resources/misuse and theft;

- service delivery – organization of service provision;

- information systems/ use of information;

- housing;

- use of public vehicles.

Particular challenges that have been specified in the risk assessment include:

- bribery,

- conflict of interest,

- political interference,

- favoritism/nepotism,

- hiring relatives/friends misuse of working time,

- improper use of information,

- outside work for extra compensation,

- personal use of work-related resources.

Within this wide range of potential vulnerabilities, which may become risks if exploited by specific threats and actors, possibilities for intervention are different. Before all, they depend on the current level of risks based on the believed resilience of the system. In some cases, the very organization and structure of the processes pose a serious problem, in other cases, in the presence of a structure, there are issues with its efficiency and effectiveness. Further cases open the question about resourcing of the functions. Even where there are employees available, there might be issues with their professional competence. The above was to illustrate some of the many issues and complexities that the Municipality faces in its continuous struggle to move forward integrity protection. Measures, listed in this Plan, are thought necessary and are justified, based on the preliminary risk assessment. They do not prevent further targeted action that may compliment the initial efforts.

Consistency of action is also an important parameter, as measures need to be well planned based on the proven urgency of action. This means that simple resourcing of a process, for example by hiring the right people, will not solve a process based deficiency, where vulnerability lies in the process itself as even right people are imperfect substitutes for deficient processes. In view of the above, the measures listed in the Plan reflect our preferred Roadmap to strengthen organizational resilience to integrity violations in the Municipality of Gračanica/Graçanicë. They need to be interpreted and implemented in line with the overall organizational development modernization measures, as well as in line with the respected sectoral policies and plans.

Activity lines and respective measures per processes and areas of operation:

2.1. Administration and personnel

Administration

2.1.1.   Expand use of IT technologies to enhance the document control management system. Ensure adequate familiarisation with the Electronic Document Management System that is being developed / piloted at central level in Kosovo as to decide on the feasibility/appropriateness of introducing such system in the Municipality of Gračanica/Graçanicë. Consider alternative ways to enhance critical parameters of document control: traceability, efficiency, easy access, etc. Improvements brought by opportunities for   electronic allocation and monitoring of documents; electronic processing of files, creation of an electronic inter-face in order to obtain information about petitions related to the files status will increase accountability, efficiency and effectiveness of processes, reduce costs, and provide clear audit trail.

2.1.2.   Consider opportunities to upgrade the current record management system by setting out appropriate archive, adequately resourcing the function, building appropriate infrastructure, upgrading the database and introducing professional scanning.

Personnel

Rationale: Integrity performance and adherence to professional standards by employees forms an important part of the organisational resilience to integrity violations. This extends high demands to the maintained human resource management and human resource development processes, which need to ensure as their outputs adequate capacities of staff as regards professional services and integrity management.

The risk assessment conducted in the Municipality of Gračanica/Graçanicë demonstrated high level of awareness of all staff about the critical importance of the HRM and HRD processes. If the latter as a whole are to offer a strong resistance to integrity violations, the following areas are seen in need of further improvement:

- training system,

- selection and recruitment of staff,

- financial reward system,

- attestation and performance appraisal,

- study trips abroad.

As potential integrity related measures that may help increase integrity in the selection and recruitment processes, the following measures are considered appropriate:

- introduction of clear and transparent selection criteria to prevent favoritism and nepotism;

- reasonable length of time to prepare documents and submit job application,

- written internal procedure on selection and recruitment of staff;

- check of qualifications and diplomas before recruitment,

- opportunity to appeal selection of results within reasonable time,

- clear documented audit trail of the work of the selection commission.

Opportunities for improvement of the carrier development system are seen as follows:

- ad hoc audits on adherence to rules,

- clear and transparent criteria on carrier development established and consistently followed;

- clear internal procedures on carrier development established;

- complaint system upgraded to respond effectively to claims for abuse of carrier development procedures,

- external audits on carrier development procedures.

As regards assessment, opportunities for further improvement are seen in the following:

- clear and transparent assessment criteria to prevent favoritism and nepotism;

- written internal procedure on assessment of staff,

- opportunity to get advice from and report to an integrity counselor on deficiencies of the assessment process,

- clear documented audit trail of the assessment process.

As regards training, opportunities for further improvement are seen in the following:

- Increased transparency of training opportunities,

- clear and transparent criteria for competitive selection of trainees;

- clear audit trail and reporting of training results;

- evaluation of training effectiveness.

2.1.3.   Familiarise with the Human Resource Information Management System in the Civil Service (HRIMS)– built and managed by Department of Civil Service Administration (MPA) and to be further extended to all institutions of public administration at local level. Explore opportunities to introduce and maintain the system at the Municipality of Gračanica/Graçanicë.

2.1.4.   Review currently practices recruitment and hiring processes to identify further opportunities for strengthened controls and transparency. To enhance transparency, consider setting up of minimum standards of transparency in recruitment and monitor and report on implementation. Allow for sufficient time for application and preparation and submission of documents. Consider submission of CoI declarations by members of the recruitment body, inclusion of line managers, personnel or an independent observer in the committee, strengthened documentation requirements. Consider checking of qualifications of candidates for sensitive high-risk positions.

2.1.5.   Review possibilities to improve the reward system to provide additional incentives for staff to attain higher professional standards. Familiarise with the new performance system that is to be adopted centrally in Kosovo. Explore opportunities and feasibility to introduce it in the Municipality of Gračanica/Graçanicë.

2.1.6.   Review opportunities to enhance controls over employees' adherence to standards of performance. Make public information on disciplinary procedures that have been undertaken, to increase preventive potential. Consider instituting a hot line for anonymous reporting of abusive conduct with the necessary protection of whistleblowers. Strengthen controls over working time management: i.e. consider using work time registration system, ad hoc surveillance actions; complaint system, etc. Strengthen controls over business trip management; ensure all business trips are made according to accepted well defined criteria, be transparent and bound to terms.

2.1.7.   Periodically, and in planned intervals, consider measuring satisfaction of staff with work and integrity environment as an "early warning system" to detect issues and trends. Make results public. Put the necessary effort to identify trends and opportunities for improvement, based on comments/suggestions by employees.

2.1.8.   Significantly improve effectiveness of the training system by a structured effort to bridge the training needs with the actual training delivered. Use any existing opportunity: i.e. conferences, seminars, donor projects, to compensate deficiencies in the trainings offered. Make all training opportunities public, so that staff has better access and understanding of the possibilities to strengthen competence. Consider evaluation of effectiveness of training, to guide further choices and prevent from putting the effort in the wrong direction.

2.2. Public procurement

Rationale: In the risk assessment conducted in the Municipality of Gračanica/ Graçanicë, procurement and contracting practices are highlighted as an area of major potential corruption risk. Further operational controls are seen as needed in the following areas (rated according to risk levels): pre-tender phase:

- preparation and publication of procurement plans/ bids;

- evaluation of tenders; award decision and justification,

- procurement planning of needs,

- control over implementation of the contract,

- formulation of selection criteria,

- financial monitoring of contract implementation,

- quality controls over implementation.

2.3.1. Adequately resource the procurement function. Strengthen professional capacities of staff involved in all stages of public procurement. To this purpose, assess training needs and use any possibilities to compensate deficiencies by using all possible sources: KIPA offered trainings, donor funded projects, conferences and seminars, etc.

2.3.2. Improve coordination and communication practices among the public procurement unit and other municipal structures.

2.3.3. Consider opportunities to mobilise additional resources in the process of preparation of bids to compensate against deficiencies of staff and resources. To this, purpose, consider participation of technical departments, maintaining of an electronic database of specifications to facilitate preparation of future tenders. To provide for effective protection in case of corruption related offences, consider including in the model contract terms of specific provisions, including contract cancellation, to deal with corruption and related issues.

2.3.4. Where feasible, ensure appropriate segregation of duties, as well as the obligations for internal reporting. As appropriate, ensure that the following functions are handled by different employees: recommendation of award, issue of purchase orders, certification of the receipt of goods and services, and payment verification.

2.3.5. To effectively raise public image, and in the interest of the community, ensure maximum possible transparency of public procurement procedures/ practices. To this purpose, set up a standard for transparency for all public procurement types, aligned with the national regulations and the best practices. Effectively

communicate this standard to all relevant stakeholders, including publishing this in the website. Allow a structure to monitor adherence to this standard in every procedure, and put into effect an efficient mechanism for corrective actions in case of disobedience.

2.3.6.   Consider introducing a practice to require companies doing business with the Municipality to certify that they comply with the integrity commitments of the Municipality of Gračanica/Graçanicë and accordingly, signing such declaration of commitment in addition to the concluded contract.

2.3.7.   Proactively endorse a policy for increasing opportunities for citizen's oversight over municipal public procurement. Consider using the following measures: disclosing public information on the headlines of major contracts, involving representatives from NGOs and the wider public in monitoring high-value or complex procurements; include in the selection committees independent NGO observers, etc.

2.3.8.   Further strengthen controls over implementation of contracts by using: planned and unplanned ad hoc controls, commissions for accepting results and approving project deliverables, stricter requirements to documenting quality check-ups and acceptance of results/ deliverables.

2.3.9.   Streamline as feasible the available resources to increase data protection and control of documented information during the entire process of public procurement. Thus incudes appropriate archiving of files, considering a possibility to use professional scanning system. Protecting security of information shall become internalised as an area of major concern, so operational controls should be considered with the participation of the staff of the procurement unit and the responsible IT personnel. Protected internal domains provide further guarantees to both staff, and the organisation.

2.3. Budget and finance

> **Rationale:** Based on the higher stake involved, as well as on their complexities, budget planning and budget management, and financial management and assets remain critical processes for integrity protection. Incentives for abusive behaviour in respect of these appear high, therefore, any opportunities for abuse, will need to be kept at the lowest minimum possible. The integrity risk assessment conducted in the Municipality of Gračanica/Graçanicë demonstrates that staff is well aware of the complexities of the current budget planning and management processes and their risk profile.
>
> High-risk areas are seen in the following vulnerabilities and potential risks:
>
> - diversion of payments to own accounts;
>
> - credits /payments/ passed without supporting documentation;
>
> - lack of asset register results in misappropriation of asset;
>
> - misuse of municipal vehicles for personal benefit.

2.3.1. Resource the budget and financial management functions adequately by keeping appropriate number of staff and making sure it remains well trained. Use any capacity strengthening opportunities that arise, including trainings organized by central bodies, KIPA, donors, etc.

2.3.2. Harmonize the process of budget planning with actual needs of stakeholders by actively promoting participation of interested stakeholders: citizens/ businesses/ NGOs in budget planning. This may include, but is not limited to holding relevant awareness and information campaigns, providing timely information, assuring that Draft budget is published and available for comments, monitoring existing rules and procedures of the municipal assembly on public participation in budget planning and undertaking necessary corrective measures, if and where necessary.

2.3.3. Improve information sharing and communication with the ministries/ donors- faster response means better planning- improve coordination with central levels in budget planning.

2.3.4. Improve intra municipal cooperation across departments to allow appropriate representation of their needs in the budget. Apply strict scheduling and closely monitor related deadlines.

2.3.5. Increase opportunities for citizens' oversight by promoting participation of citizens/ businesses/ NGOs in monitoring of budget implementation. To this purpose consider organizing public debates/ forums to inform citizens about budget implementation, publishing periodic reports on budget implementation in a timely manner, so that interested parties may track budget expenses and hold the municipality accountable.

2.3.6. Improve budget control of expenditures by maintaining a reliable system/ adequate mechanism to trace budget expenditures at planned appropriate intervals (i.e. on a monthly basis) to allow better accounting of the budget implementation dynamics. Monitor and reconcile all credits on a monthly basis. Provide for analysis of trends and evaluate accordingly.

Assets

2.3.7. Effectively and adequately resource the asset management function. To this purpose, consider allocating specific structure and responsibilities.

2.3.8. Enhance the process of assessment of property. Consider commissions to reduce risk of biased and manipulated assessment. Apply strong documentation requirements.

2.3.9. Develop/maintain an asset register. Organize its regular update and monitor it on a monthly basis. Resource it with adequate number of staff, that is appropriately trained and competent in property related issues. Consider electronic publishing of the registry/parts, to increase transparency and allow public scrutiny.

2.3.10. Consider introducing and implementing effective measures to prevent from using municipal vehicles for personal benefit, i.e. vehicle register, using fuel cards with a PIN,   monitoring high-value vehicles with GPS. Conduct ad hoc audits to strengthen adherence to established rules and prevent misuse.

2.4. Economic development and integration

2.4.1. Improve number and capacities of staff involved in economic development. Consider professional training in the areas: territorial economic development, territorial development strategies: tools for analysis, mapping, and strategic framework, governance for territorial economic development, local economic development planning, services for economic development, territorial marketing.

2.4.2. Effectively promote investment in economic development in the budget. Make sure priorities of action are well justified, based on identified and assessed needs and opportunities.

2.4.3. Strengthen involvement of relevant stakeholders in the economic development process. To this purpose, consider establishing a joint municipal forum for economic development and planning, including municipality, representatives of business communities, NGOs, experts, with the task of sharing priorities for the annual and multi-annual strategies and plans regarding economic development, and monitoring the implementation. The Forum shall identify objectives and priorities for development, and may have some monitoring functions as well.

2.4.4. Enhance communication and coordination with central government, especially as regards allocation of funds. Make sure matters are dealt with in a transparent format, and decisions based on evidence and criteria.

2.4.5.   Decide on the division of zones in a participatory format, consider the need to increase industrial zones.

2.5.   Planning, urbanism, cadastre and environment

Cadastre

2.5.1.   Revise the organogram of the cadastral unit so that clear accountability trail is being established, as well as clear reporting obligations. Increase the overall level of accountability and transparency in the Cadastral Unit.

2.5.2.   Consider possibilities to increase use of e-service and electronic monitoring of documents- to increase transparency.

2.5.3.   Consider any opportunities to improve record management practices in the cadastre, especially with the use of relevant IT tools. Pay special attention to introduction of professional scanning and archiving.

2.5.4.   Review selection and recruitment criteria for the cadastre unit to ensure selection of appropriate professional personnel with specific background and knowledge. Check credentials for candidates to ensure they verify actual qualifications.

2.5.5.   Identify capacity gaps and strive to fill them in by appropriate professional development of staff as needed. Ensure full familiarity with the Code of Conduct and the IMS principles/ controls/ rules. Provide refresher/continuous training in the new regulations and/or frameworks for cadastre measurements. Encourage participation of staff in relevant expert networks, conferences, to encourage good practices and learning.

2.5.6.   Improve coordination and communication policies and practices within the cadastre unit. Consider instituting regular operational meetings to identify issues, discuss potentials solutions, foster team approach and enhance accountability.

2.5.7.   Strengthen/diversify control mechanisms, including ad hoc checks, Pay special attention to high-rusk areas as determined. To detect abusive behaviour, including passing the queue, consider setting up of a separate box/line for cadastre related concerns.

Urbanism and environment

2.5.8.   Adequately resource the planning function. Use any opportunity available to offer the employees involved in the planning process additional professional training.

2.5.9.   Strengthen strategic approach in the planning system, maintain midterm planning to link with priorities and prevent from ad hoc decisions. Where feasible, use the donors help and further assistance to develop needs based and sound plans.

2.5.10.   Provide for increased transparency of the urban and rural planning by considering transparency thresholds: minimum information that needs to be published, related deadlines, formats. etc.

2.5.11.   Strengthen participatory approaches for urban and rural planning by extending opportunities for more active involvement of citizens, businesses, NGOs and other stakeholders in the planning process.

2.5.12.   Publish results of implementation of the plans. Analyse trends, weaknesses, opportunities for development, based on facts and objective evidence.

2.6.   Health, Social Welfare and Family Care

2.6.1.   Strengthen capacities of staff involved in delivery of health care and social services according to comprehensively identified and assessed needs. Support regular professional refresher training for staff. Increase awareness as regards protection of integrity.

2.6.2.   Enhance coordination and communication system between relevant stakeholders in provision of health and social welfare services.

2.6.3.   Progressively improve physical and technical infrastructure and equipment to attain modern standards. Completion of the centre of clinical hospital; Improvement of facilities in the existing health centres in the sub centres; Consider investing in improvement of energy efficiency and hot water supply through use of solar water heaters. Improve coordination with the mayor and the budget unit in budget planning so that needs are effectively accounted for. Increase funding for health and support process of decision-making based on evidence.

2.6.4.   Support introduction of electronic cards and digitalisation of Health Information System at local level to reduce opportunities for abusive behaviour.

2.6.5.   Increase controls over the work of Social Welfare Centre by instituting separate line of concerns.

2.6.6.   Increase transparency in the work of Social Welfare Centre by instituting a Transparency Information Stand where major information about services is provided

2.6.7.   Intensify work with the four associations of persons with disabilities in Municipality of Gračanica/Graçanicë for multiplied effects.

2.6.8.   Support introduction of a system to monitor professional performance of the doctors based on feedback from patients and recipients of service.

2.7.   Education, Culture, Youth and Sports

2.7.1.   Ensure transparency of vacancies, as well as development and implementation of clear and transparent procedure with professional standards for recruitment   of teachers. Use opportunities to involve NGOs, parents, other external stakeholders in the interview panels, increase transparency of the interview process, increase publicity of results. Open a hot line to monitor performance of teachers.

2.7.2.   Support periodic continuous training of educational instructors and

administrators. Include integrity risks and integrity protection in the curricula. Actively promote exchange of experiences and knowledge.

2.7.3. To increase transparency and promote citizens' engagement, support establishing of a parent-teacher forums; enable active engagement of parents in ensuring quality and integrity the education process (open door days, etc.)

2.7.4. Support a policy of inclusion of integrity issues into the school-based curriculum and consider planning and implementing relevant awareness campaign.

2.7.5. Raise effectiveness of the internal audit for the education sector. To this purpose, train special internal auditors for the education sector, increase number and quality of audits in the education sector.

2.7.6. Provide for improvement of school infrastructure and further conditions (buildings, sports fields, IT, learning materials, etc.). Improve effectiveness of communication and coordination practices with all stakeholders that may effectively contribute to this process, including besides government structures also businesses and NGOs.

2.8. Public Services, Agriculture, Forestry and Emergency

Public services

2.8.1. Consider opportunities to provide electronic services, based on needs and feasibility assessment. Structure cooperation with the relevant central level institutions responsible e-government, in particular with the MPA and the Agency for Information Society. Organise implementation at local level, provided that the necessary decisions are taken.

2.8.2. Review services provided, to analyse need of respective procedures that would better guide their implementation. Fill in the gaps, if and where found necessary.

2.8.3. Maximise information about the services provided in a client friendly format, with easy access to information and templates. Consider publishing a list of administrative services, as well as detailed information: address where service is delivered, responsible officer, procedures and conditions, cost and duration of service delivery, the right of appeal in case the service recipient is not satisfied with the quality of delivered service. Use the website to make sure that the above information is fully available, in an easy to use format, with all template/ documents that are required. Dedicate a special service stand in the municipal premises, to post such information. Consider publishing leaflets/ templates, that will make it easier for citizens and business to familiarize themselves with their respective rights and obligations.

2.8.4. Improve capacities and understanding of staff as regards client focused service delivery.

2.8.5. Monitor client satisfaction, using variety of channels, with the purpose to improve satisfaction and prevent from nonconformities and underperformance.

Publicise positive and negative developments, to increase awareness, add incentives, and/or act preventively.

2.8.6. For key services, i.e. water supply, sewers and drains, sewage treatment, waste management, local roads, local transport, and local heating, consider setting up of specific mechanisms to measure client satisfaction instruments, including information on abusive behaviour.

Agriculture and Rural Development

2.8.7. Review the governance structure in the agriculture unit to identify opportunities for improvement and bring more clarity, accountability and consistency.

2.8.8. Enhance the overall planning system, by bridging midterm planning with priorities, and considering clear criteria to define subsidies allocation policy. Provide for medium term plans how to allocate means in the agricultural sector.

2.8.9. Ensure responsible staff is well and appropriately trained for the job.

2.8.10. Municipality of Gracanica in cooperation with Ministry for Agriculture and Forestry encourages development of agriculture through subsidies for spring and autumn season, supporting in this way economic strengthening of farms in order to intensify their production capacities. To guard against integrity violations, enhance control over allocation of subsidies by developing a procedure on allocation of grants with clear criteria to guide against subjective decisions. Ensure decisions and justifications are well documented to allow consequent follow up inspections.

2.8.11. Municipality of Gracanica is trying to give incentives to farmers in order to engage themselves in livestock breeding and agriculture through loans and subsidies granted by Ministry of Agriculture. To guard against integrity violations, enhance control over allocation of loans/subsidies by developing a procedure with clear criteria to guide against subjective decisions. Ensure decisions and justifications are well documented to allow consequent follow up inspections.

2.8.12. Enhance the overall mechanism of control over the actual utilisation of the subsidies to check how grants are absorbed and implemented. Plan measures towards users of subsidies/grants so that controls are enhanced and accountability and quality of implementation are ensured.

2.8.13. Consider appropriate formats and forums to effectively raise awareness of beneficiaries as regards of their entitlements/ rights.

2.8.14. Improve communication and coordination practices with the relevant responsible central level institutions, including as regards the adoption of the new procedure on grants allocation.

2.9.   Inspectorate

2.9.1.   Consider possibilities to resource better the inspection function by hiring additional inspectors, as well as by enhancing professionalism of the inspectors. Use existing opportunities to offer professional training by exchange of experience, relevant projects, etc. Consider training in investigation techniques, integrity and risk management, etc.

2.9.2.   Review the overall governance structure in the Inspectorate to identify opportunities for improvement and efficiency gains, provide for clear accountability lines and respective reporting obligations. If considered necessary, adopt the appropriate procedure to cover inspections, with special attention to planning of inspections based on risk assessment, specialization of inspectors, possibilities for further integrity controls as rotation and four eyes principles.

2.9.3.   Review opportunities to increase job incentives in the current reward system, i.e. work in hazard coefficient.

2.9.4.   Enhance quality of cooperation with the police and the other law enforcement institutions.

2.9.5.   Increase use of ad hoc/ unplanned inspections.

2.9.6.   Improve monitoring of activities of the inspection unit, including implementation of plans for inspections, types of inspections, issues encountered, trends, etc.

2.9.7.   Intensify collaboration with local media to raise awareness about the role of the inspectorate to stimulate cooperation and external feedback.

2.10.   Public housing

Rationale: In Gracanica, the Municipality is determined to expand housing capacities through the construction of collective and individual units. Thus, housing affordability is an important issue for the local government. Effective implementation requires adequate and well enforced integrity controls, to reduce potential for losses and abuse of trust. In the Risk assessment, that has been conducted respondents see as the major corruption risks the following:

- sale of municipal houses for personal gain;

- contractors paid despite no delivery of houses;

- poor quality control over repaired houses;

- award of tenders for houses reconstruction/ repair.

2.10.1.   Link planning in the three-year program for sustainable housing in the

municipality with well assessed needs and projections, in a format that allows transparency and participatory approach from the community. Publish the programm and make it available in an user-friendly format.

2.10.2. Strengthen transparency and documentation requirements, as well as operational controls in management of public housing processes. Provide housing at affordable and competitive prices, ensuring their transparency.

2.10.3. Resource the process by building/strengthening the necessary capacities, including in applicable laws and regulations in the development of design and technical documentation.

2.10.4. Strengthen controls over constructors involved in reconstruction of municipal housing: i.e. quality assurance and check-ups, payments of building contractors.

2.10.5. Advance the work of inspection in order to control the illegal construction;

2.10.6. To guarantee against abusive behaviour, improve the feedback system, generating information on the compliance of constructors/projects with the available building and land use restrictions.

2.10.7. Further develop municipal geographic information system to ensure effectiveness, efficiency and transparency.

2.11. Access and Security arrangements

2.11.1. Consider strengthening physical security controls, based on a detailed review of the physical security arrangements; i.e. specific focus is physical security over infrastructure, assets and staff.

STRATEGIC OBJECTIVE 3

Raise quality of participation and involvement of stakeholders in decision making and implementation of integrity measures; support visibility of integrity prevention measures, promote openness and transparency with guaranteed access to public information.

Activity lines and respective measures

3.1. **Raise quality of participation and involvement of stakeholders in decision making and implementation of integrity measures**

Rationale: Opportunities for effective involvement of external stakeholders in the activities of the Municipality are numerous, both in decision making and in citizens oversight. Effective use of these opportunities will increase capacities for taking the right and informed decisions, implementing these decisions and monitoring their planned effects. The effort is double sided, as the Municipality alone may not substitute for missing or inadequate commitment by the key groups of stakeholders, where they do not absorb the existing possibilities and refuse to cooperate. Yet, weak or inadequate interest can be stimulated so that the dynamics of cooperation is changed. This requires proactive attitude besides only laying an opportunity, effective advertisement, stating value added, convincing stakeholders that this right is their chance to see the Municipality developing towards shared aims.

3.1.1. To excel external coordination policies and obtain improved access to information and opportunities, consider placing some more structure in the relationship with donors, NGOs, other external stakeholders. This would require to allocate special unit and resources: specifically assigned officer to act as a contact point. Provide this function with a detailed ToR, identify the necessary communication channels so that information is channelled effectively and timely. Provide the maximum level of transparency of existing opportunities for cooperation, including project proposals, conference opportunities, other. Where needed, assign working groups to brainstorm on proposals to get involved in opened opportunities and project schemes. Require contact points to regularly report on absorption of opportunities, in order to excel accountability.

3.1.2. With the participation of NGOs, business associations, other stakeholders, consider setting up of a technical stakeholder committee(s) on specific topics (education, health, infrastructure, etc.) that have hybrid oversight/consultative roles. These committees can liaise with the municipality on an as needed basis to build upon its experiences in utilizing civil society to facilitate public oversight.

3.1.3. Implement a policy of effectively involving members of the Municipal Assembly in the public hearings on the implementation of the Integrity Plan, so that they share commitment and responsibility with the administration towards achievement of integrity objectives.

3.1.4. Implement a proactive Public Participation Policy and a supporting action plan

for planned periods that entails key events where public consultation is required, i.e. before new budget, regulations and/or economic development projects commence and/or plans are finalized. Make sure that opportunities are well advertised in advance through diversified communication channels: i.e. website and information stand. Partner with local media to publicise such events.

3.1.5.   In appropriate format, e-based and/or mail box, consider maintaining an anti-corruption hotline for citizens and businesses to provide Municipality with a trusted channel to report integrity violations. Secure timely response to complainants. Assign responsibilities for analysis of complaints per subject matter, type of abuse, to identify trends and opportunities for improvement. Make this analysis public, to raise preventive potential.

3.2.   Promote openness and transparency with guaranteed access to public information

Rationale: Maximising transparency outreach belongs to the most effective tools for enhancing integrity protection. The more information on the activities is available publicly, the better are the chances that the Municipality of Gracanica is perceived by the community as a trusted partner, effectively and actively involved and committed to enhancing quality of their life. Effective partnership with citizens, businesses, and other stakeholder requires a climate of trust. Access to information is an important driver here, to not only raise the image, but also promote co-ownership and shared commitment.

3.2.1.   Use any opportunities to publicise the integrity commitment of the Municipality of Gracanica, as well as the implementation of integrity measures. To this purpose, develop a ToR with respective responsibilities, so that the process has a process owner, accordingly tasked and accountable.

3.2.2.   Resource the external communication, as well as the IT function with the right number of personnel, and make sure staff is trained to develop/support websites and maintain user-friendly web transparency.

3.2.3.   Upgrade the website, provide for implementation of the instruction on websites of institutions and set up a system to monitor its implementation and regular update. Where appropriate and feasible, publish information about key areas of functioning of the Municipality: relevant laws/regulations; Code of Conduct; annual management reports; 'easy-to-understand budget reports' which provide a simple overview of financial operations; procurement; recruitment and vacancies;   activities and decisions taken by the municipal assembly. Continuously work with municipal departments, NGOs and communications and media experts to identify data held by the municipality which could be published to improve transparency and reduce margin for integrity violations.

3.2.4.   Implement a policy, where information board(s) available in the Municipality offer as much information on the various aspects possible, including leaflets, regulations, orders, announcements, service standards, manuals/reference templates/ helpers, etc. displayed in user friendly format to allow easy and proper familiarisation and use. To facilitate choice of materials to be displayed, set up a transparency board standard, identifying key clusters and items that are to be

made public, deadlines, etc. Assign respective responsibilities in this relation.

3.2.5.   Consider hosting "Open-Door Days" in offices of high-ranking municipal officials, as well as at the sessions of the Municipal Council to enhance public understanding of job functions and responsibilities of leadership and extend visibility reach. To this purpose, set up a list of Open Days in a planned period, allocate responsibilities, publicise accordingly, ensure organisation and monitor implementation. Use these days to get structured feedback on the activities of the administration, including quality of services and integrity performance.

3.2.6.   Familiarise staff in regulatory and procedural framework on access to public information, and consider publishing relevant information on the website to promote stakeholders' awareness of its entitlements as regards access to information.

3.2.7.   Upgrade the current system of organizing access to public information, further to national regulatory environment, and accounting for local needs and feasibilities. Consider opportunities to make this access easier, by publishing the necessary templates/ request on the website, providing further information on sites for public information delivery and related costs.

3.2.8.   Organise monitoring of processing of requests for access to public documents and information in a structured format and allocate respective responsibilities. Take immediate corrective measures where deficiencies are reported/ identified. Analyse and report on nonconformities, trends, etc. Make these reports public.

ACTION PLAN

Strategic Objectives

Action/Measures	Responsible unit	Coordinating unit/ partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source
Actions/measures to support implementation of the objectives	Municipality of Gračanica - responsible for implementation of specific measure	Units to coordinate implementation and institutions/organizations that partner	The anticipated time to complete the implementation of specific action	Indicators which serve to verify the implementation of the action	Presents the budget needed to implement the relevant action from the budget of Kosovo or different donors

STRATEGIC OBJECTIVE 1

Progressively introduce adequate risk policy and risk governance framework to effectively provide for reduction of integrity risk levels in the short run, improvement of integrity performance in the mid run and sustainable integrity risk prevention culture in the long run

Action/Measures	Responsible unit	Coordinating unit/ partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source

STRATEGIC OBJECTIVE 2 Strengthen resilience to integrity violations in key processes					
Action/Measures	Responsible unit	Coordinating unit / partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source

STRATEGIC OBJECTIVE 3

Raise quality of participation and involvement of stakeholders in decision making and implementation of integrity measures; support visibility of integrity prevention measures, promote openness and transparency with guaranteed access to public information

Action/Measures	Responsible unit	Coordinating unit/ partnering stakeholders	Deadline for implementation	Success indicators	Financial cost and funding source