



MINISTRY OF JUSTICE

NATIONAL COORDINATOR AGAINST CORRUPTION

MONITORING REPORT

**FOR THE PERIOD
JULY - SEPTEMBER 2023**

INTERSECTORAL STRATEGY AGAINST CORRUPTION 2015 – 2023

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LIST OF ABBREVIATIONS

ACThG	Anti-Corruption Thematic Group
AP	Action Plan
ARO	Asset Recovery Office
ASCS	Agency for the Support of Civil Society
CSO	Civil Society Organizations
CRIPPD	Commissioner for the Rights to Information and Protection of Personal Data
GPO	General Prosecutor's Office
GDSP	General Directorate of the State Police
HIDAACI	High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests
IPMG	Integrated Policy Management Group
ISAC	Inter-Sectoral Strategy Against Corruption
NAIS	National Agency of Information Society
NCAC	National Coordinator against Corruption
MES	Ministry of Education and Sport
MoI	Ministry of Interior
MoJ	Ministry of Justice
MoFE	Ministry of Finance and Economy
M&R	Monitoring and Performance
PPA	Public Procurement Agency
PSA	Police Surveillance Agency
SASPAC	State Agency for Strategic Programming and Aid Coordination
SPAK	Special Prosecution Office against Corruption and Organised Crime

ENTRY

Corruption is a threat to democracy, good governance, fair competition, sustainable economic, social and political development of a country. It severely hinders economic development, creating a system of inequality, prejudice and nepotism, destroying people's trust in their state, therefore the fight against corruption is today one of the primary challenges of any state with a democratic culture, vision and high integrity. The government has and will continue to have an unwavering will in the fight against corruption, through preventive actions, punitive measures and awareness raising activities.

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

Since 2015, Albania follows and implements the Inter-sectoral Strategy against Corruption. With Decision no. 516, dated 1.7.2020 of the Council of Ministers, the deadline for the implementation of the ISAC was extended until 2023. The vision of the ISAC 2015-2023 is: "Transparent Albanian institutions with high integrity, which enjoy the trust of citizens and guarantee service qualitative and incorruptible". The main policy goals of the Inter-sectoral Strategy against Corruption are prevention, punishment and awareness/education about corruption. These policy goals (approaches) are long-term and extend throughout the time of implementation of the strategy and action plan.

The Inter-sectoral Strategy against Corruption, 2015-2023, contains 18 specific objectives, which are:

Prevention:

- A.1 Increasing transparency in state activity and improving citizens' access to information
- A.2 Increasing transparency in planning, management and control of public funds
- A.3 Strengthening the electronic infrastructure of public institutions
- A.4 Improving the treatment of corruption complaints
- A.5 Strengthening the regime of declaration and control of assets of public officials and cases of conflict of interests
- A.6 Strengthening the regime of controls on the financing of political parties
- A.7 Improving the efficiency of internal audit and inspection and the systematic use of risk analysis

- A.8 Systematic use of the mechanism for identifying areas for corruption
- A.9 Strengthening the integrity of public servants
- A.10 Analysis of corruption trends, effectiveness of anti-corruption measures and improvement of statistics regarding the activity of anti-corruption law enforcement agencies
- A.11 Adoption of anti-corruption policies at the local government level

Punishment:

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

Awareness raising:

- C.1 Awareness 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 the progress of the implementation of the action plan for January-March 2023

The 2020-2023 Action Plan, in implementation of the Inter-Sectoral Strategy against Corruption 2015-2023, provides for specific measures and activities that must be carried out for the fulfillment of these objectives, according to the deadlines detailed therein.

This monitoring report, July - September 2023, presents only the implementation of measures and activities (products) of the Action Plan. The report identifies the progress of the implementation of the measures for this monitoring period, taking into consideration and evaluating their achievement, the degree of performance of the activities of the institutions that report the activities and measures in the process of implementation and the reduction of the number of unimplemented measures.

The report identifies the achievement of the recommendations and the steps for their implementation, referring to the recommendations left in the January – June 2023 monitoring report. In this analysis, information is also provided to see the relevance of the content of this action plan related to achieving the goals of the policies (approaches) of the Strategy, prevention - punishment - awareness-raising.

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 2023, data has been collected and analysed for 56 measures and 93 activities, distributed respectively in 30 measures and 52 activities for the preventive approach (A), 19 measures and 25 activities for the punitive approach (B) and 7 measures and 16 activities for the awareness approach (C).

Through the implementation of the Action Plan for the period *July – September 2023*, 30 measures have been fully implemented, 10 measures have been partially implemented and 16 measures have not been implemented, as well as 49 activities have been fully implemented, 6 activities have been partially implemented and 38 activities have not been implemented.

The following presents the feasibility of the objectives of the strategy according to the degree of achievement of measures and activities

Objectives		Degree of achievement according to measures
Prevention	A.1 Increasing transparency in State Activity and improving citizens' access to information	51 to 85 percent of implemented measures
	A.2 Increasing transparency in planning, management and control of public funds	86 to 110 percent of implemented measures
	A.3 Strengthening the electronic infrastructure of public institutions	86 to 110 percent of implemented measures
	A.4 Improving the treatment of corruption complaints	31 to 50 percent of implemented measures
	A.5 Strengthening the regime of declaration and control of assets of public officials and cases of conflict of interests	86 to 110 percent of implemented measures
	A.6 Strengthening the regime of controls on the financing of political parties	0 to 30 percent of implemented measures ¹
	A.7 Improving the efficiency of internal audit and inspection and the systematic use of risk analysis	51 to 85 percent of implemented measures
	A.8 Systematic use of the mechanism for identifying areas for corruption	86 to 110 percent of implemented measures
	A.9 Strengthening the integrity of public servants	86 to 110 percent of implemented measures
	A.10 Analysis of corruption trends, effectiveness of anti-corruption measures and improvement of statistics	86 to 110 percent of implemented measures

¹ Reporting on absence

	regarding the activity of anti-corruption law enforcement agencies	
	A.11 Adaptation of anti-corruption policies at the local government level	51 to 85 percent of implemented measures
Punishment	B.1 Improving the efficiency and effectiveness of criminal investigations against corruption	51 to 85 percent of implemented measures
	B.2 Improvement of cooperation between law enforcement institutions in criminal prosecution and criminal cooperation of corruption	0 to 30 percent of implemented measures
	B.3. Revision of the legal framework for criminal prosecution of economic and financial crime	0 to 30 percent of implemented measures
	B.4 Improving international judicial and police cooperation in the fight against corruption	51 to 85 percent of implemented measures
Awareness –raising	C.1 Awareness and education of the general public on the consequences of corruption	86 to 110 percent of implemented measures
	C.2 Encouraging the public to actively use mechanisms for reporting corruption	31 to 50 percent of implemented measures
	C.3 Encouraging cooperation with civil society.	0 to 30 percent of implemented measures

For the monitoring period July - September 2023, achievements were noted in the goals of the preventive (A), punitive (B) and awareness-raising (C) approach, of the implementation of the strategy:

1. The Commissioner for the Right to Information and Protection of Personal Data has monitored 3/4 of the central and subordinate public authorities. 250 out of 313 public authorities and 50 out of 61 local government units (municipalities) were monitored. Also, the electronic register of requests and responses has been installed in 27 new public authorities on this period, for a total number of 222 public authorities that have installed the electronic register.
2. Public Procurement Agency continues to consistently issue recommendations. In the reporting period, a recommendation was drawn up and approved on the problems found during the monitoring of the implementation of the contracts for the supply of goods, signed on the basis of the framework agreements. Also, PPA staff has been trained in the use of preliminary and periodic notices of procurement procedures.

3. NAIS has increased the number of services in the unique government portal e-Albania, in a total of 1231 electronic services. For all these services, an analysis of interactive electronic registers has been carried out and application forms have been determined. The performance of technical developments for the exposure of data from the final e-systems of the institutions was also carried out in harmony with the technical developments to consume the relevant web services of the e-systems and the information was structured for publication.
4. The Police Surveillance Agency has monitored cases of propensity for corruption and has continued to follow up on denunciations of illegal activity by police officers. All cases are tracked through the Case Management System-Complaints Module/Criminal Procedural Investigation Module. The initiation of a disciplinary investigation by the Directorate of Professional Standards, in the State Police and the Disciplinary Commission of the Agency, has been suggested for 14 police officers, in 8 cases.
5. HIDAACI has continued to maintain the electronic system of declaration of assets and private interests, through contracted companies, offering guarantees and quality in the handling and processing of information reported by public officials.
6. The Ministry of Finance and Economy has continued to strengthen the capacities of the public financial inspection staff. During this monitoring period, 44 internal auditors were trained, as well as 8 inspectors on the innovations of the ethics legislation.
7. The strengthening of the risk assessment and the approval of the Integrity Plans in the institutions of the line ministries continued at a fast pace. Currently, all institutions under the Ministry of Interior, 6 institutions under the Ministry of Education and Sports, 6 institutions under the Ministry of Finance and Economy have approved their Integrity Plans.
8. The Ministry of Justice has continued to collect and process statistical information on criminal offenses of corruption and organized crime. Thus it is evident that, in the courts of general jurisdiction, during the period January-June 2023, there are 159 cases with sentencing decisions, 173 people were convicted and 2 people were declared innocent. In the appeals court of general jurisdiction, for the period in question, 35 cases with convictions were registered, for which 87 persons were convicted and 2 persons were declared innocent. In the Supreme Court, 21 cases with convictions were registered, and the number of convicted persons is 55.
9. The State Police has continued with the organization of trainings to strengthen the knowledge of its employees. A total of 162 complaints were handled and verified. 44 cases in the field of corruption have been identified, 40 of them have been discovered, and 57 perpetrators involved in criminal activity have been identified, 6 of whom have been arrested and detained, and 51 have been pursued at large.
10. The General Prosecutor's Office has registered 133 proceedings with 94 defendants and 107 proceedings with 115 defendants have been sent for trial, for the criminal group of corruption under the competence of the general jurisdiction. Prosecutors have increased the active role for the criminal acts of corruption and related to the duty, starting mainly 15

criminal proceedings, compared to 11 started in the 9th month of 2022 and in conducting proactive investigations and/or using special investigation tools, in 28 criminal proceedings.

11. The General Anticorruption Directorate, under the Ministry of Justice, after receiving 77 denunciations and in-depth administrative treatment of the cases, concluded with 12 measures for the initiation of disciplinary proceedings, 9 measures for removal from office, 33 recommendations for public institutions and 4 reports for criminal prosecution in law enforcement bodies.
12. The Ministry of Justice as the National Coordinator Against Corruption, has continued with the programming of educational and awareness-raising activities to be developed in the following period of the year. Public information on the directorate's activities continued on social networks, and the monthly e-bulletin of July, August and September 2023 was distributed, with a summary of all projects, activities and public campaigns carried out by the National Coordinator Against Corruption.

Implementation of the recommendations left for implementation in the January - June 2023 report

For this period July - September 2023, there is a slight progress and improvement in the performance of measures and activities, in order to fulfill the recommendations given in the previous monitoring report (January - June 2023).

There is a slight positive progress in supporting the needs and engagement of all institutions, even though they are not explicitly included in the action plan. The relevant institutions have continued with the cooperation and concrete engagement in the implementation of the strategy to achieve the intended results.

Important data have been reflected that ensure the implementation of disciplinary and punitive measures, taking measures so that suspected cases of corruption are followed up and dealt with seriously and in a timely manner.

Although this monitoring is being carried out for a shorter period than the one carried out in the previous period, the report from which the recommendations also originate, an improvement in the awareness and information of citizens is evident, promoting the mechanisms for denunciation of corruption and illegal practices, from the responsible institutions.

Results have been deepened in the training and capacity development of employees, ensuring that they are equipped with special knowledge and skills to fight corruption and promote integrity.

Institutions under line ministries are engaged in integrity risk assessment and have adopted integrity plans to address potential violations. In this direction, concrete results have come from

the Ministry of Education and Sports, the Ministry of Interior and the Ministry of Finance and Economy.

Compared to the period January - June 2023, which belongs to the last period of the monitoring process, a slight upward trend is observed mainly in the implementation of those measures and activities foreseen for objectives in the three goals of the policies (approaches) of the ISAC, preventive - punitive - awareness. Thus the Preventive approach (A) shows an upward trend of 8.72%, the Punitive Approach (B) shows an upward trend of 13.45% and the Awareness Approach (C) shows an upward trend of 10.17%. In any case, it should be taken into consideration that the evaluation of the three approaches in this monitoring period is based only on the measures and activities for implementation, and not on the degree of achievement of the performance indicators.

On the other hand, for this reporting period, issues such as:

- The need for increased financial investments to support the implementation of the strategy and to face the challenges in the fight against corruption, continues to remain a challenge, also evidenced in the previous monitoring report.
- More commitment is required in the implementation of a sustainable monitoring and evaluation system to evaluate the effectiveness and progress of the strategy and to take corrective measures when necessary.
- The necessary budget that the municipalities will have to allocate, for the implementation of the Integrity Plan and the development of internal audits to assess the integrity in the institution, continues to remain insufficient.
- The number of municipalities that have approved Integrity Plans continues to remain low compared to the 2023 target, which also coincides with the end of the implementation of this strategy.
- Regular reporting is needed on administrative costs and the budget used to evaluate the efficiency and effectiveness of the measures taken.
- The establishment of the Asset Recovery Office is still in process.
- Agency for the Support of Civil Society has not yet given results in terms of promoting anti-corruption projects by CSOs, according to the categories defined in the Action Plan, as well as determining a budget for their support.
- Reporting of the budget used for each activity carried out. The costing and budgeting of the activities that are reported to have been carried out, which have a direct impact on the total calculation of the strategy implementation budget for this monitoring period.
- A more detailed report is required on the impact of the increase in the number of systems connected to the Government Interaction Platform and the added online services offered through the e-albania platform.
- Carrying out pilot internal audits, which still needs to be addressed in the Ministry of Finance and Economy.
- Increasing the use of special investigation tools in proceedings for criminal offenses in the field of corruption for more effective results in the fight against it.

- Common guidelines and standard procedures between GDSP and other law enforcement agencies as well as addressing overlaps in institutional mandates and duplicate or parallel investigations.

1.1 Monitoring methodology

1.1.1 Institutional coordination for the drafting of the Monitoring and Performance Report

Pursuant to the Decision of the Council of Ministers No. 618, dated 20.10.2021 and the Order of the Prime Minister No. 128, dated 08.11.2021, the structure and organization of the Ministry of Justice has been approved and the Strategic Planning and Monitoring Sector in the Anticorruption Field has been established, at the Directorate of Anticorruption Programs and Projects, which is the structure responsible for the monitoring process and for drawing up periodic monitoring reports of the Inter-Sectoral Strategy Against Corruption, 2015 - 2023.

The Ministry of Justice coordinates and organizes meetings with all contributing institutions, and then continues with the drafting of the monitoring report. The monitoring report of the strategic document (ISAC) for the period July 1 to September 30, 2023 was drawn up on the basis of the contribution given by the responsible and contributory institutions of the action plan.

1.1.2 Periodicity of drawing up the Monitoring and Performance Report

The Ministry of Justice will draw up quarterly, six-monthly and annual reports for the monitoring and reporting of strategic documents, which will produce necessary and timely information for policy makers on the progress of the implementation of the measures that are foreseen in the action plan of the ISAC.

1.1.3 Reporting Manual according to the IPSIS system

The Ministry of Justice will draw up the monitoring and performance report for the relevant period according to the manual of data entry in the IPSIS system. According to this strategic document, each institution reports on the level of implementation of each objective and measure, on the assigned budget, the problems encountered and the evaluation of the progress of the strategy in general. The coordination for compliance with the data entry manual in the IPSIS system will be carried out with the SASPAC Agency.

1.1.4 Compliance of monitoring and performance reports with Good Governance principles

The Ministry of Justice will draw up the monitoring and performance report for the relevant period in accordance with the principles of good governance.

The Principles of Good Governance contain a framework for the evaluation of Monitoring and Performance Reports which enables the regular analysis of the progress achieved in the implementation of the Principles and the setting of standards that the country must meet. The principles are designed for countries that want to join the EU and that receive assistance from the EU through the Instrument for Pre-Accession (IPA). The terms of the acquis, as well as other EU directives and guidelines, are the core of the Principles in the areas where the acquis exists. In other

areas, the principles are derived from international standards and requirements, as well as from good practices in EU member states and OECD countries. As a minimum standard for good performance-oriented administration, countries must ensure adherence to these basic principles. The coordination for the evaluation of the monitoring and performance report related to the fulfillment of these principles will be carried out with the Good Governance Unit, Department of Policies and Good Governance in the Prime Minister's Office.

1.1.5 Integrated Policy Mechanism

Pursuant to Prime Minister's Order No. 90, dated 01.08.2023 "On taking measures for the implementation of the broad sectoral/intersectoral approach, as well as the establishment and operation of the integrated sectoral/intersectoral Mechanism",⁸ Thematic Groups have been created, which are part of the Integrated Policy Management Group (IPMG) for Good Governance and Public Administration. Specifically, the Anticorruption Thematic Group (AThG) has been established for the Ministry of Justice.

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

1.1.6 Stages for drafting the Monitoring and Performance Report

The stages to be followed for the preparation and consolidation of performance reporting and monitoring are presented below:

Phase 1: Sending the request for contribution on October 3, 2023 to all reporting institutions and consolidating the package in accordance with the standards of the IPSIS system and the Principles of Good Governance;

Phase 2: Sending the complete package for evaluation on 18.12.2023 to the Good Governance Unit, Department of Policies and Good Governance at the Prime Minister for evaluation of the performance report in accordance with the principles of good governance.

Phase 3: Consolidation of the package after receiving and reflecting the comments brought by the Good Governance Unit, Department of Policies and Good Governance at the Prime Minister;

Phase 4: Organizing the meeting of the AThG on 27.12.2023 for the consultation of the consolidated package, receiving comments from the actors, as well as its approval;

Phase 5: Reflecting on comments and finalizing the monitoring and performance report package;

Phase 6: Publication of the 3-monthly report on the official website of the Ministry of Justice;

Phase 7: Sending the proceedings (meeting minutes, operational conclusions, public consultation report) of the AThG meeting and the final package, together with the link for acknowledgment to the Good Governance Unit, Department of Policies and Good Governance at the Prime Minister's Office.

Phase 8: Sending the proceedings (meeting minutes, operational conclusions, public consultation report) of the AThG meeting and the final package, together with the link for acknowledgment to the SASPAC Agency.

1.1.7 Principles of Good Governance that will be taken into consideration for the drafting of the Monitoring and Performance Report

The Monitoring and Performance Report will implement the principles of good governance that will have to be followed in the implementation of a good and effective M&R system:

- **EFFICIENCY:** Aggregation of document levels. This principle should allow the use of synergies between the reports of different documents. If the documents are closely related in terms of content, then the M&R system should take this into account to enable the further development of each-other and not overlap each-other. The basic elements of the M&R reports (eg objectives, activities, indicators) in the lower-level document will evolve towards the M&R content in the higher-level documents. Connections must be considered. This principle should improve the frequency and content of M&R reports.
- **ACCOUNTABILITY:** Compliance with the content of planning documents. Monitoring reports should focus on elements of planning documents to ensure accountability for planned reforms and interventions.
- **IMPORTANCE:** Respecting the monitoring and performance needs of users. M&R reports should be tailored to the needs of the user in terms of content, length and frequency. Furthermore, the reports should account for the achievement of results in a verifiable manner and in relation to the SMART indicators.

The main components that the Monitoring and Performance Reports will evaluate for compliance with the Principles of Good Governance relate to the following components:

Structured analytical approach based on evidence and consultation

- The information provided explains the methodological framework in accordance with the procedures and standards of the system.
- Progress towards each political goal and specific objective of the strategy based on indicators as well as the implementation of key reforms in the sector is clearly presented.
- The degree to which the main stakeholders are involved in the process of drawing up the report and the monitoring report was consulted with all groups as well as published on the

respective website of the institution (the main evidence is the public consultation report on the process as well as the evidence that the comments are taken into consideration).

- The level of analytical presentation of the developments of the sector globally or in the region.
- The scale of the analytical presentation of the implementation of the strategy with effects on the European integration agenda.
- The degree of analytical presentation related to the identification of the field which is addressed for improvement as well as the effects on the overall execution of the budget.

Progress achieved vs policy goals, specific objectives and measures

- The extent to which progress clearly expresses the assessment of key achievements using performance indicators. The analysis was evaluated through graphs, dashboards, in-depth analysis and visually through tables). The identification of the performance scale is also clearly presented.
- The extent to which progress addresses the assessment of challenges, gaps and inefficiencies (clearly identified in the monitoring report which areas (based on policy goals / specific objectives) show the weakest/ineffective performance, vs the highest performance of objectives, using result indicators, through graphs, dashboards, in-depth analysis and visually through tables.
- The conclusions and recommendations are based in accordance with the evidence of the report and provide concrete measures for correction/improvement to be addressed in decision-making.

Performance categorized according to standards

- The level of achievement of the objective of each performance indicator is identified. Collection of available data has been carried out. The rate of achievement of the indicator was calculated: 1) target value, 2) base value and 3) data for achieving the goal.
- The level of achievement of the objective is defined. The average rate of implementation of all performance indicators related to each specific objective was also calculated. (disposing of data on the levels of realization of each performance-related indicator and dividing by the number of performance indicators)
- The level of determining the degree of achievement of the objective for one of the four (4) intervals of the performance system has been carried out and analyzed. Also, the Interval is defined based on the level of tolerance. (i. Poor, ii. Adequate, iii. Good, iv. Very good, v. Exceeded)

The risks

- The degree to which risks are identified at the political goal and specific objective level in accordance with Law No. 10 296, dated 07.08.2010 "On financial management and control".
- The extent to which risks are analyzed at the political goal and specific objective level.

- The risk assessment was carried out in accordance with the following categorizations; ii. medium and iii. high.
- The assessment of the possibility of the occurrence of the risk was carried out in accordance with the low categorizations; ii. medium and iii. high.

Financial analyses

- The extent of the analysis performed regarding (i) the budget used in the monitoring period, (ii) the funding gap and (iii) future needs.
- The analysis of the used budget is analyzed related to the budget programs (the total number of budget programs are correctly identified) at three (3) levels: (i) the purpose of the policies (ii) the specific objective (iii) the measures/products as well as the total for the strategy.
- The level of financial analysis has been carried out where the causes of the lack of funds and how this gap will be handled in the future have been identified.

Action Plan

- The plan is broken down into the feasibility of measures/products/activities.
- Implementing institutions and reference codes for budget programs have been identified.
- Feasibility periods are clearly identified.
- Other/collaborating institutions have been identified.
- The measures/products are aligned with the products of the budget programs (the budget programs are clearly identified)

1.1.8 Procedure for analyzing data for the monitoring and performance report

The data analysis was done in accordance with the principles of good governance and the evaluation structure for achieving performance in the Prime Minister's Office.

First, the implementation of the measures was analyzed, giving a quantitative and qualitative result of their implementation against the performance of the respective activities related to them.

Secondly, the achievement of the target value for this period defined in the performance indicators has been analyzed, also evaluating the degree of impact of the implemented measures on the achievement of the target value.

Thirdly, the achievement of specific objectives was analyzed through the calculation of the achievement of performance indicators and the percentage of measures related to the relevant objective realized.

The applicability of the measures and activities of the Action Plan is classified with the following values:

Implemented: The status "Implemented" is reported for those measures/activities that have been fulfilled.

Partially implemented/In process: The status "In process" was reported for those measures/activities, which in the reporting period had partial implementation and/or which continue to be implemented by them.

Unimplemented: Those measures/activities that have not registered development for the reporting period, as well as those measures/activities for which there has been no progress, are reported as unimplemented.

To calculate the achievement of specific objectives according to the achievement of the measures planned for implementation in this period, the following formula was used:

$$NR = \frac{TP\ 1\ NR + TP\ 2\ NR}{2\ TP} \times 100\%$$

The calculation of the achievement of the objective against the implementation of the measures is carried out on the basis of 4 intervals of the performance system as in the table and the color code below:

Category	Tolerance level	Points (110)
Weak	From 0 to 30 percent of the implemented measures	30
Enough	From 31 ñ 50 percent of the implemented measures	20
Good	From 51 ñ 85 percent of the implemented measures	35
Very good	From 86 ñ 110 percent of the implemented measures	25
Exceeded	111 and above	N/A

The next level of analysis is carried out according to policy goals. Based on the feasibility data for each analytical level (measure, performance indicator, specific objective), each of the four policy goals has been evaluated: 1. The full and professional functioning of the institutions of governance of the justice system in accordance with the constitutional and legal requirements and European standards, guaranteeing independence, efficiency and accountability; 2. Strengthening transparency, judicial efficiency and access to justice in accordance with constitutional and legal requirements and European standards; 3. A Criminal Justice System relying on modern European principles of crimes, which guarantees resocialization, reintegration and rehabilitation, as well as respect for human rights and freedoms and gender equality within an integrated approach and with solid crime prevention practices; 4. Coordination, efficient and effective management of the cooperation system in all institutions of the sector.

Risk Matrix

In the monitoring report, the identification of risks is assessed in order to identify the steps that will need to be followed to be addressed within the implementation of the objectives of the Inter-Sectoral Strategy Against Corruption. The risk assessment was carried out in accordance with the table below:

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

1.1.9 Public consultation of the monitoring and performance report

In accordance with the legal criteria for public consultation, after drafting the draft report, the Ministry of Justice sent the document for the first consultation to the reporting institutions on 01.12.2023, and on 18.12.2023 it continued with the consultation of the second draft and published the draft on the official website of the Ministry of Justice, where an electronic address is set for receiving comments, on the website www.drejtesia.gov.al, in the menu priorities/inter-sectoral strategy/cross-sectoral strategy against corruption. At the end of the consultation process, the Ministry of Justice reflected the relevant comments/suggestions on the draft monitoring report and continued with the holding of a dedicated meeting on December 27, 2023, in the framework of the discussion of the analysis carried out, the findings of the report, the assessment of policy goals in the presence of all implementing and reporting institutions of the action plan.

The public consultation report of the monitoring report is also published on the website of the ministry, www.drejtesia.gov.al.

PROGRESS OF THE INTERSECTORAL STRATEGY AGAINST CORRUPTION

The Intersectoral Strategy against Corruption 2015-2023 aims to achieve the major objectives of this strategy through the implementation of concrete anti-corruption measures, with the aim of developing 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 the maximum elimination of threats of corruption, as well as the will to prevent and fight corruption. In order to monitor the progress of ISAC 2015-2023, the next periodical report has been drawn up, within the framework of the implementation of the Action Plan 2020-2023, which covers the period from *July 1 to September 30, 2023*.

Measures and activities successfully implemented in the relevant period

The goals of the policies (approaches) and specific objectives are made feasible through the measures and activities (products), foreseen for implementation, by the responsible and cooperating institutions of the Strategy and the Action Plan.

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

Applying the same formula² for assessing the degree of achievement of the objectives - by collecting the feasibility in the percentage of policy goals and dividing by their number - the feasibility of the inter-institutional strategic goal against corruption is 59.96 %.

Preventive Approach (A)	75.83%
Punitive approach (B)	59.72%
Awareness-raising Approach (C)	44.33%

In this monitoring report, important achievements are noted for some institutions and a mostly positive trend in the feasibility of Policy Goals II and III is found, compared to the monitoring carried out in the same period of the previous year, July - September 2022. Compared to the monitoring performed in this report, the Preventive Approach (A) shows a slight downward trend of 1.21%, the Punitive Approach (B) shows an upward trend of 27.22% and the Awareness Approach (C) shows an upward trend of 15.17%.

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

Approach A	Feasibility
A.1	66.66%
A.2	100%
A.3	100%
A.4	50%
A.5	100%
A.6	No reporting
A.7	66.66%
A.8	100%
A.9	100%
A.10	100%
A.11	75%

Approach B	Feasibility
B.1	66.66%
B.2	25%
B.3	25%
B.4	62.5%

Approach C	Feasibility
C.1	100%
C.2	33.3%
C.3	0%

The Action Plan 2020 - 2023, for the year 2023, foresees the implementation of 120 activities and 73 measures, distributed respectively in 64 activities and 37 measures for Policy Goal I (preventive approach A), 32 activities and 22 measures for Policy Goal II (punitive approach B) and 24 activities and 14 measures for Policy Goal III (awareness approach C).

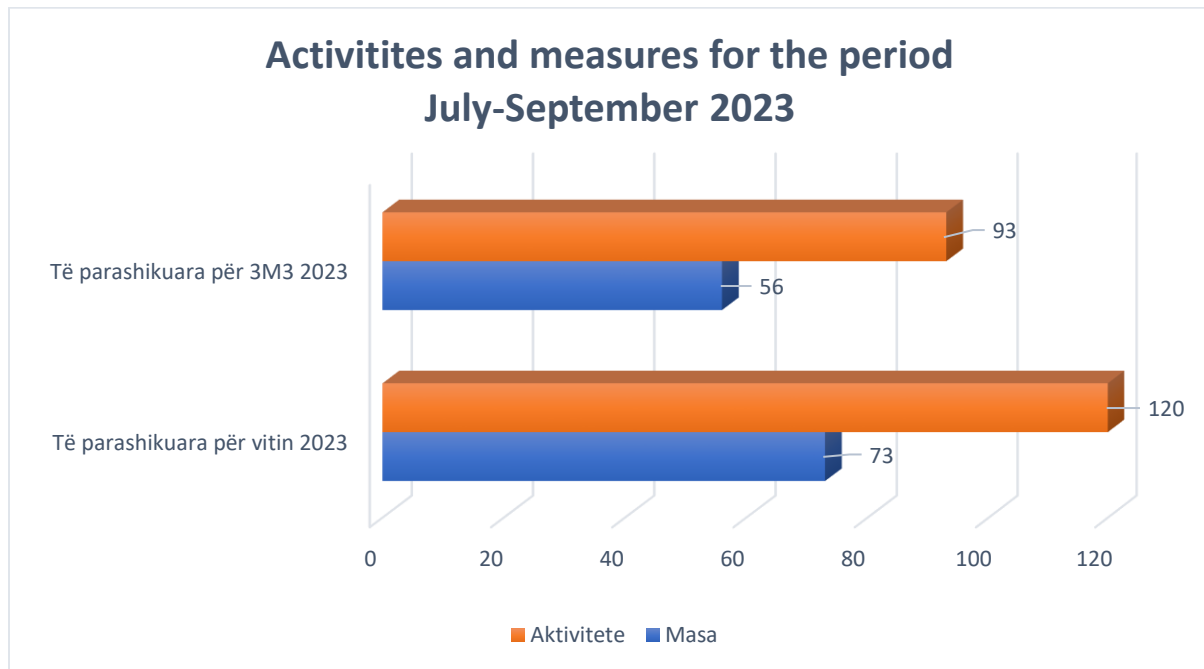
For this monitoring period, July - September 2023, it turns out that 93 activities and 56 measures are planned for implementation, of which: 89 activities and 55 measures are subsequent/ongoing from the period of 2022, 4 activities and 1 measure are new /which have started implementation in this third quarter of 2023.

Policy objectives (Approach)	Activities and measures	Activities and measures, july - september 2023			
		Activities and measures for 2023	Activities and Measures foreseen for 3M3 2023	Ongoing measures and activities ³	New measures and activities ⁴
Preventive	Measure	38	30	29	1
	Activities	65	52	50	2

³ Activities and measures that have started implementation in the previous periods of 2023 and continue their implementation in this quarter of 2023.

⁴ Activities and measures that start their implementation in this quarter of 2023.

Punitive	Measure	23	19	19	0
	Activities	32	25	24	1
Awareness-raising	Measure	12	7	7	0
	Activities	23	16	15	1
Total	Measure	73	56	55	1
	Activities	120	93	89	4



The status of the measures and activities that have achieved the goals of the policies (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:

- 30 measures and 49 implemented activities;
- 10 measures and activities still in the process of implementation;
- 16 measures and 38 unimplemented activities (including measures not reported at this stage of the monitoring process).

Regarding the above, **out of 30 measures and 49 activities implemented** for the third quarter of 2023, specifically 17 measures / 30 activities belong to the preventive approach (A), 9 measures /

11 activities belong to the punitive approach (B), as well as 4 measures / 8 activities belong to the awareness approach (C).

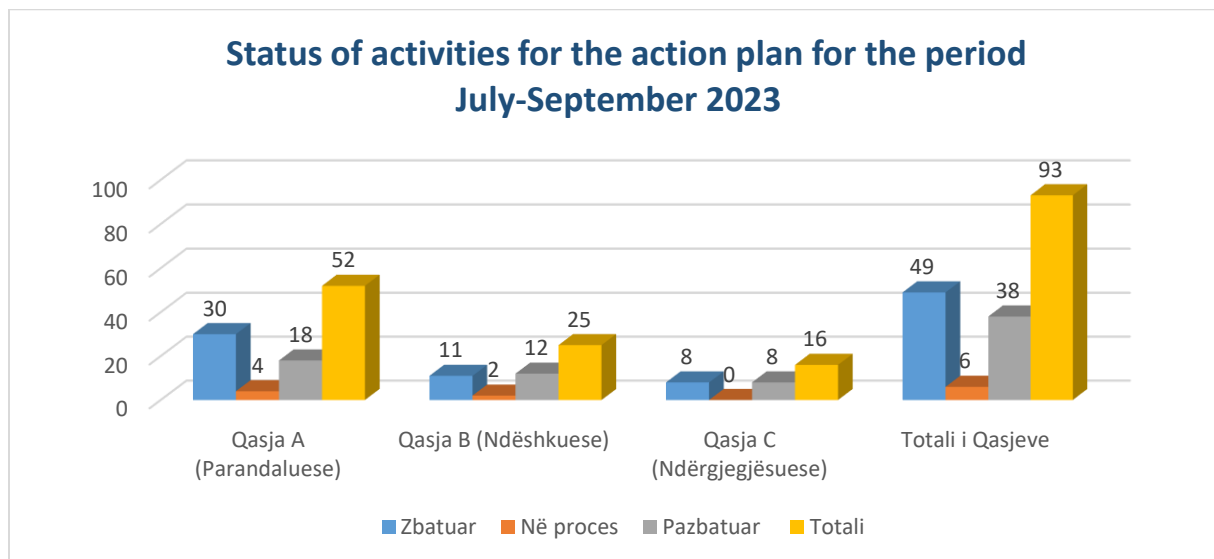
Out of 10 measures and 6 activities which are still in the process of implementation for the third quarter of 2023, specifically 7 measures / 4 activities belong to the preventive approach (A), 3 measures / 2 activity belong to the punitive approach (B), and 0 measure / 0 activities belong to the awareness approach (C).

Out of 16 measures and 38 unimplemented activities for the third quarter of 2023, concretely 6 measures / 18 activities belong to the preventive approach (A), 8 measures / 12 activities belong to the punitive approach (B), as well as 2 measures / 8 activities belong to the awareness approach (C).

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

Out of the total of 93 activities foreseen for implementation in July-September 2023, 52 of them belong to Approach A, 25 activities belong to Approach B, as well as 16 activities to Approach C

Status of measures from the Action Plan 2020 - 2023, for the period July-September 2023				
Progress of measures	Preventive Approach A	Punitive Approach B	Awareness Raising Approach C	Total of the Approaches
Implemented	30	11	8	49
Partially implemented	4	2	0	6
Unimplemented	18	12	8	38
Total	52	25	16	93



It turns out that out of 93 activities envisaged for the period July - September 2023, following and new activities, their status for the 3 approaches is reported as follows:

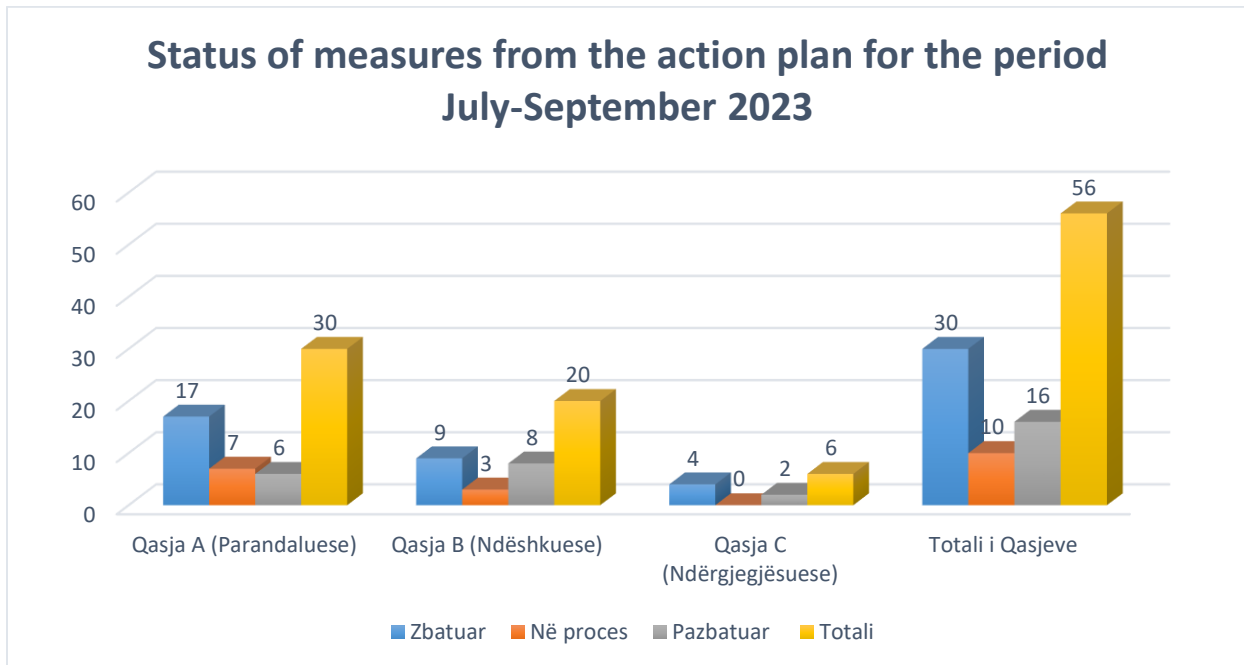
- 49 implemented activities;
- 6 activities are still in the implementation process;
- 38 activities not implemented (unreported) by the responsible institution, where we can mention:
A.4.2.1; A.4.3.1; A.4.4.1; A.4.4.2; A.4.4.3; A.6.1.1; A.6.1.2; A.6.2.1; A.6.2.2; A.6.3.1; A.6.3.2;
A.6.4.1; A.6.4.2; A.6.5.1; A.6.5.2; A.6.5.3; A.7.1.4; A.7.3.2; B.1.2.1; B.1.2.2; B.1.3.1; B.1.4.1;
B.2.1.1; B.2.2.1; B.2.3.1; B.2.3.2; B.2.3.3; B.2.3.4; B.3.4.1; B.4.4.1; C.2.2.1; C.2.3.1; C.3.1.1;
C.3.1.2; C.3.1.3; C.3.1.4; C.3.1.5 dhe C.3.1.6).

The status of the measures that have realized the goals of the policies (approaches):

From the total of 57 measures envisaged for implementation in July - September 2023, 30 of them belong to Approach A, 19 measures belong to Approach B, and 8 measures to Approach C.

Status of measures from the action plan 2020-2023 for the period July-September 2023				
the progress of measures	Approach A (Preventive)	Approach B (Punitive)	Approach C (Awareness-raising)	Total approaches
Implemented	17	9	4	30
In process	7	3	0	10

Unimplemented	6	8	2	16
Totali	30	20	6	56



It turns out that out of 56 measures envisaged for the period July – September 2023, the following and new measures, their status for all 3 approaches is reported as follows:

- 30 measures implemented;
- 10 measures are still in the process of implementation;
- 16 measures not implemented (unreported) by the responsible institution (from which we can mention A.4.4; A.6.1; A.6.2; A.6.3; A.6.4; A.6.5; B.1.2; B.1.3; B.1.4; B.2.1; B.2.2; B.2.3; B.3.4; B.4.4; C.2.3 dhe C.3.1).

Evaluation of key achievements using measures and activities:

Based on the information on reporting and evaluation of implemented activities and measures, the achievement of objectives for July-September 2023, is as follows:

Weak - 4 objectives (A.6; B.2; B.3 dhe C.2)

Sufficient - 2 objectives (A.4 dhe C.2)

Good - 5 objectives (A.1; A.7; A.11; B.1 dhe B.4)

Very good - 7 objectives (i A.2; A.3; A.5; A.8; A.9; A.10 dhe C.1)

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 2023, in implementation of the Action Plan 2020-2023, of the Inter Sectoral Anti-Corruption Strategy 2015-2023, is as follows:

- Efficient monitoring by the Commissioner for the Right to Information and Protection of Personal Data, of more than 3/4 of public authorities. Also, the installation of the electronic register in 27 new public authorities marks an important step towards transparency and efficiency in response to public requests.
- PPA continues to issue important recommendations, addressing the problems identified in the implementation of contracts. Staff training related to procurement procedures and the use of advance and periodic notices mark efforts to improve integrity in procurement.
- NAIS has marked a significant success by increasing the number of services in the unique government portal e-Albania. The analysis of electronic records and the structuring of information for publication show a commitment to modernization and transparency in public services.
- The Police Surveillance Agency continued to monitor cases of propensity for corruption and has followed up on denunciations of illegal activity by police officers. The suggestion to initiate a disciplinary investigation into 14 police officers shows their efforts to maintain integrity and accountability.
- HIDAACI has continued to ensure integrity in the declaration of assets and private interests through the maintenance of the electronic system. The processing of information with standards proves progress in handling the data of public officials.
- The General Directorate of Anticorruption is bringing important results in the administrative investigation of suspected corruption cases, bringing a reliable window for citizens and businesses.
- The State Police continues to efficiently fight criminal offenses of corruption and organized crime, increasing the number of detectability of reported cases.
- The Ministry of Justice, in the role of the National Anti-Corruption Coordinator, has developed several activities as well as the monthly newsletter of July, August and September with a summary of all projects, activities and public campaigns carried out by the NAC, has been drafted and published, accessible in the link <https://drejtesia.gov.al/e-buletin/>.

BUDGET EXECUTION

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

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

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

A1: ALL 37,044, covered by the state budget.

A2: ALL 87,857, covered by the state budget, as foreseen in the Action Plan.

A3: ALL 214,400, covered by the state budget, as foreseen in the Action Plan.

A4: 10,785 ALL, covered by the state budget.

A5: ALL 19,400, covered by the state budget.

A6: ALL 43,300, covered by the state budget, as foreseen in the Action Plan.

A7: ALL 10,668, covered by the state budget.

A8: ALL 20,911, covered by the state budget.

A9: 2,855 ALL, covered by the state budget.

A10: ALL 2,848, covered by the state budget.

A11: ALL 38,790, covered by the state budget, as foreseen in the Action Plan.

B1: ALL 116,214, covered by the state budget.

B2: ALL 29,050, covered by the state budget, as foreseen in the Action Plan.

B3: 37.5 ALL, covered by the state budget, as foreseen in the Action Plan.

B4: ALL 62,045, covered by the state budget, as foreseen in the Action Plan.

C1: ALL 5,259, covered by the state budget.

C2: 0 ALL.

C3: ALL 95,950, covered by the state budget, as foreseen in the Action Plan.

Even for this monitoring report, it results that for a part of the activities carried out during this year, implementation, costs continue

to be reported in "administrative costs", and their concrete value is missing. In total, there are 21 activities that are reported to have been carried out with "administrative costs" and 83 activities with 0 (zero) costs/not reported.

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

Policy objective 1 (preventive approach- A)

488,858 ALL covered by the state budget

Policy objective 2 (punitive approach - B)

207,346.5 ALL covered by the state budget.

Policy objective 3 (awareness approach - C)

101,209 ALL covered by the state budget

The total budget used for this period is:

- Financing from the state budget is in the amount of ALL 797,413.5.

CONCLUSIONS AND RECOMMENDATIONS

Based on the results of the monitoring carried out, it turns out that for the period July 1 - September 30, 2023, the areas that have shown performance but are also accompanied by problems are activities and measures distributed in all the specific objectives in the three policy goals (approaches) of ISAC, prevention (A) – punishment (B) – awareness (C).

The institutions have demonstrated continuity, effort and positive will to implement the measures, carry out the activities in their function, in accordance with the budgets provided in the action plan, the support of international and local partners; and have relied on their human resources and internal professional technical capacities.

Public bodies and law enforcement agencies are continuing their work with solid data, compared to the same period last year, and are witnessing positive developments in function of the annual target that will have to be reached at the end of 2023.

RECOMMENDATIONS

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

- start carrying out activities and measures for those objectives of the strategy, which result in the level of poor implementation (from 0 to 30 percent of implemented measures), also due to the lack of reporting, namely objective A.6; B.2; B.3 and C.3.
- to report costs for each activity that has begun and completed implementation in this reporting period.
- ensure transparency and updated reporting of administrative costs and the budget used to evaluate the effectiveness of the measures taken.
- the inclusion of civil society in anti-corruption projects and the Agency for the Support of Civil Society to provide effective support according to the requirements of the Action Plan.
- to strengthen the institutions' capacities, including training for employees and common standards between GDSP and other law enforcement agencies.

- to continue work on the further improvement of the process of treatment and processing of information reported by public officials, by HIDAACI.
- continue to strengthen the capacities of the public financial inspection staff and ensure the necessary training for internal auditors, as well as create an effective mechanism for increasing cooperation and information exchange in the Ministry of Finance and Economy.
- to continue the transparent handling of citizens' complaints and the reporting of the results of the investigation and the measures taken in the fight against corruption, by the General Anticorruption Directorate.
- to continuously improve communication and cooperation with the final e-systems of institutions for a more effective publication of data and the provision of better services to citizens.

Assessment of challenges, gaps and inefficiencies

It turns out that among the objectives with a complete lack of feasibility for the reporting period (also due to the lack of reporting), July - September 2023, is objective A.6 and C.3. In this report, there is also a lack of information about the budget of a number of measures and activities, as well as an assessment of concrete needs, for the areas that have the highest risk.

One of the main challenges is the lack of a sustainable monitoring and evaluation system, emphasizing the need for an efficient mechanism that would enable the evaluation of the progress of the strategy by each institution. Another part of the challenges has to do with limited budgets, especially in local municipalities, for the implementation of the Integrity Plan, creating an obstacle in efforts to increase the standards of integrity in institutions.

The report also highlights some gaps in the level of coordination and cooperation between institutions. The lack of a stable coordination has led to interruptions and delays in the implementation of anti-corruption plans and measures.

Another gap concerns the lack of a system for regular and transparent reporting on administrative costs and the budget used to evaluate the efficiency of the measures and activities undertaken.

An important challenge is the effective implementation of the law, ensuring continuous, complete and comprehensive control and monitoring of central or local institutions and agencies, increasing public confidence and efforts to fight against corruption.

Overall, this monitoring report shows that, despite the achievements, there are still challenges and gaps waiting to be addressed. It is important that the authorities further engage in addressing these issues to strengthen the implementation of the strategy and ensure greater progress in the fight against corruption in Albania. The above recommendations and the continuous commitment of institutions to improve the implementation of anti-corruption measures should help address these challenges and improve efficiency in the fight against corruption.

Risk assessment using measures and activities

In this monitoring report, July-September 2023, among the risks that were mainly identified, are related to technical and institutional capacities, work processes, technical assistance, institutional cooperation and the regulatory environment.

The objectives which present a high level of risk are objectives A6, B.2, B.3, B.4 and C3.

Objective A11 has a high level of risk as it relates to the preparation of Local Integrity Plans and the determination of a specific budget for their implementation, since their disapproval in time endangers, among other things, the achievement of the budget support indicator. The insufficient budget for the implementation of the Integrity Plan at the local level is a challenge, and requires a greater commitment from the municipalities.

Objectives B.2 and B.3 have a high level of risk due to the need to coordinate the work between the law enforcement bodies GDSP. It will also be necessary to disclose concrete results related to the approval, establishment and operation of the ARO and the addressing of overlaps and/or gaps in institutional mandates, double or simultaneous investigations, etc. The process of setting up the Asset Recovery Office should be accelerated to address potential risks.

Within the awareness approach, objective C.3 represents a great importance and an increased risk also due to the fact that it results in a weak feasibility repeatedly in different periods of monitoring reports.

In conclusion, although there are notable achievements, it is important to focus on addressing the identified challenges to ensure a successful implementation of the Inter-sectoral Anti-Corruption Strategy. In the next monitoring report, January - December 2023, there will be an increased analysis of performance indicators.

Next steps

In conclusion of this monitoring report for the period July-September 2023, of the findings that this report offers us, of the analytical data that the institutions have reported and of the analysis carried out, the following steps are addressed:

A.4: Improving the treatment of corruption complaints

Intensification of efforts to detect and pursue cases of corruption by police officers and increase cooperation with the Directorate of Professional Standards and the Disciplinary Commission for disciplinary investigations in suspected cases.

A.7: Improving the efficiency of internal audit and inspection and the systematic use of risk analysis:

Continuation of capacity building of public financial inspection staff and provision of regular training for internal auditors. Increasing the use of special investigative tools to improve efficiency in the detection of corruption in the financial field.

A 9: Strengthening the integrity of public servants

Implementation and monitoring of Integrity Plans, ensuring commitment and shared responsibility in institutions and at the local level. Strengthening risk assessment and raising awareness for the implementation of anti-corruption policies, from all line ministries, with a focus on their dependent institutions.

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

Continue the process of drafting integrity plans in local government units, dedicating a part of the budget for their implementation.

B.2 Improving cooperation between law enforcement institutions in criminal prosecution and criminal punishment of corruption

The establishment of joint work groups and the drafting of work plans and action plans with a focus on corruption investigation should be addressed as a priority between PSA, the State Police, the General Prosecutor's Office, SPAK and international partners, as well as the coordination of work between law enforcement bodies for putting ARO into operation.

B.4. Improving international judicial and police cooperation in the fight against corruption.

To complete the reporting for this objective and to strengthen the capacities of the joint investigation teams established for the investigation of criminal offenses in the field of corruption.

C.3. Encouraging cooperation with civil society:

To ensure the effectiveness of open calls for specific proposals in the fight against corruption, financed by ASAC, as well as to take measures for cooperation with the State Police for the generation of evaluation reports.