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ПРОТИВ КОРУПЦИЈЕ

MANUAL FOR THE INTEGRITY PLAN DEVELOPMENT AND IMPLEMENTATION

Manual for the Integrity Plan Development

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Introduction

The Law on Anti-Corruption Agency prescribes the obligation that all state authorities, organisations, territorial autonomy and local self-government authorities, public services and public enterprises are to adopt their Integrity Plans. In 2011, and in line with the Law, the Agency issued its first Guidelines for development and implementation of Integrity Plan[1]. The Guidelines defines structure of the Integrity Plan, ways to develop it per stages, performance of certain tasks, deadlines for its development, ways to monitor its development and ways to implement the Integrity Plan.

It was for the first time that a new good management mechanism, through Integrity Plan development, was introduced in a systemic manner in the public sector of the Republic of Serbia. Evaluation and critical review of the work of public authorities are still not common practice in their regular functioning, whereas the strict and formal implementation of the regulations is still not sufficient for a creation of functional and corruption-resistant system. Therefore, the adoption of Integrity Plans constitutes a proper way to stress why it is important to deal with good management and with introduction of practices and standards not always prescribed as mandatory, but whose introduction eases, i.e., enables more efficient and quality work of the institutions.

1. Concept, objective and importance of the Integrity Plan

1.1. What is an Integrity Plan?

Confronting corruption represents one of the major challenges of a contemporary society. Corruption is prevented by application of preventive and repressive measures. Prevention thwarts occurrence of corrupt phenomena, whereas repressive measures are applied when the corruption has occurred and its consequences are visible.

One of the ways to reduce scope of corruption is discovering and elimination of risks of occurrence and development of corruption, and not solely corruption as giving and receiving bribes, but corruption in a sense of existence of ethically and professionally not-acceptable actions that might provoke different manifestations of corruption and other irregularities in the operation of institutions.

The Integrity Plan represents a preventive anti-corruption measure. An Integrity Plan represents a document which is being developed as a result of the self-assessment of a degree of institution's exposure to risk of occurrence and development of corruption, and exposure to ethically and professionally not-acceptable acts. The objective of the adoption of the Integrity Plan is to strengthen the integrity of an institution, which implies individual honesty, professionalism, ethics, institutional truthfulness, as well as the way of conduct in line with the moral values. Strengthening the institutional integrity reduces risks that public authorities are being discharged in contravention to their initial intention when established, which then contributes to the improvement of institutional performance quality, and thereby increases public trust in their operations.

1 *Official Gazette of the RS*, no. 80/10.

1.2. Objective and importance of the Integrity Plan adoption

The objective of the Integrity Plan is to ensure an efficient and effective functioning of public and private institutions. That can be achieved through the following actions: simplification of complicated or elimination of unnecessary procedures, overseeing and reducing discretionary rights of managers, monitoring the transparency in work, setting standards, building a more efficient internal control system, eliminating inefficient practices and non-compliance with regulations, creation of such an organisational culture to stimulate accountability, professionalism and ethical conduct of its managers and employees. In order to implement all these actions, prior to the development of the Integrity Plan it is necessary to make an analysis about, *for instance*, complicated or unnecessary procedures, how discretionary rights of managers are reflected and what their consequences are, in which areas the employees need training, which internal enactments, procedure or criteria for actions need to be established and the similar.

The purpose of the Integrity Plan is not to resolve individual corruption cases, but establishment of mechanisms that will eliminate circumstances and reduce risks of corruption and unethical and non-professional actions in all areas of the institution's functioning. A specific objective of the Integrity Plan is to raise awareness of public officials and employees about damaging effects of corruption so as to reach "zero-tolerance for corruption"[2]. When developing Integrity Plan, **an institution is assessing its current risk management measures** in those areas which are by their nature more susceptible to corruption, such as: public procurement, HR management, (recruitment, engagement of persons on the basis of service of contract, contract for performing temporary and periodical jobs, promotion of employees, etc.), signing different types of contacts for procurement of certain goods and services, collection of different types of revenues through taxes and other fiscal and parafiscal impositions, project financing and co-financing, public finance management, issuance of different types of permits, deciding on the rights and interests of the citizens and legal entities and the similar. The assessment of the current measures for corruption risk management represents the first step towards the improvement of the work quality within the selected areas. After that, taking into account the current measures for corruption risk management, and particularly how these measures have been successful in the practice, **the institution assesses a corruption risk intensity in the given area** (and the intensity can be low, moderate or high). The next step represents **planning and introduction of new corruption risk management measures** which degree of urgency directly depends upon the assessed corruption risk intensity; for instance, in the case of the assessed high intensity risk, a deadline for the introduction of new corruption risk management measures is *immediate*, with no delay, and for the low risk intensity, adequate measures may be implemented in the longer period of time.

An important characteristic of the Integrity Plan is that it enables all employees within the institution to take part in its development and implementation, given the fact that the employees know the best how the institution they work for functions. Through their knowledge and experience, they can determine in the best possible way corruption and other irregularities risk intensity, and thereby propose adequate measures and activities for their reduction, i.e. elimination. Being a part of the development process, the employees do not see the Integrity Plan as an imposed document, but rather as their document, which application will contribute towards their better working environment.

2 "Zero tolerance for corruption" means that there are no exceptions when responding to corrupt acts.

2. Basic terms

Certain phenomena that in this context have specific notion and importance will keep on emerging in the course of the development and implementation of the Integrity Plan. It is therefore necessary to introduce these terms at the beginning of the whole process, and understand their meanings which will also ease understanding of certain Integrity Plan development stages and understanding of the overall process.

Integrity: individual honesty, conduct in line with the morale values and principles, institutional integrity, compatibility and consistency in actions.

Risk in the Integrity Plan context: possibility of incurrence of damage due to current or future event which puts the integrity of an institution under threat, i.e., impact on occurrence of corruption, ethically and professionally unacceptable practices and other irregularities; risk intensity is increased due to weaknesses in the institutional functioning, which reflects in poor relegations or lack of regulations, inadequate ways of interpreting and complying with them in practice, poor organisation of work or insufficient experience or knowledge of the employees applying that practice.

Risk impact: the amount of damage per protected public good or value; risk impact can be low, moderate or high.

Risk probability: certainty of damage consequence incurred to a protected public good or value; certainty of risk may be low, moderate or high.

Risk assessment: assessment of the current state of exposure of an institution to a specific risk in a certain area; a risk may be of a low, moderate or high intensity, and it results from the assessment of a **risk impact** and **risk probability**.

Current risk management measure: measure already applied by an institution, which serves to reduce a corruption risks in a certain area.

Improvement measure: measure which, after assessment of current risk management measures, is being planned to additionally reduce corruption risk in a certain area/process.

Activity: actions to be undertaken to implement the improvement measure.

Area: a key area in the functioning of an institution, i.e., in fulfilment of its mandate which due to its nature may be at risk of corruption.

Process: a set of connected activities necessary for functioning within one area, i.e. competence; process is a more specific term than the area, i.e., every area is comprised of a set of connected (risk) processes.

3. Draft (model)[3] Integrity Plan

3.1. Introduction

Draft (model) Integrity Plans should help to develop Integrity Plans in the Republic of Serbia in the second cycle of its development.

The first cycle of Integrity Plans development was materialised on the basis of the models developed in 2011. The first cycle Integrity Plans were adopted by March 31, 2013. Out of the total number of 4483 public authorities in the Republic of Serbia, which, according to the Anti-Corruption Agency, were obliged to develop and adopt their Integrity Plans, the total of 2121 complied with that obligation in the first cycle. The implementation period of the adopted Integrity Plans lasted until March 31, 2015, which means that until the mentioned date all public authorities were obliged to implement their improvement measures envisaged under their Integrity Plans.

3.2. Coordination when drafting and overseeing the implementation of the first cycle of the Integrity Plans

In order to assist the institutions to adopt their Integrity Plans in the first cycle of its development, the Anti-Corruption Agency designed Integrity Plan drafts, i.e. models, adjusted to different types of institutions. That endeavour was finalized by 2011.

The content of draft Integrity Plan was structured in two ways: 1) on the basis of data, proposals and suggestions the Agency was submitted by Working Group members, formed to develop these drafts and 2) on the basis of the data analysis obtained through research for the needs of verification and modifications to the draft Integrity Plans.

Working Groups, comprised of representatives of different state institutions (in total 109 members), took part in the development of Integrity Plan draft, and they were classified into 14 systems: 1) political, 2) judicial, 3) policy, 4) public administration and local self-government, 5) defence, 6) financial, 7) economy and agricultural, 8) social policy, 9) health, 10) education and science, 11) culture and sports, 12) environmental and infrastructural, 13) data, human rights and public interest protection and 14) public enterprise.

Working Group members recognized in cooperation with the Agency, those areas and processes the most exposed to corruption and other irregularities risks. The result of that work was materialized in defined risks and formulated adequate improvement measures for their prevention and elimination. Working Groups were operating in the period from December 2010 until September 2011, organizing meetings and creating tasks for the needs of the content of draft Integrity Plan. So, the risks were defined with the help of the representatives of different institutions which were knowledgeable in mandates and functioning of their respective institutions.

In the period from September 25 until October 31, 2011, the Agency implemented a research in the institutions which representatives were not involved in the work of the Working Group. The research focused on:

- Verification of until then identified risks in term of their recognisability and assessment of level of exposure of that institution to the given risk;
- Verification of the proposed measures for the improvement in sense of the assessment of

3 In the following text of the *Manual*, the terms **model** and **draft** will be used as synonyms.

their success and realizability;

- Modification, i.e., proposal to introduce new risks within each process and self-assessment of the level of exposure to risks;
- Modification, i.e., proposal to introduce new improvement measures for the proposed risks and self-assessment of success and realizability of the proposed measure.

The result of these two processes (work with the Working Groups and researches) is materialized in 69 draft Integrity Plans, which were classified per systems. Each institution used, in line with adequate pertaining system, the draft Integrity Plan intended to such type of institution.

The Agency performed the oversight function within the area of integrity through two types of oversights: quality control of the developed Integrity Plans and oversight over the implementation of the improvement measures and activities envisaged under the Integrity Plans. The importance of the Integrity Plan quality controls reflected in the fact that after each oversight, the Agency developed an oversight report, which contains specific recommendation for the improvement of Integrity Plans, and therefore for the improvement of the institution's integrity which plan was subject to the Agency's oversight. Since the beginning of February until November 15, 2014, the Agency visited 53 institutions from different systems (ministries, courts, centres for social work, gerontological centres, local governments, schools, health-care centres, and others) **in 9 towns, specifically in: Belgrade, Subotica, Zaječar, Užice, Jagodina, Novi Pazar, Niš, Vršac and Požarevac. The total of 53 reports containing the recommendations issued to the mentioned institutions were results of these visits.**

Oversight over the **Integrity Plan implementation was carried out within the visits paid to the institutions sampled from the territory of the whole state and were verified on the spot. Likewise, the verification of the implementation was also made though the reception and processing of the reports on the Integrity Plan implementation, which all institutions were obliged to submit to the Agency no later than September 15, 2015.**

Quality control and oversight over the Integrity Plan implementation played very significant role in the creation of a model Integrity Plan for the second cycle of its development, for the reason that they served for obtaining field information regarding the conditions and functioning of the wider range of the public institutions.

3.3. Development of Integrity Plans for the second cycle

The Anti-Corruption Agency already has information about the areas of the work of public authorities which are the most exposed to the risk of corruption (the list can always be updated and reviewed, which each institution will be able to do through its Integrity Plans), it is aware of the processes that take place within different areas, and takes into account existing measures to manage risk of corruption already implemented when performing their working processes. In that regards, the Integrity Plan development in the second cycle was different from the development of the first cycle Integrity Plans.

The list of different areas and processes identified by Working Groups when developing the model in the course of 2011 was updated with new different areas, mainly identified in the Integrity Plan oversight procedure that the Agency conducted when paying the visits to public authorities, in order, thanks to the interviews with the employees and access to the documentation, gain a better insight into the types of corruption risk management measures they already implement and weather these measures were efficient or not.

The second type of the information the Agency obtained, which helped identify new areas and

new processes, is, at any rate, different types of external analysis focusing on corruption risks the Agency conducted independently from the coordination process and Integrity Plan oversight. That way, for instance, in the process of the development of Integrity Plan for the Pension and Disability Insurance Fund, the Agency used "Report on corruption risks in exercising the right to disability pension" to the great extent. In a number of cases, the Agency also relied on the Report on the Implementation of the National Anti-Corruption Strategy for the period 2013–2018 and the Action plan for its implementation. Likewise, on the basis of the same source of information the Agency collected, primarily in the Integrity Plan quality control procedure and oversight over its implementation, some of risk-prone areas were not enlisted in the second cycle models. The reason thereto lies in the fact that some public entities in some of the areas introduced a set of very precise and detailed risk management measures. Naturally, if they assess that certain area is still not sufficiently covered by protective measures against risk corruption, public authorities may in the course of the development of a new Integrity Plan, assess risks in the given area and give adequate measures in line with the methodology for plan development, which will be discussed later in this Manual.

Thanks to these changes, the Agency, in the second cycle of the Integrity Plan development, developed **42 models** to serve as basis for the development of public authority Integrity Plans. Every institution shall, in line with the system they belong to, use adequate draft Integrity Plan, intended for a specific type of institution. For instance, five drafts were developed for the *Educational System*:

1. *Ministry of Education, Science and Technological Development;*
2. *High Educational Institution (faculties, academies and colleagues);*
3. *Elementary and Secondary Schools;*
4. *Preschool institutions;*
5. *Institutes for pupils' and students' standard.*

Besides the differences in the processes for model Integrity Plan development between the first and the second cycle, the difference is also observed in their contents. Now, a draft (model) Integrity Plan contains new elements such as: current measures for corruption risk management, corruption risk assessment (low, moderate and high intensity risk), risk factor – "impact" (low, moderate and high), risk factor – "probability " (low, moderate, high), implementation of the measures for the improvement of corruption risk management. The content of model is also adjusted to the changes made to the methodology related to corruption risk intensity assessment process in certain working process that take place within the area particularly exposed to corruption risk. The Methodology will be separately and thoroughly explained in the part of the Manual dedicated to description of each Integrity Plan development stage.

For the needs of the development of a new Integrity Plan cycle, the Anti-Corruption Agency has designed a new software that will be accessible to all public authorities, and will be also used for the needs of reporting in the Integrity Plan implementation.

3.4. Contents of a draft (model) Integrity Plan

A draft (model) Integrity Plan contains areas recognized in the process described in the previous part as the areas most exposed to corruption and other irregularities risks. In the process of the development of a model, the identified areas are divided in the following way:

1. Common areas;
2. Specific areas.

Common areas are the areas that no institution would be able to function properly without, and which are common for the whole public sector. **Specific areas** refer to the specific competencies of an institution, fulfilment of their social function, i.e. function that institution was founded for. **Processes** indispensable for their performance are identified in every area, and the current risk management measures are defined within each process, and employees and Working Groups in the institution shall agree whether these measures within the specific process are to be implemented/are not to be implemented, i.e. whether these measures already exist/ do not exist.

Common areas of the Integrity Plan contain the following areas:

- Human resource management;
- Public resources and public financial management;
- Ethics and integrity;
- Information-technology security.

Specific areas refer to the specific competences of each individual institution, i.e., one type of identical institutions. For instance:

Educational system
Type of institution: elementary and secondary schools;
Area: teaching and learning;
Process: distribution of class load.

Specific areas are mentioned in the draft (model) Integrity Plans for those institutions and types of institutions for which the data were obtained in the previous cycle of the Integrity Plan development and on the basis of the data gathered in the oversight procedure over the developed Integrity Plans. That does not mean that the list of different areas / processes deemed to be exposed to corruption and other irregularity risks in their operation is final. The way to identify and technically add different areas / processes and measures will be discussed in the following text of the Manual.

4. Which institutions are to develop their Integrity Plans?

The following entities are obliged to adopt Integrity Plans:

- State authorities and organisations;
- Territorial autonomy and local self-government authorities;
- Public services (for instance: institutions of culture, education, science, physical culture, of pupils and students, health-care, social welfare, social care for children, social insurance, environmental protection...);
- Public enterprises.

If an institution performs its competences through its organisational units (local office, branch offices…), every one of them shall adopt its own Integrity Plan.

Other legal entities may adopt Integrity Plan in line with the "Guidelines for the Integrity Plan development and implementation".

For the needs of adoption and implementation of Integrity Plans, the Anti-Corruption Agency has formed the records of reporting entities, i.e., the list of the institutions obliged under the law to develop and adopt Integrity Plans, and it can be found at the web page of the Agency (http://www.acas.rs/plan-integriteta/).

5. Integrity Plan development

Integrity Plan development represents a systemic process and is performed through the following stages:

- preparatory stage;
- state of affairs assessment stage;
- final stage, i.e., planning of measures for the improvement of integrity with the elements indispensable for the fulfilment of these measures (deadlines, responsible person).

Keeping or adoption of certain enactments is envisaged in each of the stages. For the needs of the Integrity Plans development, the Agency developed the models of these enactments, which form integral part of this Manual in the form of its annexes. Certain models of these enactments are also available in the software application which serves for the Integrity Plan development.

6. Preparatory stage

In the course of the preparatory stage, a head of an institution adopts a decision to appoint a Working Group for the development of Integrity Plan.

Model decision on the appointment of the Working Group for the development of the Integrity Plan: Annex no. 1

Such Working Group is comprised of 5 to 7 members depending on the complexity of an institution and the number of its employees. If an institution has up to 10 or 15 employees, the Working Group may have 3 members, and if it has more than 1000 employees, then a Working Group should have at least 7 members. Working Group members should be from the critical areas of institution's functioning (finance, procurement, HR service, office of a head of the institution, service in connection with the fulfilment of jurisdiction), from different positions and seniority.

Working Group has its own **coordinator.**

In the course of the Integrity Plan development, particularly when it comes to the assessment of the institution's exposure to risks, it is advisable to involve the employees not being a part of the Working Group, but who can offer to the Working Group valuable information on functioning of the area subject to assessment in order to make such assessment as objective and of good quality as possible (*for instance, if you assess risks in the area of the information technology (IT) security of the institution, and no Working Group member is from that area, it would be necessary to involve the employees from that area so as to make assessment of the area's exposure to risks in an objective and quality fashion*).

Upon its establishment, the Working Group designs the program for Integrity Plan development.

The programme contains tasks and duties the Working Group members would perform per stages, information on responsible person to perform these tasks and pertaining deadlines for their implementation.

Model programme for the Integrity Plan development: Annex no. 2

Minutes are to be developed about every meeting held.

Model minutes of the Working Group *meeting: Annex no. 3*

The Working Group, together with a head of the institution, has the obligation to present to its employees the term, objective, importance and way to develop its Integrity Plan.

The Working Group may present to the employees the development of the Integrity Plan by:

- Organizing a staff meeting (for an institution with a small number of the employees);
- Posting the notification on a visible place in the institution;
- Sending the notification to all employees via email;
- Organising sectoral meetings (for an institution with a large number of the employees).

Model notification to the employees: Annex no. 4

7. Current state of affairs analysis stage

The second stage is dedicated to the assessment of the current state of affairs of a public authority's (institution's) exposure to corruption and other irregularities risks. Depending on the way, quality and objective level of the current state of affairs assessment, the institution will generate its Integrity Plan in the following document development stages.

In order to conduct an objective and quality current state of affairs assessment, two steps are to be taken:

1. Assessment of the current state of affairs on the basis of the questionnaire completed by the employees;
2. Assessment of the current state of affairs made by the appointed Working Group.

In different stages of their engagement in the course of the assessment of the current state of affairs, the employees and Working Group respond to the questions describing the current state of affairs of institution's functioning, i.e., to the question concerning the existence or nonexistence of the current risk management measures. These measures represent a legal, HR or practical framework, and their character is such that merely their existence reduces corruption and other irregularities risks and vice-versa – lack of these measures creates an enabling environment for corruption and other irregularities. Due to the importance of this stage, i.e., to the importance to provide an objective answer to questions describing the current risk management measures, the employees and Working Group answer to the same questions, whereby the consistency and reliability of the data serving for assessment of the current state of affair is ensured.

7.1. Assessment of current state of affairs based on the questionnaires completed by employees

The first step of the assessment of the current state of affairs is the questionnaire completed by the employees. The questionnaire is a significant tool for assessment, because all generated results are used when assessing the current state of affair of institution's exposure to corruption risks. At the same time, the questionnaire represents an oversight mechanism since it is used to reduce excessive deviation from objective, realistic state of affairs (the way the employees see it) and assessment made by the Working Group. Completing the questionnaire, which is very important, offers a possibility to the employees to actively take part in the development of the Integrity Plan of their institution and to, via this activity, learn about the content of the document, which areas it encompasses, what the corruption risk management measures are and so forth.

It is important that before questionnaire completing, a head of the institution together with the Working Group present to the employees all goals and ways to develop the Integrity Plan, to stress the importance to objectively complete the questionnaire and explain the way to complete it. It is important to mention that completing the questionnaire is **anonymous,** as well as that a head of the intuition or Working Group members cannot influence the way the employees will complete the questionnaire, or to have any insight in the course of its completion.

One of the common issues in the previous cycle of the Integrity Plan development was related to the optimum number of the employees that should complete the questionnaire in order to obtain relevant results. The general answer reads: *the higher the number of the employees completing the questionnaire, the result would be more reliable for the very institution*. However, reliability of results depends upon the size of the institution, i.e., the number of its employees. If an institution has only 10 employees, it is important that all or at least majority of them complete the questionnaire, because a statistical reliability, i.e., accuracy also depends upon the total number of examinees against which the percentage of answers will be calculated. If, for instance, it concerns institution with 100 to 1000 employees, that percentage may even be up to 10%. It is important to ensure in big systems, i.e., where questionnaire is to be completed by a small number of the employees, that employees from all organisational units complete the questionnaire, i.e., the employees who are working in each of the areas subject to the specific model Integrity Plan.

Another issue which used to cause doubts in the previous Integrity Plan development stage is whether every employee shall complete the questionnaire for each area of the institution's functioning, i.e., for every area and process. The answer is "no", because it cannot be expected that an employee in charge of a certain competence of the institution in a specific area knows well, for instance, financial management or public procurement. **The employees shall complete the questionnaire in the areas they believe they know well and can give an objective observation regarding the current state of affairs**. It is necessary when one process „is opened", they entirely complete the process, i.e., to answer all question so that the programme would save all information.

Through the software application, an employee is enabled to complete the questionnaire **electronically, i.e., via Internet,** by accessing the Agency's server. All costs are thereby reduced, as well as surveying time, and a large sample of the employees is being processed and quantitative data processing is eased since the questionnaires, at the time of completion, are automatically entered into the programme which then calculates the results. All employees can, on the basis of a unique user's name the institution obtains from the Agency, access the Agency's server and start completing the questionnaire. It is necessary to inform all employees about their duty and deadline to complete the questionnaire, as well as about the user's name to access the questionnaire. It is possible to complete the questionnaire from any computer, even outside the institution, within the envisaged deadline as of

the day the model Integrity Plan is launched. After the expiry of the envisaged deadline, electronic completing of the questionnaire shall no longer be possible. All completed questionnaires are statistically and electronically processed, and the results are automatically made available to the Working Group, when it starts with its work. The Working Group analyses the obtained statistics and uses them for the final risk assessment per areas of institution's functioning.

If a management of your institution wants to complete the questionnaire manually, it can also be done, but in a different format than the one provided previously. In that case, it is also important to ensure that completing the questionnaire is anonymous. One of the ways to do so it to organize questionnaire completing with different representative groups of examinees in the conference room or send it electronically to your employees and set the place to submit their completed questionnaires. It is advisable not to extend the deadline, given the fact that the purpose of the questionnaire's results is to have them used by the Working Group, which should objectively assess and evaluate exposure of the institution.

Instructions for the employees to complete the questionnaire: Annex no. 5

7.2. Assessment of current state of affairs made by an appointed Working Group

The second step of the assessment of the current state of affairs of the corruption and other irregularities risk exposure is the development of the Integrity Plan using the electronic application, which starts after the deadline for questionnaire completing expires. Deadlines for questionnaire completing and deadlines for Integrity Plan development are successive – one stage cannot be initiated until the previous one ends, and the institutions will get additional information in that regards.

On the basis of the user's account and password your institution received via email or in writing, the Working Group may log in to the link containing all draft Integrity Plans. The instruction for the Working Groups in the application is given as a separate part of this Manual.

Guidance on the technical approach to develop the Integrity Plan: Annex no. 6

The Working Group may in several occasions log in to the system using its user's account and password and access the software application of the draft Integrity Plan. The Integrity Plan application is designed in a way that the Working Group has a possibility to independently select which area will be subject to the assessment first. In the course of the assessment process of that area, the Working Group conducts interviews with the employees who know the processes necessary for the functioning of the given area, which may help them in their more objective assessment. The computer application enables storing the assessed processes of that area, whereas the other may be assessed later, which means that there is no need to assess all areas at once. The Working Groups that way assesses all areas until the end of its draft (model) Integrity Plan.

The process and the course of the assessment of the current state of affairs, i.e., corruption risk and corruption risks intensity assessment will be explained in the continuation of this part, and that constitutes the vital part for the Integrity Plan development.

In the course of the assessment of the current state of affairs, it is necessary to understand properly the term of manifestation of corruption, i.e., the term of corruption risk.

Within the context of the Integrity Plan, corruption needs to be understood in a broader sense

than this phenomenon is colloquially and in the most often cases understood, and that is as a criminal and legal term. Below, we will describe some of the most common and broadly understood manifestations of corruption, so that the Working Group assessing the current state of affair always keeps in mind all mentioned meanings and is able to recognize whether there are circumstances and possibilities that might lead to occurrence of any of these known manifestations within the specific process. One should take into account that no legal provisions regarding the manifestations of corruptions are quoted here, but the classification is of working, more descriptive character, adjusted to better understanding of the corruption context when developing the Integrity Plan. These descriptions are used in some of the international documents.[4]

1. **Bribery / giving and receiving bribery –** informal payments in goods, money and services solicited from or offered to civil servants for the work or services that should be anyhow performed or provided, i.e., for the work or services that should not be performed or provided. It is often the case that bribery giving or offering is identified with corruption, despite the fact that it is just one of the manifestations of corruption. In many languages, corruption is a synonym for bribery.
2. **Conflict of interest –** circumstances under which private interests impact on or may seem to impact on a direct and objective discharge of public duties; situations in which some individual faces with choice between his/her duty, i.e. request his/her position entails and his/her private interests.
3. **Embezzlement –** theft or use of public funds, equipment and resources regularly used for working operations for one's private purposes.
4. **Trade of influence –** sale of influence in the process of decision-making for the benefit of third parties.
5. **Stake/Commission –** a supplier gives a bribe to get the job (directly or indirectly or using a go-between) to a public servant / official who makes a decision on awarding or job.
6. **Extortion –** threat with a use of force or other forms of intimidation so as to get a material benefit.
7. **Self-engagement** – encompasses the practice to hire one's own company or a company owned by close relatives or friends of a civil servant / public official for the purpose of public services provision; it may represent one of the forms of conflict of interests.
8. **Services –** exchange or services is a form of corruption very hard to be discovered and suppressed. Mutual exchange of services is manifested in a large number of forms, including business activities, permits/certificates, employment, provision of educational and health-care services.
9. **Political corruption –** appointment or selection of heads of public institutions (directors of public enterprises, members of supervisory and managing boards, and similar) in exchange for political support, influencing over the appointed employees (heads and officials) when making decision and similar.

Identifying the areas and processes particularly exposed to corruption and other irregularities risks

How can we identify **the risk-prone areas or processes that may form part of the Integrity Plan**? These are, for instance, areas and processes that have the following characteristics:

4 T*ools for assessing corruption & integrity in institutions: Handbook*, USAID, pp. 11–12, http://pdf.usaid.gov/pdf_docs/PNADF529.pdf), [accessed on 10. 10. 2015].

- Setting the rights and obligations of both natural persons and legal entities, and particularly issuance of decisions, certificates and other document of importance for the attainment of rights and obligations;
- Payments to third parties (subsidies, donations, premiums, loans, sponsorships);
- Payment to employees (premiums, bonuses, compensations, borrowings);
- Generation of revenues (fiscal and parafiscal levies, fees);
- Information management, and particularly with confidential information;
- Contracting which is not regulated under the public procurement, i.e., contracting with third persons so as to set mutual rights and obligations;
- Compliance with the law in the broadest sense of its meaning, such as oversight, monitoring and determining accountability for (non) compliance with the laws.

The Working Group may identify risk-prone process in different ways: during the interviews with heads and employees, using questionnaires completed by heads and employees, from documents developed on the basis of the oversight over the work of the institution, on the basis of internal or external complaints filed against the work of the institution and the similar.

These are just some of the examples, i.e., characteristics of potentially risk-prone areas and processes the institution may identify in its work.

Assessment of the current state of affairs, i.e., assessment of corruption risks of the institution can be made in the following way:
1. by the analysis of the current risk management measures
2. by the assessment of the corruption risk intensity.

The Working Group primarily answers to the questions given within the filed "**Current risk management measures "**.

The current measures represent something that is already in place within the institution, which can be deemed a certain type of a barrier for the occurrence of some form of corruption or any other irregularity within the specific process. The current measures may be, for instance: a) existence of a general or a specific enactment or document, b) existence of a certain procedure, i.e., in advance prescribed and clear action / procedure when performing certain working process, c) qualifications, knowledge, experience or integrity of the employees performing certain activities, d) existence and application of clear and in advance known criteria when making decisions, e) existence and application of mechanisms to limit discretionary right, f) existence and application of mechanisms to ensure transparent work and openness of the work of the institution outwards and so forth.

After answering all questions, i.e., assessing the status of the current risk management measures mentioned within the drat (model) Integrity Plan, the Working Group may **also** add **other measures** existing in the institution within the implementation of the processes, which are already on the list. Measures need to be defined in an affirmative form (for instance, "Advertisement for employment is published on the website of the institution ").

When the assessment of the current measures mentioned in the draft (model) and those which are possibly added is completed, the Working Group answers to additional questions within the **"Risk Assessment"** field. It concerns the questions related to the degree of impact (severity of the damaging consequence) and degree of probability that within the current context, i.e., within the current corruption risk management measures, corruption risk occurs or not.

We will further analyse in the text below how the corruption **risk intensity assessment is made**.

When the Working Group assesses the risk intensity in terms of the existing risk management measure (and those possibly added), it has to take into account the following:

1. Is the existing measure being *implemented*?
2. If so, does it achieve the *expected effects*?

What does that specifically mean? In the course of the analysis of the current measure, the Working Group may learn that there *is* adopted internal enactment which in one part, for instance, regulates action of the employees in the course of decision-making processes. However, the Working Group must analyse whether that enactment is really being applied and whether it attains *expected effects*. If the enactment was adopted, but is not being applied or is partially applied and insufficiently clear to those who need to apply it, such a measure cannot be deemed as "risk management measure ".

1. The first question to assess corruption risk intensity reads: **What impact (damage) per public good (budget, public resource, trust the citizens have in your institution) may be caused by one or several forms of corruption and other irregularities in the given process if you take into account the current risk management measures in that area (including measures for the ethics and integrity areas) in force in your institution?**

The possible answers may read: impact (i.e. severity of the damage) is **small, moderate** or **big.** What does that specifically mean? It means that, if there is any corruption form within the specific working process, a damage per public good (good in the broadest sense of that word – material resources, quality of process performance, trust in the institution...) may be small, moderate or big. In what way it is possible to assess the scope of the damage? It may be done in different ways. Besides the fact that one should take into account the efficiency of the current measures within the specific process, the most important for damage assessment, i.e., assessment of damages inflicted by corruption is in the **character** of the risk-prone process. Below, we present several examples.

a) The bigger the amount of material damage inflicted in the misuse within the process of public funds management, the higher the impact factor gets, for the reason that the potential damage is bigger. The example for this is the public procurement area, i.e., the value the public procurements have in each specific institution – the bigger the value of the public funds that might be misused, the higher the impact/damage factor must be, i.e., it cannot be said that it is "small".

b) Further on, the damage must not always have material dimension, because the damage may be manifested in the spread of a certain phenomenon – for instance, a number of persons the consequences of some poorly regulated process may impact on. For instance, in certain manifestations of corruption or irregularity there should be no material damage in terms of misuse of public funds. However, if a large number of service beneficiaries of some institutions will be injured, disappointed or unsatisfied, the impact factor – potential damage will be bigger. The example for this may be those processes wherein the different rights and obligations of citizen are being decided.

c) Finally, a damage may be reduction or loss of trust in the wok of the institution. Bribery receiving in certain cases, for instance, does not imply misuse of public office or damage for large number of other service beneficiaries. However, if a certain process is of a such character to enable a possibility to receive a bribery, and at the same time there is no optimum number of the existing measures to prevent such practice, the impact factor shall be assessed as big or at least as moderate.

2. Another issue within this risk intensity assessment stage reads: **What is the probability (certainty) that one or several forms of corruption will occur in this process if you take into account the current risk management measures within this area (including measures from the area of ethics and integrity) in force in your institution?**

The possible answers may read: probability (certainty) factor is **small, moderate** or **high.** What does that specifically mean? In this case, it is necessary to analyse the probability in terms of *certainty of damage infliction* if the corruption or some other irregularity occurs, and taking into account all responses to the current measures, as well as other circumstances under which the institution is operating, which are not described under the current measures (for instance, legal framework, relationship with other institutions, level of work oversight, etc.). Depending upon all these factors, the Working Group assesses whether the probability for corruption occurrence in the specific process is small, moderate or high. It is very important to make an objective assessment, in that sense that if an institution does not possess efficient risk management measures, the probability factor is determined as **high** and vice versa.

Depending of the answer to the previous two questions, the software application shall in line with the principle of so-called "temperature map" automatically assess a risk intensity for the entire process offering three possible options: **risk of a low, risk of a moderate and risk of a high intensity**. Low, moderate and high impact, as well as low, moderate and high probability are arithmetically marked with grades 1, 2, or 3. Risk intensity, depending upon the product, may be 1 or 2 (low intensity risk), 3 or 4 (moderate intensity risk) and 6 or 9 (high intensity risk), as outlined in the table below, which shall not be displayed as such in the application, but shall be in the basis of this risk assessment system.

Figure 1 „Temperature Map" of the intensity of risk as a result of impact factors and probability factors

IMPACT FACTOR (HARM)	**High**	3	3	6	9
	Moderate	2	2	4	6
	Low	1	1	2	3
RISK INTENSITY (result of impact and probability)			1	2	3
			Low	**Moderate**	**High**
			PROBABILITY FACTOR (certainty)		

In this way, classification of risks according to intensity is generated: a) risks that require urgent introduction of new measures and their implementation, b) risks that require moderate introduction of measures and c) risks that require the introduction of measures during the implementation period of the Integrity Plan.

If the risk intensity is **high**, the *red colour* in measures that are automatically listed as improvement measures shall indicate to the Working Group and the institution that it is necessary to implement them as soon as possible and without delay.

If the risk intensity is **moderate**, that means that it is necessary to implement the measures in the moderate term but without undue delay, which will be presented to the Working Group and the Head of the institution in *orange* listed improvement measures.

If the risk intensity is **low**, that will be presented in *green* improvement measures, which means that measures need to be implemented no later than within three years, or within the period of validity and implementation of the Integrity Plan.

Different degree of urgency of the measures does not mean that some are necessary to be

undertaken, while the others are not. As soon as the improvement measures emerged in the Integrity Plan, they need to be implemented, only in different periods.

At each stage of risk assessment – at the level of areas, processes within the areas or at the level of improvement measures - **the Working Group has the opportunity to amend the Integrity Plan with the areas / processes / measures that are not part of the model, but that from the standpoint of practice and needs of the institution are required as such to be part of the Integrity Plan**. Working Group in this case should formulate areas / processes / measures and act accordingly in the further stages (detailed explanation in the Manual under the sub-title "Identifying the areas and processes particularly exposed to corruption and other irregularities risks ").

If for any reason the institution does not implement some of the processes from the Integrity Plan model, there is an option for that process to be "de-activated", i.e., not to assess the intensity of risk in it. The Working Group should carefully analyse the content of each process and the authority of the institution within this process before selecting this option, in order not to unduly avoid risk self-assessment in the processes that the institution nonetheless implements in a way. Technical manner of "deactivation" of a risk-prone process will be discussed in more detail in the technical instructions for the Working Group operation.

Assessment in the area of ethics and integrity

Area **Ethics and integrity** is a specific common area of risk assessment - its specificity stems from the significance and importance of this area for the overall functioning of the institution. Measures from the area of ethics and integrity are "contained" in each work process that is carried out in the institution. If the institution does not have measures related to the area of ethics and integrity, other areas and processes, regardless of them being well regulated, may be insufficiently resistant to corruption. Conversely, the existence and implementation of measures from the area of ethics and integrity may boost resistance to corruption and other irregularities in the given process, even though other measures for risk management are missing.

When the Working Group assesses the intensity of risk in other areas / processes, it should constantly bear in mind the current measures in the field of ethics and integrity and accordingly "correct" and objectify the current measures in all other areas; in particular, if there is no or only a small number of current measures in the field of ethics and integrity, regardless that, for example, there are a large number of current measures in the area of public finance management, it is undue that assessment of the impact and probability, i.e., assessment of risk intensity in public finance management be "small" / "low", because due to the absence of ethics and integrity measures this area would none the less be susceptible to corruption.

We encourage each institution to start from the area of ethics and integrity in the assessment of current measures and the risk intensity in the Integrity Plan. **Bearing in mind the significance and character of the current risk management measures in this area, the institution does not perform the risk intensity assessment (does not answer to questions about impact and probability factors), but only performs analysis of the current measures.**

8. Final stage - improvement measures for the corruption risk managing

Depending on how the Working Group assessed the risk intensity, the institution should implement appropriate measures or the implementation of those measures should eliminate the risks of

occurrence of corruption and other irregularities that infringe the integrity of the institution.

After the risk intensity assessment, software application will automatically generate the **improvement measures for corruption risk management** that should be implemented during the validity period of the Integrity Plan, covering three years.

Draft (model) Integrity Plan is designed so that the Working Group can add other improvement measures that it considers necessary to be implemented within a working process, in order to reduce the risk of corruption or other irregularities. That not only is possible, but it is also highly desirable, since the draft (model) cannot include everything that could be encountered in the daily, operational functioning of each institution!

The Working Group, in cooperation with a Head of the institution and other employees, should determine other two important elements of the Integrity Plan:

1. **Deadline for the implementation of measure**

Deadlines for the implementation of measures should be set in accordance with the urgency (intensity) of measures, or in accordance with whether the risk is of low, moderate or high intensity.

Deadlines can be set in two ways:

1.1. By specifying a deadline for the type of measures that are of such a character that sustains such a deadline (for example, 31.12.2016 as a deadline for the adoption of an internal act).
1.2. By selecting a periodic deadline for implementing measures, for the measures which are of such a character that their implementation is conducted periodically (for example, define a deadline as "quarterly" if you assess that it is an adequate period for the submission of the report as an improvement measure).

2. **Responsible person**

It is necessary that the Working Group, in cooperation with the manager and in consultation with other employees, record position, work post and function of the person who will be responsible for implementing the measures. It is possible to appoint several persons for the implementation of the improvement measure, if the measure requires so.

The deadline and the responsible person shall be recorded also for the automatically generated ("listed") improvement measures and the improvement measures defined by the Working Group itself.

Upon the termination of the work on the Integrity Plan, the Working Group shall prepare the final report.

Final Report Model: Annex no. 7

A Head of the institution shall issue a decision adopting the developed Integrity Plan, dissolving the Working Group and appointing a person responsible for monitoring the implementation of planned improvement measures stated in the Integrity Plan.

The decision on the establishment of the Working Groups, as well as the decision on the adoption of the Integrity Plan, or forms of these documents, can be downloaded from the software application in order to later "pin" them on the application, in a manner that will be described in the technical instructions for the Working Group.

Model of the Decision on the adoption of the Integrity Plan: Annex no. 8

The deadline for the assessment of the risks intensity stated in the draft Integrity Plan shall be no later than by the deadline that will be determined later. After that deadline, this stage shall be locked and the Working Group will not be able to access it.

9. Reporting on the implementation of measures for the risk management from the Integrity Plan

A novelty in the second cycle of the development and implementation of Integrity Plans is that the software application will also allow reporting on implemented improvement measures, after the expiry of the deadline for their implementation, which the Agency will set subsequently and notify thereof all persons subject to the Integrity Plans.

A specific deadline for the implementation of improvement measures from its own Integrity Plan will be available to the institution. Subsequently, and within the provided time frame, the institution will be required to report on the implemented measures, or the outcome of their implementation in one of two general categories of answer: "**measure is implemented**" or "**measure has not been implemented**." Besides these general answers, the institutions will be offered certain types of explanations (subcategories) for these two main groups of answers.

For the measures that have been implemented, possible answers shall read as follows:

1. The measure was implemented in due time;
2. The measure was implemented after the deadline;
3. The measure has been implemented periodically.

For measures that have not been implemented, possible answers shall read as follows:

1. The measure has not been implemented due to inadequate management of the process;
2. The measure has not been implemented due to inadequate management of the institution;
3. The measure has not been implemented due to lack of human resources;
4. The measure has not been implemented due to lack of material resources;
5. The measure has not been implemented for other reasons;
6. The measure has not been implemented because the deadline for implementation of the measure has not yet been reached.

For those reporting on the implementation of measures, it is important to distinguish between *inadequate management of the process* and *inadequate management of the institution*. The first reason places the responsibility on managers and/or employees in individual organizational units of the institution who, for whatever reason, failed to take appropriate action to comply with the measure. The other reason indicates that the failure to comply with the measure is the responsibility of a Head of the institution who, for whatever reason, did not provide for the activities leading to the compliance with the measures to be fully implemented.

Reporting on the implementation of measures shall be carried out in the application, by selecting already offered answers, as described in the "Guidelines for reporting on the implementation of measures" included as annex no. 9 in the Manual.

Reporting in the application is a required stage, subsequent to the implementation of the measures from the Integrity Plan.

10. Monitoring and supervision of the Integrity Plans

The Agency shall monitor and supervise the development and implementation of the Integrity Plan in the institutions, by the direct control in the institution and the analysis of the report on the implementation that institution will also submit to the Agency through the software application, in the period following three years after the implementation of the measures from the Integrity Plan.

Supervision includes the following questions and areas:

- Question: Is the development of the Plan in progress or is the Integrity Plan developed in accordance with the "Guidelines"?;
- Quality assessment and objectivity of the developed Integrity Plan;
- Implementation of measures from the plan of integrity improvement measures.

A report on the oversight shall be prepared.

Based on all the developed Integrity Plans, the Agency will be able to monitor the causes, the occurrence and the modification of risks in areas defined in the draft Integrity Plans across systems and to provide recommendations for preventing corruption and other irregularities.

Annex No. 1 – Model of the Decision on the appointment of the Working Group for the Integrity Plan development

Name of the institution: _____
Number: _____
Date: _____
Place: _____

Pursuant to Article 59 of the Law on Anti-Corruption Agency (*Off. Gazette of RS*, No. 97/2008 and 53/2010) and Article ___ of the "Guidelines/Instructions for the development and implementation of Integrity Plan" (*Off. Gazette of RS*, no. _____) and _____, a Head of the institution hereby adopts the following

Decision

1. To appoint a Working Group for the Integrity Plan development, in accordance with the Guidelines for the Integrity Plan development and implementation , in the following composition:

- Coordinator: _____(name and surname), _____(workplace)
- Member of the Working Group: _____(name and surname)

- Person for the supervision of the Integrity Plan development: _____ (name and surname)

2. The Working Group shall prepare a program for the Integrity Plan development, inform employees about the purpose, significance and manner of IP development; assess the current state of the exposure and the resistance of work processes in the areas of institution functioning, and analyse the existing measures for corruption risk management; assess the intensity of the risk of corruption; propose deadlines and persons responsible for the implementation of improvement measures that reduce the risk of corruption; inform employees about the situation in the institution by assessing corruption risk intensity and implementation plan for improvement measures. Working Group may involve other employees of the institution in the Integrity Plan development.

3. The Working Group shall finish the Integrity Plan development no later than _____.

4. Person responsible for the adoption of Integrity Plan is _____.
(Head of the Institution)

5. This decision shall enter into force on the day of its adoption.

Explanation

Article 59 of the Law on Anti-Corruption Agency (Off. Gazette of RS, No. 97/2008 and 53/2010) stipulates the obligation of the state authorities and organizations, territorial autonomy and local self-government authorities, public services and public enterprises to adopt their own Integrity Plans. The provisions of Article ___ of the "Guidelines/Instructions for the Integrity Plan development and implementation " (Off. Gazette of RS, No. _____) provide that a Head of the institution shall pass a decision on the development and implementation of Integrity Plan and appoint coordinator, members of the Working Group and the person responsible for the supervision of the Integrity Plan development.

Integrity Plan is a document that represents the result of the self-assessment of institution's exposure to the risks of occurrence and development of corruption, as well as the risks of ethically and professionally unacceptable practices. The purpose of the Integrity Plan is to maintain and improve the integrity of the institution by simplifying procedures, strengthening accountability, control of discretionary powers, education, strengthening ethics, establishing an effective system of control and elimination of inefficient practices.

The purpose of the adoption of the Integrity Plan is to create an institutional mechanism that prevents or reduces the intensity of the risks that the public authorities are performed contrary to the purpose of their establishment, and improves the efficiency and effectiveness of the institution's operations.

The Working Group shall prepare the institution's Integrity Plan based on the adopted and published draft Integrity Plan drawn up by the Anti-Corruption Agency.

(Head of the Institution)

_____

To be delivered to:

- Members of the Working Group
- Anti-Corruption Agency
- Archives

Annex No. 2 – Integrity Plan development and implementation program

Institution:

Responsible person:

Members of the Working Group:

Date of adoption:

Starting date:

1. STAGE

No.	DEVELOPMENT STAGES	ACTIVITY	RESPONSIBLE PERSON	DATE OF THE MEETING	DEADLINE
1	PREPARATORY STAGE	A Head passes the Decision on the appointment of the Working Group	*(Head)*		
2		The Working Group prepares the Integrity Plan development and implementation program	*(Working Group)*		
3		Informing the employees about the Integrity Plan	*(Working Group and the Head)*		

2. STAGE

No.	DEVELOPMENT STAGES	MEASURE / ACTIVITY	RESPONSIBLE PERSON	DATE OF THE MEETING	DEADLINE
1	STAGE OF ASSESSMENT AND EVALUATION OF THE CURRENT STATE OF AFFAIRS – EXPOSURE EVALUATION	Completing the questionnaire	*(Working Group)*		
2		Development of Integrity Plan in the software application	*(Working Group)*		

3. STAGE

No.	DEVELOPMENT STAGES	MEASURE / ACTIVITY	RESPONSIBLE PERSON	DATE OF THE MEETING	DEADLINE
1	PLAN OF INTEGRITY IMPROVEMENT MEASURES	Introducing to the employees existing measures and improvement measures that will be implemented within the Integrity Plan	*(Head)*		
2		Drafting of final report	*(Working Group)*		
3		Dissolution of the Working Group and the adoption of the Integrity Plan	*(Head)*		
4		The appointment of the person responsible for the implementation of the Integrity Plan	*(Head)*		

Annex No. 3 – Minutes of the meeting of the Working Group for Integrity Plan development

Date of the meeting:

Venue:

Present:

Not present:

The meeting began at _____ hours.

Agenda:

Date of the next meeting _____

The meeting concluded at _____ hours.

Working Group Coordinator

Annex No. 4 – Notice to the employees

Dear Colleagues,

We are hereby informing you that _____ (name of the institution) started developing its Integrity Plan.

The deadline for development of the Integrity Plan is _____.

The Law on the Anti-Corruption Agency stipulates the obligation of all the state authorities and organizations, territorial autonomy and local self-government authorities, public services and public enterprises to adopt Integrity Plans in line with the "Guidelines/Instructions for their development and implementation " developed by the Agency.

What is the Integrity Plan?

Integrity Plan is a document that represents the result of the self-assessment of institution's exposure to the risks of occurrence and development of corruption and other irregularities.

The purpose of the Integrity Plan is to establish a mechanism that will ensure the efficient and effective functioning of institution by strengthening accountability, simplifying complicated procedures, increasing transparency in decision-making, controlling discretionary powers, strengthening ethics, eliminating inefficient practices and inapplicable regulations, introducing efficient system of supervision and control.

Integrity Plan development shall be carried out in three stages.

The first stage is the preparatory stage in which a Head of the institution shall pass a decision on the development and implementation of the Integrity Plan and shall appoint a coordinator, members of the Working Group and a person responsible for monitoring. The plan for program development shall be prepared.

The second stage concerns the assessment of the current state of affairs and the resistance of work processes and relations in the areas of institution functioning to the risk of the occurrence and development of ethically and professionally unacceptable practices, corruption and other irregularities. Assessment stage includes determining the existence of appropriate measures to eliminate the risk of corruption, involving employees in the institution as well.

The third stage or the final stage is designed to determine the measures, deadlines and persons responsible for the implementation of the measures.

Following the adoption of the Integrity Plan, Head of the institution shall appoint a person responsible for its implementation; the responsible person monitors the process, efficiency and results of implementation of the proposed measures for improving the integrity of the institution.

On _____, we initiated the first stage of Integrity Plan development, by adopting the decision on the Integrity Plan development and implementation and appointment of the members of the Working Group. Appointed members of the Working Group are:

-
-
-
-

The Working Group shall prepare a program for Integrity Plan development, inform employees about the purpose, significance and manner of the Integrity Plan development; evaluate the current state of the exposure and the resistance of the working processes in the areas of institution functioning.

In the evaluation stage of the institution's exposure to the risks of occurrence and development of corruption and other irregularities, and when proposing additional appropriate measures and activities to reduce and eliminate the identified risks, the Working Group coordinator may include employees from the areas of institution functioning that are assessed at a given time.

In developing the Integrity Plan, it is important to provide for the participation of employees due to the fact that they know the functioning of the work processes they are performing and they can in the best way assess the risks and propose adequate measures for their prevention and elimination.

During the second stage, the employees and officials shall complete an anonymous questionnaire in a manner that will be determined later.

(place and date)

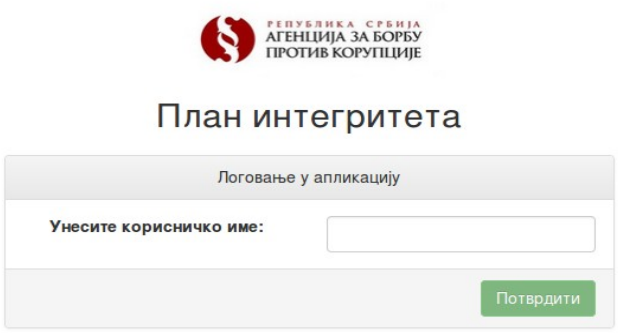
Annex No. 5 – Completing the questionnaire - instructions for employees

Step 1. Connecting (logging) to the application

On the website of the Anti-Corruption Agency (www.acas.rs) in the part „Integrity Plan“ (address: http://www.acas.rs/plan-integriteta/) there is a link through which you shall login to the software application that contains the questionnaire for employees.

The page, which is due to open after you have clicked on the link, looks like the image below. You should enter a **unique user name**, which your institution received from the Anti-Corruption Agency. Make sure to enter correctly the user name because otherwise the program will not allow you to transfer to the next page.

After entering the user name, choose the option "Confirm".

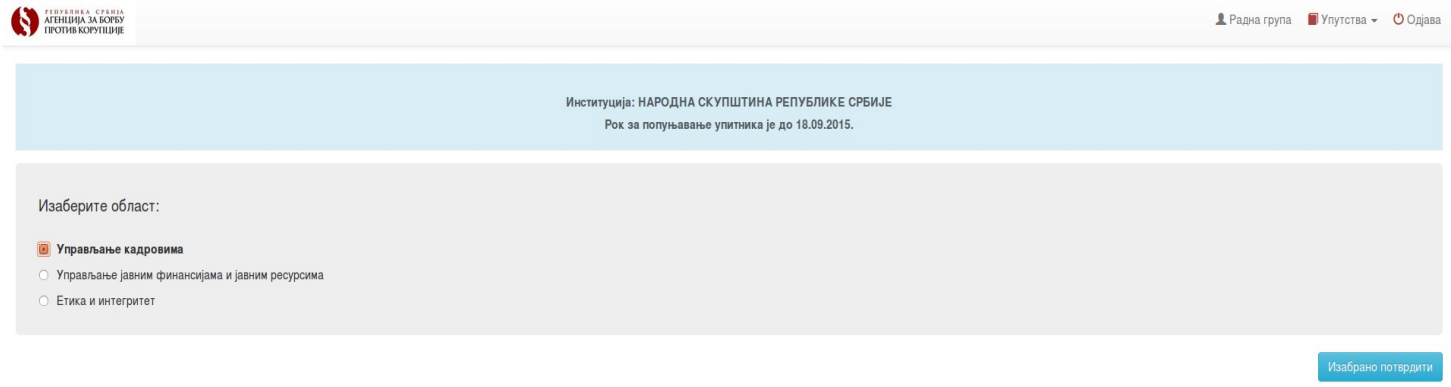


Step 2. Opening the page with the areas covered by the draft Integrity Plan

If you correctly entered the user name of your institution, you will open a page as shown below. When you mark the circle ("click on it") before the name of the area and then click the option "Confirm the selected", a new page with the processes pertaining to this area shall open.

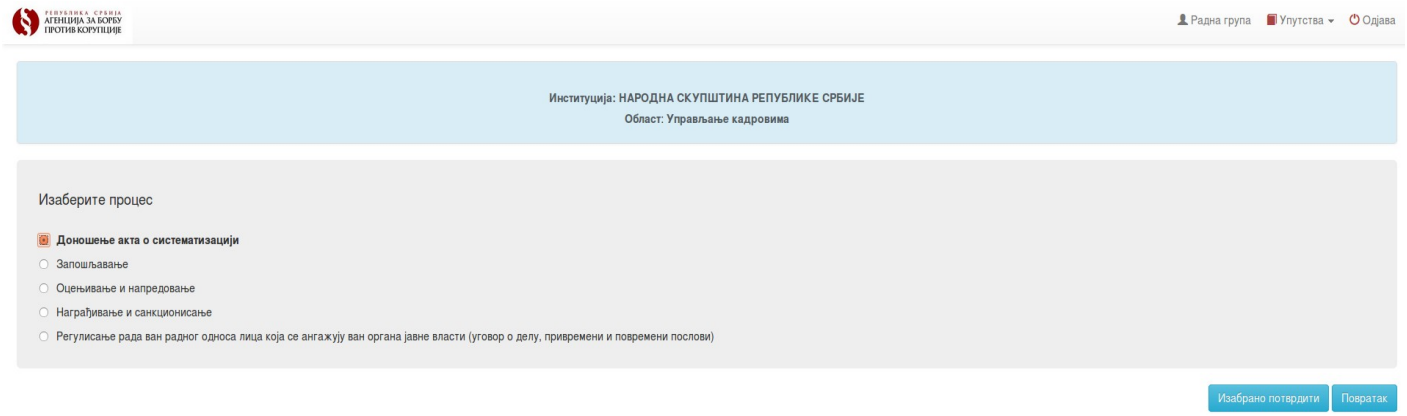
At the top of the page appears the name of your institution and the deadline for completing the questionnaire. *In the figure below the name of the institution and the deadline are given as illustration, as these elements shall be determined later.*

In the upper right corner, there is a Heading "Working Group" activated by the Working Group when it begins its work, after the employees finish completing the questionnaire. Under the Heading "Instructions", you can find manuals and instructions related to the Integrity Plan development. Under the Heading "Logout", you are exiting the application - this option is present on every page of the program, so you can use it if you want to stop completing the questionnaire for any reason.



Step 3. Opening the page with the processes within each individual area

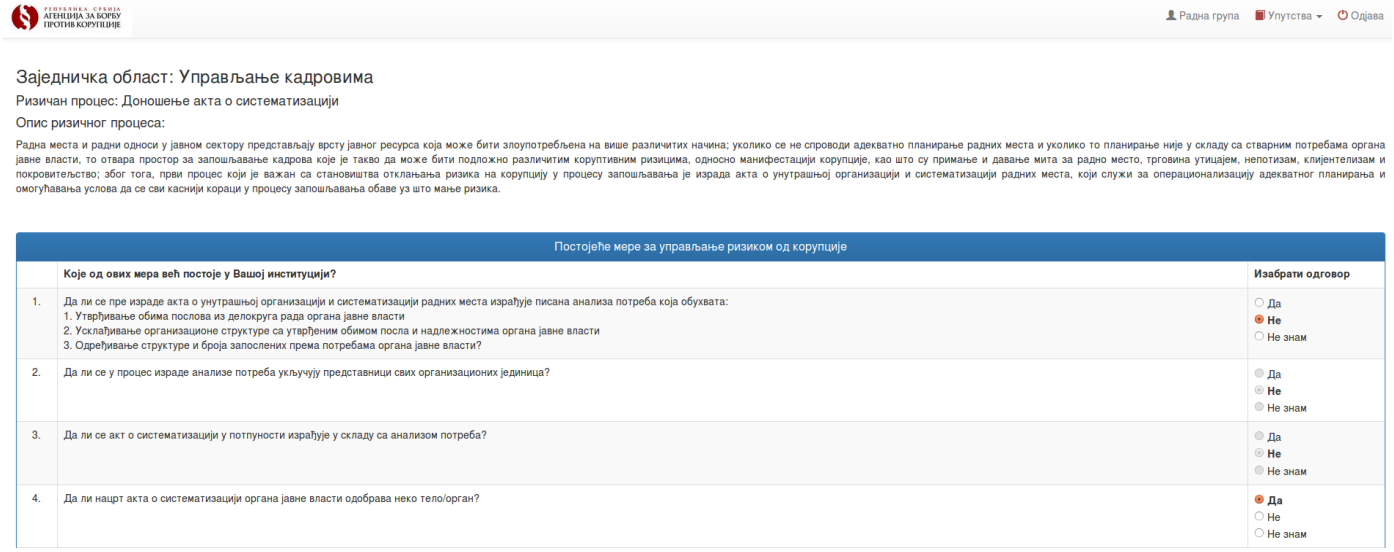
Pre-selection of the area opens a page with lists of risk-prone processes, from which under the same principle – by "clicking" on the circle before the title of the process and by "clicking" the option "Confirm the selected" - questionnaire for the specific process is opened. If for any reason, you wish to return to the previous page, where there are areas of the Integrity Plan model, select option "Back".



Step 4. Opening the page with the questionnaire and completing the questionnaire on the existing measures for corruption risk management

After opening the questionnaire (step 3) by selecting and confirming one of the processes, it is necessary that each employee before completing the questionnaire read the description of the risk-prone process (see figure below), in order to understand where in this process risks of corruption and other irregularities are reflected. After that, employees respond to each question by "clicking" on the circle before one of the three offered answers. If in the course of completing the questionnaire employees change their minds, they can do so by clicking on another answer.

If a question contains several elements (for example, the first question in the illustration below where three elements that an existing measure contain are listed under 1, 2 and 3), all the elements need to be met in order for the answer to the question to be affirmative. If only one element is missing, the answer should be negative, or the employee should choose the option "do not know" if there is no sufficient information.

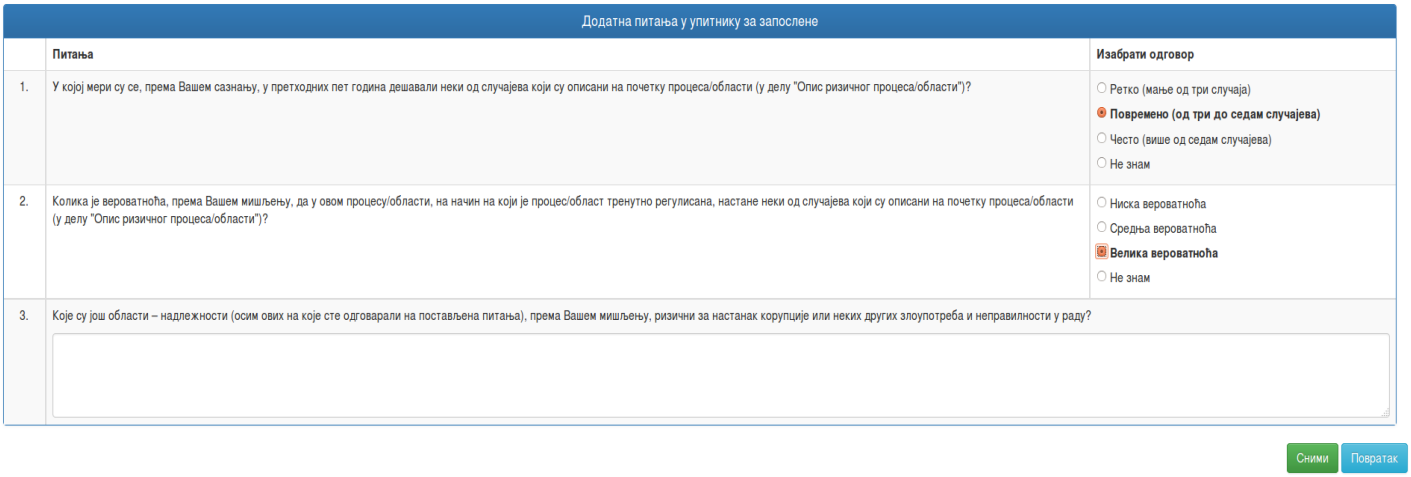


Step 5. Continuation of the previous figure (images at step 4 and 5 appear on the same page of the application)

At the end of the page with the existing measures for risk management, there are two additional questions that need to be completed. These are the questions relating to the knowledge of employees about corruption events, however not only corruption but also other irregularities that may have occurred in the particular process. If an employee does not have such knowledge, or does not want to respond to these questions, he/she should choose the option "do not know".

The last question in the part of the questionnaire is "What other areas - competencies (other than those for which you have responded to questions), in your opinion, are subject to the risk of corruption or other abuses and irregularities in the work?". The answer to this question is optional, and should be of completely free form, i.e. the employee who wants to answer this question formulates the answer at his/her discretion, by entering it in the appropriate box below the question.

After completing the questionnaire, the option "Save" needs to be chosen, after which the completed questionnaire shall be stored in the database on the Agency server.

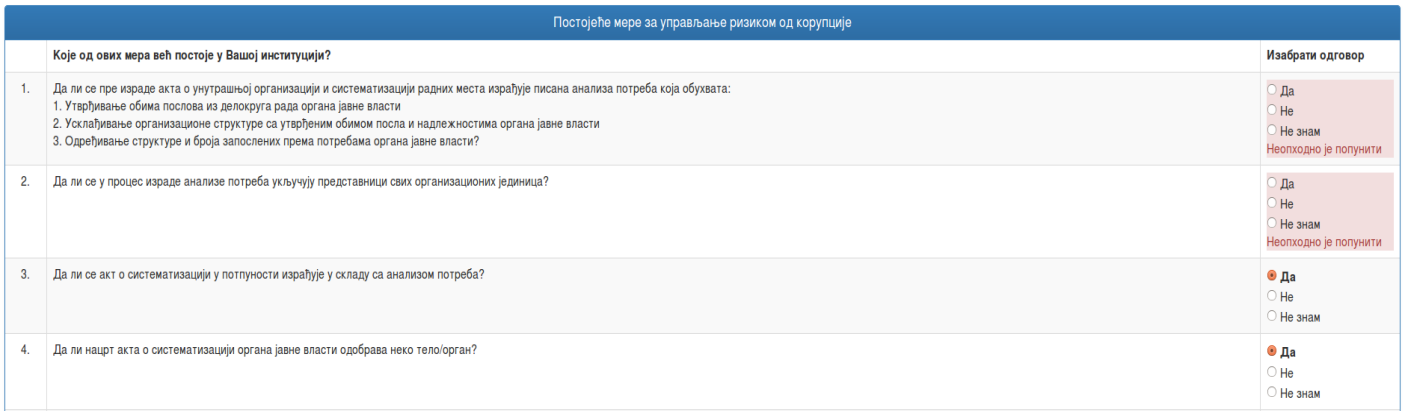


Додатна питања у упитнику за запослене

	Питања	Изабрати одговор
1.	У којој мери су се, према Вашем сазнању, у претходних пет година дешавали неки од случајева који су описани на почетку процеса/области (у делу "Опис ризичног процеса/области")?	○ Ретко (мање од три случаја) ● **Повремено (од три до седам случајева)** ○ Често (више од седам случајева) ○ Не знам
2.	Колика је вероватноћа, према Вашем мишљењу, да у овом процесу/области, на начин на који је процес/област тренутно регулисана, настане неки од случајева који су описани на почетку процеса/области (у делу "Опис ризичног процеса/области")?	○ Ниска вероватноћа ○ Средња вероватноћа ● **Велика вероватноћа** ○ Не знам
3.	Које су још области – надлежности (осим ових на које сте одговарали на постављена питања), према Вашем мишљењу, ризични за настанак корупције или неких других злоупотреба и неправилности у раду?	

Сними Повратак

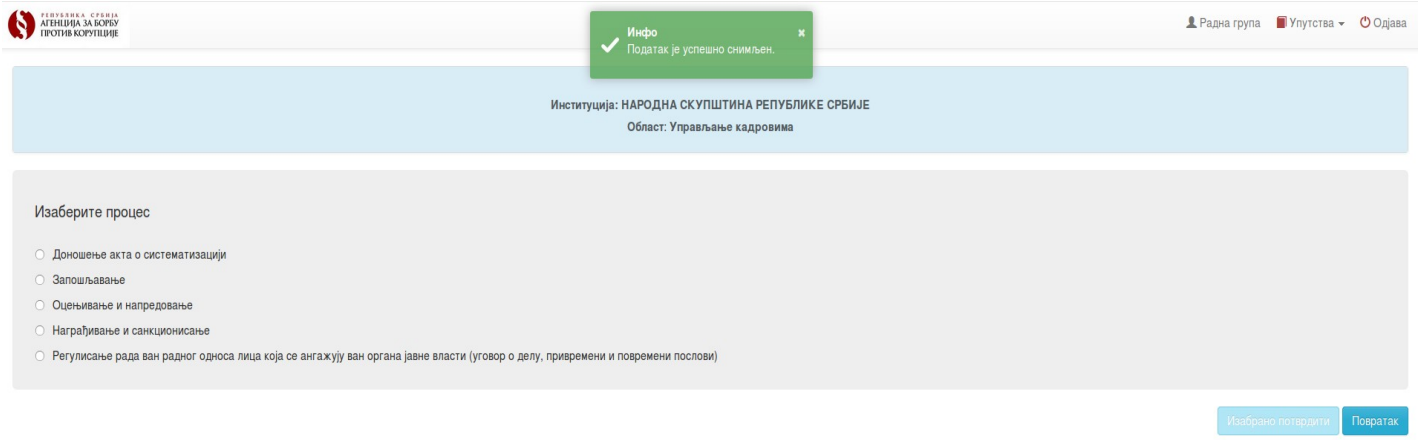
If a question is not answered, a message appears with each unanswered question, such as shown in the figure below. In that case, it is necessary to answer the remaining questions, and then again select option "Save".



Постојеће мере за управљање ризиком од корупције

	Које од ових мера већ постоје у Вашој институцији?	Изабрати одговор
1.	Да ли се пре израде акта о унутрашњој организацији и систематизацији радних места израђује писана анализа потреба која обухвата: 1. Утврђивање обима послова из делокруга рада органа јавне власти 2. Усклађивање организационе структуре са утврђеним обимом посла и надлежностима органа јавне власти 3. Одређивање структуре и броја запослених према потребама органа јавне власти?	○ Да ○ Не ○ Не знам Неопходно је попунити
2.	Да ли се у процес израде анализе потреба укључују представници свих организационих јединица?	○ Да ○ Не ○ Не знам Неопходно је попунити
3.	Да ли се акт о систематизацији у потпуности израђује у складу са анализом потреба?	● **Да** ○ Не ○ Не знам
4.	Да ли нацрт акта о систематизацији органа јавне власти одобрава неко тело/орган?	● **Да** ○ Не ○ Не знам

Returning to the page with the list of all processes and info message "Data successfully saved" constitutes the confirmation that the questionnaire for each particular process is properly completed and stored, as shown in the figure below.



After that, the employee may choose another process within the same area, return to the list of areas (by "clicking" the option "Return"), and select the processes within the context of another area or logout from the application.

Each employee can subsequently return to the application and continue filling in the questionnaire against the processes, i.e. it is not necessary to do so within one login.

It is important to stress that each employee fills in the questionnaire **only once.**

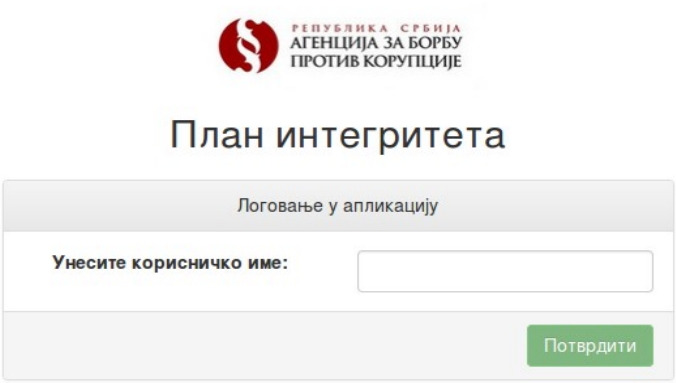
Annex No. 6 – Integrity Plan Development – Guidance for the Working Group

Step 1. Connecting (logging) to the application – entering user name

On the website of the Anti-Corruption Agency (www.acas.rs) in the part ”Integrity Plan“ (address: http://www.acas.rs/plan-integriteta/) there is a link through which you shall login to the software application that contains the draft (model) Integrity Plan for your institution.

The page, which is due to open after you have clicked on the link, looks like the image below. You should enter a **unique user name**, which your institution received from the Anti-Corruption Agency by electronic mail or otherwise. Make sure to enter correctly the user name because otherwise the program will not allow you to transfer to the next page.

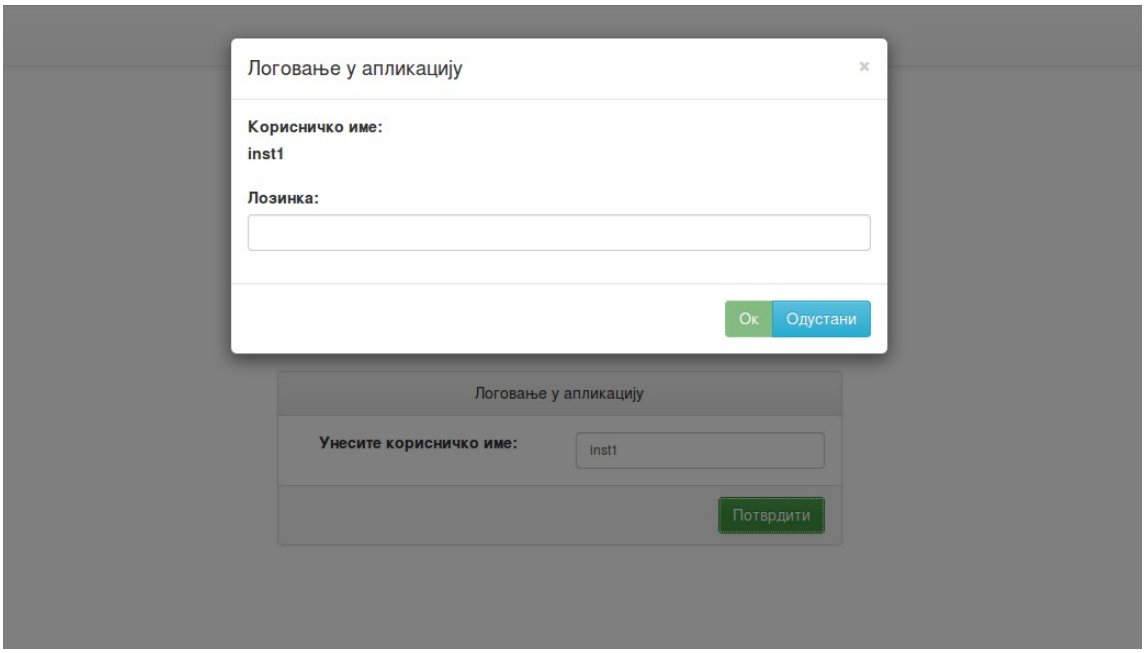
After entering the user name, choose the option "Confirm".



Step 2. Connecting (logging) to the application – entering the password

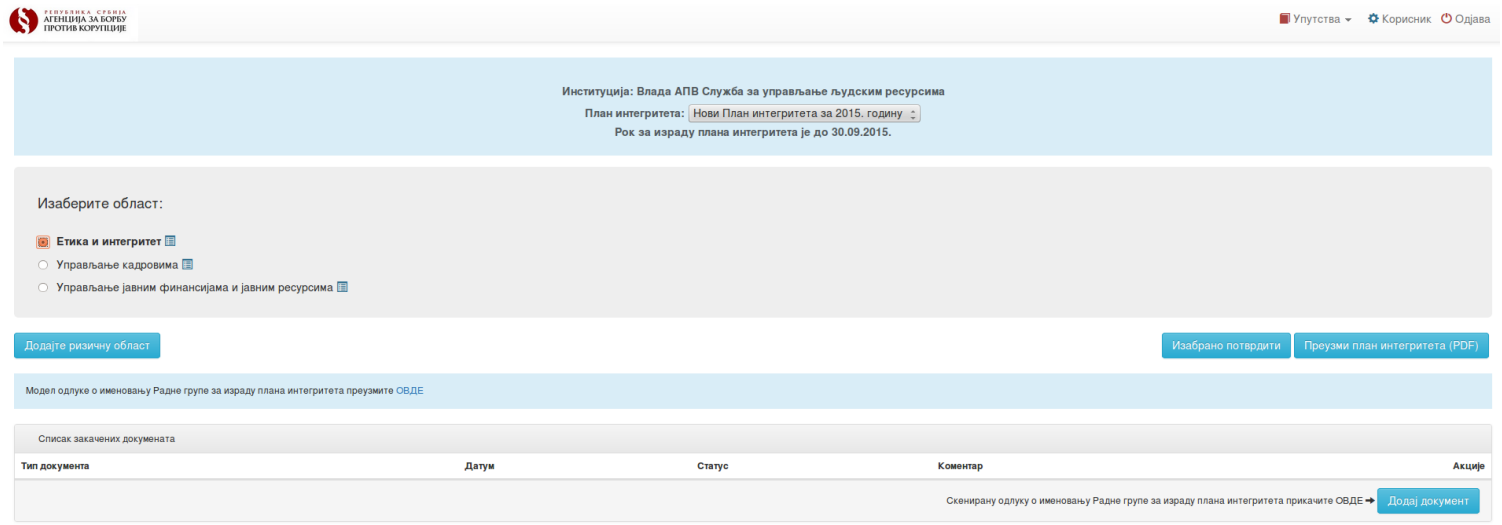
If you typed the correct assigned user name, the program will open a special section ("window") where it is necessary to enter the password of your institution and confirm it by clicking "Ok". If for any reason, you wish to close this window, or to go back, you can do so by selecting "Cancel".

Make sure that the password is only available to the Working Group members and you should not share it with others outside the group, because it can lead into the Integrity Plan of your institution.



Step 3. Opening the page with the list of areas contained in the Integrity Plan model[5]

If you entered the correct password, it will open the home page of the application with areas that your institution should assess within its Integrity Plan.



Beside the list of the areas, on this page there is also:

- Model of the decision on the appointment of the Working Group, which you can download on

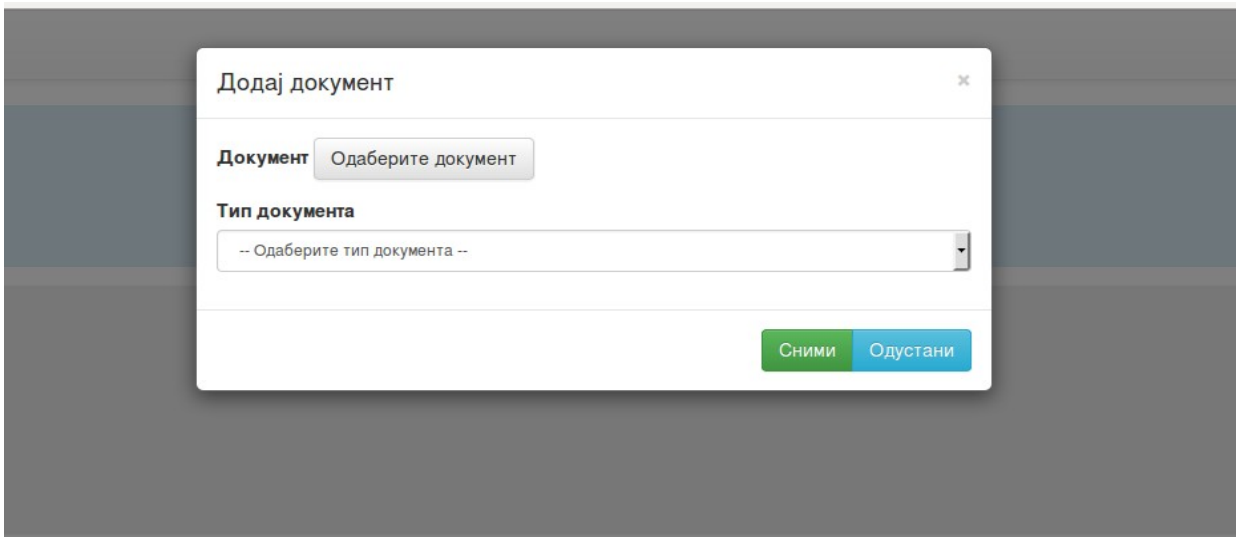
5 Note: "The name of the institution " "The deadline for the Integrity Plan Development" and other elements are created in the so-called "demo" version of the application (trial version) and they do not represent the final and operational layout of the deadlines, the institution name, the names of all areas and the like, because this version of the application was made for the manual development purposes.

your computer and use it as a form for adopting the decision in your institution.

Signed and scanned decision of your institution needs to be "uploaded" or "attached" to the application, because in the event that there is no decision on the appointment of the Working Group the program will not allow further work in the application. The Agency can access this page, check and mark the status of your decision (e.g. to put a comment if a wrong document is "attached", etc.).

Step 4. „Uploading" the decision on the establishment of the Working Group

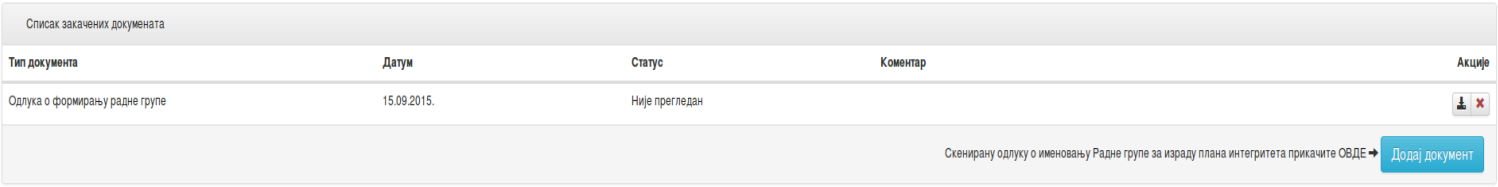
To add a scanned decision, it is necessary to "click" in the right lower corner of the option "Add a document". After that, a small "window" will open. In this window, click on the "Choose document" option. After you have selected the correct document from your computer, click on the drop-down menu "Select a type of document" and select the option "Decision on the establishment of the Working Group." Finally, click on "Download" as shown in the figure below.



Step 5. Example of a successfully attached decision

If you have successfully attached the document - decision on the establishment of the Working

Group - in the "List of attached documents" an information shall appear that the document is attached and the date when it was done. This step is important, because not only that the application will not allow further work in the Integrity Plan model, but the posted decision on the establishment of the Working Group is also the indicator and the proof that your institution has started the process of Integrity Plan development.



IMPORTANT: Although the institutions in the previous cycle of Integrity Plan development delivered to the Agency their decision on the establishment of the Working Group by mail, this time it is not necessary, because it is possible to deliver this document via the application.

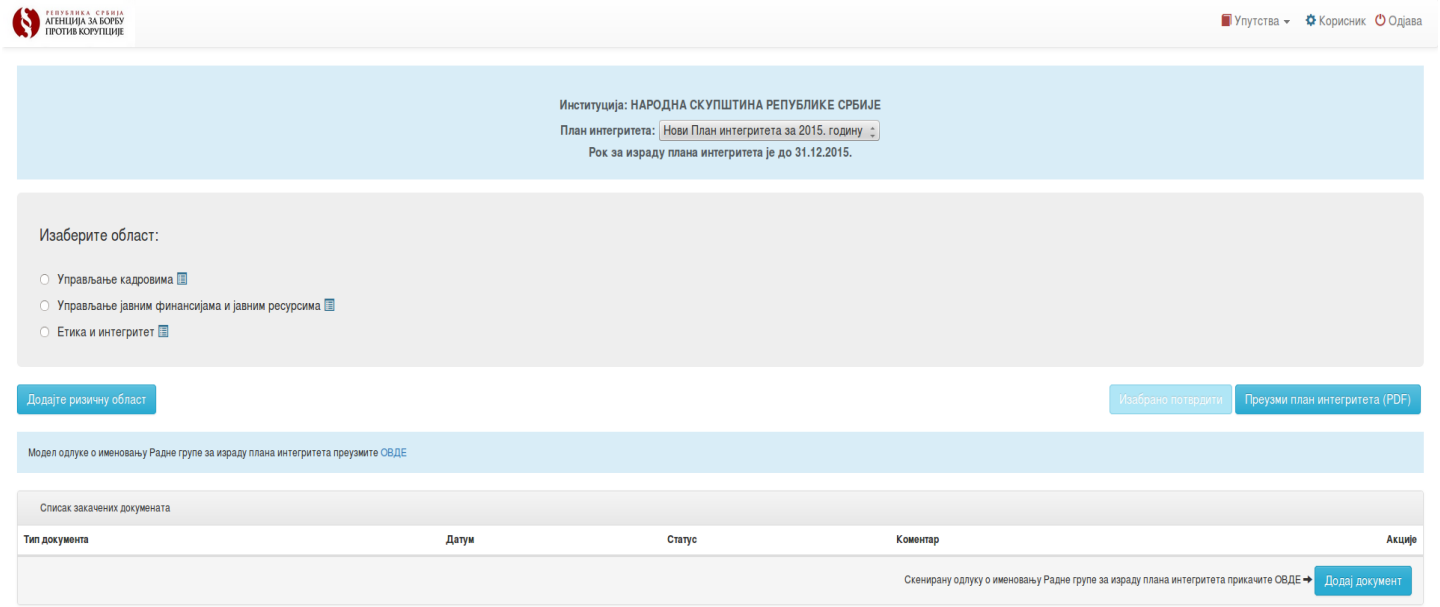
Fields "Status" and "Comment" in the figure above are reserved for the Agency to complete them. In the field "Actions", by clicking on the first mark you can download the decision, if you have, for example, lost it. By clicking on the second mark (X), you can delete the attached decision, in case, for example, you have attached the wrong document.

According to the note on the character and importance of the area of **ethics and integrity**, which was presented in the previous parts of the Manual, it is recommended that the Working Group initially perform analysis and respond to the questions about the current measures in this area.

When the Working Group assesses the intensity of risk in other areas / processes, it should constantly bear in mind the current measures in the field of ethics and integrity and accordingly "correct" and objectify the current measures in all other areas; in particular, if there is no or only a small number of current measures in the field of ethics and integrity, regardless that, for example, there are a large number of current measures in the area of public finance management, it is undue that assessment of the impact and probability, i.e. assessment of risk intensity in public finance management be "small" / "low", because due to the absence of ethics and integrity measures this area would none the less be susceptible to corruption.

Besides, we need to remind the Working Group that in the field of ethics and integrity it **shall not perform the assessment of the risk intensity, or the assessment of impact factors and the probability of occurrence of corruption, but only an analysis of the current measures**. This is an exception to the rule when it comes to the areas - for all others, the analysis of current measures and assessment of the risk intensity shall be performed in a way that will be described hereinafter.

Let us now look at the layout of the window shown in the figure under *Step 3.*



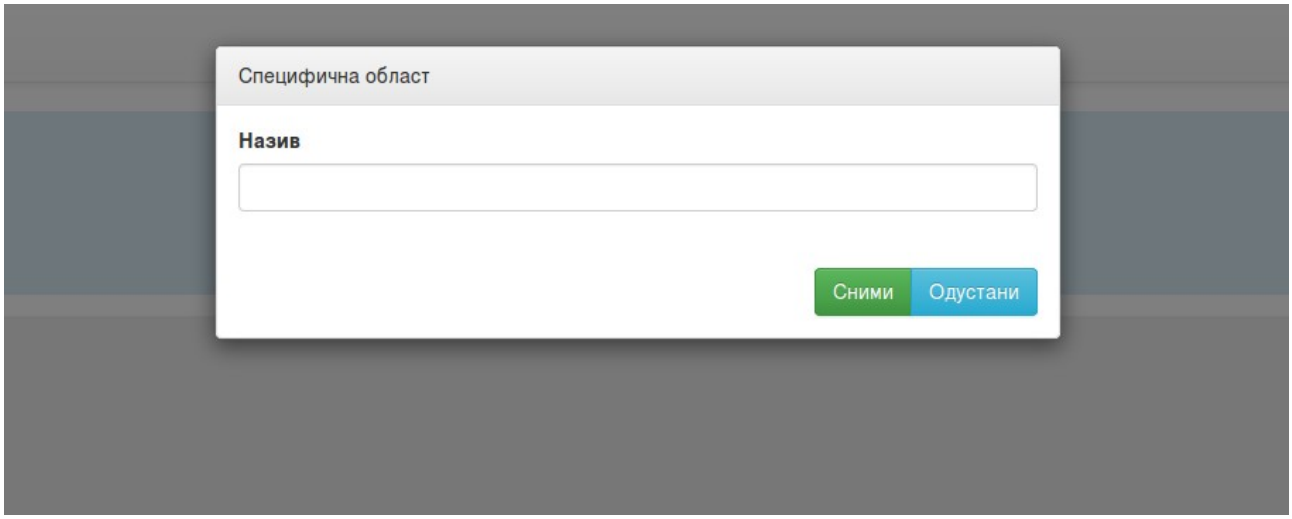
This page also includes:

- Areas that need to be chosen, or evaluated; selection of the area is made by "clicking" on the circle in front of the area name, and then selecting the option "Confirm the selected", when you want to go to a specific area.
- On this page, you have the option to download your complete Integrity Plan in PDF format, but only after you finish, or after you evaluate all risk-prone areas and processes in your Integrity Plan. If this is not done, the program will alert you with warning info messages that you have not assessed all areas and processes.
- The possibility of adding new areas (see step 6).
- Heading "Instructions" (upper right corner) where you can download all the necessary instructions for Integrity Plan development. In that corner, there is also the option "Logout", used when you want to exit your Integrity Plan.

Step 6. Adding new areas to the Integrity Plan

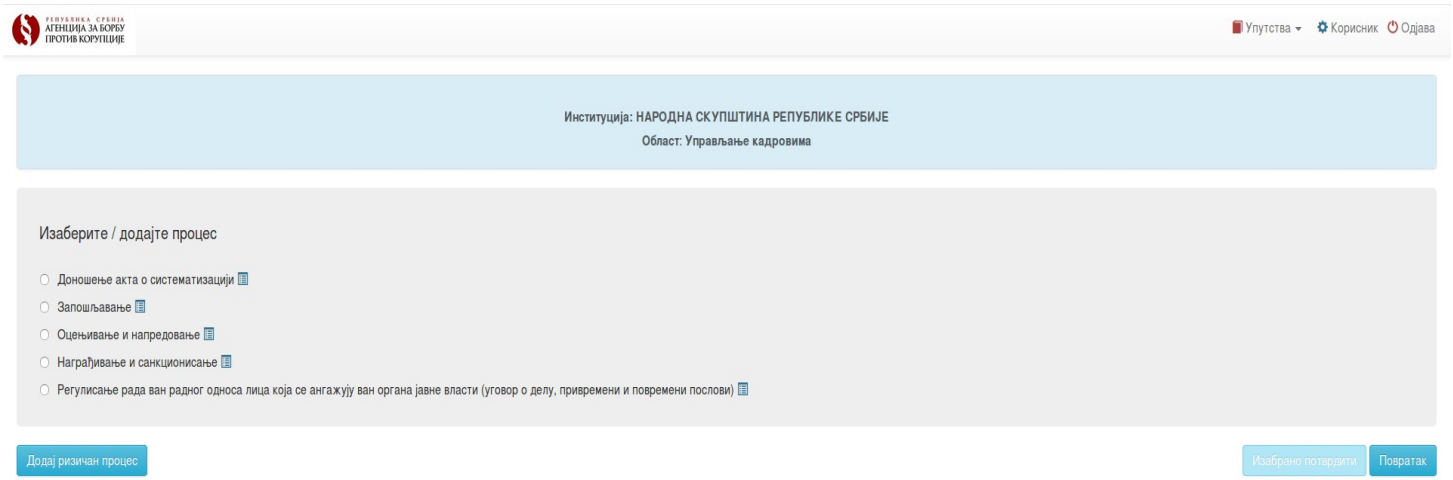
If you consider it necessary to add some more areas, you can do that by "clicking" on the option "Add a risk-prone area." After that, a separate window will open in which you need to type the name of the area, which you can define, or formulate yourself.

After entering the name of the new area, you can choose the option "Save" or "Cancel".



Step 7. Opening the page with the list of processes contained in the Integrity Plan model

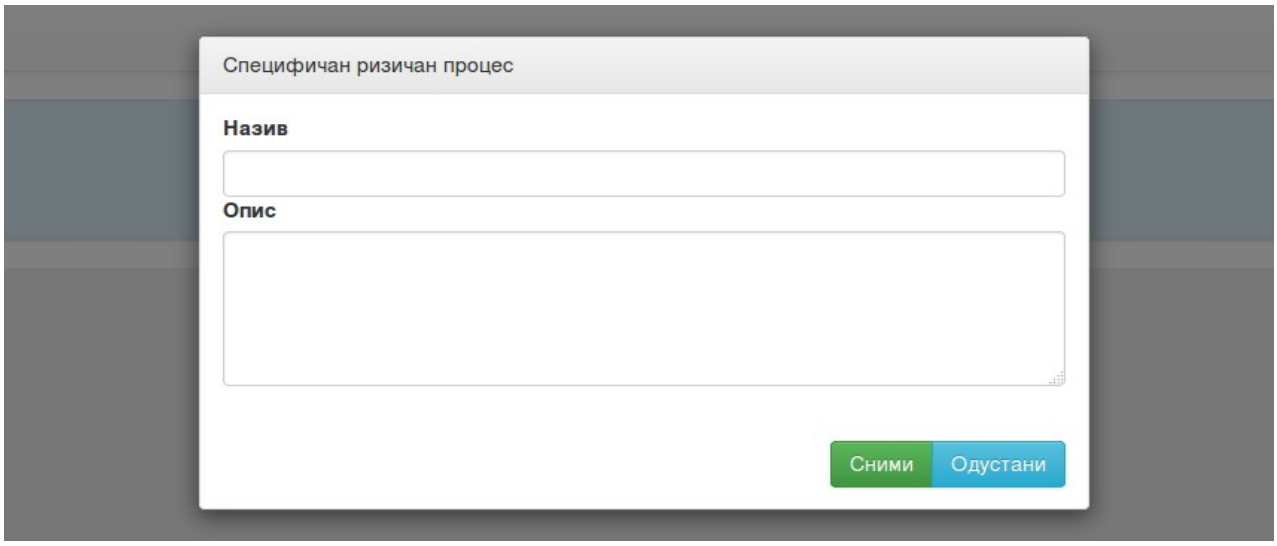
If you selected one area, such as "Human Resources Management", a page will open, containing the processes identified by the Agency during the development of the model as risk-prone for this area.



At this stage also, the Working Group can add another process within the area, which is considered to be risk-prone for the occurrence of corruption. To do this, you need to click the option "Add a risk-prone process" (see Step 8).

Step 8. Adding new processes within the area

When you click the option "Add a risk-prone process," the following window will open:



If the Working Group decides to introduce a new risk-prone process in the Integrity Plan, it needs to assign to it an appropriate name that will reflect the essence of the process and that contextually must fit within the framework of the selected area (e.g. within the "Human Resources Management"), and to describe what are the corruption risks of corruption that may occur in the context of this process. For the content and scope of the description, the Working Group may consult the descriptions given for the already identified processes (section "Description of the risk-prone process" on the next page of the program).

Step 9. Opening the page with the current measures for corruption risk management

When you select one of the processes (see figure in step 7), the following page will open:

At the top of this page of the program, there is the name of the area that the risk-prone process belongs to, as well as a reference whether it is a common or a specific area.

Under the name of the area, the name of the risk-prone process can be seen, as well as a

description of the risk of corruption occurrence in this process.

Important note: if for any reason the institution does not implement certain process, there will be an option to mark that by *ticking* a box at the end of the sentence "The institution does not implement this process"; after that, the process becomes "inactive" and is not included in the Integrity Plan. The Working Group should carefully analyse the content of each process and the competence of the institution within the context of this process before selecting this option, in order not to unduly avoid self-assessment of risk in the processes nonetheless implemented by the institution.

On this page the Working Group can see the number of questionnaires that were completed the institution, or how many employees in the institution completed the questionnaire in the previous stage of the assessment of the current situation.

The results of the questionnaire, or the number and percentage for each question and answer, are found with each existing measure - questions that are answered by the employees as well.

After the assessment by the Working Group, it is necessary to respond with "Yes" or "No" to each existing risk management measure, by clicking on the circle in front of one of the two answers.

Note to the so-called conditional measures: you will notice that, depending on how you answer certain questions / measures, you will not be able to "click" on some of the following questions / measures, because the program will automatically respond to these questions. These are the so-called conditional (dependent) measures - the answer "No" to one of the measures automatically means "No" to a number of the subsequent ones. Specifically, if you answer "No" to the question "Is there an internal act on ...?" the answer "No" will automatically be assigned to the subsequent questions examining and analysing the content of that act, because there is no sense in analysing the content of the act that does not exist. Carefully review all questions / measures to see which ones are dependent and mutually conditioned, or which of the following questions / measures you need to answer first, since it is independent from the preceding ones and is not assigned with the automatic answer.

Step 10. Continuation of the previous figure [6] *– Analysis of additional questions in the questionnaire for employees*

On the same page, there are answers of employees, related to their assessment of the frequency and probability of occurrence of corruption cases and other irregularities in the specific process, as well as the fields of potential risks added possibly by the employees in the course of completing the questionnaire. The Working Group, operationally, does not intervene in this part, but it is necessary when deciding on the method of assessment of the current risk management measures or when deciding whether to add a new area / process, to take into account the statistics of answers to these questions, or what the employee, possibly, have written themselves.

Додатна питања у упитнику за запослене

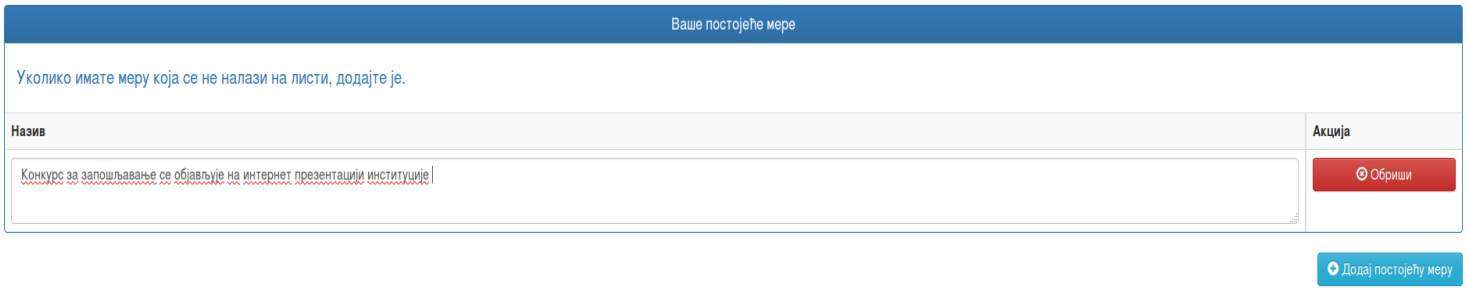
	Питања	Статистика		
1.	У којој мери су се, према Вашем сазнању, у претходних пет година дешавали неки од случајева који су описани на почетку процеса/области (у делу "Опис ризичног процеса/области")?	Ретко (мање од три случаја) Повремено (од три до седам случајева) Често (више од седам случајева) Не знам	0 0 2 0	0% 0% 100% 0%
2.	Колика је вероватноћа, према Вашем мишљењу, да у овом процесу/области, на начин на који је процес/област тренутно регулисана, настане неки од случајева који су описани на почетку процеса/области (у делу "Опис ризичног процеса/области")?	Ниска вероватноћа Средња вероватноћа Велика вероватноћа Не знам	0 1 1 0	0% 50% 50% 0%
3.	Које су још области – надлежности (осим ових на које сте одговарали на постављена питања), према Вашем мишљењу, ризични за настанак корупције или неких других злоупотреба и неправилности у раду?			

Step 11. Continuation of the previous figure – Adding existing measures

6 Note: "Continuation of the previous image" means that images with this remark appear on the same page of the program, or application.

After responding to all the questions, and assessing what is the status and condition of the current risk management measures outlined in the draft (model) Integrity Plan, the Working Group can add **other measures** existing in the institution within the implementation process, which are not on the list. Measures need to be defined in a positive manner (e.g. "Advertisement for employment is published on the website of the institution").

In the part of the application "Your current measures", the Working Group selects the option "Add current measures" and in the box that opens below the part "Name" it formulates and enters the measure, as shown in the figure below.



The Working Group can add an unlimited number of measures that exist in their institution. Besides adding, the Working Group can delete the added current measures by using the option "Delete", as long as that stage of the application is active.

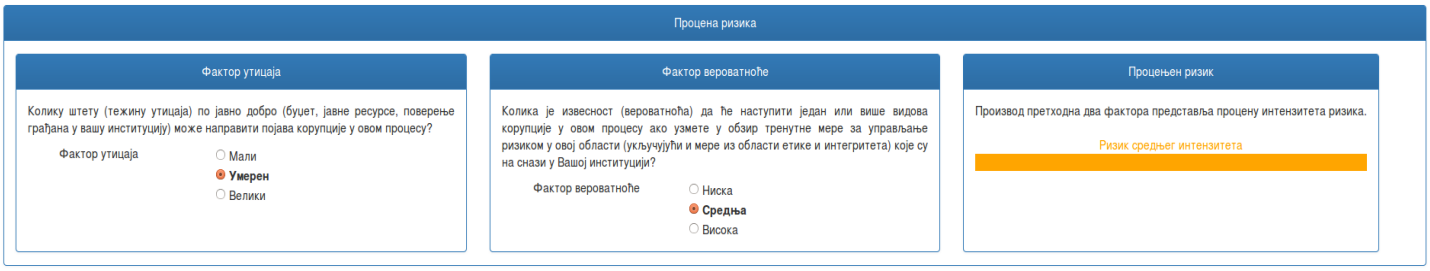
Step 12. Continuation of the previous figure – Risk Assessment

As described in the section of the Manual **7.2. Assessment of the current state of affairs performed by the Working Group**, after answering questions related to the current risk corruption management measures, the Working Group should answer questions about the **factors of impact (damage) and probability (certainty) of occurrence of corruption**. After responding to these two questions, the application will automatically "calculate" the intensity of the risk in the specific process, mark it by certain colour depending on the intensity of risk (green, yellow or red, according to the "traffic light colours" system) and list **improvement measures for corruption risk management**, which the institution should introduce. Improvement measures for risk management will have the same colour as the intensity of the assessed risk.

Risk assessment, or factors of impact (damage) and probability (certainty) are determined against the answer to two questions:

1. What impact (damage) to public property (budget, public resources, citizens' trust in your institution) can cause the appearance of one or more forms of corruption and other irregularities in the given process, if you take into account the current risk management measures in this area (including the measures in the area of ethics and integrity) that are in force at your institution?

2. What is the probability (certainty) of occurrence of one or more forms of corruption in this process if you take into account the current risk management measures in this area (including the measures in the area of ethics and integrity) that are in force at your institution?



Step 13. Continuation of the previous figure – Determination of deadlines and persons responsible for the listed improvement measures for corruption risk management

After the risk assessment, it is necessary that the Working Group perform the following:

- **Define the deadlines for the implementation of measures**

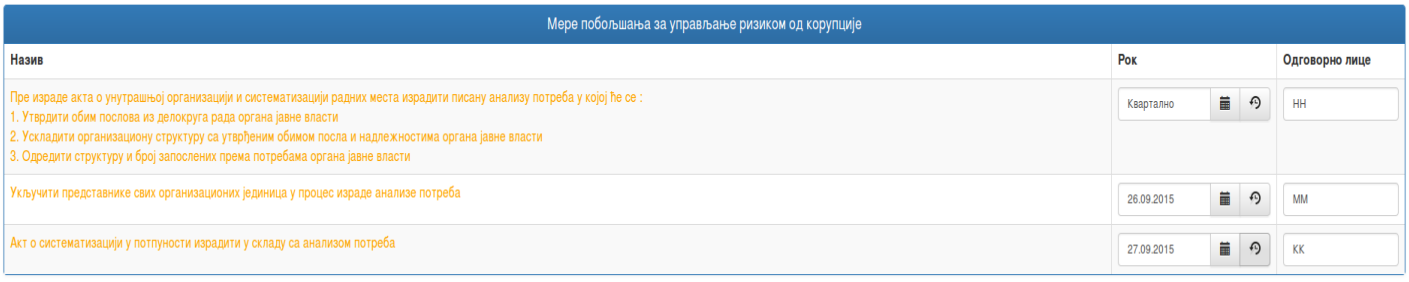
Deadlines for the implementation of measures should be determined in accordance with the urgency (intensity) of measures, or in accordance with whether the risk is of low, moderate or high intensity.

Deadlines can be determined in two ways:

1. By selecting an option marked by the image of the calendar, you are choosing the deadline for the type of measures that are of such a character that sustains such a deadline (for example, 31.12.2016 as the deadline for the adoption of an internal document).
2. By selecting the box next to the image of the calendar you can select from the drop-down menu an answer for a deadline for the measures which are of such a character that their implementation is conducted periodically (for example, choose the "quarterly" option if you assess it as an adequate period for the submission of the report as an improvement measure).

- **Appoint persons responsible for the implementation of measures**

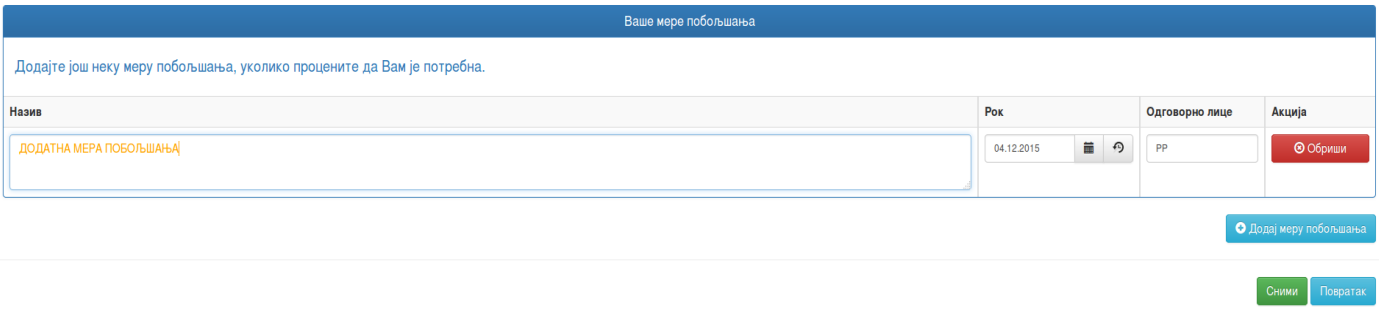
It is necessary that the Working Group, in cooperation with the manager and in consultation with other employees, record the position, work post and function of the person responsible for implementing the measure.



Step 14. Continuation of the previous figure – Additional improvement measures

Finally, the Working Group has the possibility to add within each process other measures that are not specified in the Integrity Plan model. This step is performed by selecting the option "Add another improvement measure, if you estimate that it is needed," which will open the option in the program where it is necessary to enter the name of the measure, determine a deadline and the

responsible person, in the way in which it was done with the "automatically" listed measures. A measure can be deleted as well, by selecting the option "Delete", and added, without limitation. After that, you need to click on the field "Save" to store the data in the Integrity Plan.

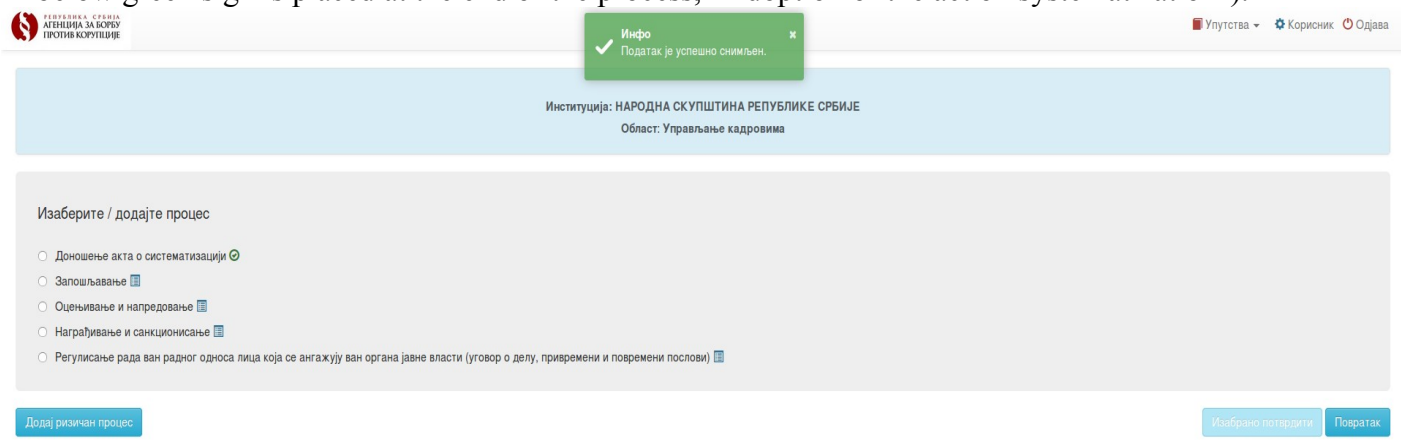


Important note: The program will not allow saving and completing the work on the process if the Integrity Plan does not have at least one improvement measure, either automatically generated in relation to the answers about the existing measures, or added by the Working Group itself. It is essential therefore, that in each process there is **at least one risk management measure**.

Step 15. Return to the list of risk-prone processes

Finally, if you have successfully completed work on the selected risk-prone process, the program will take you back to the page with the list of other processes within the area and an info-message that the data has been successfully saved.

Confirmation that you have successfully performed risk assessment in this particular risk-prone process, or that you have completed the Integrity Plan model for the process, can be seen when a circle with a green sign is displayed after the name of the process, "ticking" performance (e.g. in the figure below green sign is placed at the end of the process, "Adoption of the act on systematization").



After that, the Working Group selects another risk-prone process and continues to work under the same described principle.

At the end of the Integrity Plan development, and after a Head of the institution adopted a **Decision on the adoption of Integrity Plan**, it is necessary to scan and add it to the application in the same way as shown at Step 4 (description of "uploading" the decision on the establishment of the Working Group). **The decision is not required to be sent in the hardcopy to the Anti-Corruption Agency.**

The institution has the possibility to print its Integrity Plans in PDF version (*Step 3*), but only after filling all required areas and processes.

Annex No. 7 – The final report of the Working Group for the Integrity Plan development

_____ (Name of the institution) developed the Integrity Plan in accordance with the "Guidelines/Instructions for the Integrity Plan development and implementation " and delivered the developed IP to the Anti-Corruption Agency _____(date). _____ (Name of the institutions) adopted the decision on the appointment of the person responsible for the implementation of Integrity Plan.

(*Provide below a brief outline of the development of IP in stages, the frequency of the Working Group meetings, whether there are minutes for each held meeting, if other employees beside the members of the Working Group were involved in the drafting of IP, whether the Working Group took into account during the risk assessment the results of questionnaires completed by employees, whether they identified and evaluated in the second stage of development in specific competencies other risks and improvement measures besides those offered in the draft IP...*)

Working Group Coordinator

_____

Annex No. 8 – Decision on the adoption of the Integrity Plan

Name of the institution: _____
Number: _____
Date: _____
Place: _____

Pursuant to Article 59 of the Law on Anti-Corruption Agency (*Off. Gazette of RS*, No. 97/2008 and 53/2010) and Article ___ of the "Guidelines/Instructions for the Integrity Plan development and implementation " (*Off. Gazette of RS*, no. _____) and _____, a Head of the institution hereby adopts the following

Decision

1. To adopt the developed Integrity Plan and dissolve the appointed Working Group for the development of the Integrity Plan.

2. To appoint a person responsible for monitoring the implementation of the Integrity Plan:

- _____(name and surname), _____(work post).

2. This decision shall enter into force on the day of its adoption.

Explanation

Article 59 of the Law on Anti-Corruption Agency (Off. Gazette of RS, No. 97/2008 and 53/2010) stipulates the obligation of the state authorities and organizations, territorial autonomy and local self-government authorities, public services and public enterprises to adopt their own Integrity Plans. The provisions of Article ___ of the "Guidelines/Instructions for the Integrity Plan development and implementation " (Off. Gazette of RS, No. _____) provide that a Head of the institution shall pass a decision on adoption of the developed Integrity Plan and dissolution of the Working Group and shall appoint the person responsible for monitoring of the Integrity Plan implementation.

The person responsible for the implementation of the Integrity Plan shall monitor whether the improvement measures from the Integrity Plan of the institution are implemented, prepare the indicators for assessing the efficiency and evaluating the results of the proposed measures to improve integrity.

(Head of the Institution)

_____

To be delivered to:

- Members of the Working Group
- Appointed person
- Anti-Corruption Agency
- Archives

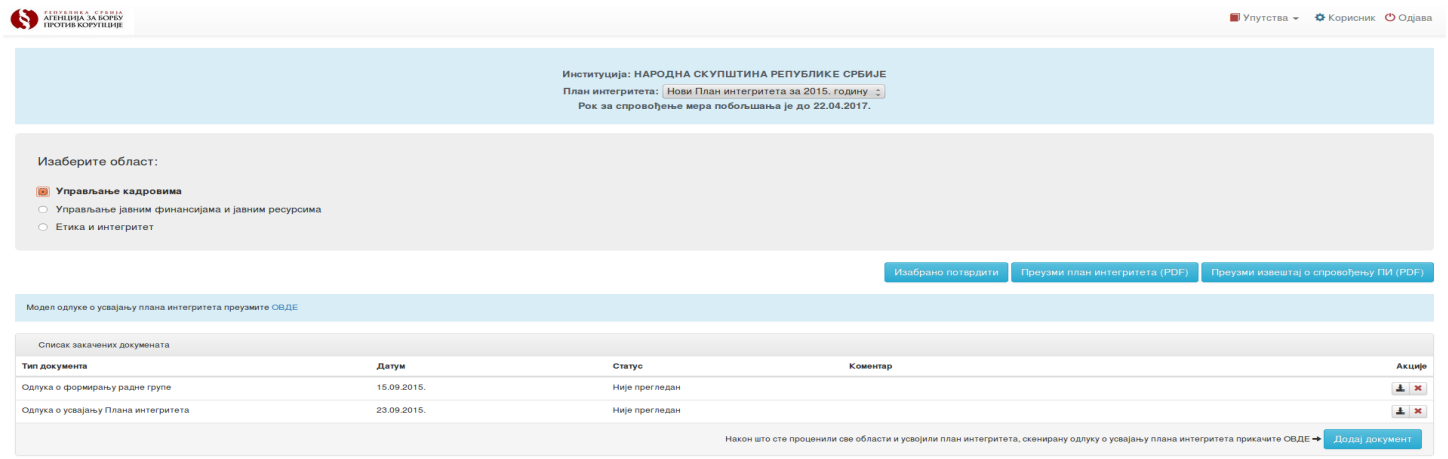
Annex No. 9 – Guidelines for reporting on the implementation of measures

Step 1. Opening the application in the part for reporting

Connecting (logging) to the application for the purposes of reporting on the implementation of measures is identical to the logging of the Working Group for Integrity Plan development. Once you have entered your username, and then the password, a part of the program will open which lists the areas, and then the risk-prone processes in the context of each chosen area.

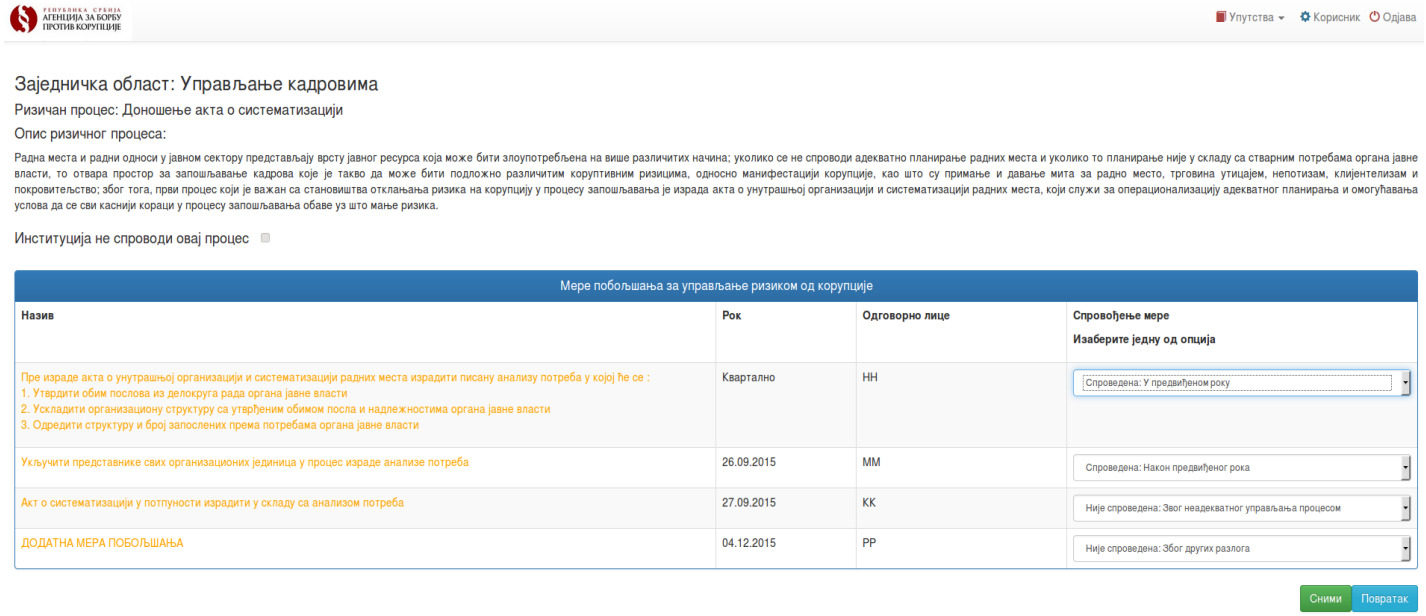
In the Header of the page containing the areas, under the name of your institution and the tag of the Integrity Plan that is active, there is a **deadline set for the implementation of improvement measures**, which the Agency will set for each cycle of Integrity Plans and subsequently inform all the institutions thereof.

Beside the confirmation of selected areas, on this page it is possible to download the complete Integrity Plans in PDF format, as well as the report on the implementation of Integrity Plan, but only after reporting on the manner of implementation of the measures, in a manner that will be described below.



Step 2. Opening the program in the reporting part

Selection of the area and the process opens the program page as shown in the figure below.



Page of the program for reporting looks like the automatically listed and added improvement measures in Integrity Plan development (see Step 12). The first three columns contain the names of measures, deadlines and responsible person. A novelty in the program for reporting is the "drop-down list" of possible outcomes for the implementation of measures, from which it is necessary to select one of two outcomes - **implemented** or **not implemented** - with several sub-answers for each of the two main options.

You can select one of the following answers:
Implemented: in due time
Implemented: after the deadline
Implemented: periodically
Not implemented: due to inadequate management of the process
Not implemented: due to inadequate management of the institution

Not implemented: due to lack of human resources
Not implemented: due to lack of material resources
Not implemented: for other reasons
Not implemented: the deadline for implementation of the measure has not yet been reached.

After selecting the appropriate answer for each of the measures, you choose the option "Save" after which the program returns you to the page containing the list of processes, with the info-message that the data was successfully saved.

As in the previous stages of the work in the application, at any time for any reason you can choose the option "Back" or "Logout" from the application.