



INTEGRITY PLAN

OF THE MINISTRY OF INTERNAL AFFAIRS

2023-2025



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INTEGRITY STATEMENT



To Whom It May Concern,

The Integrity Plan is an internal anti-corruption document that contains a set of measures that prevent and eliminate the possibilities for the emergence and development of various forms of corrupt and other unprofessional behavior within the Ministry of Internal Affairs, one which has been developed as a result of the assessment of the susceptibility of certain workplaces which are assumed prone to the occurrence and development of corruption and other forms of unprofessional employee behavior. This assessment of workers' exposure to various risks is undertaken in order to implement the principle of "zero tolerance" for corruption and to preserve and strengthen the integrity of workers in the Ministry of Internal Affairs.

The goal of the Integrity Plan is to establish mechanisms that will ensure an efficient and effective operation of the Ministry of Internal Affairs through the following:

- strengthening of responsibility/accountability,
- simplification of procedures,
- increasing transparency in decision-making,
- controlling discretionary powers,
- upholding ethical values,
- elimination of inefficient practices and unenforceable regulations,
- introduction of an effective system of supervision and control of the work and behavior of workers.

The importance of this Integrity Plan first and foremost lies in our continuous efforts to consider integrity, ethics, and transparency as fundamental values that serve the institutional functioning of the Ministry of Interior, as well as in the effects and direct impact of its measures on institutional

strengthening within the effective fight against corruption.

The Integrity Plan of the Ministry of Internal Affairs for the period 2023-2025 is part of the mosaic that completes the institutional anti-corruption framework and will serve as an important instrument for identifying and preventing the risks of corruption and violation of integrity in the most exposed areas of responsibility. The document provides the approach to understanding, development, and execution of the integrity set-up in the structures and institutions of the Ministry of Internal Affairs, but also defines the effective methods and mechanisms for the same.

Although facing the negative impact of corruption and its perception is a constant challenge, the Ministry of Interior will continue its efforts to increase proactivity and inter-institutional cooperation, in order to ensure quality, impartial and transparent services to the community, as well as continued promotion of work culture in public administration grounded in such values.

Police with high integrity are expected to harmonize the behavior of police officers with democratic values and in the process of applying authority be guided by the rule of law and continuous respect for human rights.

Starting from the firm determination of the Ministry of Internal Affairs to combat corruption, which has been identified as the first strategic priority of the Ministry of Internal Affairs, and considering that high police integrity is precisely the basis for

an effective fight against crime and corruption, we adopted this Integrity Plan which represents a tool to measure the degree of exposure to the risk of corruption in the Ministry and will represent a guarantee for the efficient and effective operation of the Ministry.

Extending our sincere gratitude to the Geneva Centre for Security Sector Governance - DCAF, whose personnel made a huge contribution to the development of this Plan, we promise a strong commitment to fulfilling the obligations we pledged to.

MINISTER OF INTERNAL AFFAIRS
Oliver Spasovski



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I. INTRODUCTION

In the past period, the term integrity has grown into one of the most frequently used terms when it comes to the concept of good governance. In that respect, when we talk about good governance, we basically mean building and nurturing the spirit of integrity at the personal and institutional level, whereby we would encourage and ensure independence, professionalism, and accountability in the delivery of competencies as specified in the domestic and international legislation.

Integrity represents a set of appropriate actions and ways of doing things, i.e. a set of ethical values, moral principles, wisdom, and the way we act and behave. Hence the need for police officers to adhere to these principles and demonstrate inner strength, courage, and skill to always apply them regardless of the consequences they face.

We will not be wrong if we define integrity in police operations as the absence of police abuse, respect for the ethical code of conduct, the prescribed rules, standard procedures, or the behavior of police officers in accordance with the applicable legal regulations.

High police integrity is the basis for forging mutual respect and trust between citizens and the Police, and plays a major role in the effective fight against crime and corruption.

No country is immune to corruption as a negative phenomenon of modern life, regardless of the level of its development, and is present in all segments of social life.

Therefore, corruption is inevitably present in the police ranks.

The term corruption in the Police means any violation of standard procedure or procedures, abuse of office or overstepping of police powers on account of directly or indirectly promised, offered, given, requested, accepted or expected benefit, for oneself or for other people's benefit.

The most common factors that contribute to the emergence of corruption in the Police are the following: confluence of unprofessionalism and poor organization, employment of unprofessional staff, and lack of criteria during recruitment or selection and training of police employees.

The fight against corruption is determined as the first strategic priority in the Strategic Plan of the Ministry of Internal Affairs for the period 2021-2024. Taking that into account, the Ministry of Internal Affairs every year adopts an anti-corruption program, which aims to establish a system of measures that will enable tackling corruption and identifying its enabling



causes, conditions, and factors. According to this program, it is the obligation of all employees to act in accordance with the rules, regulations and professional standards applied by the Ministry and the Police when performing their work-related tasks. It is necessary for every employee to uphold the Ethical Code of Conduct, manifest a high degree of integrity in work, be able to recognize the forms of corruption and possess the ability to resist corruption. No one shall be exempt from liability in cases of corrupt behavior, as no one has the mandate to hinder, limit or in any way dilute the process of establishing responsibility or liability.

In order to effectively combat corruption, the following are equally important - political will, normative solutions, institutional framework, effective application of laws, institutional and personal capacity and integrity, as well as cooperation between institutions in the country and internationally.

The main challenge for the Ministry of Internal Affairs in terms of the fight against corruption is the timely detection and identification of corruption risks, as well as the timely discovery, clarification, recording and proving of corrupt behavior involving police officers.

The main goal of the Ministry of Internal Affairs in the fight against corruption is to reduce corruption and establish an anti-corruption culture among employees, building the integrity of employees in the Ministry of Internal Affairs in accordance with European standards, raising the awareness of employees through appropriate training, removing the conditions for the occurrence of corruption in the Police or unprofessional behavior and establishing the desired ethical standards.

In order to effectively combat corruption and crime in general, it is necessary for the Ministry to have established and strengthened cooperation with other relevant ministries, state bodies, and institutions. Cooperation should serve as the basic foundation and guiding force of the institutions in the fight against corruption. Therefore, it is necessary to have a functional interrelatedness and a common database to which all entities in charge of combating corruption will have access, for the purposes of exchanging information to ensure a sustainable system of a common approach in the realization of the institutions' own commitment to the indiscriminate fight against corruption.

The Ministry of Internal Affairs, with its proactive fight against corruption and its absolute unacceptability, is building control mechanisms, measures and activities that will diminish the scope of corrupt behaviour by employees in the Ministry and the Police, as well as detect and appropriately sanction each specific case.

The impact of corruption can be devastating for a country's stability, as it erodes and weakens the three important pillars on which it rests: security, politics and the economy. From this perspective, the fight against corruption takes on a special meaning for our institution and for every employee in the administration. The dynamic and complex security situations, which include trafficking and organized crime, but also situations of political instability, natural disasters, pandemics, etc., unleash increased potential for corruption and abuse. For this reason, it is necessary to consolidate preventive and supervisory mechanisms for each situation and for each aspect of the activity.

The Ministry of Interior aims to guarantee a safer environment for the development of the country and society by strengthening order and public security, by providing quality services and territorial protection with professional structures and integrity that operate in full compliance with the law, respecting rights and freedoms of citizens, serving the public interest with dedication and professionalism and fulfilling the country's national, regional and international commitments.

Under the auspices of the European Union and the Council of Europe, the Ministry of Internal Affairs implemented the "External Mechanism for Police Control" project, the purpose of which was to establish an external mechanism that would ensure impartiality and objectivity in dealing with cases where there is

a suspicion that crimes have been committed by persons with police powers and members of the prison police.

The external police control mechanism functions in practice as an additional mechanism to the existing internal control mechanism in the Ministry of Interior.

In the course of the implementation of the project, in the Basic Public Prosecutor's Office Prosecuting Organized Crime and Corruption, a specialized Unit was established for the investigation and prosecution of crimes committed by persons with police powers and members of the prison police.

The duty of the Ministry of Interior and the procedure upon receipt of a criminal complaint or knowledge gained that an employee of the Ministry with the status of a police officer has committed a crime while acting or not acting in an official capacity by using serious threats, force or means of coercion that resulted in death, grievous bodily harm, bodily harm, unlawful deprivation of liberty, torture or other cruel, inhuman or degrading treatment and punishment, shall be governed by the Law on Internal Affairs and the Law for the Police, provided legislation has envisaged an ex officio criminal prosecution.

Namely, in these cases, the Ministry shall forthwith notify the Unit for investigation and prosecution of crimes committed by persons with police powers and members of the prison police in the Basic Public Prosecutor's Office Prosecuting Organized Crime and Corruption. Together with the notification, the Ministry shall forward to the Unit all the sources of knowledge about the committed crime, the perpetrator and the victim as well as other sources of information at its disposal.

The Department for Internal Control, Criminal Investigations and Professional Standards in the Ministry, shall take actions in order to initiate disciplinary proceedings for such an employee, after the approval of the Public Prosecutor from the Unit for investigation and prosecution of crimes committed by persons with police powers and members of the prison police, for which a report with an opinion submitted to the Minister of Interior shall be prepared.

Since the establishment of the External Police Control Mechanism, the Department for Internal Control, Criminal Investigations and Professional Standards has established uninterrupted cooperation with the specialized unit for the investigation and prosecution of crimes committed by persons with police powers and members of the prison police in the Basic Public Prosecutor's Prosecuting Organized Crime and Corruption and other basic public prosecutor's offices for the purposes of efficient investigations in the fight against illegal actions by police officers and protection of human rights and freedoms.

With this concept, "External control mechanism", a special unit was established within the Ombudsman, a mechanism for civil control, by the means of which the Ombudsman may file initiatives to instigate procedures to establish disciplinary responsibility amongst police officers.

The Department for Internal Control, Criminal Investigations and Professional Standards is the control mechanism of the Ministry of Internal Affairs over the work of the police and the Ministry, which is why the competencies of the Department include a wide range of measures and activities to be undertaken to determine unprofessional, illegal or unethical conduct by employees in the Ministry, as well as take on a series of measures and activities for their prevention and repression. The emphasis of the work of the Department is on the consistent adherence to the corpus of human freedoms and rights in accordance with the Constitution of the Republic of North Macedonia and the ratified international agreements by the Ministry and the Police.

The Department for Internal Control, Criminal Investigations and Professional Standards is part of the Ministry of Internal Affairs of the Republic of North Macedonia and controls the legality of the work of police

officers, as well as other employees of the Ministry, especially in relation to the adherence and protection of human rights and freedoms when performing police tasks and applying police powers. In the Department for Internal Control, Criminal Investigations, and Professional Standards, a Unit for Integrity, Prevention of Corruption, and Protection of Human Rights was established. The focus of this Unit is the implementation of the Program for Strengthening Police Integrity and the Program for Strengthening the Ethical Capacity of Employees in the Ministry of Internal Affairs. An essential integral part of these programs is the promotion and implementation of the principle of non-discrimination in the performance of official tasks on all grounds.

The Department takes measures and actions to detect and suppress crimes with elements of corruption and other forms of corrupt behavior, as well as other crimes committed by police officers and other employees of the Ministry, committed during work or in connection with work, and has the authority to act on the territory of the entire country. In order to detect, suppress, record or prosecute crimes that are prosecuted ex officio, it applies appropriate operational and tactical measures and actions to secure material evidence and submits criminal charges to the competent prosecutorial authorities. The Department acts on its own initiative, at the request of the competent public prosecutor, based on collected information, following written correspondence from police officers and other employees of the Ministry, citizens or legal entities. The Department performs preventive control of all organizational units of the Ministry. Proposes amendments or adoption of new regulations and introduces clear procedures for work. All interventions are targeted towards diminishing the possibility for abuse and preventing corrupt and unethical behavior of employees in the Ministry. The Department conducts a corruption risk analysis in all organizational units in the Ministry and for each position in the Ministry in order to develop a unique methodology based on which the corruption risks and the institutional and individual factors that lead to corruption are identified and assessed. The Department cooperates with related services, international institutions, and organizations whose primary goal is to combat corruption and to safeguard human freedoms and rights and as well as implement EU standards and recommendations.

With the adoption of the Law Amending the Law on Internal Affairs ("Official Gazette of RNM" No. 89/22), the Department for Internal Control, Criminal Investigations and Professional Standards received another tool to strengthen the capacities of the Department in the fight against corruption among the employees of the Ministry of Internal Affairs, which is the implementation of the Professional Integrity Test.

Verification of the professional integrity of the workers in the Ministry will be carried out continuously for the duration of the employment, by means of conducting a Professional Integrity Test which means control of the actions of employees in the Ministry in a simulated situation, identical to his/her work-related tasks and activities, without the obligation to deliver a prior notice to the organizational unit in which the employee is assigned and currently works.

The result of the Professional Integrity Test can be an indicator for initiating preliminary proceedings, corruption risk assessment and analysis, change in the methodology and work procedures and identification of the workers' training type and needs.

The Professional Integrity Test is conducted on the basis of the Professional Integrity Test Implementation Plan, which is adopted by the head of OVKKIPS (Department for Internal Control, Criminal Investigations, and Professional Standards).

It is important to note that during the implementation of the Professional Integrity Test, special emphasis will be placed on safeguarding the principle of legality, fundamental human freedoms and rights, and the dignity of the worker being tested.

During the implementation of the Professional Integrity Test, the employee being tested must not be encouraged to commit a crime or come in breach of official duty or professional authority.

The activities undertaken during the Professional Integrity Test are not part of the special investigative measures prescribed by the Law on Criminal Procedure.

The procedure for conducting the Professional Integrity Test may be recorded on a video or audio recording, and during its implementation, legend of means and documents may be used. The Professional Integrity Test will have a positive or a negative result. The Test will come up negative if the tested worker has not proven his/her professional integrity. The negative result of this Test is foreseen as grounds for a more serious case of disciplinary responsibility and the basis for initiating disciplinary proceedings. The legal norming of the negative result of the Professional Integrity Test as a more serious case of disciplinary responsibility and basis for initiating disciplinary proceedings will undoubtedly affect the process of a worker's promotion since a worker cannot be promoted to a higher pay ranking position if, during the previous year, a disciplinary measure had been issued against that worker for a more serious case of disciplinary responsibility, i.e. if the worker in the past year had been disciplined for violating the work-related order and discipline. Through such regular checks, the purpose is to strengthen public confidence, guarantee and promote integrity, and raise the standards and professional skills of employees working in these important public order and security institutions.

The Integrity Plan is conceptualized to have two components: Integrity Plan and Action Plan for its implementation. The document is guided by a holistic approach and reflects some key features in the concept of addressing solutions to reduce potential risks of corruption and to increase institutional integrity, such as:

- Dynamics;
- Flexibility;
- Temporality/ provisionality;
- Preventive and proactive nature;
- Upgrade and continuous improvement of integrity in the structures and institutions of the Ministry of Internal Affairs.

The language of the document is clear and concise, in order to easily and objectively understand, implement and monitor progress.

II. PURPOSE OF THE DOCUMENT

The Integrity Plan of the Ministry of Internal Affairs is a strategic-level document of an operational nature, which aims, on one hand, to identify risks to integrity in subordinate structures and institutions, and to assess the level of their vulnerability, and on the other hand to plan appropriate measures for their prevention and minimization.

The Integrity Plan, based on the analysis of the risks related to this aspect in the organizational units of the Ministry of Interior, aims to identify and put into effect the mechanisms for minimizing the factors that can be related to the causes, pressures, cases or made circumstances, which serve as basis for the occurrence of corruption. In this way, it aims to manage risks and always guarantee high-quality, impartial and responsive services to citizens.

In this context, this document will serve as a comprehensive preventive tool against corruption, as it aims to promote and strengthen integrity, professionalism, and ethics, as well as the application of moral values and professional standards.

Building integrity is a challenge and requires continuous effort, a good grasp of the issues at hand, and the willingness to ensure change at various levels. However, due to the high level of resistance we face, the biggest challenge will be to change the mentality, the mindset and acquire work-related culture.





III. ABOUT THE METHODOLOGY AND THE PROCESS

The Integrity Plan and its Action Plan are the results of work over several months by the representatives of the Ministry of Internal Affairs, supported by experts from the DCAF project (Geneva Centre for Security Sector Governance).

The process of making the Integrity Plan for the Ministry of Internal Affairs underwent several phases.

Firstly, a Working Group was formed for the development of the Integrity Plan of the Ministry of Internal Affairs, consisting of representatives from various organizational units in the Ministry of Internal Affairs.

Secondly, a Work Plan was prepared to specify deadlines, measures, and planned activity, so that the Integrity Plan and the Action Plan for its realization can be timely prepared and finalized.

Thirdly, continuous meetings of the members of the Working Group were held, at which they discussed the continuity of the process and the tasks designated for each structure.

The DCAF experts actively offered their expertise, as part of the meetings of the Working Group for the preparation of the Integrity Plan, as well as through the seminars and training sessions that they carried out with the members of the Working Group, on the methodology for risk analysis preparation.

The Working Group was engaged in the preparation of an in-depth situational analysis and based on the specifics of the structures involved, in details examined each aspect and work process, as well as every service and product offered. This process included several components, as follows:

- Analysis of the legal framework according to the sectors related to the risks in terms of legality, clarity, stability, and legal deficiencies;
- Analysis related to internal organization, including organizational structure, frequency of organizational changes, and problems arising as a result of structural changes;

- Analysis of the chain of decision-making process, employment, and career procedures, procurement;
- Identifying sources and availability of relevant data, including statistical data; possession and access to such data, transparency, data advantages and limitations, data protection;
- Identification of the most sensitive and exposed areas, aspects, processes, services and structures prone to corruption, as well as the rationale behind their identification;
- Cases and areas where corrupt events were identified;
- Identification of specific and national or international recommendations for the institution in this regard, provided such recommendations were implemented or applied.

After drawing up the scores for each area, the information was processed and integrated into a single document. The identification of risks was carried out for all procedures and different areas as well as for all levels assessed as potentially threatened or exposed in terms of violation of the integrity of employees and the institution.

The identified risks were conceptualized and categorized into several groups and main areas of risk: risks related to abuse of office by authorized officials who provide direct services to citizens; risks related to receiving bribes by the traffic and border police; risks related to excessive use of physical force in the exercise of police powers; risks related to the area of public procurement; risks related to the area of human resources management and risks related to violation of ethics, impartiality, dignity, protection of reputation and image of the institution.

In this context, the meetings continued with the guidance of the DCAF experts to identify the necessary measures and activities that are real and impactful and to determine the responsible structures and the relevant deadlines, goals/objectives, and indicators.

The measures planned in this document are related to a clearer definition of the responsibilities of the functions, drafting policies and regulatory acts, training, and qualification of employees, as well as improving control mechanisms.

IV. OBJECTIVES AND PRINCIPLES

The drafting of the Integrity Plan document has a special significance and supports the efforts of the heads of the Ministry of Internal Affairs in the fight against corruption and the consolidation of the organizational units towards a common goal.

The Integrity Plan was designed for a three-year period 2023-2025, and aims to achieve several main objectives:

- Prevention of corruption and strengthening of institutional integrity;
- Increase in the transparency of the Ministry of Internal Affairs;
- Creation of mechanisms for monitoring behaviors that violate integrity;
- Establishing clear procedures and rules for the integrity of employees in the Ministry of Interior;
- Strengthening of cooperation between organizational units in fulfilling obligations and strategic goals in the field of anti-corruption.

The general spirit of the document is guided by the following principles:

- The principle of legality, according to which the Ministry of Internal Affairs, in the course of its activity, shall apply the Constitution, ratified international agreements and applicable legislation;
- The principle of unity and hierarchy, according to which the Ministry of Internal Affairs shall be organized in such a way that each subordinate organizational unit will submit a report to the higher organizational unit;
- The principle of accountability, according to which each employee shall be subject to direction and supervision according to the organization of the hierarchy;
- The principle of effectiveness, according to which, every employee and every organizational unit shall be organized in such a way so as to professionally and committedly perform assigned tasks and defined objectives;
- The principle of impartiality, according to which, every employee who participated in the decision-making process, shall act in accordance with the rules for preventing conflicts of interest, according to the applicable legal regulation;
- The principle of transparency, as a basic principle for the publication of essential information from the work of the Ministry of Interior in an accessible and widely intelligible way, respecting the limitations for the protection of personal data and privacy;



- The principle of confidentiality, dealing with classified information in accordance with the Law on classified information and the internal acts of the Ministry of Interior in this area;
- The principle of equality and non-discrimination, to prevent any form of direct or indirect discrimination, violation of human dignity and creation of intimidating, hostile, humiliating, unequal treatment or offensive environment.
- The principle of internal cooperation, according to which each employee shall cooperate within the organizational unit where s/he works, as well as with employees in other organizational units within the Ministry, to meet set objectives.



V. RISKS RELATED TO INTEGRITY IDENTIFIED IN THE ORGANIZATIONAL UNITS OF THE MINISTRY OF INTERIOR AFFAIRS

1. Risks related to abuse of office by authorized officials who provide direct services to citizens

Special structures of the Ministry of Internal Affairs, which provide direct services to citizens, carry an increased potential risk of diminishing the integrity of its employees and the institution itself. There are many internal procedures and processes that can be subject to abuse and diversion of Ministry resources for personal gain. The powers available to the employees of the Ministry can very easily be directed for private benefit, meaning that great risks exist for employees to be involved in corrupt practices for external "benefit". In everyday interactions with citizens, the most obvious form of abuse of office is such that involves the receipt of money or other forms of benefit. Corrupt payments can also be made in kind to entail free drinks, meals, or other benefits in exchange for preferential treatment. The referred to individual payments in such acts of misconduct can range from relatively small amounts to serious amounts as well as the commission of criminal offenses.

The consequences are adverse with regard to public perception and a decline in trust in one of the most visible institutions in the country.

The most exposed to risk are the employees of the Department of Civil Affairs in the Ministry of Internal Affairs, whose competence is the issuance of personal documents of citizens, permits, certificates, licenses, etc.

The most common forms of abuse of office and workers' authority in this Department are the following: receiving bribes, favoring certain parties on various grounds when issuing documents, falsification of documents, etc.

This behavior of the workers of this Department results in an increased number of criminal charges filed against them for crimes that are often committed through a well-organized network, so they are prosecuted as organized crime offenses.

The provision of such services through physical contact and exchange carries its own risks. In this context, the initiated work on the digitalization of services through online (electronic) platforms will continue in future.

2. Risks related to receiving bribes by the traffic and border police

The traffic police controls and regulates traffic on all travel routes in and out of the populated areas in RNM, in order to maintain the safety of the road traffic. At the same time, they take measures to ascertain traffic violations in order to prevent them, since they are the main cause of traffic accidents. Also, the traffic police undertake measures to ensure high-quality intelligence at the scene of a traffic accident.

When performing tasks related to ascertaining traffic violations, police officers from the traffic police are often prone to abuse of police powers for the purposes of obtaining financial gain or other forms of personal advantage. Accepting a bribe in exchange for not reporting or sanctioning certain illegal activities is the most common crime committed by members of the traffic police.

Police officers from the border police, especially those who work at border crossings, are also exposed to this risk. These police officers are often susceptible to abuse of their police powers in order to obtain a certain personal gain, most often when clearing passengers at border crossings who do not have proper documentation for entry to or exit from the country.

In the past period, the Ministry of Internal Affairs implemented a Project that included mobile camera recordings of traffic police units. The so-called body cameras represent a barrier to protect against corruption, with which we practically safeguard both citizens and the police by precluding human subjectivity thus applying them to traffic and border police officers.

3. Risks related to excessive use of physical force in the exercise of police powers

The Police Force is defined as a civil force of a state that is responsible for the prevention and detection of crime, as well as guardianship of public order and peace.

It is the duty of all employees of the Police to act in accordance with the law, rules, regulations and professional standards applied in the Ministry of Internal Affairs when performing their work tasks. It is necessary for every employee to respect the Code of Ethics prescribing the conduct of the workers, with the aim to ensure legality, professional and personal integrity, high morals and standards, efficiency, effectiveness, commitment and raised level of accountability when performing work and work-related tasks, strengthening the integrity of the Ministry as a whole, as well as respect for human rights, through equal treatment and non-discrimination, without privilege and without any personal interest, upholding the rights and dignity of others. Police officers should have the ability to recognize forms of illegal and unprofessional behavior and to oppose such behavior thus manifesting a high degree of professional integrity.

The protection of human rights and freedoms of all citizens is what every democratic society primarily expects from the police. However, it may happen that police officers, for various reasons and motives, act contrary to law when exercising their police powers and overstep powers, therefore violating human rights and freedoms.

The Criminal Code, article 142 envisages the criminal offense of "torture and other cruel, inhuman or degrading treatment and punishment", then article 143 envisages the criminal offense of "harassment in the performance of duty", article 353 envisages the criminal offense of "abuse of official position and authorization".

Through these criminal acts, the legislator sanctions forms of police powers abuse that result in serious bodily injuries, mental suffering, coercion, harassment, intimidation, insult, humiliation and violation of human dignity, and any form of discrimination.

When exercising police powers, the Police are obliged to treat all citizens equally, without discrimination based on gender, race, skin color, language, religion, political or any other beliefs, national or social origin, affiliation to a national minority, material position, origin by birth or any other status. In the relationship with the Police, all citizens equally enjoy the fundamental freedoms and rights of citizens recognized by international law and determined by the Constitution. In this sense, during police officers' exchange with citizens, the right of each individual to personal safety is particularly guaranteed, that no physical or mental pressure will be exerted in an attempt to obtain information and that no coercion will be used to extort a confession, while the collected information will be handled confidentially.

The risks of excessive use of physical force by police officers lead to a direct attack on human rights and freedoms guaranteed by the Constitution, laws and internationally ratified agreements. The Police have police powers (including the exercise of force) to temporarily deprive people of their liberty, restrict the full exercise of their rights (eg. stop, question, detain and arrest people), confiscate their property, take their fingerprints, photograph them and conduct a personal search). In addition, in many cases, the Police have a discretionary right to decide whether and how to exercise such powers. However, police officers must always adhere to the rule of law in accordance with the best international standards and procedural rules and strategies prescribed in the applicable national laws. In the performance of their tasks, police officers must respect and protect human dignity and preserve and protect basic human rights, as well as civil and political rights.

When exercising police powers for the purposes of realizing the basic function of the Police in terms of protection and respect for fundamental human freedoms and rights, prevention and detection of criminal offenses, prosecution of their perpetrators of crime, there exists the possibility to overstep and abuse police powers, to disproportionately exercise authority, thereby exhibiting inhumane treatment and violation of the dignity, reputation and honor of the persons subjected to such exercise of police powers and thus endangers fundamental human freedoms and rights.

It is certain that illegal phenomena during police work contribute to the rise of a negative image in society, and consequently a distrust of citizens in the work of the Police.

Hence, control over the Police should represent an integrated system, which will not be limited only to the individual and his/her personal characteristics but will cover a wider segment of control over the work of the organizational units as a whole. Another proven recipe should be applied in the control of the Police, which implies a combination of preventive and repressive measures, according to the principle "prevention as a commitment, and repression as a necessity". Consequently, the control should take two basic directions: 1) prevention of illegality in the work of the Police, primarily by strengthening professional integrity and 2) suppression of police illegality, and the development of capacities to detect, settle/overcome and prove/establish such illegality.

The Department for Internal Control, Criminal Investigations and Professional Standards is a competent organizational unit in the Ministry of Internal Affairs of the Republic of North Macedonia that controls the legality of the work of police officers, as well as other employees of the Ministry, especially in relation to the respect and protection of human rights and freedoms when performing police tasks and exercising police powers.

In addition to the internal control over the work of the police, in every democratic society, external control over the police is also a very important segment carried out by the following: the Ombudsman, the Basic Public Prosecutor's Office Prosecuting Organized Crime and Corruption, under which a specialized unit was established for the investigation and prosecution of criminal cases committed by persons with police powers and members of the prison police, the non-governmental sector, the public, etc.

4. Risks related to the area of public procurement

Public procurement represents a process of utilizing public funds by a certain public authority for the purpose of obtaining external resources, usually from commercial bidders - economic operators. Public procurement is usually one of the areas carrying a high risk of corruption. Employees working in this sector, including managers, are exposed to the risk of breach of integrity in the performance of their official duties, due to the type of activity, specifically in the development of procedures for the procurement of public funds.

Regarding the development of public procurement procedures, there is primary and secondary legislation governing this area that defines the steps and procedures to be followed.

Even though there is a legal framework and regulation for this subject matter, the appropriate and responsible application of its legislative provisions is often lacking, not precluding attempts to influence and direct purchases to preferential operators. In procurement procedures, at various stages, the risk increases from selection up to the stages of actual purchase. Every procurement should start by keeping

in mind the cause behind it and the final outcome it wants to achieve by answering the question "What do we want to improve?" rather than "What do we want to buy?". Procurement must be based on specific and realistic priorities and needs.

Employees engaged in the sectors that deal with public procurement and whose job is to prepare tender documentation, such as defining the set of criteria and conditions for the participation of economic operators in public procurement procedures, are exposed to risk related to the following aspects:

- Conflict of interest with candidates/economic operators who are eligible to participate in procurement procedures;
- Unwarranted communication with candidates/economic operators who are eligible to participate in the procurement procedures;
- Defining criteria/conditions that can artificially eliminate competition in relation to the participation of economic operators in procurement procedures, which in general, apart from violating the integrity of employees, can cause unequal and discriminatory treatment for economic operators participating in the public procurement procedures or may undermine public trust and transparency in public procurement procedures.

The employees whose job is to review and evaluate the bids submitted by the economic operators participating in the procurement procedures, i.e. to establish the grounds for disqualification of bidders, to identify the qualified/eligible bidders as well as select the best bid, are exposed to risks related to the following:

- Subjective/biased evaluation of bids;
- Publication of information or documentation classified as confidential by bidders;
- Conflict of interest with bidders;
- Unwarranted communication with bidders participating in the procedure, which in general, apart from violating the integrity of employees, may cause unequal and discriminatory treatment for economic operators participating in public procurement procedures or may undermine public trust and transparency in procurement procedures.

Employees whose job is to review and decide on objections/complaints submitted by candidates/economic operators or bidders, both concerning the criteria/conditions for participation and the evaluation of bids, are exposed to the following risks when decisions are made on the claims of the economic operators and when it comes to any changes of the previous decisions:

- Subjective/biased assessment of the claims presented in the submissions of the economic operators in connection with the procurement procedures;
- Publication of information or documentation classified as confidential by bidders;
- If in a conflict of interest with the bidders;
- Unwarranted communication with bidders participating in the procedure, which in its entirety, apart from violating the integrity of employees, may cause unequal and discriminatory treatment for economic operators participating in the public procurement procedures or may violate public trust and transparency in the procurement procedures.

Quality assurance remains a delicate link in the process. The employees, whose job is to monitor the implementation of the contracts signed between the contracting authorities and the best bidder in the procurement procedures, are exposed to risks related to the following:

- Conflict of interest with the best bidders who have entered into a contract with the contracting authorities or even with the employees of the contracting authorities responsible for implementation and monitoring of the implementation of contracts;
- Unilateral subjective assessment of whether contracts have been meticulously enforced and in their entirety by the contractors or contracting authorities.
- For purchases/procurements of low value, the procedures are similar and require special measures to be applied by subordinate institutions that minimize the risks identified in all stages of procurement.

Non-compliance with public procurement procedures and lack of transparency can lead to a breach of public trust in public procurements and in institutions.

From the above-mentioned, the following measures are planned to be applied:

- Completing a conflict of interest statement for each procurement procedure, in the phase of market study and evaluation of bids submitted by economic operators, by the means of which the potential for conflict of interest will be reduced; and signing and conforming to the statement of confidentiality
- Conducting training sessions to increase the professional level of employees who carry out public procurement procedures and to prevent risks related to operations in this field, where the aim is to reduce the number of reported cases of abuse;
- Preparation of market studies/analyses for products/services and standards, in order to identify needs and take them into account in the stages of evaluation and selection of bids;
- Improving the preparation of technical specifications, by introducing appropriate expertise, in order to incorporate recommendations by the performed audits;
- Compliance with legal deadlines for each stage of the process.

5. Risks related to the area of human resource management

Human resource management is an important area that is under threat with risks that may negatively impact the institution. They can be observed in different aspects and phases of human resources management, such as in the choice and selection, deployment, promotion, termination of the employment contract of employees, change in the organizational structure, regulations, various codes, etc. and all those may harm the integrity of the institution having a direct impact on its proper functioning. Continuous organizational reorganization and adaptation are necessary processes in the interest of increasing efficiency, however, sometimes such processes can create confusion, inefficiency, uncertainty and demotivation among employees.

After an analysis performed in relation to the recruitment process in the structures of the Ministry of Internal Affairs, the employees of the Ministry of Internal Affairs are employed and assigned to work positions pursuant to the Law on Internal Affairs and its accompanying by-laws.

Based on the Law on Internal Affairs ("Official Gazette of the Republic of Macedonia" No. 42/14, 116/14, 33/15, 5/16, 120/16, 127/16, 142/16, 190/16, 21/18, 108/19, 275/19, 79/20, 110/21 and 89/22) employment in the Ministry is entered into following a public announcement, but even without a public announcement in the Ministry, an employment procedure is carried out without a public announcement for jobs referred to in the Jobs Systematization Act, specific in the type and nature of the work-related tasks, as well as the special conditions under which they are performed.

The selection procedure for entering into employment in the Ministry includes several stages, as follows:

- administrative selection;
- written test;
- psychological test;
- interview and
- medical examination.

For the purposes of the selection process when entering into employment in the Ministry, the Minister shall establish a selection committee.

A worker in the Ministry has the right and obligation, during the year, to be trained in accordance with the needs of the Ministry, based on an individual plan for professional development. An employee in the Ministry may, during his/her employment be assigned to another workplace different from the one in which s/he previously worked, in a transparent procedure. By exception, the transparency of the procedure shall not apply to assignment of workers to jobs in the Ministry when being assigned according to the needs of the Ministry or according to the employee's request.

The purpose of the promotion procedure is to enable the workers in the Ministry to advance their careers, that is, to move from junior to more senior jobs. An employee in the Ministry may be promoted to another position which, compared to the previous position, is higher ranked as per the Classification of work positions. The promotion is carried out in a transparent procedure, with the publication of an internal announcement, based on the professional qualities and qualifications of the employee, his/her working ability, completed training during employment, and the manner of performing work-related duties, regardless of gender, race, skin color, political or religious belief and national affiliation. By exception, the transparency of the procedure shall not refer to promotion of workers to certain jobs.

Regarding the area of human resources management, it is necessary to fully respect the principles of competitiveness, transparency and accountability; to increase control over the application of internal procedures for the method of employment, deployment and promotion in order to properly implement these procedures, isolated from any influences (nepotism, cronyism and politicization); a clearly defined career path system and evaluation without favoring individuals.

In that context, the Ministry of Interior, with the Law Amending the Law on Internal Affairs ("Official Gazette of RNM" No. 89/22), amended and complimented Article 66 of the Law on Internal Affairs to include an employment requirement for a work position in the Ministry with special duties and authorization to be entered into by a person who is not a member of a political party or a member of organs and bodies of a political party. Likewise, an employee who is already employed in the Ministry shall not be a member of a political party and may neither establish, manage, advocate for or represent a political party, nor be a member of organs and bodies of a political party.

6. Risks related to violation of ethics, impartiality, dignity, protection of image and reputation of the institution

One of the principles and at the same time a priority of the Ministry of Internal Affairs is the continuous consolidation and promotion of the values of professional ethics of the employees. Increased attention and application of measures aimed at equal treatment and opportunities, will reduce the risk of corruption.

In addition to specific risks related to corrupt behavior and actions, the Integrity Plan also identifies risks that violate the ethics and dignity of employees and have a direct impact on the image and reputation of the institution such as the following:

- Discriminatory, exclusionary or favoring behavior of any form, harassment, bullying, pressure, unethical communication or verbal violence;
- Failure to use the mechanism for reporting/ whistleblowing and protection of whistleblowers.

In order to prevent activities and behavior that damage the reputation and integrity of the institution, this Plan envisages an increased number of training sessions for the employees of the Ministry of Interior

in order to familiarize them with the provisions of the Code of Ethics for the employees of the Ministry of Interior, which governs various aspects, such as conflict of interests, acceptance and reporting gifts, incompatibility of performing certain activity alongside police duty, etc.

Training of employees on the framework and mechanisms for legal protection against discrimination, respect for gender equality, reporting/ whistleblowing and legal protection of whistleblowers are other mechanisms provided for in this Plan.

Through the implementation of the measures identified in this document, the purpose is to change the culture of "silent acceptance", to increase awareness in the field of safeguarding the physical and moral integrity of the employee at the workplace, as well as to reduce the number of recorded cases of violated ethics, violated human dignity and the reputation of the institution.

Integrity in police work is a principle of constant behavior conformant to ethical values. It can be considered as the integrity of individuals and the integrity of the organization.

Organizational integrity is much more than preventing corruption or having a written Code of Ethics. When it comes to the integrity of the Ministry of Interior, the focus should be put on creating a set of values and their incorporation into existing by-laws, respective strategies, plans, or other regulations related to corruption and corrupt behavior.

Police integrity mandates that police work be based on clearly defined ethical values such as transparency, impartiality, equality, fairness, honesty, and respect for human rights. Police should promote integrity at all its levels, and the police officer with integrity needs to set an example in the environment since such a police officer is the key to the fight against corruption and a protector of human rights. A police officer with integrity needs to have acquired knowledge and skills, ethical capacity, determination, and professionalism through compliance with established rules and procedures that will benefit public interest and contribute to increased public trust. The personal integrity of the police officer reflects the integrity of the Ministry of Internal Affairs, so it is also of great importance that the integrity of the management staff, through the imposition of high professional values, enables consistent compliance with the rules and regulations in the execution of work-related tasks by employees in the Ministry. The Department for Internal Control, Criminal Investigations and Professional Standards will continuously implement preventive activities in order to strengthen police integrity, according to the "Program for strengthening police integrity".

VI. MONITORING AND REPORTING

The Ministry of Internal Affairs is the responsible institution for coordinating and harmonizing the structures and institutions for monitoring the implementation of the Integrity Plan and Action Plan for 2023-2025.

Implementation of the Integrity Plan will be subject to a periodic monitoring and evaluation process. This process will be carried out with the participation of representatives/coordinators from all organizational units in the Ministry of the Interior.

As part of the monitoring, the coordinators will prepare and forward reports, which will serve to evaluate the degree of implementation of the measures, activities and objectives defined in the Action Plan, as well as the effectiveness of the measures.

The Department for Internal Control, Criminal Investigations and Professional Standards in the Ministry of Interior will coordinate the collection, processing and analysis of reports that will be forwarded to the structures and institutions in charge of meeting the relevant objectives and measures and will prepare the annual integrated report.

Based on the quantitative and qualitative assessment of the achievements, circumstances, risks and previous experiences, and the problems faced during implementation, recommendations for changes in the document will be formulated to lead to a continuous improvement of institutional policies when it comes to the prevention of corruption and increase in integrity.

After the end of the implementation period of the Integrity Plan 2023-2025, a final evaluation report will be prepared, where the results will be analyzed and evaluated in terms of the fulfillment of the objectives, measures taken, resources invested, effectiveness and impact, and determine the needs for continuity of measures in order to further combat corruption and build integrity of the Ministry of Internal Affairs.



VII. CONCLUSIONS AND RECOMMENDATIONS

Corruption is a dynamic phenomenon that takes different forms, adapts to circumstances, roles, legal or technological developments. Therefore, the risk of corruption is present in all sectors. Corruption is also directly linked to organized crime and terrorism, becoming a constant threat to public safety. In this context, the fight against corruption must be uncompromising, and continuous, taking into account its complexity and phenomenon.

A strategic response to corruption would be to increase and promote integrity, as well as increase transparency and accountability in the sectors assessed as the most vulnerable, thereby significantly reducing opportunities for abuse and corruption.

The Integrity Plan of the Ministry of Internal Affairs is a strategic document prepared based on the areas most at risk of corruption and integrity violations. The Action Plan for its implementation includes rules, measures and activities for preventing corrupt actions, as well as avoiding and diminishing risks that affect the integrity of employees in the institution. The document defines the responsible structures, the time restrictions, the indicators for measurement of the degree of implementation of a measure, and the intended purpose for each of them.

After the adoption of the document, all organizational units within the Ministry of Internal Affairs will be familiar with it and will be organized to take appropriate measures to implement their obligations to overcome detected risks.

MINISTER OF INTERNAL AFFAIRS
Oliver Spasovski



ACTION PLAN
FOR THE IMPLEMENTATION OF THE INTEGRITY PLAN
OF THE MINISTRY OF INTERNAL AFFAIRS
2023-2025

OBJECTIVE 1:

ACTION PLAN FOR THE IMPLEMENTATION OF THE INTEGRITY PLAN OF THE MINISTRY OF INTERNAL AFFAIRS 2023-2025

RISK	MEASURES AND ACTIVITIES	RESPONSIBLE ORGANIZATIONAL UNITS	OTHER RESPONSIBLE ORGANIZATIONAL UNITS	INDICATORS FOR MONITORING AND EVALUATION OF MEASURES AND ACTIVITIES	TARGETS OF THE INDICATOR FOR 2023	TARGETS OF THE INDICATOR FOR 2024	TARGETS OF THE INDICATOR FOR 2025
1. Favoring certain parties when issuing personal documents, permits, licenses, certificates 2. Falsification of personal and other documents 3. Accepting money from citizens and asking for and accepting gifts, free services and other benefits	1. Training sessions for the employees of the Civil Affairs Department on the topic: "Strengthening the work integrity and respecting the procedures for issuing documents" 2. Video surveillance in the premises of the Administrative Affairs Unit in Skopje 3. Civil Affairs Department conducting oversight over the employees in the units/ sections in relation to the legality of their work and the manner of exchange with third parties. 4. Internal controls over the work of the Civil Affairs Department 5. Civil Affairs Department conducting oversight over the employees on the wearing of badges by employees in order to distinguish them from third parties	- Civil Affairs Department (CAD) - Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS)	- Training center - Legal Affairs, Court Proceedings and Human Resources Management Department - domestic and foreign experts in the field	1. Number of carried out training sessions 2. Number of trained employees 3. Number of provided cameras for video surveillance in the premises of the Administrative Affairs Unit- Skopje 4. Number of oversight carried out by the CAD on the legality of work and the manner of exchange with third parties 5. Number of conducted internal controls by DICCIPS 6. Number of conducted oversight by CAD on the wearing of badges by employees in order to distinguish them from third parties	1. Two trainings of 20 CAD employees on the subject: „Strengthening the integrity of CAD employees involved in procedures for issuing personal documents, permits, licenses, certificates“ 2. Secured 10 cameras for video surveillance in the premises of the Administrative Affairs Unit- Skopje; 3. Conducted 5 inspections by CAD on the legality of work and the manner of exchange with third parties 4. Conducted 2 internal controls to CAD; 5. Conducted 5 oversights by CAD on the wearing of badges by employees in order to distinguish them from third parties	1. Two trainings of 20 CAD employees on the subject: „Strengthening the integrity of CAD employees involved in procedures for issuing personal documents, permits, licenses, certificates“ 2. Secured 10 cameras for video surveillance in the premises of the Administrative Affairs Unit- Skopje; 3. Conducted 7 inspections by CAD on the legality of work and the manner of exchange with third parties 4. Conducted 2 internal controls to CAD; 5. Conducted 7 oversights by CAD on the wearing of badges by employees in order to distinguish them from third parties	1. Two trainings of 20 CAD employees on the subject: „Strengthening the integrity of CAD employees involved in procedures for issuing personal documents, permits, licenses, certificates“ 2. Secured 10 cameras for video surveillance in the premises of the Administrative Affairs Unit- Skopje; 3. Conducted 6 inspections by CAD on the legality of work and the manner of exchange with third parties 4. Conducted 2 internal controls to CAD; 5. Conducted 6 oversights by CAD on the wearing of badges by employees in order to distinguish them from third parties

ACTION PLAN FOR THE IMPLEMENTATION OF THE INTEGRITY PLAN OF THE MINISTRY OF INTERNAL AFFAIRS 2023-2025

OBJECTIVE 2:

STRENGTHENING THE INTEGRITY IN THE TRAFFIC AND BORDER POLICE WITH THE PURPOSE OF REDUCING THE ACCEPTANCE OF BRIBE

RISK	MEASURES AND ACTIVITIES	RESPONSIBLE ORGANIZATIONAL UNITS	OTHER RESPONSIBLE ORGANIZATIONAL UNITS	INDICATORS FOR MONITORING AND EVALUATION OF MEASURES AND ACTIVITIES	TARGETS OF THE INDICATOR FOR 2023	TARGETS OF THE INDICATOR FOR 2024	TARGETS OF THE INDICATOR FOR 2025
1. Accepting money from citizens 2. Asking for and accepting gifts, free services and other benefits	1. Training sessions for traffic police and border police employees on the topic: "Strengthening the integrity of traffic police and border crossing employees". 2. Regular controls by IAD and PSB (UPD, BAMD) 3. Internal controls by DICCIPS 4. Procurement of appropriate technical equipment – body cameras and cameras in vehicles. 5. Purchase of a police uniform with the police officer name tag or official ID number marked	-Uniformed Police Department (UPD) - Border Affairs and Migration Department (BAMD) -Department of Internal Control, Criminal Investigations and Professional Standards (DICCIPS)	-Training center - Internal Affairs Departments (IAD) -domestic and foreign experts in the field	1. Number of carried out training sessions 2. Number of trained employees 3. Number of body cameras and vehicle cameras provided 4. Number of controls carried out by IAD and PSB 5. Number of internal controls carried out by DICCIPS 6. Uniforms procured	1. Two training sessions for 40 employees on the topic: "Strengthening the integrity of traffic police and border crossing employees" 2. Procured 10 body cameras and 10 vehicle cameras 3. Conducted 12 controls by IAD 4. Conducted 6 controls by PSB (UPD, BAMD) 5. Conducted 2 internal controls in all traffic stations/units and PS for ГП (note by the translator: unclear if it is an abbreviation for border crossing?) and ГН (note by the translator: unclear if it is an abbreviation for border supervision?) 6. Purchased 100 uniforms	1. Two training sessions for 40 employees on the topic: "Strengthening the integrity of traffic police and border crossing employees" 2. Procured 10 body cameras and 10 vehicle cameras 3. Conducted 12 controls by IAD 4. Conducted 6 controls by PSB (UPD, BAMD) 5. Conducted 2 internal controls in all traffic stations/units and PS for ГП (note by the translator: unclear if it is an abbreviation for border crossing?) and ГН (note by the translator: unclear if it is an abbreviation for border supervision?) 6. Purchased 100 uniforms	1. Two training sessions for 40 employees on the topic: "Strengthening the integrity of traffic police and border crossing employees" 2. Procured 10 body cameras and 10 vehicle cameras 3. Conducted 12 controls by IAD 4. Conducted 6 controls by PSB (UPD, BAMD) 5. Conducted 2 internal controls in all traffic stations/units and PS for ГП (note by the translator: unclear if it is an abbreviation for border crossing?) and ГН (note by the translator: unclear if it is an abbreviation for border supervision?) 6. Purchased 100 uniforms

OBJECTIVE 3:

STRENGTHENING THE INTEGRITY OF POLICE OFFICERS FOR THE PURPOSES OF LAWFUL EXERCISE OF POLICE POWERS

RISK	MEASURES AND ACTIVITIES	RESPONSIBLE ORGANIZATIONAL UNITS	OTHER RESPONSIBLE ORGANIZATIONAL UNITS	INDICATORS FOR MONITORING AND EVALUATION OF MEASURES AND ACTIVITIES	TARGETS OF THE INDICATOR FOR 2023	TARGETS OF THE INDICATOR FOR 2024	TARGETS OF THE INDICATOR FOR 2025
Committing crimes and undermining trust in the police	1. Training of police officers on the topic: "Strengthening personal integrity and compliance with primary and secondary legislation for the application of police powers" 2. Provision of appropriate technical equipment – body cameras and cameras in vehicles. 3. Oversight by the heads of organizational units where police powers are exercised over the application of police powers 4. Initiation of amendment of by-laws for detained, remanded and persons deprived of liberty 5. Internal controls by DICCIPS 6. Updating the web portal with primary and secondary legislation	-Department of Internal Control, Criminal Investigations and Professional Standards - all organizational units where police powers are exercised	-Training center -Common Affairs and Human Resource Management Department - Legal Affairs, Court Proceedings and Human Resources Management Department -domestic and foreign experts in the field	1.Number of carried out training sessions 2. Number of trained employees 3. Number of body cameras and vehicle cameras provided 4. Number of oversights conducted by managers 5. Amended and adopted legal acts 6. Number of conducted internal controls byDICCIPS 7. Updated web portal	1. Two training sessions for 20 employees on the topic: „ Strengthening the integrity of police employees when exercising police powers (abuse and overstepping of police powers)“ 2. 10 body cameras and 10 vehicle cameras provided 3. Conducted 12 oversights by managers 4. Adopted legal acts according to the initiated changes 5. Conducted 6 internal controls in IAD/PS6.Fully updated web portal with primary and secondary legislation	1. Two training sessions for 20 employees on the topic: „ Strengthening the integrity of police employees when exercising police powers (abuse and overstepping of police powers)“ 2. 10 body cameras and 10 vehicle cameras provided 3. Conducted 12 oversights by managers 4. Adopted legal acts according to the initiated changes 5. Conducted 6 internal controls in IAD/PS 6. Fully updated web portal with primary and secondary legislation	1. Two training sessions for 20 employees on the topic: „ Strengthening the integrity of police employees when exercising police powers (abuse and overstepping of police powers)“ 2. 10 body cameras and 10 vehicle cameras provided 3. Conducted 12 oversights by managers 4. Adopted legal acts according to the initiated changes 5. Conducted 6 internal controls in IAD/PS 6. Fully updated web portal with primary and secondary legislation

OBJECTIVE 4:

STRENGTHENING INTEGRITY IN PUBLIC PROCUREMENT IMPLEMENTATION

RISK	MEASURES AND ACTIVITIES	RESPONSIBLE ORGANIZATIONAL UNITS	OTHER RESPONSIBLE ORGANIZATIONAL UNITS	INDICATORS FOR MONITORING AND EVALUATION OF MEASURES AND ACTIVITIES	TARGETS OF THE INDICATOR FOR 2023	TARGETS OF THE INDICATOR FOR 2024	TARGETS OF THE INDICATOR FOR 2025
1. Conflict of interest with economic operators 2. Subjective approach in drafting the documentation for public procurement with the aim of discriminating against certain economic operators and subjective evaluation of offers 3. Disclosure of confidential information to economic operators	1. Training of employees from GCAD to strengthen integrity during the implementation of public procurement, respect for primary and secondary legislation and prevention of conflict of interests 2. Preparing an analysis of the market for products and services if necessary for a specific case 3. Internal audit 4. Internal controls by DICCIPS 5. Installation of video surveillance in the archive of completed public procurement cases in the GCAD and installation of security doors in the premises where the procedure for public procurement is carried out	- General and Common Affairs Department (GCAD); - Internal Audit Unit - Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS)	- Training center - Financial Affairs Department - Legal Affairs, Court Proceedings and Human Resources Management Department - domestic and foreign experts in the field	1. Number of carried out training sessions 2. Number of trained employees 3. Preparation of an analysis of the market for products and services if necessary for a specific case 4. Number of internal audits performed 5. Number of internal controls performed by DICCIPS 6. Installed video surveillance in the archive of completed items after public procurement in GCAD and installed security doors in the premises where the procedure for public procurement is carried out	1. One training for 20 employees on the topic: "Strengthening the integrity of GCAD employees during the implementation of public procurement and preventing conflicts of interest" 2. Prepared analysis of the market for products and services necessary for a specific case 3. Performed 1 internal audit 4. Conducted 2 internal controls in the General and Common Affairs Department 5. Installed video surveillance in the archive of completed cases after public procurement in GCAD and installed security doors in the premises where the procedure for public procurement is carried out	1. One training for 20 employees on the topic: "Strengthening the integrity of GCAD employees during the implementation of public procurement and preventing conflicts of interest" 2. Prepared analysis of the market for products and services necessary for a specific case 3. Performed 1 internal audit 4. Conducted 2 internal controls in the General and Common Affairs Department 5. Installed video surveillance in the archive of completed cases after public procurement in GCAD and installed security doors in the premises where the procedure for public procurement is carried out	1. One training for 20 employees on the topic: "Strengthening the integrity of GCAD employees during the implementation of public procurement and preventing conflicts of interest" 2. Prepared analysis of the market for products and services necessary for a specific case 3. Performed 1 internal audit 4. Conducted 2 internal controls in the General and Common Affairs Department 5. Installed video surveillance in the archive of completed cases after public procurement in GCAD and installed security doors in the premises where the procedure for public procurement is carried out

OBJECTIVE 5:

REDUCTION OF RISKS IN THE HUMAN RESOURCE MANAGEMENT SYSTEM

RISK	MEASURES AND ACTIVITIES	RESPONSIBLE ORGANIZATIONAL UNITS	OTHER RESPONSIBLE ORGANIZATIONAL UNITS	INDICATORS FOR MONITORING AND EVALUATION OF MEASURES AND ACTIVITIES	TARGETS OF THE INDICATOR FOR 2023	TARGETS OF THE INDICATOR FOR 2024	TARGETS OF THE INDICATOR FOR 2025
1. Insufficient transparency when hiring new personnel through a public announcement in the Ministry of Internal Affairs 2. Discrimination in employment on various grounds 3. Favoring individuals in the promotion process	1. Publication of public announcements on the website of the Ministry of Internal Affairs 2. Compliance with the primary and secondary legislation according to which the selection of candidates for employment is carried out 3. Compliance with the primary and secondary legal procedures for the promotion of employees in the Ministry of Internal Affairs	- Legal Affairs, Court Proceedings and Human Resources Management Department; - Common Affairs and Human Resource Management Department; - Placement and Promotion Committees	Public Relations and Strategic Affairs Department	1. Number of published public announcements for employment in the Ministry of Internal Affairs 2. Number of objections submitted by applicants in a public announcement, who were not selected. 3. Number of objections submitted by applicants to an internal advertisement for promotion, who were not selected for promotion.	1. Regular publication of public announcements for employment in the Ministry of Internal Affairs- increased transparency in employment in the Ministry of Internal Affairs 2. Reduced number of objections by applicants in a public announcement, who were not selected 3. Reduced number of objections by applicants to an internal advertisement for promotion, who were not selected for promotion.	1. Regular publication of public announcements for employment in the Ministry of Internal Affairs- increased transparency in employment in the Ministry of Internal Affairs 2. Reduced number of objections by applicants in a public announcement, who were not selected 3. Reduced number of objections by applicants to an internal advertisement for promotion, who were not selected for promotion.	1. Regular publication of public announcements for employment in the Ministry of Internal Affairs- increased transparency in employment in the Ministry of Internal Affairs 2. Reduced number of objections by applicants in a public announcement, who were not selected 3. Reduced number of objections by applicants to an internal advertisement for promotion, who were not selected for promotion.

OBJECTIVE 6:

STRENGTHENING OF INDIVIDUAL AND INSTITUTIONAL INTEGRITY FOR MAINTAINING THE REPUTATION OF THE INSTITUTION

RISK	MEASURES AND ACTIVITIES	RESPONSIBLE ORGANIZATIONAL UNITS	OTHER RESPONSIBLE ORGANIZATIONAL UNITS	INDICATORS FOR MONITORING AND EVALUATION OF MEASURES AND ACTIVITIES	TARGETS OF THE INDICATOR FOR 2023	TARGETS OF THE INDICATOR FOR 2024	TARGETS OF THE INDICATOR FOR 2025
1. Illegal and unprofessional conduct of the employees of the Ministry of Internal Affairs, which damages the reputation of the Ministry of Internal Affairs and brings about a low degree of personal integrity, and thus reduced institutional integrity. 2. Inapplicability of the Whistleblower Protection Law	1. Training of employees in the Ministry of Internal Affairs in terms of consistent compliance with the provisions of the Code of Ethical Conduct of the employees in the Ministry of Internal Affairs, the System for Integrity in the Mol and the Law on Whistleblowers. 2. Provision of a separate room, a separate telephone line and an e-mail address for the person authorized to receive reports from whistleblowers	Department of Internal Control, Criminal Investigations and Professional Standards	-Training center -domestic and foreign experts in the field	1. Number of carried out training sessions 2. Number of trained employees 3. Is a separate room, a separate telephone line and an e-mail address provided for the person authorized to receive reports from whistleblowers?	1. Two held training sessions for 20 Mol employees on the topic: „System for integrity in the Mol with a special reference to the Code of Ethics and the Law on Whistleblowers “. 2. Separate room, a separate telephone line and an e-mail address are provided for the person authorized to receive reports from whistleblowers	1. Two held training sessions for 20 Mol employees on the topic: „System for integrity in the Mol with a special reference to the Code of Ethics and the Law on Whistleblowers “. 2. Separate room, a separate telephone line and an e-mail address are provided for the person authorized to receive reports from whistleblowers	1. Two held training sessions for 20 Mol employees on the topic: „System for integrity in the Mol with a special reference to the Code of Ethics and the Law on Whistleblowers “. 2. Separate room, a separate telephone line and an e-mail address are provided for the person authorized to receive reports from whistleblowers

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INTEGRITY PLAN

OF THE MINISTRY OF INTERNAL AFFAIRS

2023-2025