



REPUBLIC OF ALBANIA
MINISTRY OF DEFENCE

INTEGRITY PLAN OF THE MINISTRY OF DEFENCE

2022-2025

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Abbreviations

CIDS	Center for Integrity in the Defense Sector, Norway
DMBNJSH	Directorate of Human Resources and Services Management
DSIK (DCIS)	Directorate of Classified Information Security
FA (AF)	Armed Forces
GDI	Government Defense Index Integrity of Transparency International
KKK	National Anti-Corruption Coordinator
KDIMDP	Commissioner for the right to information and protection of personal data
MM (MoD)	Ministry of Defence
MD (MoJ)	Ministry of Justice
NATO	North Atlantic Treaty Organization
PI (IP)	Integrity Plan
SP (SG)	Secretary General

INTRODUCTION

Building integrity is an important functioning aspect for democracies and an important pillar of the rule of law. Corruption greatly affects public confidence, severely undermines the effectiveness of institutions and undermines their democratic legitimacy. Corruption in the defense sector has serious consequences, as it undermines the country's defense and security capabilities. It causes misuse of financial and material resources, procurement of inadequate equipment, mismanagement of human resources which endanger the lives of personnel and reduce the operational effectiveness of the Armed Forces.

Although the defense sector is as vulnerable to corruption as other sectors, it has traditionally been one of the hermetic sectors in terms of measures to address these risks. As a result, the focus of anti-corruption reforms in this sector has been smaller. However, in recent years there has been a growing focus on addressing integrity risks and the fight against corruption in the defense sector as well, thanks to its interaction with NATO. At the 2016 Warsaw Summit, NATO adopted the Integrity Building Policy, which aims to develop effective, transparent and accountable defense institutions that are able to respond to unpredictable security challenges, including those of a hybrid nature, and which contribute significantly to the Alliance's mission to protect the freedom and security of its members.

As a NATO member country and as one of the key countries in Southeastern Europe region, Albania is playing an important role in the security of the region and the Alliance as a whole and in this context it is expected that it will contribute to the effective implementation of Integrity Building Policy. The Government and all state institutions in Albania have paid special attention to strengthening the integrity and the fight against corruption, which has been one of the key priorities in order to open membership negotiations with the European Union, which remains the last step of the process of our country's Euro-Atlantic integration.

Strengthening the integrity and taking measures to reduce the possibility for corruption are foreseen in the Inter-sectorial Anti-Corruption Strategy. A number of reforms aimed at increasing transparency, improving the procurement system, strengthening measures to investigate and punish corruption, including justice sector reform, have been undertaken guided by this aim.

The Ministry of Defence has taken a series of measures, strengthening the system of transparency of the institution, reviewing the legislation on procurement in the defense and security sector, strengthening the financial management system, etc. The new sample of the transparency program has been published on the official website of the Ministry of Defence, which is regularly updated in order to acquaint the public with more information, as well as to fulfill the obligations arising from law 119/2014 "On the right to information". Also, a special section is dedicated to the documentation related to the process of public notification and consultation, publishing not only the acts that are subject to the consultation process, but also the transparency reports that are drafted after the public consultation of each act.

However, integrity efforts have resulted mostly from the implementation of policies at the national level, and the Ministry of Defence has not had a separate document focusing on addressing corruption risks in the defense sector.

The Integrity Plan 2022-2025 is the first document drafted by the Ministry of Defence to contribute to the prevention and fight against possible corruption risks in this institution. The plan focuses on the defense sector and aims to serve as a mechanism for guiding measures to strengthen integrity and address corruption risks in the Ministry of Defence and responsible and subordinate structures, as well as in the General Staff of the Armed Forces and its responsible subordinate structures.

The plan has identified integrity risks in the following areas:

1. Area of policies and mechanisms of democratic control and oversight;
2. Area of human resources;
3. Area of financial management and internal control;
4. Area of international operations and missions;
5. Area of asset management;

The Integrity Plan envisages producing a new and further impetus to the existing efforts, generating new activities and practices which aim to improve management mechanisms as a whole.

Given its importance, the Integrity Plan also envisages the establishment of an implementation, monitoring and evaluation mechanism to measure achieved progress.

METHODOLOGY

The plan is based on the Integrity Risk Assessment Methodology for Central Government Institutions, approved by the National Anti-Corruption Coordinator, the NATO Integrity Building Self-Assessment Questionnaire and the Government Defense Integrity Index of Transparency International.

The development of the Integrity Plan went through several stages, starting with (1) the establishment of the process through setting up a working group, composed of officials of the directorates of the Ministry of Defence chaired by the Deputy Minister of Defense, (2) conducting the assessment of corruption and integrity risk in specific sectors of defense and drafting of risk matrix, (3) drafting measures and activities to address risks. The process ended with the consultation of the plan, its official approval by the Minister of Defense and its publication.

The development and drafting of the Integrity Plan was carried out by the working group for drafting the Integrity Plan of the Ministry of Defence (consisting of representatives from the

Directorate for Monitoring and Implementation of Priorities, the Directorate for Good Administration of Human Resources and Services, the Directorate for Audit, Directorate of Budget and Financial Management, Directorate of Procurement and Auctions, Directorate of Programming, Standardization and Harmonization of Regulatory Acts, Directorate of General Inspection, as well as the Sector of Secretariat, Archive, Protocol and NATO Sub-Register), during December 2021-March 2022. Also, there were involved representatives from other structures outside the working group, such as the Directorate of Good Administration and Property and Assets.

The drafting of the Integrity Plan was carried out with the technical assistance of the Center for Integrity in the Defense Sector of the Kingdom of Norway (CIDS).

PURPOSE AND VISION

The main goal of the Integrity Plan of the Ministry of Defence 2022-2025 is to strengthen the integrity and anti-corruption culture in the defense sector in Albania.

The vision of this plan is a defense sector that preserves integrity and rejects corruption, institutionalizing the highest standards and principles of good governance.

STRATEGIC OBJECTIVES

To achieve the goal and vision, the Integrity Plan of the Ministry of Defence defines six strategic objectives which are intended to be achieved through the implementation of activities set out in this plan. Also, strategic objectives have served as a highlight to identify appropriate activities and measures as well as indicators for their measurement.

The strategic objectives also reflect the objectives of the defense policy (National Security Strategy, Military Strategy, Armed Forces Long-Term Development Plan and Strategic Defense Review), the Human Resources Management Strategy 2020-2024 of the Ministry of Defence, as well as the objectives of the Inter-sectorial Strategy for the Fight against Corruption.

In this way, the MoD Integrity Plan ensures the inclusion of the concept of integrity in key aspects of work in the MoD and the Armed Forces, linking them to "Good Governance, Democracy, and the Rule of Law." which is one of the main pillars of the National Strategy for Development and Integration.

Based on the above, the strategic objectives of the MoD Integrity Plan 2022-2025 are:

1. Improving the process of policies and mechanisms of democratic control and oversight;
2. Increase the transparency and accountability of the Ministry of Defence;
3. Improving human resource management;
4. Strengthening internal control mechanisms;

5. Strengthening integrity in international operations and missions;
6. Improving asset management systems.

RISKS OF INTEGRITY AND CORRUPTION

Improving the process of policies and mechanisms of democratic oversight.

Democratic oversight is an essential component of good governance in the defense sector. Good governance anticipates participation in the design, implementation and evaluation of defense and security policies of a range of actors, whether state institutions or media, interest groups and civil society in general.

This ensures that defense policies and decisions are consistent and in line with strategic needs, and that problems can be identified at an early stage, before they become a risk to defense institutions.

Democratic control and oversight ensures that Defense resources are managed efficiently and effectively, that defense and security sector personnel are treated with integrity, that wrongdoing is detected and corrected, and that those who commit it are held accountable in front of the law.

Current status.

Risks in the area of policy are high, mainly due to the lack of an anti-corruption policy for the defense sector, the lack of periodic integrity risk assessments, and the lack of substantive and sustained debate over defense policies.

These shortcomings are reflected in the lack of public communication on integrity in defense sector institutions and the low involvement of civil society in external public oversight processes in matters of design, implementation and evaluation of defense policies. This risk assessment is also in line with the assessment conducted in the Government 2020 Defense Integrity Index of Transparency International.

The MoD has not drafted any documents, except for the implementation of measures stemming from the inter-sectoral anti-corruption strategy. In the framework of the Integrity Plan, the MoD will address this shortcoming, including a dedicated section in the Annual Defense Directive approved by the Minister of Defense, which guides anti-corruption activity.

With the approval of the Integrity Plan, the identification of corruption risks will be carried out periodically and the results will be used to guide the anti-corruption policy in the defense sector periodically.

To address the risks arising from the weakness of oversight processes, the MoD will take measures to improve the strengthening of relations with the Assembly and the respective committees.

The MoD will also develop an engagement program with civil society organizations, which contains areas and modalities of cooperation, in order to better involve them in the public debate on defense policies.

These measures are in line with the declaration of the mission of the Ministry of Defence, which provides "drafting programs of cooperation with other central or local state institutions and civil society, in order to fulfill the mission of the Ministry of Defence."

Another integrity risk identified by the assessment is that of organized crime. Albania is a country with a high risk of being threatened by organized crime, which has become more sophisticated and there have been cases when AF personnel have been involved in such activities.

To address this risk, the MoD will include in the measures of strengthening integrity the drafting by the respective structures depending on the risk assessments from organized crime and taking appropriate measures.

General measuring indicator.

The general measuring indicator for this area is: *"Improved debate on defense policies and more active participation of state and institutional actors and civil society"*

Human resource management.

Human resource management is an important and indispensable part of defense sector. For any institution that is part of the defense sector, the effective management of its resources, whether these human resources or other resources, should represent the overall institutional philosophy on the basis of which long-term and medium-term objectives, policies and relationships with other institutions should be designed. To have successful human resource management it is necessary that the process includes all four managerial functions, which are: planning, organization, direction and control. Also, this process should be accompanied by a high level of transparency and accountability.

Current status.

Human resources are the main element of the defense system and their effective management has a very significant impact on this system. The Ministry of Defence, in order to fulfill its obligations within NATO, in 2020 has adopted the Human Resources Management Strategy, paying special attention to the human resources of the Armed Forces and the Ministry. The main

goal of this strategy is to improve and consolidate the human resource management system, in order to increase the efficiency of the system, in support of Armed Forces mission.

Effective management of human resources can be hindered by a number of risks, which, if not assessed and appropriate measures taken to avoid them, have a negative effect on the field of defense. In the assessment made by the Transparency International 2020 Government Defense Integrity Index (GDI), integrity risks in the field of human resource management are moderate. Some of the issues that require special attention, according to GDI are: proper implementation of the law "On whistleblowing and whistleblower protection", the Code of Ethics for military forces or the necessary training of personnel on issues of corruption, integrity and anticorruption policies. According to this assessment, problems are also encountered in positions that show high risk, such as public procurement.

The legal framework governing the management of human resources in the field of defense is complete, starting with law no. 152/2013 "On the status of civil servant", law no. 138/2015 "On guaranteeing the integrity of persons elected, appointed or exercising public functions", law no. 15/2021 "On some changes and additions to law 59/2014" On military career in the Armed Forces of the Republic of Albania ", as amended", law no. 59/2014, "On the military career in the Armed Forces of the Republic of Albania" etc. Also, the Ministry of Defence has approved the Internal Regulation.

The recruitment of the staff of the Ministry is done based on the procedures defined in law no. 152/2013 "On the status of civil servants", which specifically states that admission to the civil service is based on equal opportunities, merit, professional skills and non-discrimination and is carried out through a transparent and fair selection process. The selection process is based on the assessment of the professional skills of the candidates through a national competition, which includes a written test, an oral test and any other appropriate form of verification of skills, as well as the assessment of the professional skills of the candidate. The role of the Ministry of Defence in the staff recruitment process is small, as the whole process is administered by the Department of Public Administration. Currently, there are significant staff shortages, where there are vacancies in the civil service, which is one of the main risks to have a good performance and achieve the necessary results.

The legal framework for the recruitment of military personnel (professional soldier, non-commissioned officer and active officer) in the Armed Forces of the Republic of Albania is regulated by law no. 59/2014 "On military career in the Armed Forces of the Republic of Albania", amended by law 15/2021, as well as internal acts, such as order no. 1028, dated 27.07.2021 "On the approval of the document" Policy and procedures for the recruitment of candidates for new officers in the Armed Forces of the Republic of Albania", order no. 886, dated 28.06.2021 "On the approval of the regulation" On the organization and functioning of the High Commission and Ordinary Career Commissions " , order no. 887, dated 28.06.2021 "On the approval of the regulation" On the organization and functioning of the Special Career Commission" , directive no. 05, dated 08. 06.2021 "On the procedures and criteria for the

recruitment of active non-commissioned officers in the Armed Forces" , order no. 04, dated 24.05.2021 "For some amendments in the directive no. 13, dated 08.10.2014 "On the procedures for concluding a military service contract", order no. 756, dated 03.06.2021 "For some changes in the directive no. 9, dated 31.12.2018, "On the procedures and criteria for the recruitment of active soldiers / sailors in the Armed Forces", as well as order no. 1290, dated 26.10.2020 "On the establishment and functioning of the firing team of the Armed Forces of the Republic of Albania" .

The documentation related to the personal files of the employees of the Ministry is administered by the human resources unit not only in *hard copy*, but also in electronic form in the human resources management system. The personal files of military and civilian staff in the Armed Forces are administered in the same way. By order no. 1383, dated 27.08.2015, the Minister of Defense has approved the regulation "On the administration and content of the personnel file in the Armed Forces". This regulation clearly defines the rules for the manner of administration of personal data, defines the level of access to the electronic system of human resource management, as well as the fact that persons who will have access to this system must be provided with a security clearance certificate.

But, in addition to personnel files, the Ministry of Defence maintains and administers sensitive documentation, which not only contains personal data, but can also be information classified as "state secret". It is therefore necessary to have all the technical and human capacity to guarantee the protection of personal data. One of the documents that the MoD has approved in this area is the privacy policy, a document that derives from law no. 9887, dated 10.03.2008 "On the protection of personal data". This document was adopted in 2015, but staff still need to be familiar not only with the privacy policy, but with all the necessary rules to ensure proper implementation of the law on personal data protection.

The promotion of civil servants is provided in the law "On Civil Servants", clearly defining that the filling of vacancies in the executive, lower or middle management category is done first by civil servants of the same category, through the procedure of parallel movement, in case of non-filling of the vacancy with the procedure of promotion.

Promotion of military personnel is done according to law no. 59/2014 "On the military career in the Armed Forces of the Republic of Albania", as amended, as well as the order of the Minister of Defense no. 1446, dated 06.10.2014 "On the approval of standard policies and procedures for the appointment of personnel in the Armed Forces".

Job descriptions are designed for each position. Job descriptions do not reflect all the tasks performed by employees. Duties arising from specific laws such as for example: the law "On the right to information", the law "On notification and public consultation", the law "On signaling and protection of whistleblowers", the law "On personal data protection" or the inter-sector Strategy in the Fight against Corruption, although in some cases like the law "On the right to information" are regulated by internal acts, are not reflected in job descriptions. Usually the conducting of these additional tasks is performed through the orders of the direct superior or

determined by order of the secretary general. It is therefore necessary that job descriptions not only be reviewed; reflecting all additional duties arising from other laws, but they should also be transparent. In addition to the organizational chart of the institution, the respective mission or tasks of each directorate should be published.

To reflect the implementation of the highest international standards in human resource management, some structures of the Ministry have drafted and approved standard operating procedures, such as. the Directorate of Finance and Financial Management and the Directorate of Audit, while for other directorates these procedures are lacking.

The behavior and ethics of the staff of the Ministry of Defence are regulated by law no. 9131, dated 8.9.2003 "On the rules of ethics in public administration". The Ministry has not had a sub-legal act by which it has adopted a code of ethics, which clearly states the detailed rules of conduct not only of employees with the status of civil servant, but also of employees who are employed under the labor code or who hold military status. But with order no. 359, dated 28.03.2022, of the Minister of Defense, the regulation "On the code of ethics in the Ministry of Defence and subordinate institutions" was approved. This regulation will also serve as a manual where clear rules are set out to move towards an ethical and fair decision-making. The rules for receiving and giving gifts are also part of this code.

Performance evaluation at the Ministry of Defence apparatus is performed every six months, in accordance with the formats approved by the Department of Public Administration for personnel with the status of civil servant or with the formats approved by the Regulation on Performance Assessment for Military personnel. The job evaluation form for civilian staff provides not only job evaluation, but also training to be provided by staff, in order to improve job performance or deepen knowledge in a specific field. However, it has been noticed in practice the lack of a complete analysis regarding the training needs. Due to the lack of training needs assessment, the annual training plan / calendar of the MoD staff is also lacking.

In relation to the implementation of anti-corruption mechanisms, it is noticed that the signaling unit is functional at the Audit Directorate, but there are no reported cases so far. The same situation arises for the authority responsible for conflict of interest. There is even a conflict register for conflict of interest, but there is no case registered in it. Lack of alerts or cases of conflict of interest may come as a result of lack of training related to the signaling process or cases of pure conflict or apparent conflict. These trainings should be conducted not only for the staff of the Ministry, but also for the military personnel. The main goal of these trainings should not only be to improve the knowledge of the staff, but also to raise awareness to signal corrupt activities or report as many cases of conflict of interest.

General measuring indicator.

The general measuring indicator for this area is: *"Improving the human resource management process through capacity building and increasing transparency and accountability."*

Internal audit and control.

The role of internal audit is to provide assurance to the senior management of the institution that the audit process is objective and independent. Internal audit helps the institution to achieve objectives, through a disciplined and systematic activity, and serves to assess and improve risk management. Audit serves to identify risks in an institution, and contributes to the improvement of risk management systems, the evaluation of controls that address risks, and encourages effective and efficient controls.

Current status.

In the Ministry of Defence, internal audit is performed by the Audit Directorate. The internal audit process is a completely independent process in an organizational and functional way and reporting is done to the head of the institution.

Audit typologies that can be performed in an institution like the MoD are:

- a) Compliance audit, which includes assessing whether the institution's activities are in compliance with laws, bylaws, internal acts and regulations. Compliance audits are intended to test whether the institution complies with the relevant legislation and rules of the field in which it operates. The objective of the compliance audit is to determine the level of compliance of the actions of the institution to achieve the objectives, implementation of laws and regulations, mandatory rules, standards, plans, contracts, commercial policies and procedures that determine the area to be audited.
- b) Financial audit, which includes the assessment of the accuracy, completeness and legality of financial operations.
- c) Performance audit, which includes the assessment that the fulfillment of the objectives of the activity in the institution is being achieved through effective processes and the use of funds economically, with effectiveness and efficiency. Performance audits analyze objectives in order for the head of the institution to be able to use the information to improve work processes, reduce costs, and facilitate decision-making. Also, the objective of performance auditing is to review and evaluate the activity, processes, projects or programs of the institution and at the end of this evaluation, to give an opinion whether the resources (financial, human, material) are used economically, efficiently and effectively, for achieving the objectives.

The Audit Directorate conducted financial audits and compliance audits, but never conducted performance audits. As performance auditing has never been performed, there is a need to organize a specific training cycle to improve the internal audit activity knowledge.

As the audit process (internal and external) is considered as an instrument that helps prevent corrupt activities of the institution, the transparency of this process is very important. Referring to Law 119/2014 "On the right to information", it is provided that internal and external audit

reports must be public in the transparency program of the Ministry. Therefore, these reports should be easily accessible, in accordance with the law "On personal data protection".

General measuring indicator.

The general measuring indicator for this area is: "*Strengthening the role of the Internal Audit Directorate, conducting performance audits in order to strengthen the integrity of MoD staff*".

Financial management and public procurement.

Integrity risks can be encountered at any stage of the procurement process, from needs assessment, market analysis, planning, budgeting, drafting of technical specifications, finalizing the contract to overseeing the implementation of the contract. As integrity risks exists throughout the public procurement process, it is necessary to apply a comprehensive method to prevent corruption and completely reduce integrity risks. This comprehensive approach should be based on principles such as: transparency, participation and equal access for all economic operators, e-procurement, supervision and control.

Current status.

Public procurement is one of the areas where the probability of corruption is high. The fight against corruption and the strengthening of integrity in the public procurement process cannot be achieved only through the adoption of an advanced legal and regulatory framework. In order to avoid corruption, but also unethical behaviors that may occur during different stages of the public procurement process, it is necessary and imperative that the level of transparency be maximal. In addition to strengthening transparency, another important element for public procurement is regular oversight and control in order to ensure a fair process. Employees involved in public procurement processes are exposed to a high level of risk, ranging from the process of drafting technical specifications to the criteria for participation in tenders. But despite the high risk posed by this sector, the Ministry has not adopted specific rules to enable frequent rotation of staff in high risk sectors, such as public procurement.

In the GDI estimate for 2020, the field of procurement in the defense sector is considered highly risky. Precisely to reduce the room for corruption in the defense sector, a special law was adopted that regulates procurement in this sector, law no. 36/2020 "On procurement in the field of defense and security" and DCM no. 1170, dated 24.12.2020 "On the approval of procurement rules in the field of defense and security".

In the field of public procurement, despite the fact that a large range of documents are published on the website of the Public Procurement Agency, the Ministry needs to improve the level of transparency. Referring to the law on the right to information, documentation on the public

procurement process should be easily accessible in the transparency program. The register of estimates and the register of accomplishments must be transparent and up-to-date. Other necessary information is the one related to the contracts concluded by the Ministry. All data on the parties who have agreed the contract, the amount and the term must be proactively published.

In addition to procurement, another important area is financial management. Regarding the legal framework that regulates the finances of the institution, it can be said that it is in full compliance with the standards of the European Union. The Directorate of Budget and Financial Management in the Ministry of Defence is one of the structures that has approved and standard operating procedures. However, despite this fact, even in this area there may be various integrity risks. Frequent movement of staff dealing with finance and budget in the institutions under the Ministry, affects the level of performance of the entire system. It is essential that finance employees have the appropriate level of knowledge and training needed, in terms of budget for current expenditures, investments, financial monitoring reports, etc. In addition to the staff of the subordinate institutions, the leaders of the program management groups should also be familiar with the methodology used for budgeting.

The risk coordinator is responsible for the establishment and operation of the financial risk management system, the establishment of the risk register, as well as the coordination of activities related to risk management. Given that the process he leads is very complex and regulated by a very detailed legal framework, his participation in training would be necessary.

A large part of the documents drafted by the Directorate of Budget and Financial Management are electronic and are sent directly to the AFMIS system, but the digitization of all documents of this directorate would facilitate accessibility by the staff of the MoD in this information category.

Other risks that may appear in the field of financial management may be the non-implementation of contracts concluded according to schedule, thus creating financial gaps. Also, changing institutional priorities can lead to a mismatch between the planning and execution of the institution's budget, creating problems for the institution.

General measuring indicator.

The general measuring indicator for this area is: *"Improved proactive transparency for all stages of the public procurement process"*

International missions and operations.

Addressing integrity risks in operations is one of the main pillars of NATO's integrity building policy and program. In February 2021, NATO adopted the Military Concept of Building Integrity in Operations, which aims to ensure the consideration and addressing of corruption risks at all stages of planning and conducting operations and missions. This concept is based on

three key principles: integrity, transparency and accountability and should be integrated into all phases of operations and reflected in all planning and training documents.

Current status.

As a member of Partnership for Peace and later as a member of NATO, Albania has participated in a large number of international missions abroad. Since 1996, the Armed Forces of the Republic of Albania have participated in peacekeeping missions in Afghanistan, Iraq, Chad, Georgia, Somalia, the Aegean Sea, and Mali and are currently engaged in peacekeeping and combat missions in Bosnia and Herzegovina, Kosovo, South Sudan and Latvia. Over 8,000 troops have participated in these missions and dozens of vehicles and logistical equipment have been deployed. Also, the Armed Forces periodically conduct training within the country and abroad, alone or in cooperation with the armed forces of partner countries.

But despite this volume of operational missions and exercises within the country and abroad, the risk of corruption in missions and operations remains unaddressed in the entirety of the MoD integrity building architecture.

The MoD and the Armed Forces do not have in their doctrine any reference that recognizes the risks of integrity and corruption as a strategic threat during operations. The military documents of the Armed Forces of the Republic of Albania refer to corruption as a favorable factor for the aggravation of asymmetric threats, but do not further elaborate on how the Armed Forces plan to handle and address the risks of integrity and corruption in operations.

This shortcoming is also reflected in the training programming and the content of the training curricula. Training on corruption and especially training on integrity risks in operations is lacking in the training programs of the AF Academy. Consequently, no systematic training is provided on corruption and especially on the risks of corruption in operations and their addressing to the military at all levels.

There is also a lack of specific rules and guidelines for addressing corruption risks in contracting during international missions and operations.

Overall, these shortcomings have led to the monitoring of corruption during missions and the use of the practice of lessons learned, which is used as a method in the Armed Forces for other aspects.

To address these shortcomings, the MoD will draft a comprehensive and detailed document, which addresses the risks of corruption in domestic operations, as well as in peacekeeping operations and missions at the strategic, operational and tactical levels. The document will also address the risks of contracting in operations, including the destruction of assets, monitoring the implementation of contracts, security of equipment and personnel, etc.

The procurement sub-legal framework will also include procurement in operations, including expedited procurement, and a regulation on procurement in international missions and operations, including the employment of contractors.

To address training deficiencies, a training curriculum on integrity and corruption risks in operations will be developed, tailored to different levels of command.

General measuring indicator.

The general measuring indicator for this area is: *"Improved policy for addressing integrity risks in operations and full awareness of all levels of leadership and command of the Armed Forces on these risks"*.

Asset management.

Effective management of military assets and equipment is essential to the effectiveness of the defense mission, as the tasks of the Armed Forces have become more complex. The ability to know in real time the quantity and quality of materials, the level and location of reserves, as well as understanding the physical condition of particular assets, contribute to optimizing the use of military resources. Effective asset management, on the other hand, enables the Armed Forces to link assets to military strategy and avoid corrupt practices, which combined lead to the strengthening of integrity. In case of decommissioning or disposal of surplus assets, defense sector institutions have the obligation to obtain the best result for the taxpayers, receiving the highest possible value. In essence the principles of decommissioning or disposal of surplus assets should be guided by the same principles as public procurement and also the risks of integrity and corruption in this area are similar to those of public procurement, and require the same attention to address.

Current status.

Downsizing military forces and reducing defense capabilities has been one of the main policies of the transformation and reform process throughout the country's NATO membership reforms. As a result of this policy, the Armed Forces have decommissioned hundreds of real estate and several thousand tons of obsolete ammunition, weapons and systems. This process has been fraught with significant corruption risks, as evidenced by a number of criminal investigation and trial processes. For these reasons the attention of public opinion has been increased and a number of media investigations have been focused on this process over the last two decades.

In addition to the decommissioning of surplus or obsolete assets, within the modernization programs of the Armed Forces, new equipment and systems have been procured which over the

years will be subject to the process of assessing their usability for the purpose of protection, in accordance with the predicted life cycle.

The integrity risks of these processes may arise from a lack of adequate and sufficient expertise to adequately calculate the value of assets derived from the use, programming and planning of new purchases, and the integration of needs derived into long-term budget programs. Mechanisms that prevent participation in the decision-making process for the identification of assets of individuals who are in conflict of interest situations or who lack expertise should be envisaged and function effectively.

Also, ensuring the highest possible returns from the process of selling surplus assets and ensuring the transparency of sales and revenue estimates it is essential to avoid the risks of corruption.

Due to the complexity and intertwining of several processes, regular and periodic evaluation of the system and practice of extraction or disposal of assets is required and evaluation reports should be accessible to oversight institutions and the public.

The MoD and the GS will conduct a comprehensive and detailed assessment, which addresses the risks of corruption and will produce efforts for practices that aim to improve mechanisms in asset management processes.

General measuring indicator.

The general measuring indicator for this area is: *"Improved policies and practices for addressing integrity risks in defense asset management"*.

MONITORING AND REPORTING

The Monitoring and Priority Enforcement Directorate (DMJP) in the Ministry of Defence will be the responsible structure that will lead the coordination and cooperation with other directorates to monitor the implementation of the Integrity Plan and Action Plan 2022-2023. Each of the respective directorates of the Ministry of Defence will have its commitment in fulfilling the measures foreseen in the Action Plan, as well as will appoint an employee responsible for the monitoring and evaluation process.

The implementation of the Integrity Plan will be subject to a periodic monitoring and evaluation process. In the framework of the monitoring, the responsible persons of each directorate will prepare and submit, to the Directorate for Monitoring and Implementation of Priorities, the semi-annual reports which will serve to assess the degree of implementation of the measures, activities and objectives set out in the Action Plan.

The Monitoring and Priority Enforcement Directorate will coordinate the collection, processing and analysis of reports that will be followed by the structures in charge of meeting the relevant objectives and measures and will prepare the integrated 6-month report.

This directorate will also be responsible for organizing meetings with the institutions involved, civil society and other stakeholders to discuss the findings and address issues.

In order to strengthen integrity, reduce the scope for corruption and based on the assessment of problems encountered during the implementation of the integrity plan, the relevant recommendations for the measures provided in this document will be drafted.

At the end of the Integrity Plan implementation period, not only will the final report be drafted, but the necessary measures to be taken throughout the defense sector will be identified, with the aim of strengthening integrity.