



NATIONAL COORDINATOR AGAINST CORRUPTION

MONITORING REPORT FOR THE PERIOD JULY - SEPTEMBER 2021

INTER-SECTORAL STRATEGY AGAINST CORRUPTION 2015 – 2023

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TABLE OF CONTENT

ENTRANCE.....5
Executive summary on the implementation progress of the action plan for July -September 2021.....6
Implementation of the recommendations left for implementation in the January – June report.....10
Methodology for drafting the monitoring report.....12
Risk matrix.....14
Public consultation.....15

PROGRESS OF INTER-SECTORAL STRATEGY AGAINST CORRUPTION.....16
Measures and activities successfully implemented in the relevant period.....16
Status of measures and activities that have achieved the policy goals (Approaches).....18
Status of activities that have achieved the policy goals (Approaches).....19
Status of measures that have achieved the policy goals (Approaches).....19
Evaluation of key achievements using measures and activities.....22
Success story (through priority measures).....23

BUDGET EXECUTION.....23

CONCLUSIONS AND RECOMMENDATIONS.....25
Recommendations25
Assessment of challenges, gaps and inefficiencies.....26
Risk assessment using measures and activities.....27
Next steps.....27

LIST OF ACRONYMS

AAC	Albanian Adoption Committee
AASCA	Agency of the Administration of Seized and Confiscated Assets
ACThG	Anti-Corruption Thematic Group
ADC	Agency for Dialogue and Co-Government
AP	Action Plan
ARAD	Agency for Rural Agricultural Development
ASCS	Agency for the Support of Civil Society
ASLSG	Agency for the Support of Local Self-Government
ATP	Agency for Treatment of Property
CEC	Central Elections Commission
COP	Center for Official Publications
CRIPPD	Commissioner for the Rights to Information and Protection of Personal Data
DCM	Decision of Council of Ministers
DFLA	Directorate of Free Legal Aid
GDB	General Directorate of Bailiff
GDP	General Directorate of Prisons
GDPS	General Directorate Probation Service
GDSP	General Directorate of State Police
GPO	General Prosecutor's Office
HCP	High Council of Prosecution
HIDAACI	High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests
ICSP	Internal Control Service of Prisons
IFM	Institute of Forensic Medicine
ISAC	Inter-Sectoral Strategy against Corruption
LPD	Local Police Directorate
MARD	Ministry of Agriculture and Rural Development
MEFA	Ministry for Europe and Foreign Affairs

MESY	Ministry of Education, Sport and Youth
MHSP	Ministry of Health and Social Protection
MIE	Ministry of Infrastructure and Energy
MoC	Ministry of Culture
MoD	Ministry of Defense
MoFE	Ministry of Finance and Economy
MoI	Ministry of Interior
MoJ	Ministry of Justice
MTE	Ministry of Tourism and Environment
NAIS	National Agency of Information Society
NBI	National Bureau of Investigation
NCAC	National Coordinator against Corruption
NFA	National Food Authority
PPA	Public Procurement Agency
SAJS	State Archive for the Judicial System
SEC	State Election Commission
SIAC	Service for Internal Affairs and Complaints
SPAK	Special Prosecution Office against Corruption and Organized Crime

ENTRANCE

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

Since 2015, Albania has been pursuing and implementing the Inter-Sectoral Strategy against Corruption. With Decision no. 516, dated 1.7.2020 of the Council of Ministers, the implementation deadline of ISAC was extended until 2023. The vision of ISAC 2015-2023 is: "Albanian institutions transparent and with high integrity, which enjoy the trust of citizens and guarantee 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, 2015-2023, contains 18 specific objectives, which are:

Preventive:

- 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 Adopting of anti-corruption policies at the local government level.

Punitive:

- 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:

- 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.

Executive Summary on Progress of the Action Plan for the reporting period July-September 2021

Action Plan 2020-2023, pursuant to the Inter Sectorial Strategy Against Corruption 2015-2023, provides specific measures and activities that should be done in order to achieve objectives according to the deadlines detailed in it.

This monitoring report, July - September 2021, presents only the implementation of measures and activities (products) of the Action Plan. The report identifies the progress of the implementation of measures for this monitoring period, taking into account and evaluating their implementation, the level of performance in activities of the institutions reporting activities and reducing the number of unimplemented measures.

This report identifies the achievement of recommendations and steps for their implementation, referring to the recommendations left in the six-monthly monitoring report 2021. This analysis also provides information to see the relevance of the content of this action plan regarding the achievement of the indicators provided in the Passport of Indicators, specific objectives and the major policy goals of the Strategy, prevention - punishment - awareness.

This report creates and establishes the entire analytical infrastructure for the recommendations left to be addressed in subsequent reports.

For this monitoring period, July – September 2021, data were collected and analyzed for 59 measures and 107 activities, distributed respectively in 30 measures and 57 activities for the preventive approach (A), 20 measures and 29 activities for the punitive approach (B) and 9 measures and 21 activities of awareness-raising approach (C).

Through the implementation of the Action Plan for the period July – September 2021, 29 measures have been fully implemented, 22 measures have been partially implemented and 8 measures have not been implemented also 65 activities have been fully implemented, 21 activities have been partially implemented and 21 activities are not implemented.

The following is the feasibility of the strategy objectives according to the achievement rate of measures and activities:

Objectives		Achievement rate according to measures
Prevention	A.1 Increasing transparency in State Activity and improving citizens' access to information	51 to 85 percent of the implemented measures
	A.2 Increase transparency in the planning, management and control of public funds;	51 to 85 percent of the implemented measures
	A.3 Strengthening the electronic infrastructure of public institutions	86 to 110 percent of the implemented measures
	A.4 Improve the handling of allegations of corruption	51 to 85 percent of the implemented measures
	A.5 Strengthening the regime of declaration and control of assets of public officials and cases of conflict of interest	86 to 110 percent of the implemented measures
	A.6 Strengthen the regime of controls over the financing of political parties	51 to 85 percent of the implemented measures
	A.7 Improving the efficiency of audit and internal inspection and the systematic use of risk analysis	86 to 110 percent of the implemented measures
	A.8 Systematic use of the mechanism for identifying areas for corruption	51 to 85 percent of the implemented measures
	A.9 Strengthening the integrity of public servants	51 to 85 percent of the implemented measures
	A.10 Analysis of corruption trends, effectiveness of anti-corruption measures and improvement of statistics related to the activity of anti-corruption law enforcement agencies	86 to 110 percent of the implemented measures
	A.11 Articulation and adoption of anti-corruption policies at the local government level	31 to 50 percent of the implemented measures

Punitive	B.1 Improve the efficiency and effectiveness of anticorruption criminal investigations	51 to 85 percent of the implemented measures
	B.2 Improve cooperation between law enforcement institutions in prosecuting and punishing corruption	31 to 50 percent of the implemented measures
	B.3. Review of the legal framework for the prosecution of economic and financial crime	31 to 50 percent of the implemented measures
	B.4. Improving international judicial and police cooperation in the fight against corruption	31 to 50 percent of the implemented measures
Awareness	C.1 Awareness and education of the general public on the consequences of corruption	51 to 85 percent of the implemented measures
	C.2 Encourage the public to actively use mechanisms for denouncing corruption	51 to 85 percent of the implemented measures
	C.3. Encourage cooperation with civil society	0 to 30 percent of the implemented measures

For this period July - September 2021, there have been achievements in the policy goals (approach preventive (A), punitive (B) and awareness (C) of the strategy implementation, more specifically we mention:

- Commissioner for the Right of Information and Personal Data Protection has resumed the monitoring of the implementation of the Transparency Program in the central government authorities, 235 out of 317 public authorities and has continued with the monitoring in the local authorities and also 46 out of 61 units of Local Government. 5 new public authorities that have installed the electronic register of requests and responses, have been added for the reporting period July - September 2021. There is a total number of 12 new public authorities from January to September 2021.
- National Agency of Information continues to increase electronic services with a total number of 1209. The e-Albania portal serves to 2.148.407 citizens and 160.575 businesses (2.3 million registered) without any cost, without waiting in line and without having any physical contact with employees or administration. 12.5 million applications have been made for electronic services mainly in civil status services, tourism, culture and art, finance and economy, social services, education, foreign affairs, etc. For this reporting period, the Directorate of Co-Government in the Prime Minister office has reported 30 denunciations.
- HIDAACI has continued the process of coordination and support with the necessary institutional resources, in order to finalize the commitments made in the framework of the establishment of the electronic system of declaration of private interests in the foreseen deadlines, which is the end of 2021.

- The Central Election Commission has updated the methodology of control and verification of finances of political parties. Several reports have been published: the financial reports of the political parties for the calendar year 2020; the financial reports of the political parties for the election campaign. There is also an increment of the professional capacities on financial control, for the preliminary verification and the control of the financial reports.
- Ministry of Finance and Economy has continued with the implementation of 19 external quality assessments in audit units, operating in public units; has held 2 meetings with representatives of internal audit directorates of central institutions and has conducted 4 trainings with public financial inspectors on cases of mismanagement and abuse of office.
- Institutions under the Ministry of Justice continue the process of integrity risk assessment, in accordance with the document "Methodology of Integrity Risk Assessment in Central Institutions" under the coordination of the Ministry of Justice (1 meeting dedicated to information / awareness group with representatives from the subordinate institutions of MoJ);
- Proactive investigation operations have been conducted by State Police and the Internal Affairs and Complaints Service. From the investigation structures of the Service have been conducted 6 operations in order to detect, legally document and crack down on the illegality of police officers in the most disturbing forms and phenomena, such as "passive corruption", "abuse of power", "favors", "cultivation of narcotic plants", "smuggling", "assistance for illegal border crossing", etc. These operations were carried out in cooperation with the Prosecution Offices of the First Instance and the structures of the State Police, being finalized with the documentation with legal evidence of the illegal activity of 4 police officers and 10 implicated citizens, as well as the execution of coercive and prohibitive personal security measures given to them as subjects of criminal proceedings in prosecution, by the Special Court and those of the Judicial Districts of the First Instance.
- For a group of criminal offenses of corruption within the competence of the general jurisdiction, the General Prosecutor's Office reports that 76 proceedings were registered with 66 accused and 34 proceedings with 38 accused that were sent for trial. Compared to 9 months of 2020, these numbers are 3 times more. There is an increase in the number from 2 to 34 of proceedings and from 15 to 38 of the number of accused sent for trial for these criminal offenses.
- The Special Structure Against Corruption and Organized Crime has registered a total of 23 proceedings with 15 persons under investigation; 2 people sent for trial and 12 people were officially charged. There is also 1 proceeding with 2 people accused sent in trial to drop charges.
- The Ministry of Justice has improved communication and public visibility in the field of anticorruption by drafting and publishing a monthly newsletter with a summary of activities carried out each month, accessible on the website of the Ministry of Justice and shared via email to various groups, academia, businesses, foreign partners in the field, foreign organizations, in Albanian and English version. In the context of raising public

awareness in anti-corruption efforts, the Ministry of Justice in the Role of National Anti-Corruption Coordinator has continued to promote and familiarize the general public with the Network of Anti-Corruption Coordinators to address complaints of suspected corruption cases. The Ministry of Justice has continued the cooperation with the Ministry of Education and Sports and the Embassy of Italy in Albania for the concrete implementation of a cooperation agreement, for the joint promotion of a pilot didactic-educational project (anti-corruption module) in high schools.

- The Agency for Dialogue and Co-Government reports periodically on the denunciations of citizens and businesses, every week through the detailed data presented in the report for each minister and the Prime Minister; There have been 4448 registered cases, requests and complaints, of which 2699 belong to the authorities at the central level, 943 at the local level and 806 are for business matters; 18 punitive measures were given by the administrative investigations of late responses to citizens' rights.

Accomplishment of the recommendations left for implementation in the January – June 2021 report

For this period July - September 2021, there is a progress and improvement in the implementation of measures and activities in order to meet the recommendations given in the previous monitoring report (first half of 2021), where we can mention respectively the forecasts made for objectives A1; A7; B1 and B2. The non-implementation of some measures and activities under objective C3 remains problematic.

Compared to the data of the monitoring report for the reporting period (most recent), January - June 2021, there is a total upward trend in 12 objectives, which are A.1, A.4, A.5, A .6, A.8, A.9, A.10, A.11, B.1, B.2, B.3, C.2 and a downward trend of 5 objectives, namely A.2, A.3, B.4, C1 and C.3.

From the monitoring and evaluation conducted, it results that institutions should continue to play a proactive role in achieving the objectives set in the Action Plan 2020-2023, in order to achieve products (output) that lead to achieving the target values in the indicators. projected for 2021. It is also necessary to intensify efforts in those initiatives that have a more significant impact on the achievement of indicators, such as the measures under objectives A.11, B.2, B.3, B.4 and C3.

As noted above, for this reporting period, there are measures and activities for which there is a lack of reporting on their development by implementing institutions (1 measure and 2 activities) and that of the budget used (15 measures and 29 activities).

But, from the monitoring and evaluation carried out, it results that the institutions should activate their implementation role in accordance with this action plan, in order to realize the products (output) that lead to achieving the target values in the indicators projected for 2021, as they should start, continue and intensify the implementation of those initiatives that have a more significant

impact on the achievement of indicators, such as the measures under objectives A1, A2, A4, A5, A9, A11 and objectives B and C3.

Compared to the July-September 2020 monitoring period, there is a slight progress, and mainly in the measures and activities envisaged for the objectives in the preventive approach.

The addition of 5 new public authorities that have installed the electronic register of requests and responses for the reporting period July - September 2021 is a positive step towards objective A1.

Objective A3 has a better degree of feasibility, with 1209 e-services added and in use until this period of 2021, thus achieving the target value for the year.

The realization of objective C1 has been improved, where the Ministry of Justice has drafted and published for the first time a periodic e-bulletin with a summary of activities carried out during each month.

In conclusion, in this reporting period continue to be addressed challenges in the implementation of the action plan, such as:

- focusing on those specific elements that have a direct and substantial impact on the achievement of specific objectives;
- lack of financial reporting for all activities and measures implemented for this reporting period;
- lack of proactive approach to the establishment of joint inter-institutional groups for the implementation of measures provided in the action plan;
- contributions brought by institutions are in some cases incomplete and not relevant to the specific measure or activity in monitoring, due to lack of experience or concrete knowledge in this process;
- timely addressing of problems that have resulted in low achievement or non-achievement of relevant objectives;
- improvement of technical and human capacities that contribute to the achievement of the expected results;
- awareness on the increased work to be done by institutions that result in a low feasibility, in terms of the level of achievement on the specific objective, measure or activity, which increase over time, according to the forecasts in the Action Plan 2020-2023. For instance the target value for the approval of integrity plans in line ministries and local self-government units;
- lack of regular identification of concrete next steps;
- updated reports on progress made only for the required period of implementation of the action plan;
- other issues related to the internal regulatory environment and the external environment,

factors that have had their impact on the progress of the implementation of measures and activities provided in the Action Plan.

Methodology for drafting the monitoring report

Pursuant to the Prime Minister's Order no. 114, dt. 04.09.2019 “On the approval of the structure and staff of the Ministry of Justice”, was established the Sector of Programs in the Field of Anticorruption, at the Directorate of Programs and Projects in the Field of Anti-Corruption, which is the responsible structure for the monitoring process and drafting Periodic Reports of Monitoring the Inter-sectorial Strategy Against Corruption 2015 - 2023.

The Directorate of Programs and Projects in the Field of Anti-Corruption (DPPFA) coordinates with all responsible institutions, and then continues with the drafting of the monitoring report. This report covers the period from July 1 to September 30, 2021 and is based on the input provided by all institutions included in the ISAC Action Plan 2020-2023. The aim is to have information on the achievements of progress and the challenges towards meeting the objectives of the strategy. The monitoring of the Strategy consisted of two main phases:

1. Reporting of institutions through anti-corruption 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.

Each institution has reported on the level of implementation of each policy goal, specific objective, measures implemented (based on activities performed), budget foreseen for the reporting period, budget allocated for the reporting period, problems encountered, further steps and assessing the progress of the strategy as a whole. In order to monitor the implementation of the commitments undertaken, in terms of measures implementation (activities) the monitoring process is carried out for each policy purpose (approach) of the strategy, in accordance with the format (annex) used for collecting the reporting contribution, according to the methodological guide on the structure of monitoring reports for sectoral and inter-sectoral strategic documents for the good governance agenda.

The assessment of the implementation progress of ISAC for this reporting period was performed by DPPFA through the analysis of data submitted by reporting institutions adhering to the method of analysis provided in Decision no. 290, dated 11.4.2020, of the Council of Ministers, “*On the establishment of the State Database of the System of Integrated Planning Information (SIPI / IPSIS)*” and Order no.157, dated 22.10.2018, of the Prime Minister, “*On taking measures for the implementation of the broad sectoral / inter-sectoral approach, as well as the establishment and functioning of the integrated sectoral / inter-sectoral mechanism*”.

Pursuant to the Prime Minister's Order no. 157, dated 22.10.2018 “*On taking measures for the implementation of the broad sectoral / inter-sectoral approach, as well as the establishment and functioning of the integrated sectoral / inter-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 (ACThG) has been set up for the Ministry of Justice.¹

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

- High-level political and managerial decision-making in the planning and monitoring of sectoral reforms, policies and strategic framework;
- Coordination of planning, programming and monitoring for the sectors involved, through the organization of regular dialogue with development partners;
- Providing support in the framework of the European Union membership process;
- Government policy dialogue 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, providing reporting monitoring of IPA funds, by sectors.

Data analysis was done in accordance with the above acts and the orientation structure for monitoring strategies and action plans.

First, the implementation of measures and activities (realization of products) is analyzed, giving a quantitative and qualitative result of their achievement versus the performance of the respective activities related to them.

Second, the achievement of specific objectives is analyzed by calculating the rate of their achievement.

The achievement rate of the objective versus the implementation of the measures was performed based on the 4 intervals of the performance system as in the table and the color code below.

Category	Level of Tolerance	Points (110)
Poor	From 0 to 30 percent of the implemented measures	30
Sufficient	From 31 to 50 percent of the implemented measures	20
Good	From 51 to 85 percent of the implemented measures	35
Very Good	From 86 to 110 percent of the implemented measures	25

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

Exceeded	111 and above	N/A
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The following formula was used to calculate the achievement of specific objectives according to the achievement of measures and activities ²:

$$NR = \frac{\text{Measure No 1} + \text{Measure No 2}}{2 \text{ Measures}} \times 100\%$$

The next level of analysis is that according to the goals of the policy (approaches). Based on the feasibility data for each analytical level (specific measures and objective) each of the three policy goals (approaches) was assessed: prevention, punishment and awareness.

A more general summary assessment was also conducted for the implementation of the strategy as a whole for this reporting period.

Progress in the monitored period is classified into these categories ³:

- **Implemented:** Institutions have reported the status of “Implemented” for those measures/activities that have been fulfilled.
- **Partially implemented/Ongoing:** : Institutions have reported the status “Ongoing” for those measures/activities, which in the reporting period have been partially implemented and/or continue to be applicable by them.
- **Not implemented:** Not implemented are those measures/activities that have not recorded development for the reporting period as well as those measures/activities for which no reporting has been provided by the responsible institutions.

In the reports brought by the responsible institutions according to the Action Plan 2020-2023, it is noticed that some measures / activities planned to be implemented in the fourth quarter of 2021, have started their implementation in advance, for example activities A.4.1.1, A.4.1.2 and B.2.1.1.

Risk Matrix

This monitoring report also includes a risk assessment and identification in order to identify the steps that will need to be followed to address in the framework of ISAC objectives implementation.

The risk assessment was done in accordance with the table below:

² The formula is taken from the structural guide for monitoring and evaluation of strategic document monitoring reports, SIPI and adapted for evaluation of measures and activities (subject of this monitoring report).

³ In this column is given the status of realization of the measure. Status can be fully implemented; partially implemented; or not implemented. The “fully implemented” measure is the measure, the object of which is fully implemented, as defined in the action plan. The “partially implemented” measure is the measure that has been implemented on a scale of 51 to 90 percent. The “not implemented” measure is the one that has been implemented on a scale from 0 to 50 percent. Written status and color codes are used to indicate status. The fully implemented mass cell is highlighted in green. The partially implemented mass column is highlighted in yellow. The column of not implemented mass is highlighted in red.

Possibility	High	3	6	9
	Medium	2	5	8
	Low	1	4	7
		Low	Medium	High
		The impact		

Public consultation

In accordance with the legal criteria for public consultation, after drafting the report, the Ministry of Justice sent the document for consultation to reporting institutions and civil society organizations, and published the draft on the official website of the Ministry of Justice, at the link <https://www.drejtesia.gov.al/wp-content/uploads/2021/11/Draft-Raporti-i-monitorimit-SNKK-Korrik-Shtator-2021.pdf>, where an e-mail address is provided for receiving comments, on the website www.drejtesia.gov.al, in the menu priorities/cross-sectoral strategy/cross-sectoral strategy against corruption.

The draft was sent for preliminary evaluation to the Department of Good Governance and Development in the Prime Minister's office, in the role of evaluator of the monitoring report.

The Ministry of Justice reflected the relevant comments / suggestions on the draft monitoring report sent by the institutions and CSOs and held a meeting of the technical secretariat on December 14, 2021 to discuss the analysis performed, the findings of the report, the evaluation of policy goals in the presence of all implementing and reporting institutions of the action plan and the Prime Ministry.

In conclusion, the technical secretariat at the Thematic Group for anti-corruption (Sector of programs in the field of anti-corruption) presents the draft for discussion and approval at the meeting of the Coordination Committee for the implementation of the Cross-cutting Anti-

Corruption Strategy, 2015-2023. Following the approval of the draft monitoring report, July - September 2021, the full report package is sent to the General Secretariat of the Integrated Policy Management Group for Good Governance and Public Administration. The approved monitoring report is published on the website www.drejtësia.gov.al, together with a consultation report on the process followed from the beginning to its finalization / approval.

PROGRESS OF INTER-SECTORAL STRATEGY AGAINST CORRUPTION

The Inter-Sectoral Strategy Against Corruption 2015-2023 aims to achieve the major objectives of this strategy through the implementation of concrete anti-corruption measures, in order to develop a society in which there is a responsible and efficient anti-corruption system, which is able to obtain tangible results and show a tendency towards maximum elimination of corruption threats, as well as the will to prevent and fight corruption. In order to monitor the progress of the Inter-Sectoral Strategy Against Corruption 2015-2023, the next periodic report has been drafted, in the 15 framework of the implementation of the Action Plan 2020–2023, which covers the period *July 1, 2021 to September 30, 2021*.

Measures and activities successfully implemented in the relevant period

The specific policy goals (approaches) and objectives are made achievable through the measures and activities envisaged (products) for implementation, by the responsible and collaborating institutions of the Strategy and the Action Plan.

ISAC **has three main policy goals** (approaches) through which it aims to meet its vision and 18 specific objectives.

Applying the same formula ⁴ for assessing the achievement rate of objectives - summing the feasibility in the percentage of policy goals and dividing by their number - the feasibility of the inter-institutional strategic goal against corruption is 62.85%.

Preventive Approach (A)	81.96 %
Punitive Approach (B)	49.77 %
Awareness Approach (C)	56.83 %

It is noted that all three approaches represent a more positive trend compared to the previous reporting period. Compared to the monitoring report conducted for January - June 2021, the Preventive Approach (A) shows an increasing trend by 16.82%, the Punitive Approach (B) shows

⁴ Check footnote 3.

an increasing trend by 14.5% and the Awareness Approach (C) shows an increasing trend by 33.33% more.

Specifically, according to 18 specific objectives, the level of feasibility according to the measures and activities for implementation for the monitoring period is as follow:

Approach A	Feasibility
A.1	83.33%
A.2.	83.33%
A.3	100%
A.4	80%
A.5	100%
A.6	70%
A.7	87.5%
A.8	62.5%
A.9	85%
A.10	100%
A.11	50%

Approach B	Feasibility
B.1	70%
B.2	41.6%
B.3	50%
B.4	37.5%

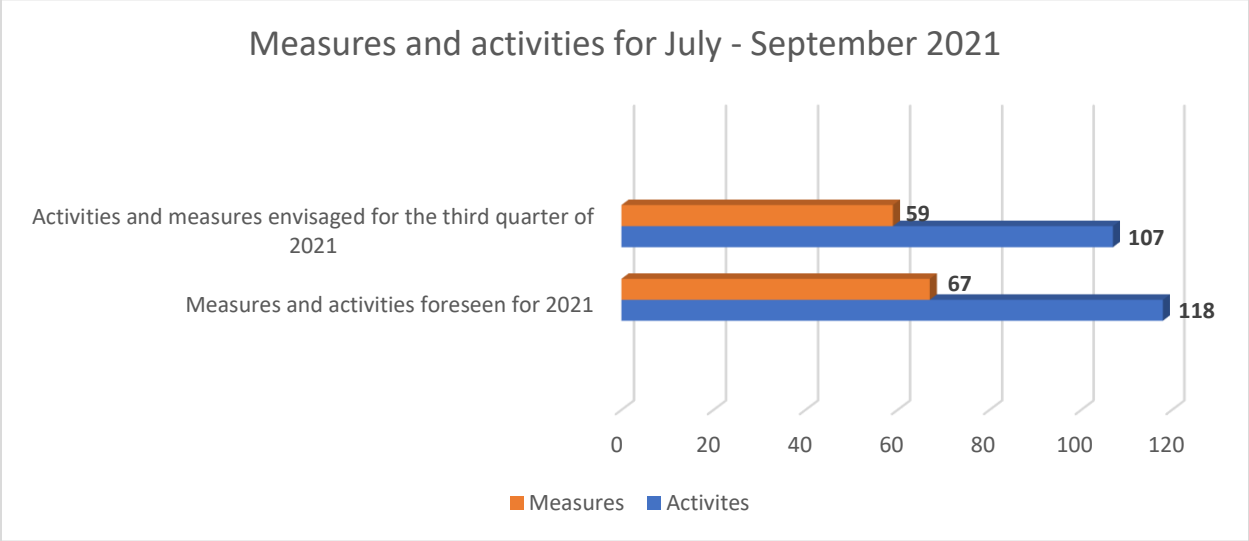
Approach C	Feasibility
C.1	62.5%
C.2	83 %
C.3	25%

While taking into account the level of feasibility (in percentage) of objectives in the monitoring report January - June 2021 versus the feasibility of measures and activities for the monitoring period, July - September 2021, we have an increasing trend in the measures of 12 objectives, namely A.1, A. 4, A.5, A.6, A.8, A.9, A.10, A.11, B.1, B.2, B.3, C.2 and downward trend in the measures of 5 objectives, specifically A.2, A.3, B.4, C1, C.3.

The Action Plan 2020 - 2023, for 2021 envisages the implementation of 118 activities and 67 measures, distributed respectively in 65 activities and 36 measures for Policy Goal (preventive approach A), 32 activities and 22 measures for Policy Goal II (punitive approach B) and 21 activities and 9 measures for Policy Goal III (awareness approach C).

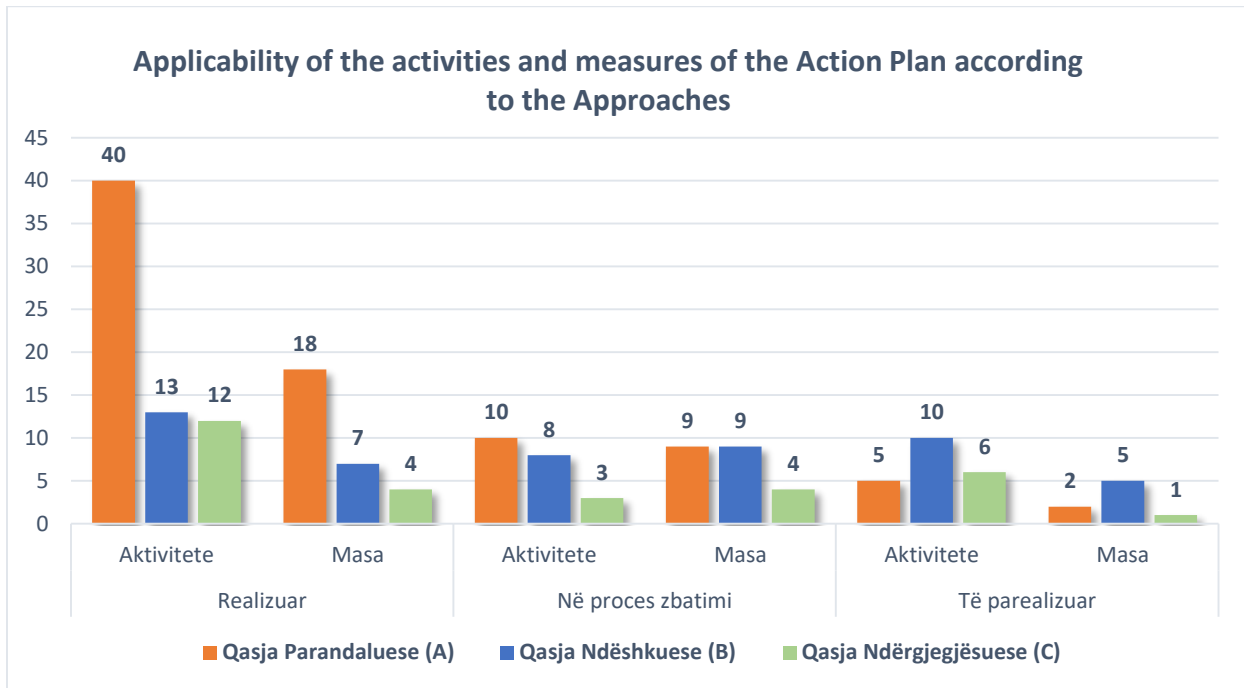
For this monitoring period, July - September 2021, it results that 107 activities and 59 measures are foreseen for implementation, of which: 57 activities and 30 measures are part of Approach A (Policy Goal I), 29 activities and 20 measures are part of Approach B (Policy Goal II) and 21 activities and 9 measures are part of Approach C (Policy Goal III).

Policy Goals (Approach)	Measures and Activities	Measures and Activities, July – September 2021		
		Measures and activities foreseen for 2021	Measures and activities foreseen for July-September 2021	Measures and activities foreseen for the fourth quarter 2021
Preventive	Measures	36	30	1
	Activities	65	57	9
Punitive	Measures	22	20	0
	Activities	32	29	0
Awareness	Measures	9	9	0
	Activities	21	21	1
Total	Measures	67	59	1
	Activities	118	107	10



For the reporting period July - September 2021, 59 measures and 107 activities in total are monitored. For the whole of 2021, the total of activities is 118, while of measures is 67.

Status of measures and activities that have achieved the policy goals (approaches):



The total progress achieved in meeting the three policy goals (approaches) of the strategy regarding the status of implementation of activities and measures is as follows:

- 29 measures and 65 activities carried out;
- 22 measures and 21 activities still in the process of implementation;
- 8 measures and 21 unimplemented activities.

Regarding the above, **out of 29 measures and 65 activities** carried out for the third quarter of 2021, 18 measures / 40 activities belong to the preventive approach (A), 7 measures / 13 activities belong to the punitive approach (B), as well as 4 measures / 12 activities belong to the awareness approach (C).

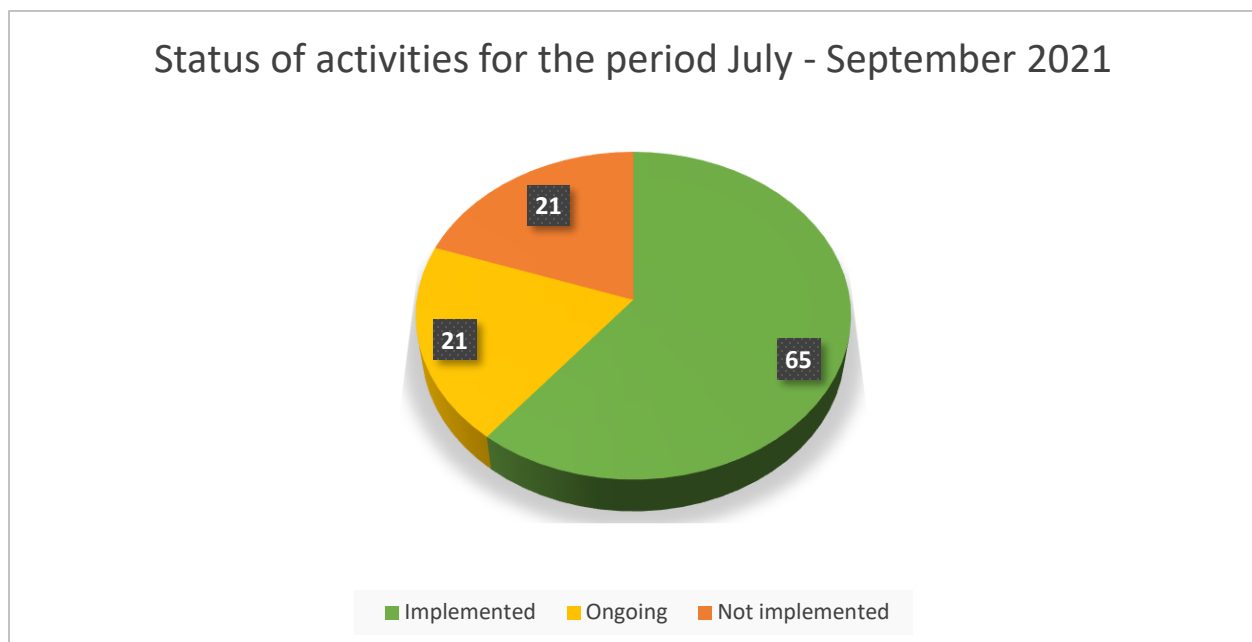
Out of **22 measures and 21 activities** which are still in the process of implementation for the first quarter of 2021, specifically 9 measures / 10 activities belong to the preventive approach (A), 9 measures / 8 activities belong to the punitive approach (B), and 4 measures / 3 activities belong to the awareness approach (C).

Out of **8 measures and 21 unrealized activities** for the first quarter of 2021, concretely 2 measures / 5 activities belong to the preventive approach (A), 5 measures / 10 activities belong to the punitive approach (B), as well as 1 measure / 6 activities belong to the awareness approach (C).

Status of activities that have achieved the policy goals (approaches):

Out of the total of 107 activities foreseen for implementation in July - September 2021, 57 of them belong to Approach A, 29 activities belong to Approach B, as well as 21 activities to Approach C.

Status of activities in the Action Plan 2020 - 2023, for the period July – September 2021				
Progress of activities	Approach A (Preventive)	Approach B (Punitive)	Approach C (Awareness)	Total Approaches
Implemented	40	13	12	65
Ongoing	10	8	3	21
Not implemented	5	10	6	21
Total	55	31	21	107



It turns out that out of 107 activities foreseen for the period *July - September 2021*, their status for all 3 approaches is reported as follows:

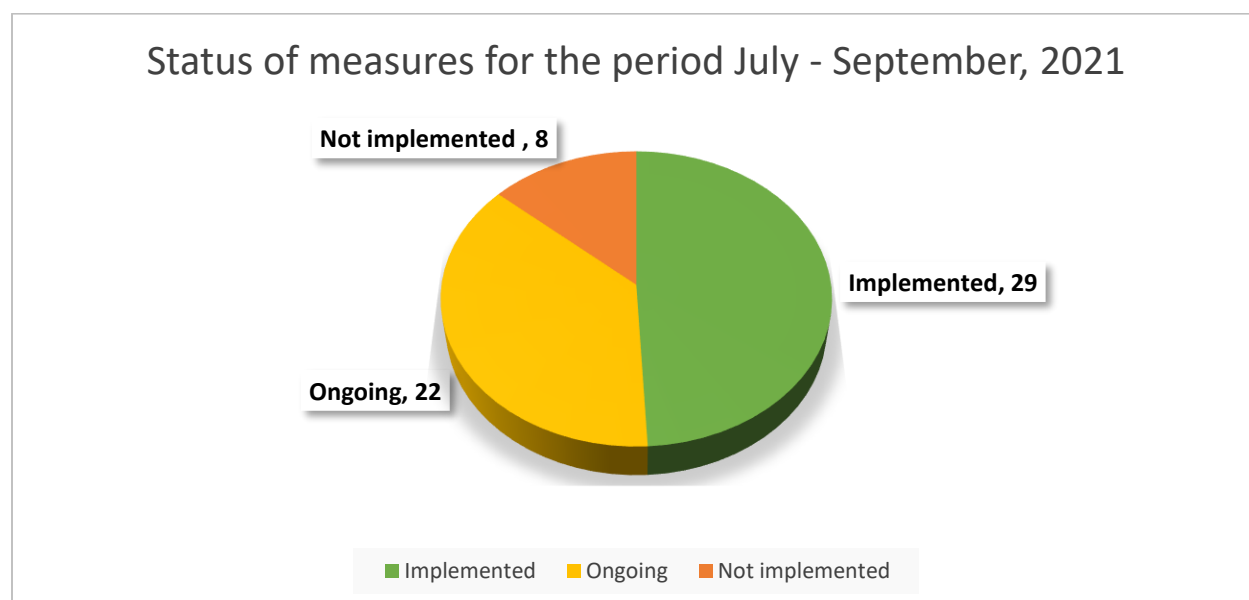
- 65 implemented activities;
- 21 activities are still in the process of implementation;

- 21 unimplemented activities (or reporting is missing) by the responsible institutions (from which we can mention A.6.1.1, A.6.1.2, A.7.3.2, A.7.3.4, A.8.7.1, B. 1.3.1, B.2.3.1, B.2.3.3, B.2.3.4, B.2.4.1, B.2.4.2, B.2.5.1, B.4.1.2, B.4.3. 1, B.4.4.1, C.2.2.2, C.3.1.6, C.3.2.1, C.3.2.2, C.3.2.3)

Status of measures that have achieved the policy goals (Approaches):

Of the total of 59 measures envisaged for implementation in July - September 2021, 29 of them belong to Approach A, 22 measures belong to Approach B, and 8 measures belong to Approach C.

Status of measures in the Action Plan 2020 - 2023, for the period July – September 2021				
Progress of measures	Approach A (Preventive)	Approach B (Punitive)	Approach C (Awareness)	Total Approaches
Implemented	18	7	4	29
Ongoing	9	9	4	22
Not implemented	2	5	1	8
Total	29	21	9	59



It turns out that out of 59 measures foreseen for the period July - September 2021, their status for all 3 policy goals (approaches) is reported as follows:

- 29 measures implemented;
- 22 measures are still in the process of implementation;
- 8 measures not implemented by the responsible institution (from which we can mention A.6.1, A.8.7, B.1.3, B.2.4, B.2.5, B.4.3, B.4.4, C.3.2).

It is also estimated that measure A.4.1 has started to be implemented before the deadline set in the Action Plan 2020-2023, there is no reporting on measure B.1.3 and it is foreseen for implementation in the last quarter of 2021, measure A.5.5.

Evaluation of key achievements using measures and activities:

Based on the information on the reporting and evaluation of the implemented activities and measures, the realization of the objectives for July - September 2021, is as follows:

Poor - 1 objective (objective: C.3)

Sufficient - 4 objectives (A.11, B.2, B.3, B.4)

Good - 9 objectives (objectives: A.1, A.2, A.4, A.6, A.8, A.9, B.1, C.1, C.2)

Very good - 4 objectives (objectives: A.3, A.5, A.7, A.10)

Exceeded - N / A objectives.

Success story (through priority measures)

The progress achieved in the framework of fulfilling the foreseen activities and measures, for the monitoring period, July - September 2021, in implementation of the Action Plan 2020-2023, of the Cross-cutting Anti-Corruption Strategy 2015-2023, is as follows:

- The Commissioner for the Right to Information and Personal Data Protection has monitored the transparency programs of $\frac{3}{4}$ Central Authorities and local self-government units. In total, 235 out of 317 public authorities and 46 out of 61 Local Self-Government Units were monitored. The installation of the electronic register of requests-complaints in the implementation of the right to information also continues. (objective A1)
- The National Agency for Information Society provides 1209 electronic services. The e-Albania portal has served 2 148 407 citizens, 160 575 businesses, with a total number of 2.3 million registrations. - (objective A3)
- The Sector for Corruption Investigation, in the Directorate for Economic and Financial Crimes in the State Police has identified 799 criminal offenses and 761 of them have been discovered, 7 of which are old, or 95.24% of them. 1125 authors were prosecuted, of which 204 authors were arrested and detained, 892 were prosecuted without a coercive measure and 29 were declared wanted. (objective A4)

- HIDAACI has continued the process of coordination and support in order to finalize the commitments made in the framework of the establishment of the electronic system of declaration of private interests. (objective A5)
- The Central Election Commission has changed and approved the reporting format of monitors and auditors in accordance with legal changes, the instructions regarding the financial reporting of monitors have been updated / changed / added; The capacity building (training) of 64 monitors (32 women and 32 men) and 19 statutory auditors has continued. (objective A6).
- MoFE has continued with the implementation of 19 external quality assessments in the internal audit units operating in public units; has continued to hold meetings with representatives of the audit directorate, central institutions and has conducted 4 trainings with public financial inspectors on cases of mismanagement, abuse of power. (objective A7).
- Institutions under the Ministry of Justice continue the process of integrity risk assessment, in accordance with the document "Methodology of Integrity Risk Assessment in Central Institutions" under the coordination of the Ministry of Justice (1 meeting dedicated to information / awareness group with representative of the MoD subordinate employee); - (objectives A8 and A9);
- Data collection and administration of statistical information on the activity of law enforcement institutions against corruption and confiscated assets, harmonized statistical data, by institutions such as; State Police, General Prosecutor's Office, SPAK, AAPSK, courts, data that will be part of the Statistical Yearbook 2021; statistical data are also collected and harmonized for organized crime. (objective A10).
- SPAK has registered a total of 23 proceedings with 15 persons under investigation; and sent for trial 2 proceedings with 12 defendants. A request for terminating the trial was made for 1 proceeding with 2 defendants. (objective B1).
- The Agency for Dialogue and Co-Government reports periodically on the denunciations of citizens and businesses, every week through the detailed data presented in the report for each minister and the Prime Minister; 4448 cases, requests, complaints were registered, of which 2 699 belong to the authorities at the central level, 943 at the local level and 806 are for business matters; 18 punitive measures were given by the administrative investigations of the institutions responsible for the non-timely granting of citizens' rights. The official websites of the Co-Government Platform publish at least 2 posts per week, through which, the work done through success cases or reports is promoted and the citizens are oriented on how they can apply on the platform - (Objective C2).

BUDGET EXECUTION

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

In the framework of monitoring the implementation of activities and measures of the Action Plan 2020 - 2023, also for this period the responsible institutions were asked to report on the budget used based on the performance performed.

The budget used brought by the contributing institutions and the concrete source of funding according to the objectives is as follows:

A1: 18.674.000 ALL, covered by the state budget.

A2: 7.276.000 ALL, covered by the state budget.

A4: 3.598.000 ALL, covered by the state budget.

A5: 19.400.000 ALL, covered by the state budget.

A7: 9.212.000 ALL, covered by the state budget.

A8: 195.000.000 ALL, covered by the state budget.

A9: 89.000 ALL, covered by the state budget.

A10: 89.000 ALL, covered by the state budget.

B1: 55.244.000 ALL, covered by the state budget and 7.000.000 ALL covered from donors.

B3: 28.455.000 ALL, covered by the state budget.

C1: 29.012.000 ALL, covered by the state budget.

Objectives A3, A.11, C.2 and C.3 did not report cost used (0).

Objective A6 reported costs for each measure and activities but did not spend these funds in this monitoring period.

The budget allocated according to the policy goals / Approaches A-B-C, is:

Policy goal I (preventive approach - A)

253,338,000 ALL covered by the state budget

Policy Goal II (punitive approach - B)

83,699,000 covered by the state budget.

7,000,000 covered by donors

Policy Goal III (Awareness Approach - C)

29,012,000 ALL covered by the state budget

From the analysis of activities and measures reported progressively, for the period July - September 2021, the planned budget for this monitoring period is 1,532,204,000 ALL. Meanwhile, the total budget used for this year is:

- Financing for this monitoring period from the state budget is in the amount of 366,049,000 ALL.
- Funding from donors is in the amount of 7,000,000 ALL.

Many activities performed during this reporting period are at "administrative costs", enabled and covered by the human and financial capacities of the implementing institutions, not presenting additional costs for the implementing institutions, in accordance with the forecast made in the Action Plan. Thus in total, there are 12 activities that are reported to be performed with "administrative costs" and 10 activities with 0 (zero) costs.

CONCLUSIONS AND RECOMMENDATIONS

Based on the results of the monitoring, it turns out that for the period July 1 - September 30, 2021, the areas that have shown performance but also accompanied by problems are activities and measures distributed across specific objectives in the three policy goals (approaches) of ISAC, prevention (A) - punishment (B) - awareness (C).

Following the overall analysis of the contributions received from the reporting institutions, there is a significant improvement in the feasibility of approach A, but on the other hand the level of overall realization of approaches B remains worrying. Special attention should be paid to the improvement of objective C3, which is the only objective with a poor performance during this reporting period. The following are some concrete recommendations and assessments to address the identified problems.

Recommendations

At the end of this report, the recommendations for the implementation continuation of the action plan are:

- To follow with priority those measures that have a poor level of feasibility throughout 2021, as stated in the two previous monitoring reports.
- To improve the performance of the activity of institutions that report activities and measures in the implementation process;
- To continue to compare numbers with the same reporting period of last year or the last 2 years, especially when we are dealing with statistical data, expressed in concrete numbers.
- To report in response to the reporting request from the anti-corruption contact points, because non-reporting affects the performance of a real and accurate analysis of the implementation of the Action Plan 2020-2023;
- Report information on the budget used for the action plan measures and as far as possible the budget spent on the implementation of activities covered by donors;
- Identify possible obstacles in the implementation of measures and activities provided in the Action Plan 2020-2023, (eg. lack of human resources; failure to anticipate certain

- elements at the time of provision of measures in the action plan; lack of budget for some activities; difficulty in staff training; difficulty in coordination between institutions, etc.);
- To continue reporting in accordance with the SIPI / IPSIS methodology for the following period.
 - Avoid the same reporting for several different activities, bringing as an example activity A.2.1.2 with A.2.2.2 and A.2.3.2 or B.1.6.1 and B.4.2.1.
 - Continue the work at the same pace for the installation of the central register of requests and responses from public authorities and continue the monitoring conducted by the Commissioner for the Right to Information and Personal Data Protection periodically to see the progress of this process by the end of 2021.
 - Start carrying out activities and measures for 1 objective of the strategy, which results in the level of poor implementation (from 0 to 30 percent of the implemented measures), Poor - objective C.3.
 - To improve the performance of activities and measures for 4 objectives of the strategy in order to achieve the annual value of the performance indicator, resulting in a sufficient level of implementation (from 31 to 50 percent of the implemented measures), respectively for objectives A11 , B.2, B.3, B.4.
 - Detailing the concrete areas according to the state responsibility of the public body, for which the respective trainings of the employees have been carried out in order to increase the capacities. We bring as an example the activity A.6.4.2.
 - Conclude a cooperation agreement between SP-ASCS in the framework of strengthening the cooperation between SP and CSOs, to generate evaluation reports on the investigation of corruption cases, to measure the level of risk in anti-corruption trends and to hold joint roundtables.
 - To continue the training and development of the increased capacities of specialized structures dealing with the investigation of corruption crime in SP.
 - To approve the draft instruction of the State Election Commission regarding the annual reporting of the parties, as a standard model, in accordance with the changes of the legislative reform.
 - The ASLSG should take the necessary and concrete measures to encourage the local self-government units to determine a specific budget for the implementation of local anti-corruption policies, in accordance with the Anti-Corruption Strategy.

Assessing challenges, gaps and inefficiencies

In order to raise awareness in the joint fight against corruption, and in the implementation of concrete activities not completed, ASCS will have to format some physical or virtual events, between SP and CSOs operating in areas such as education / health / taxes & customs / properties, within the rules setting out pandemic safety protocols.

There is a need to strengthen cooperation between SP and other law enforcement agencies with a focus on investigating corruption, through working meetings and drafting an initial calendar dedicated to these meetings.

Improving the regulatory framework for political party financial reporting remains an important challenge. In this regard, joint efforts to adopt the standard model should be stepped up, in line with legislative reform changes, and training sessions on the financial reporting model with stakeholders should be conducted.

Considering as a very good practice the comparison of the current situation with the same reporting period of the previous year, it is also suggested that the General Prosecutor's Office bring figures that match the reporting format of the annex of this report.

Risk assessment using measures and activities

In this monitoring report, July - September 2021, a risk assessment was performed for each objective in accordance with its level of feasibility.

Among the risks identified were financial, administrative, technical capacity, regulatory environment and other external factors. Effective cooperation of reporting institutions in eliminating risk factors and increasing the level of feasibility on concrete objectives, measures and activities also remains a priority issue.

Objective A4 also has a high level of risk that is mainly related to processes and the system. The State Police has not yet established a separate data system for corruption investigation cases to separately identify corruption investigations initiated through citizens' denunciations.

Objective A11 continues to have high realization risk due to internal environmental risks related to communication and information, with other issues related to the regulatory environment.

It is necessary to report specific cases from the General Prosecutor's Office and the Special Prosecutor's Office only for those provisions of the Criminal Code and the Code of Criminal Procedure, expressly provided as activities in the Action Plan 2020-2023.

In conclusion, all implementing institutions of this action plan, should take into account this analysis and increase efforts to implement measures and activities with the priority of achieving the values of performance indicators to achieve the goal of specific objectives.

Next steps

At the end of this monitoring report for the period July-September 2021, after all the findings that this report provides, the analytical data that the institutions have reported and the analysis performed, are addressed to take the following steps:

A1: Increasing transparency in state activity and improving citizens' access to information:

Monitoring should continue in the rest of the central authorities and in other Local Government Units as well as to increase the number of public authorities that use the electronic register of requests and responses.

A.2 Increase transparency in the planning, management and control of public funds

The Public Procurement Agency should specify the areas of law in which trainings or study visits have been conducted in order to strengthen the capacity of employees in relation to monitoring the implementation of the contract. It should also set out the concrete steps followed within this reporting period, to draft a recommendation to the contracting authorities / entities, in order to be specifically argue in the minutes, the specific qualification criteria and technical specifications, provided according to activity A.2.3.1.

A.4 Improving the handling of allegations of corruption:

To continue the full capacity operation of the newly established economic and financial crime investigation unit, in the Central Investigation Directorate, within the Criminal Police Department in the proper receipt and treatment of corruption offenses and to complete the established economic crime investigation unit of Finance at the Central Investigation Directorate, within the Criminal Police Department, with officers on staff.

A.5 Strengthen the regime of declaration and control of assets of public officials and cases of conflict of interest:

To continue the implementation of the contract "Maintenance Service of the System of Declaration of Assets and Conflict of Interest EACIDS" and to take the necessary measures for the timely implementation of activities provided for the last quarter of 2021.

A.6 Strengthening the regime of controls over the financing of political parties:

The CEC should approve the standard model for financial reporting for the political party calendar year, in line with legislative reform changes.

A8: Systematic use of the mechanism for identifying areas for corruption:

To continue the process of integrity risk assessment in all institutions under the Ministry of Justice.

A9: Strengthening the integrity of public servants:

To continue the process of drafting integrity plans in all institutions under the Ministry of Justice and the institutions that have drafted and approved, must begin work on its implementation.

A.11 Adaptation of anti-corruption policies at the local government level:

Prioritize the envisaged measures and continue to encourage local self-government units to adopt a specific budget for the implementation of the Integrity Plan.

B1: Improving the efficiency and effectiveness of anti-corruption criminal investigations:

Strengthen and improve communication, information and inter-institutional cooperation between law enforcement agencies, and strengthen the respective administrative capacities.

B.3. Review of the legal framework for the prosecution of economic and financial crime:

To continue the implementation of measures and activities in order to establish the ARO within the foreseen deadlines, within the new set deadline.

B.4. Improving international judicial and police co-operation in the fight against corruption:

Continue to conduct joint trainings, strengthen professional capacities and increase cooperation with international counterpart institutions as well as the establishment of joint investigative teams to investigate corruption.

C2: Encourage the public to actively use mechanisms for denouncing and preventing corruption:

The co-government platform should create the possibility of sending corruption reporting cases to the State Police.

C.3. Encourage cooperation with civil society:

Provide financial support for the progress of measures and activities envisaged in the action plan and ensure more presence of civil society organizations in drafting anti-corruption programs.

