



REPUBLIKA E SHQIPËRIE
MINISTRIA E DREJTËSISË

NATIONAL COORDINATOR AGAINST CORRUPTION

MONITORING REPORT FOR JANUARY - MARCH 2020

INTER-SECTORAL STRATEGY AGAINST CORRUPTION 2015 – 2020

www.drejtesia.gov.al

Table of Content

- I. EXECUTIVE SUMMARY ON THE INTER-SECTORAL STRATEGY AGAINST CORRUPTION 2015-2020 AND ITS ACTION PLAN 2018-2020..... 4**
- II. MONITORING METHODOLOGY5**
- III. ON THE ACTION PLAN 2018 – 2020 PURSUANT TO THE INTER-SECTORAL STRATEGY AGAINST CORRUPTION. 7**
- IV. MAIN ACHIEVEMENTS FOR ALL THREE STRATEGY APPROACHES..... 9**
- V. IMPLEMENTATION PROGRESS OF THE ACTION PLAN 2018-2020, FOR THE PERIOD JANUARY-MARCH 2020.....122**
- VI. ISSUES ENCOUNTERED DURING THE FIRST QUARTER REPORTING20**
- VII. CHALLENGES21**
- Annex* - ACTION PLAN 2018-2020, ON IMPLEMENTATION OF THE INTER-SECTORAL STRATEGY AGAINST CORRUPTION 2015-2020.....22**

LIST OF ACRONYMS

AASCA	Agency of the Administration of Seized and Confiscated Assets
NAIS	National Agency of Information Society
NFA	National Food Authority
ASCS	Agency for the Support of Civil Society
ASLSG	Agency for the Support of Local Self-Government
PPA	Public Procurement Agency
ARAD	Agency for Rural Agricultural Development
GDSP	General Directorate of State Police
HIDAACI	High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests
CRIPPD	Commissioner for the Rights to Information and Protection of Personal Data
NCAC	National Coordinator against Corruption
HCP	High Council of Prosecution
HSA	High State Audit
CEC	Central Elections Commission
MESY	Ministry of Education, Sport and Youth
MoI	Ministry of Interior
MARD	Ministry of Agriculture and Rural Development
MoJ	Ministry of Justice
MEFA	Ministry for Europe and Foreign Affairs
MoFE	Ministry of Finance and Economy
MIE	Ministry of Infrastructure and Energy
MoC	Ministry of Culture
MoD	Ministry of Defense
MHSP	Ministry of Health and Social Protection
MTE	Ministry of Tourism and Environment
GPO	General Prosecutor's Office
AP	Action Plan
ISAC	Inter-Sectoral Strategy Against Corruption
SPAK	Special Anti-Corruption Unit
SIAC	Service for Internal Affairs and Complaints

I. EXECUTIVE SUMMARY ON THE INTER-SECTORAL STRATEGY AGAINST CORRUPTION 2015-2020 AND ITS ACTION PLAN 2018-2020.

Corruption is a threat to democracy, good governance, and fair competition, sustainable economic, social and political development of a country.

It seriously impedes economic growth, creating a system of inequality, prejudice and nepotism, undermining people's trust in their state, therefore the fight against corruption is presently one of the primary challenges of any state with a democratic culture, vision and high integrity.

The government has and will firmly continue to have unshaken will in the fight against corruption through preventive actions, punitive measures and public awareness raising activities.

The priority of the government in the field of combating corruption best corresponds to the conditions set by the European Union to open negotiations for membership in the EU. The fight against corruption is one of the five policies Albania is advised to follow with priority in the country's European integration process. Likewise, the prevention and punishment of corruption is an obligation deriving from the accession of Albania to international instruments for the fight against corruption such as the United Nations Convention against Corruption, the Council of Europe Criminal Convention against Corruption, the Council of Europe Civil Convention against Corruption etc.

Since 2015, Albania has been pursuing and implementing the Inter-Sectoral Strategy against Corruption. The 2015-2020 vision of the Inter-Sectoral Strategy against Corruption is: *"Albanian institutions with a high level of transparency and integrity, enjoying the trust of citizens and guaranteeing quality and non-corrupt service"*.

The major goals of the Inter-Sectoral Strategy against Corruption are prevention, punishment and public awareness/education about corruption. These goals are long-term and extend over time throughout the implementation of the strategy and action plan.

The Inter-Sectoral Strategy against Corruption covers a period of 6 years, as it foresees the objectives and the relevant measures to be implemented to meet these objectives in accordance with the deadlines detailed in the Anti-Corruption Action Plan. The Inter-Sectoral Strategy against Corruption, being a crosscutting strategy, is based on the principle of coordination between institutions in order to achieve the objectives included in the NSDI by implementing a systematic and integrated approach.

During the first three years, the institutions implemented concrete anti-corruption measures provided in the Action Plan 2015-2017. An annual review of the Action Plan for the Strategy implementation was carried out by the National Coordinator against Corruption, in order to allow the adaptation of the Strategy to the new realities and sector-based priorities.

The Action Plan 2018 - 2020 has undergone a comprehensive consultation process with the participation of key stakeholders, who play an important role in the fight against corruption, including state administration institutions at central and local level and independent institutions, international organizations and partners, civil society etc.

In drafting this document, the changes that have taken place as a result of reforms such as Justice Reform and Territorial Administrative Reform have been taken into account and reflected.

For drafting this document, initially by the National Coordinator against Corruption was conducted an assessment of the development of the Inter-Sectoral Strategy against Corruption. The Action Plan 2015-2017 of this strategy was analyzed, and the problems faced by institutions for the implementation of measures set out in this action plan, were identified and analyzed.

A key role in the process of drafting Action Plan 2018-2020 is also attributed to the Passport of Indicators of the Inter-Sectoral Strategy against Corruption, through which measurable indicators of the realization of the objectives of this strategy have been determined.

By Decision of Council of Ministers No. 241, dated 20.04.2018, was approved the Action Plan 2018-2020 for the implementation of the Inter-Sectoral Strategy against Corruption 2015-2020, the Passport of Indicators, the establishment, functioning and duties of the Coordinating Committee for the Implementation of the ISAC and the Inter-Institutional Anti-Corruption Task Force.

The establishment of the Inter-Institutional Anti-Corruption Task Force, responsible for inter-institutional inspections under the Action Plan of the Inter-Sectoral Strategy against Corruption, is chaired by the Minister of Justice, National Coordinator against Corruption and is composed of representatives from the Prime Minister's Office, Public Procurement Agency and Central Inspectorate.

The Coordinating Committee is chaired by the Minister of Justice and consists of 10 members at the level of Deputy Minister from each Line Ministry (excluding 2 Ministries without portfolio).

II. MONITORING METHODOLOGY

Pursuant to Prime Minister's Order no. 114 dated 4.09.2019 "*On approval of the structure and organigramme of the Ministry of Justice*", at the Ministry of Justice is established the Sector of Programs in the Anti-Corruption Field, at the Directorate of Programs and Projects in the Anti-Corruption Field. This sector is the responsible structure for the monitoring process and for drafting the Monitoring Reports of the Inter-Sectoral Strategy against Corruption 2015 - 2020.

The Directorate of Programs and Projects in the Anti-Corruption Field carries out the coordination with all responsible institutions and then drafts the monitoring report. This report covers the period from 1 January to 31 March 2020 and is drafted based on the contribution provided by all institutions involved in the Action Plan of ISAC. The goal is to have information on the achievements of progress and challenges towards meeting the objectives of the strategy.

Every institution has reported on the level of implementation of each policy and activity, allocated budget, problems encountered and assessment of progress of the strategy in general. In order to monitor the implementation of the undertaken commitments, regarding the implementation of the measures, the monitoring process is carried out for each approach.

Monitoring the Strategy consisted in two main phases:

1. Reporting by institutions through their contact points on the implementation of the measures for which they are responsible; and
2. Reporting by the NCAC on the implementation of the AP in its entirety.

The Monitoring Report has required a process consisting of 2 reporting stages for most of the institutions in order to complete and correct the required information. Extending the reporting process was necessary as reporting in the first rounds was incomplete or unclear in many of the Reporting Matrix components.

Continuity of progress in the period being monitored is classified into 4 categories:

- *Implemented*: Institutions have reported the status “Implemented” for those measures/activities that have been fulfilled.
- *Ongoing*: Institutions have reported the status “Ongoing” for those measures/activities which in the reporting period have been partially implemented.
- *Not implemented*: Not implemented are those measures/activities that have not recorded development for the reporting period.
- *Out of the reporting period*: Measures/activities of AP 2018-2020 which are not part of the monitoring period, as they are foreseen to be implemented in other monitoring periods.

Hereunder, the data for each stage have been handled and instructions were prepared with additional information that institutions had to complete for the necessary data framework. Verification of the reported data was performed partly online for those measures that the contact points had conducted the reporting, in order to ensure their accuracy. The statistical treatment was performed by encoding the responses based on the collected reports.

After the preparation of the draft report, the Ministry of Justice, in support of the monitoring process, sends the document for consultation to the reporting institutions, civil society as well as publishes the draft on the official website of the Ministry of Justice, where an electronic address is assigned for receiving comments. At the end of the consultation process, the Ministry of Justice reflects the relevant comments/suggestions on the draft monitoring report before being approved by the Coordinating Committee.

Pursuant to the Prime Minister’s Order no. 157, dated 22.10.2018 “*On taking measures for the implementation of the broad sectoral/cross-sectoral approach, as well as the establishment and functioning of the integrated sectoral/cross-sectoral mechanism*”, 8 Thematic Groups have been established, which are part of the Integrated Policy Management Group (IPMG) for Good Governance and Public Administration. Specifically, the Anti-Corruption Thematic Group (AC ThG) has been set up for the Ministry of Justice¹.

IPMG will provide a high-level management structure related to:

- High-level political and managerial decision-making in planning and monitoring sectoral reforms, policies and strategic framework;
- coordination of planning, programming and monitoring for the involved sectors, through the organization of regular dialogue with development partners;
- providing support in the framework of the European Union membership process;

¹ This role is played by the Coordinating Committee for the Implementation of the Inter-Sectoral Strategy against Corruption.

- government dialogue on policies with development partners, local government, civil society and the private sector, implementation of measures within the relevant field and sectors, and promotion and support of coordinated initiatives.

In the context of European Integration, these structures will play the role of Sectoral Monitoring Committee for IPA projects, ensuring that IPA funding is monitored by sectors.

III. ON THE ACTION PLAN 2018 – 2020 PURSUANT TO THE INTER-SECTORAL STRATEGY AGAINST CORRUPTION

The Action Plan 2018 - 2020 consists of a total of 18 objectives, of which 11 are part of the preventive approach, 4 in the punitive approach and 3 in awareness approach, as follows:

Preventive Approach, which aims to eradicate corruption firstly from the public administration and all state segments and mainly from institutions providing public services to citizens.

This approach marks the largest number of activities that responsible institutions are foreseen to implement throughout the period and consist of the following objectives:

- A.1 Increasing Transparency in State Activity and Improving Citizens' Access to Information;
- A.2 Increasing transparency in planning, managing and controlling public funds;
- A.3 Strengthening the electronic infrastructure of public institutions;
- A.4 Improving the treatment of corruption denunciations/reports;
- A.5 Strengthening the regime of declaration and control of assets of public officials and conflicts of interest cases;
- A.6 Strengthening the regime of controls over the financing of political parties;
- A.7 Improving the efficiency of internal audit and inspection and systematic use of risk analysis;
- A.8 Systematic use of the mechanism for identifying areas for corruption;
- A.9 Strengthening the integrity of public officials;
- A.10 Analyzing trends of corruption, effectiveness of anti-corruption measures and improving statistics related to the activity of anti-corruption law enforcement agencies;
- A.11 Articulating and adopting anti-corruption policies at the local government level.

Punitive Approach, is intended to ensure that law enforcement institutions and especially independent bodies, which have a key role in this process, should monitor law enforcement and rule of law, thus ensuring the transparency and integrity of state bodies. This approach consists of the following objectives:

- B.1 Improving the efficiency and effectiveness of criminal investigations against corruption;
- B.2 Improving cooperation between law enforcement institutions in prosecution and criminal punishment of corruption;
- B.3. Review of the legal framework for the prosecution of economic and financial crime;
- B.4. Improving judicial and international police cooperation in the fight against corruption.

Awareness Approach, aims for the public to participate in the fight against corruption by denouncing it and being active in initiatives aimed to prevent corruptive phenomena. This approach consists of the following objectives:

- C.1 Public awareness raising and education of the general public on the consequences of corruption;
- C.2 Encouraging the public to actively use mechanisms for reporting corruption;
- C.3 Encouraging cooperation with civil society.

The performance indicators² are in total 37, where 21 thereof take part in the preventive approach, 9 in the punitive approach and 7 in awareness approach. This action plan consists of a total of 97 measures, respectively 52 measures for the preventive approach, 19 measures for the punitive approach and 26 measures for the awareness approach. The number of institutions involved in the process of drafting the Action Plan is 84 (11 ministries, 12 central level institutions, 61 Municipalities).

Pursuant to the Decision of Council of Ministers no. 241, dated 20.04.2018 "On the approval of the Action Plan 2018-2020 for the implementation of the Inter-Sectoral Strategy Against Corruption 2015-2020, of the Passport of Indicators, establishment, functioning and duties of the Coordinating Committee for the Implementation of the Inter-Sectoral Strategy Against Corruption 2015-2020 and the Inter-Institutional Anticorruption Task Force ", in April 2020 the Ministry of Justice started the monitoring process of ISAC for the first quarter of 2020.

The Inter-Sectoral Strategy Against Corruption aims to achieve the major objectives of this strategy through the implementation of specific anti-corruption measures, in order to develop a society in which a responsible and efficient anti-corruption system is in place, capable of tangible results and to show a tendency toward maximum elimination of corruption threats, as well as the will to prevent and combat corruption. To monitor the performance of the Inter-Sectoral Strategy Against Corruption 2015-2020, a report has been drafted in the framework of the implementation of the Action Plan 2018-2020, which is the fifth monitoring report and covers the period from January 1st 2020 to March 31st 2020.

IV. MAIN ACHIEVEMENTS FOR ALL THREE STRATEGY APPROACHES

The most significant achievements for the first quarter 2020 regarding the implementation of Action Plan 2018 – 2020 of the Inter-Sectoral Strategy against Corruption, are as follows:

Preventive approach

1. All ministries have approved and published transparency programs on their websites.

² In order to achieve the planned objectives and evaluate the performance indicators, a Passport of Indicators is drafted for ISAC implementation, explaining the detailed methodology for the calculation of baseline values and targets introduced by the institutions. A more complete information can be found in the Annex attached hereto.

2. During the period January-March 2020, the Commissioner for the Rights to Information and Protection of Personal Data has monitored online 133 public authorities (out of 419 Public Authorities in total) regarding the publication of the transparency program, coordinator and register of requests and responses. The monitoring showed that 92 public authorities have published transparency programs on their official websites, 36 have published a register of requests and responses and 75 have published the coordinator's contacts on the right to information in accordance with the provisions of law no. 119/2014 "On the right to information".
3. The electronic register of requests and responses to the right to information has already been installed in 31 public authorities. During the first quarter of 2020 the number of requests for public information handled through the electronic system of requests and responses from 31 Public Authorities where the register has already been installed is 61. For the same period the number of complaints to the Commissioner's Office via electronic register is 19 in total.
4. During the period January - March 2020, the Commissioner's Office continued to monitor the implementation of the law on the right to information. A total of 160 complaints filed by citizens, but also by civil society organizations were reviewed. Of these complaints, 85 of them were resolved through mediation, 33 were found to be out of object, 3 out of time and 3 incompleted. Also, 5 complaints were rejected based on the restrictions of the right to information in accordance with Article 17 of Law no. 119/2014 "On the right to information". 5 Ordinance Decisions have been taken. 21 inspections were carried out and 1 hearing was held.
5. In January 2020, 128 public authorities stated through the self-declaration instrument that during 2019 they had handled 11758 requests for information, of which 1185 requests did not receive a response. The percentage of requests for rejected information is 10% of the total number of requests.
6. For the period January-March 2020, the percentage of elements changed in the PPA forecast register is 12.08%, the percentage of negotiated procedures without prior announcement of the contract notice to the total of won procedures is 6.5%, while the percentage of contract changes from the administered data it is 10.2%.
7. For the period January - March 2020, NAIS has added 19 electronic services. Direct contacts between citizens, businesses and employees of public institutions have been avoided, as follows:
 - ✓ 945,969 documents with electronic stamp generated in the period January - March 2020, through the e-albania module and the e-albania portal, thus reducing bureaucracies and directly eliminate citizen-administration contact.
 - ✓ 186,475 users registered on the e-albania portal for the period in question. In total over 1.2 million users of the portal, who can use its electronic services by reducing the physical presence at the counters of institutions.
 - ✓ Over 4.3 million uses of the portal's electronic services by citizens, businesses and administration employees which means that 4.3 million visits in administration offices have been eliminated.
 - ✓ 620 electronic services available on the portal.
8. During the first quarter of 2020, the Sector for Investigation of Corruption and Crimes in Duty, 137 criminal offenses were identified and 126 of them were detected, or to the extent of 91.97%, a total of 205 perpetrators were prosecuted, of which 21 arrested and detained perpetrators, 180 proceeded/prosecuted at large and 4 perpetrators declared wanted.

9. The criminal offenses only for corruption for the first quarter of 2020 are as follows: 34 criminal offenses have been identified, 53 suspected perpetrators have been prosecuted, of which 11 perpetrators have been arrested and detained, 41 have been proceeded/prosecuted at large and 1 has been declared wanted.
10. During the first quarter of 2020, 3 joint seminars and trainings were conducted with the Prosecution and other law enforcement institutions, as well as with CEPOL-UNODC regarding national financial investigation and international investigations, financial investigation related to fraud of public procurement and money laundering, such as the relationship between the police and the prosecution to improve the quality of referrals.
11. During this period, 34 joint meetings and analyzes were conducted with the Prosecutor's Office and other law enforcement agencies/institutions, regarding the handling of complaints and investigations, as well as penal proceedings.
12. From the Complaints Sector at the Directorate of Professional Standards are registered 205 complaints received in the Platform "Office of Co-Government", at the Prime Ministry's Office.
13. For the period January - March 2020, the Service for Internal Affairs and Complaints (S.I.A.C) received and handled 1403 calls on the green line 0800 90 90 and 303 complaints from all communication gates that the S.I.A.C has put in public discretion. After the administrative investigation of the complaints, it resulted that:
 - ✓ For 27 police officers, violations of an administrative nature were identified and it was suggested the beginning of the disciplinary investigation by the Directorate of Professional Standards, at the General Directorate of State Police.
 - ✓ Violations were found for 7 police officers that constitute elements of criminal offense. These materials were referred to the Prosecution body.
14. According to the Law "For Political Parties", by March 31, 2020, political parties must submit to CEC the financial reports for 2019 calendar year. By the beginning of March 2020, 7 annual financial reports have been submitted, which are published on the official website of CEC at the address: <http://cec.org.al/raportet-vjetore-financiare-te-partive-politike/>.
15. CEC has set up a special structure for independent control and verification of audit reports. The sector for verifying and supervising the financing of political parties at the Finance Directorate consists of three employees (the head of the sector and two specialists). Two specialists, lawyers, have also been recruited by the Legal Department to verify financial reports and audit reports, identify alleged violations and impose proportional sanctions.
16. For the period January-March 2020, MoFE has had 3 cases/signals followed by the audit structure, and has performed 3 public financial inspection missions.
17. For the first quarter of 2020, MoFE has carried out 5 external quality assessments in: General Directorate of Customs, General Directorate of Taxes, Municipality of Tirana, Shkodra Regional Hospital and Kukës Regional Hospital. During these assessments, the shortcomings were identified and recommendations were given for improving the internal audit activity.
18. The manual "Integrity Risk Assessment Methodology" (IRAM) for the Central Government has been completed and has been consulted with the working group. It is in the process of internal approval. Methodology (IRAM) is relevant for assessing the integrity risk in all central government institutions and aims to contribute to strengthening the process of planning and managing the integrity risk in the public sector in Albania.

19. From the control and verification (administrative investigation) of the implementation of legality and/or denunciations of abusive, corrupt or arbitrary practices in all public administration institutions and state agencies, it results that during the first quarter of 2020, a significant part of the institutions have carried out controls and inspections, about 23,000 controls and inspections have been carried out, 42 recommendations have been given, 112 fines have been imposed, and 7 activity interruptions have been carried out. For the reporting period, 1,621 disciplinary, administrative and organizational measures were given, 64 criminal references to the Prosecutor's Office for employees, as well as 33 employees referred to the Disciplinary Commission.
20. For 2019, 262 persons have been convicted by the Courts of First Instance (by final decision) and 246 persons by the Courts of Appeal for criminal offenses related to corruption. 27,525,360 ALL were seized from AASCA.

Punitive approach

21. The Special Prosecution Office has conducted periodic analyzes with the structures of the State Police for concrete criminal proceedings related to criminal offenses in the field of corruption. Periodic analyzes were also conducted during February 2020, regarding the sequestration of assets under Operation Force of Law (OFL).
22. In the annual analysis of the 22 prosecutor's offices with general jurisdiction, representatives of the State Police, the Courts of First Instance and the Courts of Appeal have been invited to participate and to discuss.
23. The General Prosecutor's Office is in the process of signing a cooperation agreement on access to the electronic register of the Social Insurance Institute.
24. During this period (January-March 2020) the State Police has conducted 34 joint meetings and analyzes with the Prosecution and other law enforcement agencies/institutions, regarding the handling of complaints and investigations of criminal proceedings for corruption.
25. The State Police, according to the agreements cooperates with EUROPOL, "INTERPOL", Liaison Officer (Contact), of the Albanian Police, attached to countries abroad, as well as with the Liaison Officer (Contact) of the countries attached to Albania, CARIN, SELEK, BAMIN, INTERFORCA, etc., as well as on the basis of bilateral agreements with other states. The number of information exchanged with counterpart agencies in the field of economic and financial crimes is 307 common information and practices, of which 179 information and practices followed by Interpol; 93 information and practices followed with Europol; 3 information with Interforce; 32 information with the network of offices for finding and recovering criminal assets (CARIN).

Awareness approach

26. For the first time in Albania, the "Integrity Week" was organized. This was an initiative of ICC Albania in partnership with the Ministry of Justice and with the support of the Dutch Embassy and the EU Delegation. During Integrity Week, February 3-11, 2020, 22 activities were organized by 28 partners. Through various activities with NGOs, anti-corruption experts, academics, students and businesses, the Ministry of Justice had the opportunity to exchange ideas, build new bridges of

cooperation, open more to transparency and explore opportunities for new coalitions in the fight against corruption.

27. On February 8, 2020, the “Run against Corruption” activity was carried out. About 600 people joined the Run against Corruption initiative in the second edition organized by the Ministry of Justice and the Delegation of the European Union, as part of the "Integrity Week", in order to convey the symbolic message that together we can change and fight corruption. The activity took place along the artificial lake park in Tirana.
28. The Anti-Corruption Program is an activity carried out by ASCS and in its content, has included an element related to data on funded projects and institutional commitment on its monitoring and implementation.

V. IMPLEMENTATION PROGRESS OF ACTION PLAN 2018-2020, FOR THE PERIOD JANUARY-MARCH 2020

This chapter describes the progress made in the framework of fulfillment the three approaches of the Strategy³ regarding the implementation status of the measures/activities of the Action Plan 2018-2020, for the period January-March 2020.

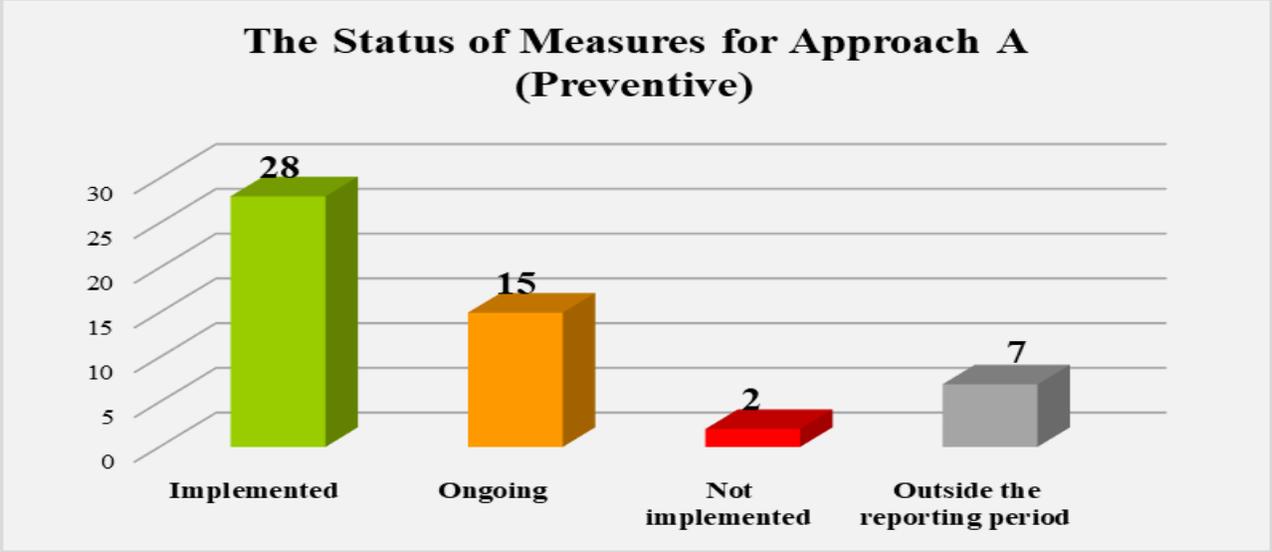
The Action Plan 2018 - 2020 consists of a total of 97 **measures/activities**, respectively 52 measures for the preventive approach, 19 measures for the punitive approach and 26 measures for the awareness approach.

The progress achieved until the first quarter of 2020, in the framework of fulfillment the measures/activities envisaged in Approach A (Preventive), pursuant to the Intersectoral Strategy Against Corruption is as follows:

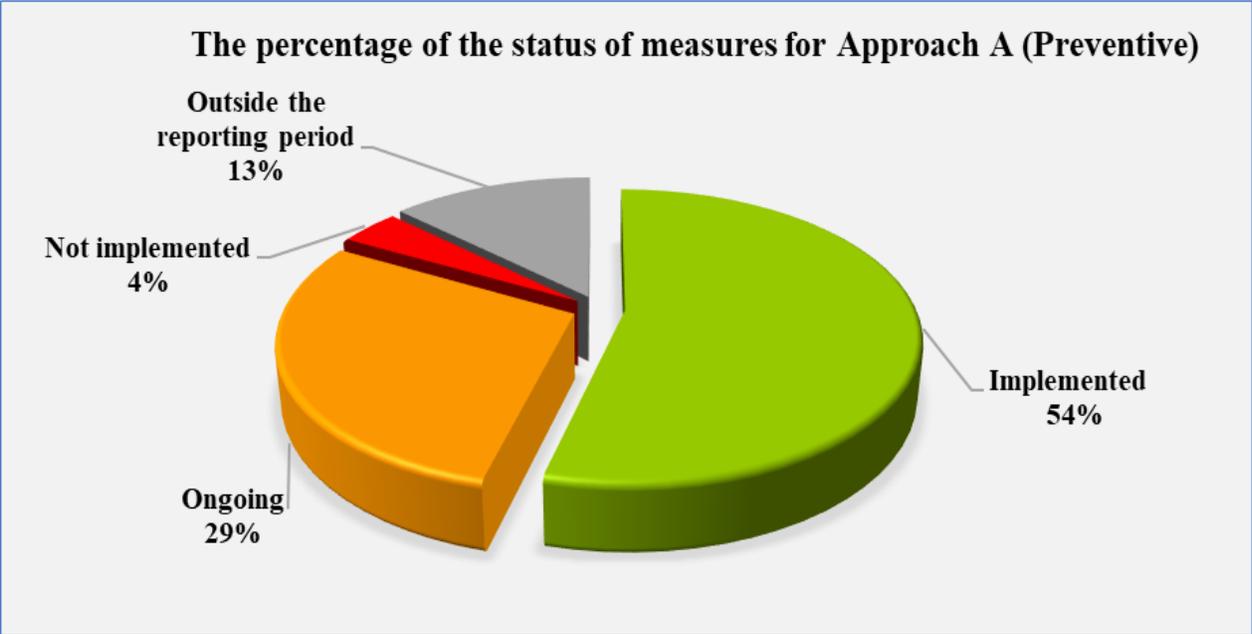
Number of measures under implementation according to Approach A (Preventive)

Current status of measures of Approach A		
Implementation status of measures under Approach A	Number of measures	Percentage to the total of Approach A
Implemented	28	54%
Ongoing	15	29%
Not implemented	2	4%
Outside the reporting period	7	13%
Total	52	100%

³ The Action Plan and Progress for each objective are included in the annex to this report.



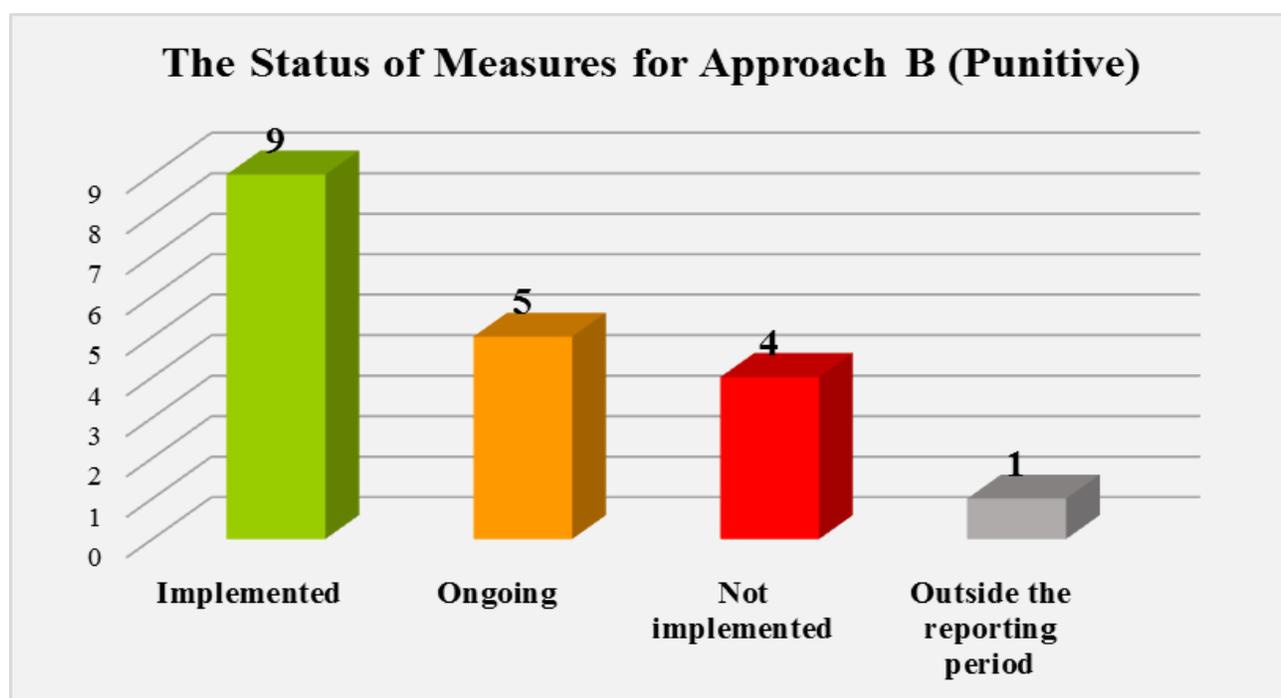
It turns out that out of 52 measures/activities foreseen in the Action Plan 2018 - 2020 for Approach A (Preventive), 28 of them have been implemented, 15 measures/activities are still in the implementation process, 2 measures are not implemented (measure A.9.2 and measure A.11.3), as well as 7 measures/activities are outside of the reporting period (mainly measures/activities foreseen to be implemented within December 2020).



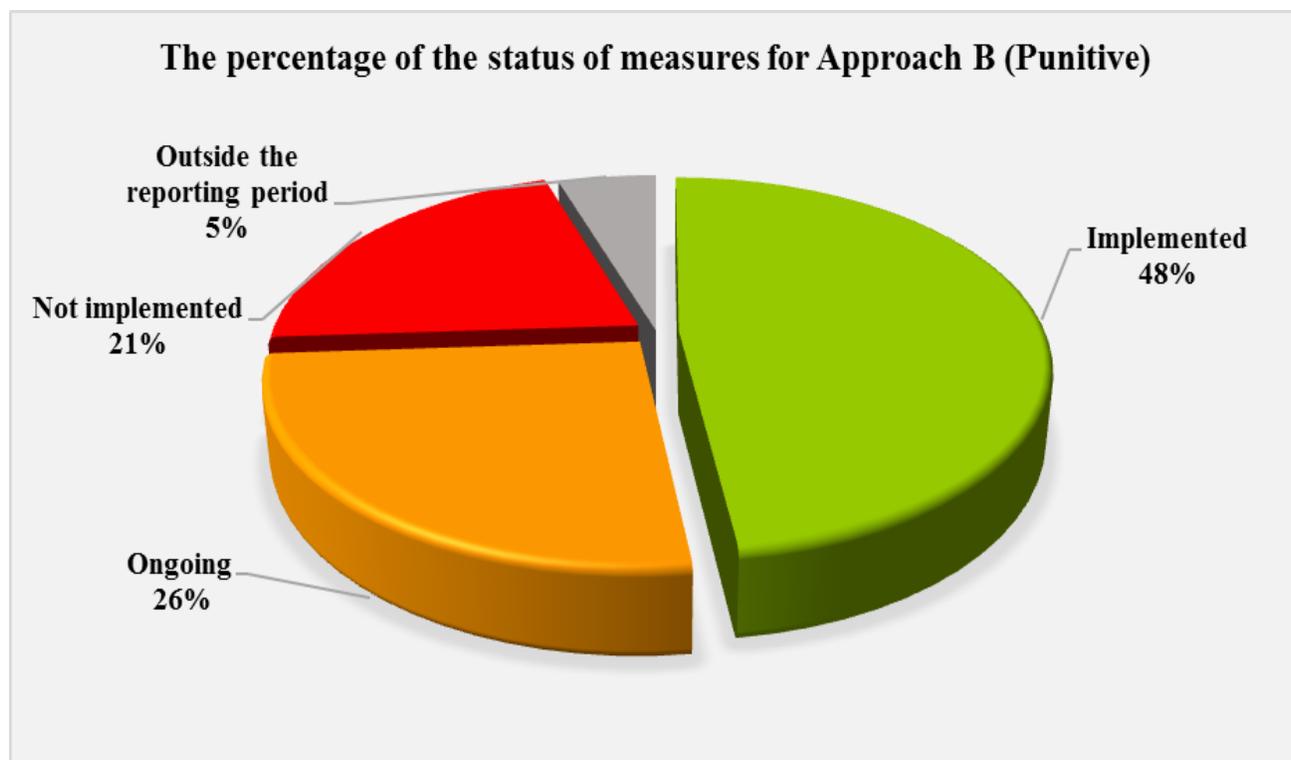
The percentage of the total progress of the implementation of the measures/activities foreseen in the Action Plan for Approach A, results in the level of 54% the measures/activities which are implemented, 29% the measures/activities in the process, 4% the measures/activities which are still not implemented, as well as 13% of the measures/activities envisaged to be carried out in the future by the responsible institutions.

Number of measures under implementation according to Approach B (Punitive)

Current status of measures of Approach B		
Implementation status of measures under Approach B	Number of measures	Percentage to the total of Approach B
Implemented	9	48%
Ongoing	5	26%
Not implemented	4	21%
Outside the reporting period	1	5%
Total	19	100%



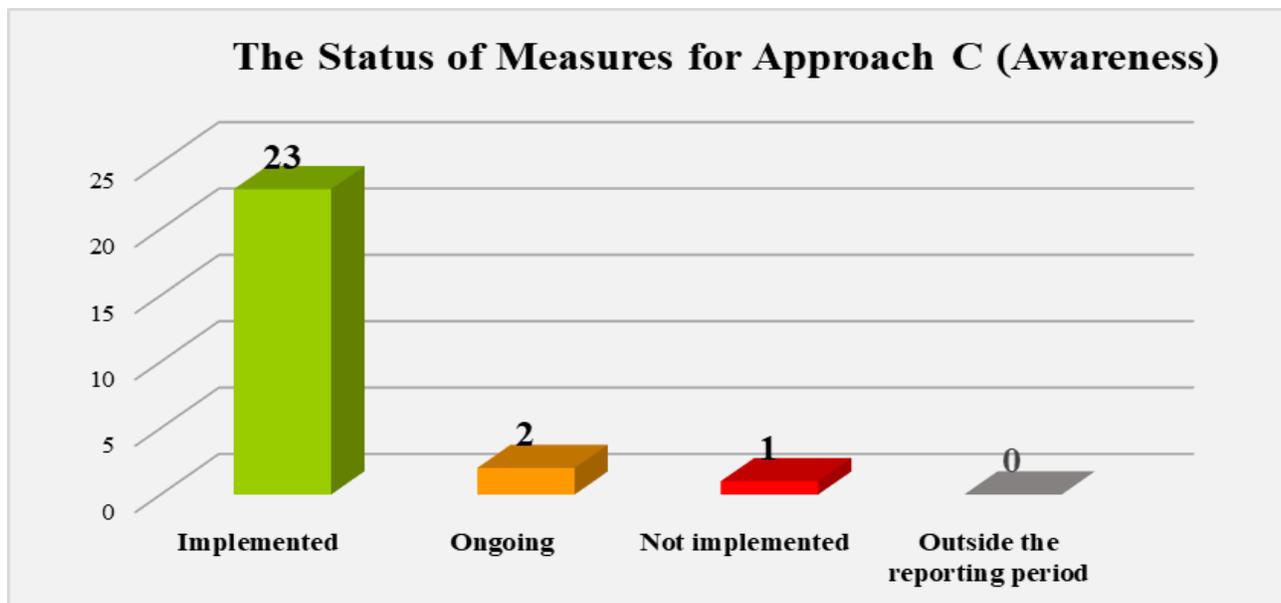
It turns out that out of 19 measures/activities foreseen in the Action Plan 2018 - 2020 for Approach B (Punitive), 9 of them are implemented, 5 measures/activities are still in the process of implementation, 4 measures/activities are not implemented (measures B.1.4; B.3.1; B.3.2; B.4.5), as well as 1 measure/activity is outside the reporting period (measure B.3.3 foreseen to be implemented within the fourth quarter of 2020).



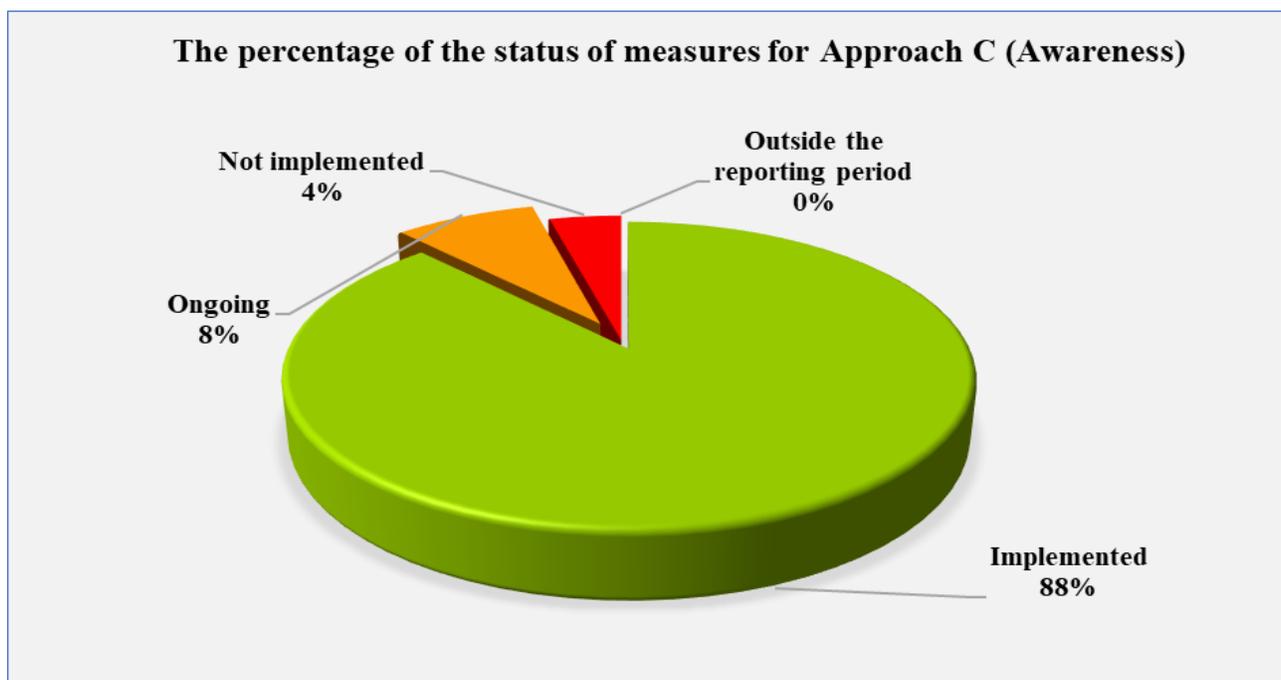
The percentage of the total progress of the implementation of the measures/activities foreseen in the Action Plan for Approach B, results in the level of 48% the measures/activities which are implemented, 26% the measures/activities in process, 21% the measures/activities which are still not implemented, as well as 5% of the measure/activity foreseen to be implemented in the future by the responsible institution.

Number of measures under implementation according to Approach C (Awareness)

Current status of measures of Approach C		
Implementation status of measures under Approach C	Number of measures	Percentage to the total of Approach C
Implemented	23	88%
Ongoing	2	8%
Not implemented	1	4%
Outside the reporting period	0	0%
Total	26	100%



It results that out of 26 measures/activities foreseen in the Action Plan 2018 - 2020 for Approach C (Awareness), 23 of them have been implemented, 2 measures/activities are still in the process of implementation, and 1 measure/activity is not implemented (measure C.B.6).



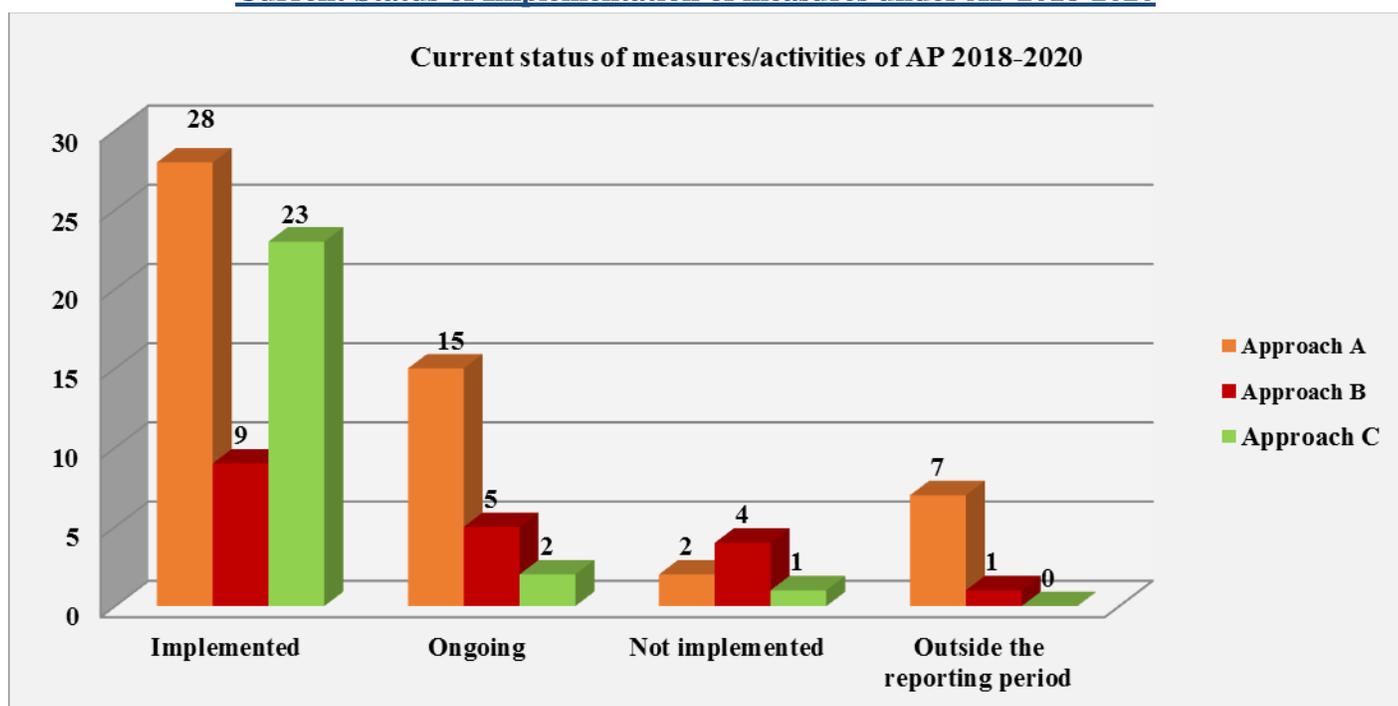
The percentage of the total progress of the implementation of the measures/activities foreseen in the Action Plan for Approach C, results in the level 88% of the measures/activities which are implemented, 8% the measures/activities in the process, as well as 4% the measures/activities which is still not implemented by the responsible institution.

The total progress achieved until the first quarter of 2020, in the framework of fulfilling the three approaches of the strategy regarding the status of implementation of measures/activities is as follows:

Number of measures under implementation according to Approaches

Current status of measures of the Action Plan 2018 - 2020					
Implementation status of measures for three Approaches	Approach A (Preventive)	Approach B (Punitive)	Approach C (Awareness)	Total for three Approaches	Percentage of status of AP measures
Implemented	28	9	23	60	62%
Ongoing	15	5	2	22	23%
Not implemented	2	4	1	7	7%
Outside the reporting period	7	1	0	8	8%
Total	52	19	26	97	100%

Current Status of Implementation of measures under AP 2018-2020



It turns out that out of a total of 97 measures/activities envisaged in the Action Plan 2018 - 2020 of the Anti-Corruption Strategy, their current status for all 3 approaches (until the first quarter of 2020) is reported as follows:

- **60** measures/activities carried out;
- **22** measures/activities are still in the process of implementation;
- **7** measures/activities are not implemented by the responsible institutions;
- **8** measures/activities are outside of the reporting period, as they are foreseen to be implemented in the upcoming quarters of 2020.

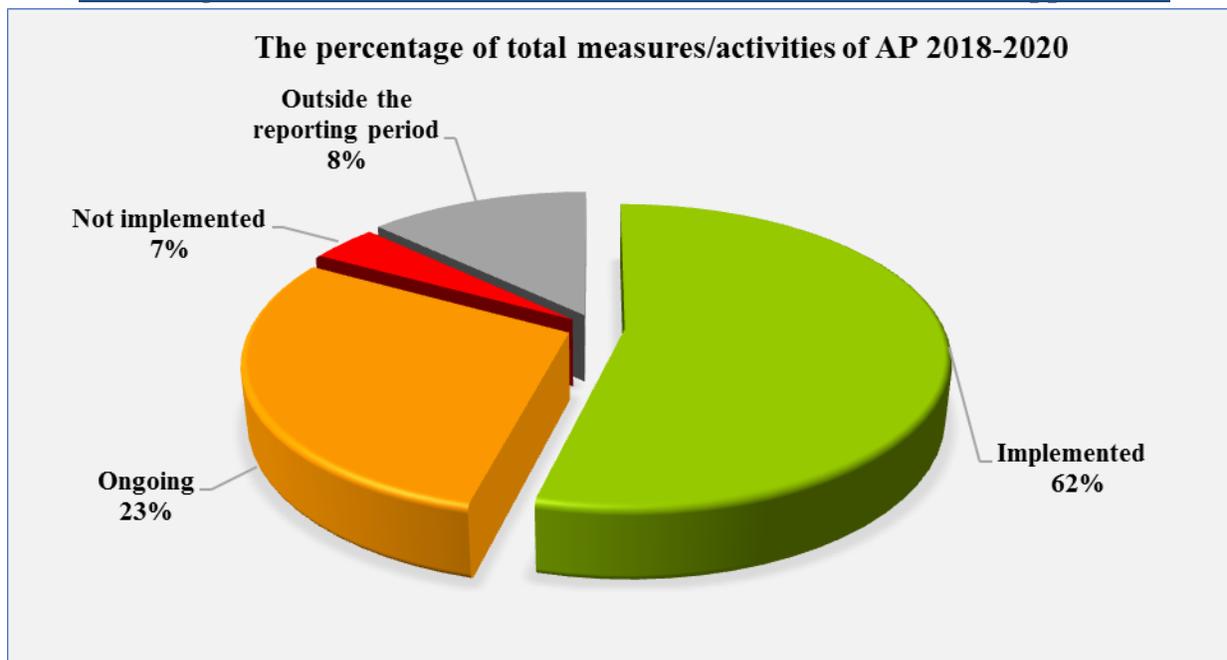
As above, out of **60 measures/activities carried out** until the first quarter of 2020, specifically 28 of them belong to the preventive approach, 9 of them belong to the punitive approach, and 23 measures/activities belong to the awareness approach.

Out of **22 measures/activities that are still in the implementation process**, specifically 15 of them belong to the preventive approach, 5 of them belong to the punitive approach, and 2 measures/activities belong to the awareness approach.

Out of **7 measures/activities not implemented** by the responsible institutions, specifically 2 of them belong to the preventive approach (measure A.9.2 where the responsible institution is the NCAC and measures A.11.3 where the responsible institution is ASLSG), 4 of them belong to the punitive approach (measures B.1.4 where the responsible institution is AASCA; B.3.1 and B.3.2 where the responsible institution is MoFE; B.4.5 where the responsible institution is the State Police), as well as 1 measure/activity belongs to the awareness approach (measure C.b.6 where the responsible institution is MoJ).

Out of **8 measures/activities that are outside of the reporting period** (since they are foreseen to be implemented in the next quarters of 2020), specifically 7 of them belong to the preventive approach (mainly measures/activities foreseen to be implemented within December 2020), as well as 1 of them belongs to the punitive approach (foreseen to be implemented within the fourth quarter of 2020).

Percentage of total measures/activities of AP 2018-2020, for all three approaches



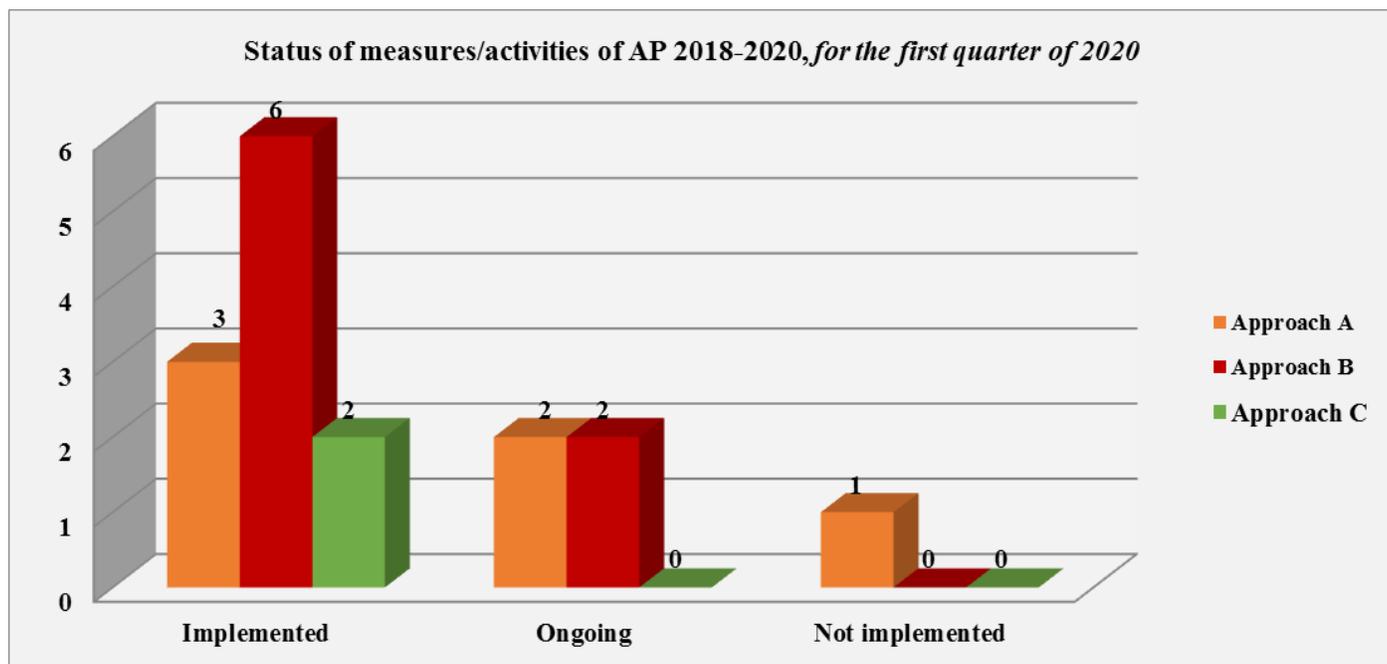
Percentage of the total progress of the implementation of the Action Plan 2018-2020 for all measures/activities foreseen for Approach A-B-C (97 measures/activities) is as follows: **62%** of them are implemented, **23%** of measures/activities are in process, **7%** are not implemented by the responsible institutions, as well as **8%** of the measures/activities are outside the reporting period.

Regarding the measures foreseen to be implemented *during the first quarter of 2020*, it results that out of the total of 16 measures foreseen in AP 2018-2020, 6 of them belong to Approach A, 8 measures belong to Approach B, as well as 2 measures belong to Approach C.

Referring to the period January-March 2020, the progress achieved in fulfilling the 3 Approaches of the Strategy, regarding the status of implementation of measures is as follows:

Number of measures under implementation according to Approaches, only for the first quarter of 2020

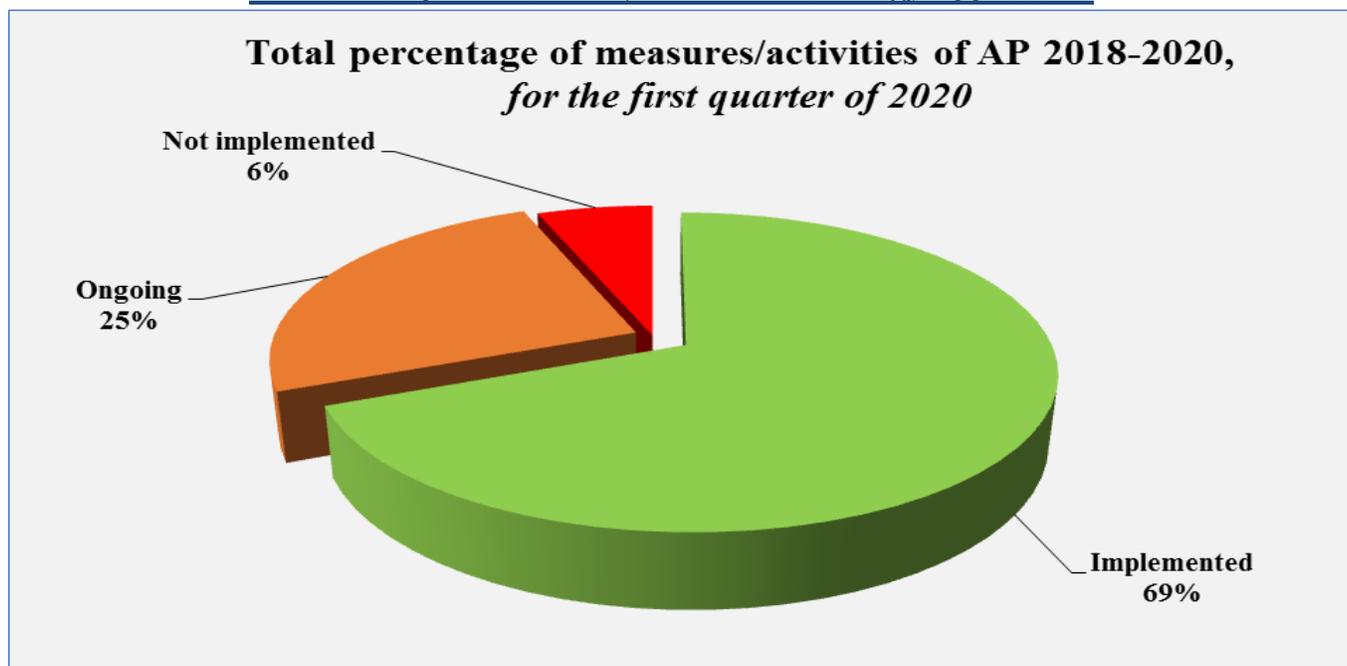
Status of measures/activities of the Action Plan 2018 - 2020, for the first quarter of 2020					
Implementation status of measures for three Approaches	Approach A (Preventive)	Approach B (Punitive)	Approach C (Awareness)	Total for three Approaches	Percentage of status of AP measures
Implemented	3	6	2	11	69%
Ongoing	2	2	0	4	25%
Not implemented	1	0	0	1	6%
Total	6	8	2	16	100%



It turns out that out of **16 measures/activities foreseen in the Action Plan 2018-2020**, their status for all 3 approaches (for the period January-March 2020) is reported as follows:

- **11** measures/activities implemented;
- **4** measures/activities are still in process of implementation;
- **1** measure/activity is not implemented by the responsible institution (measure A.11.3).

Percentage of measures/activities foreseen in AP 2018-2020,
for the first quarter of 2020, for all three Strategy Approaches



Percentage on the progress of the implementation of the Action Plan 2018-2020, only for the measures/activities foreseen for Approach A-B-C (16 measures/activities) is as follows: **69%** of them are implemented, **25%** of the measures/activities are in process, as well as **6%** are not implemented by the responsible institutions.

According to the Strategy, the financing of the Action Plan is implemented from two main sources: the state budget and the financial support of international partners.

In the framework of monitoring the implementation of measures/activities of the Action Plan 2018 - 2020, the responsible institutions have been asked to report on expenditures based on the activity performed. From the analysis for the measures/activities reported for the first quarter of 2020 it results that:

- ✚ *Funding for the first quarter of 2020 from the state budget is in the amount of 21,686,943 ALL.*
- ✚ *Funding for the first quarter of 2020 from donors is in the amount of 7,552,500 ALL.*

VI. ISSUES ENCOUNTERED DURING THE FIRST QUARTER REPORTING

- ✚ An issue even for this period remains the delay of institutions to report within the required time limit (exceeding the reporting period), which directly affect the delayed drafting of Monitoring Reports.
- ✚ Remains problematic the responsibility of the institutions to report in a timely and quality manner regarding the complete information on the measures/activities of the Action Plan 2018-2020. Higher cooperation is needed from the institutions, to contribute and report on the implementation of the Action Plan, pursuant to the Inter-Sectoral Anti-Corruption Strategy 2015-2020.

- ✚ Failure to send information on financial disbursement for activities foreseen in AP 2018 - 2020 covered by donors (from a significant part of institutions), which affect the unrealistic reflection of costs.
- ✚ Failure to send information on financial disbursement for activities foreseen in AP 2018 - 2020 from the state budget (from some of the institutions), which affect the unrealistic reflection of costs for the Strategy implementation.
- ✚ During the monitoring phase, a large number of contact points has been observed, which have reported for special activities of the Action Plan, by not coordinating within the reporting Institution, therefore a comprehensive report on all respective activities of responsible Institution would be sent to the Ministry of Justice.

VII. CHALLENGES

In order to improve implementation and impact of the Action Plan 2018-2020, important monitoring challenges in the coming period consist in:

- ✚ Raising awareness of responsible institutions involved in the Action Plan regarding the importance of ongoing work for proper and timely implementation of the AP, as well as on the importance of the reporting process.
- ✚ Ensuring a comprehensive and transparent consultation process during the reporting, monitoring and reviewing of the Action Plan with the responsible institutions and interest groups.
- ✚ Increasing the level of accountability and liability by the internal structures of the responsible institutions through strengthening of the inter-institutional coordination.
- ✚ Conducting the regular monitoring process, discussing the findings and approving the respective reports according to the reporting time limits foreseen in the Strategy.
- ✚ Evaluating the information with the Finance Directorates (of respective institutions) from the contact points, prior to the reporting sent to the NCAC.
- ✚ Interconnection with the process of annual and mid-term budgetary planning in order to ensure the necessary financial support by the State Budget for those measures that are foreseen to be implemented by the State Budget.

